In September 2001, British American Tobacco and a number of other tobacco businesses agreed a set of voluntary International Tobacco Products Marketing Standards, to be applied by no later than the end of 2002. Within British American Tobacco, these Standards, which built on our previous Advertising Principles, have continued to govern the marketing of tobacco products by all Group companies.

During 2005, stakeholders in dialogue asked us to review the content of the Standards to ensure that it continued to be appropriate. We have always accepted that the Standards should be kept relevant as the international marketing and regulatory environment evolves. In 2005-06, we thoroughly reviewed and updated the Standards, taking account of developing regulation, stakeholders’ views and discussions with Group companies internationally.

The updated provisions, now named the British American Tobacco International Tobacco Products Marketing Standards, are set out in this document.

The Board of British American Tobacco p.l.c. has provided these updated Standards to all Group companies. Group companies are expected to begin applying them on 1 July 2007 and to confirm full adherence by no later than 30 June 2008, provided in all cases that their application is not in breach of relevant laws.

British American Tobacco p.l.c. believes there is sufficient scientific evidence to support a less restrictive regime for the advertising and promotion of certain smokeless tobacco products, on the basis of their potentially lower health risk. Group companies will, however, continue to apply these Standards to the marketing of these products, pending further dialogue with regulators.

The Board of British American Tobacco p.l.c. has made clear its expectation that:

- These Standards will be observed in both the letter and intent.
- Any legal requirement or voluntary undertaking that is more restrictive than the Standards will take precedence over the Standards and practices of Group companies will not be less restrictive than the Standards unless required by law.
- Group companies will actively encourage the trade to apply these Standards in any direct dealings that the trade has with consumers when marketing our Tobacco Products.
- Group companies will take reasonable measures to prevent their tobacco product brand names, trade marks or logos from being used by third parties in a manner that violates these Standards.

These Standards are not intended to prohibit the use of any trade marks as brand names or on packaging.

1 July 2007
## Definitions used in these Standards

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>adult</td>
<td>A person who is at least 18 years old, except where legal requirements or voluntary undertakings entered into by a Group company specify a higher minimum age for the lawful sale, purchase, possession or consumption of tobacco products, in which case the term “adult” means a person of at least that minimum age.</td>
</tr>
<tr>
<td>consumer</td>
<td>An adult who uses tobacco products.</td>
</tr>
</tbody>
</table>
| advertisement / advertising | Throughout these Standards, the words “advertisement”, and “advertising” are used to mean any communication (visual, aural, verbal, written, printed or electronic) by or on behalf of a Group company containing one or more elements of tobacco product branding, made with the purpose or intent of encouraging a consumer or consumers to select one brand of tobacco product over another. The following do not constitute an advertisement / advertising:  
  - Tobacco product packaging;  
  - The use of tobacco product branding on a price list or similar application designed to convey price information to consumers; or  
  - Any business communication. |
| business communication      | Any communication by or on behalf of a Group company sent or made available in the course of the Group’s business where the purpose or intent is not to encourage a consumer or consumers to select one brand of tobacco product over another. For the avoidance of doubt, any communication comprising or including advertising which is communicated only:  
  - Internally within the Group;  
  - With the trade; or  
  - With any of the Group’s other business partners;  
Is considered, for the purposes of these Standards, to be a business communication. |
| celebrity                   | A person or group of people who are individually or collectively well known amongst target consumers for our Tobacco Products either worldwide or nationally. |
| consumer representative     | A person employed by or on behalf of a Group company whose work may involve direct contact with consumers, for example to promote and/or give out samples of tobacco products. |
out of home advertising
Advertising sites such as billboards, wall murals, bus shelters, transport stops or stations, on telephone booths, street signs or similar, which are not located at, or do not form part of, a trade or retail outlet where tobacco products are sold.

primary packaging
Packaging on tobacco products as intended for retail sale to consumers.

promotional activity
Any activity, including any promotional event, organised by or on behalf of a Group company with the purpose or intent of promoting any of the Group’s tobacco products to consumers.

promotional event
Any event organised by or on behalf of a Group company with the purpose or intent of promoting any of the Group’s tobacco products to consumers.

school
A formal, signposted or otherwise identifiable primary or secondary educational institution, attended predominantly by youth.

smoking related items
Items which have a direct relationship to the act or rituals of smoking, such as lighters, matches, ashtrays, cigarette cases and similar.

sponsorship
Any contribution by or on behalf of a Group company to a third party event, team or activity made with the purpose or intent of promoting any of the Group’s tobacco products, which event, team or activity would still exist or occur without such contribution.

tobacco product branding
An identifier of the Group’s tobacco product brands including any trade mark, logo or brand icon used in relation to one of the Group’s tobacco product brands.

tobacco products
Manufactured cigarettes, cigars, cigarillos, pipe tobacco, fine cut tobacco, shisha, pre-formed tobacco rolls and any other tobacco products including, pending further dialogue with regulators, smokeless tobacco products.

trade
Individuals or organisations engaged in the legitimate manufacture, distribution, marketing or retailing of tobacco products or their component parts. The term includes agents and employees of these organisations.

verified adult
An adult whose age has been confirmed according to an age verification procedure as set out in Section C4 of these Standards.

website
Within these Standards, the word “website” is used to mean any internet site that is accessible to the general public. For the avoidance of doubt, the term excludes intranet sites.

youth
Any person who is not an adult. The term also includes the plural.
Section A: Content standards

1. General

1. The content standards set out in this section A are to apply to all advertising by or on behalf of any Group company, including any such advertising which is, or which is included within, any business communication with the trade.

2. (a) No advertising is to be aimed at, or particularly appeal to, youth.
   (b) No advertising is to:
       ▪ Depict any person under or appearing to be under 25 years of age;
       ▪ Suggest that most people use tobacco products;
       ▪ Feature a celebrity;
       ▪ Contain an endorsement, implied or express, by a celebrity;
       ▪ Suggest that any of the following are enhanced by using tobacco products:
         o sporting or athletic success
         o popularity
         o professional success
         o sexual success; or
       ▪ Suggest and / or depict any sexually appealing attitude or moment.

3. All advertising is to be appropriate for the context and market within which it occurs, and is at all times to be acceptable according to local social convention.

4. Before any claim in advertising relating to the performance or functional attributes of any tobacco product is made, it is to have been substantiated by appropriate scientific, technical or consumer research.

2. Health warnings

1. (a) All advertising is to carry a health warning currently in use in the market in which the advertising appears or, in the case of website advertising, in the market of the Group company placing the advertising.

   (b) All images of primary packaging included in advertising are to be a true representation of the package in use in the market where the advertising appears. Each image must therefore show an appropriate health warning currently in use in that market if such a warning would be visible on the package as it is placed in the advertisement.

   (c) For the avoidance of doubt, where an image of primary packaging is taken from an angle where only part of the health warning is visible, any use of that image is to include that part of the health warning that is visible.

   (d) Images of dummy or facsimile primary packaging without an appropriate health warning are not to be used.
(e) The provisions of 1(a) to (d) above do not apply where a tobacco advertisement or item or package is displayed for purposes of historical interest and did not originally feature a health warning. This provision is designed to address situations such as displays of historical material on business premises, or inclusion of tobacco memorabilia in publications or exhibits for purposes of historical interest, including those by third parties.

2. (a) Health warnings on print, point of sale and out of home advertising are to:
   - Occupy at least 10% of the area of the total advertisement area;
   - Be clearly visible at all times;
   - Be in bold black lettering on a white background; and
   - Fill the maximum space possible within the 10% area.

(b) Health warnings on audio / visual media, such as on films, videos, digital video disks (DVDs) and similar, featuring advertising are to:
   - Use the same wording as used on print advertising;
   - Appear at the start of the presentation, and be presented full screen graphically for video communications, simultaneously with the aural warning;
   - Remain visible long enough to be read by the average adult; and
   - Be delivered at the same volume and / or visual level as the body of the communication itself.

(c) Health warnings on audio media, such as telephone messages, compact disks (CDs), consumer hotline or call-centre messages and similar, featuring advertising are to:
   - Use the same wording as used on print advertising
   - Be spoken at the start of the presentation; and
   - Be delivered at the same volume level and speed as the body of the communication itself.

(d) Health warnings on e-mails and text messages featuring advertising are to:
   - Use the same wording as used on print advertising; and
   - Be placed at the start of the message.

(e) Health warnings on any website containing advertising are:
   - If the advertising is static, to adhere to the provisions of 2(a) above and be clearly visible on the screen with the advertising and on any pages featuring the advertising which may be printed from the website;
   - If the advertising features in any film, video or other media clip or animation, to adhere to the provisions of 2(b) above; and
   - If the advertising features in any audio media, adhere to the provisions of 2(c) above.
(f) Any other form of advertising not specifically covered in (a) to (e) above, is to include a health warning appropriate for the medium, which has the effect of ensuring the recipient receives the warning message before, or simultaneously with any advertising.

3. Where a Group company distributes video or audio cassettes, CDs, DVDs, or similar media containing advertising, an appropriate health warning conforming to the provisions governing printed advertising in 2(a) above is also to appear on:
   - One face of the media (for example, on the disk itself); and
   - The packaging and any non-transparent over-wrapping.

4. All clothing worn by consumer representatives featuring tobacco product branding is to display a clearly visible health warning which:
   - Is currently in use in the market where the clothing will be worn;
   - Is in close proximity to the tobacco product branding on the clothing; and
   - Is not detachable.

5. (a) All images of primary packaging included in business communications are to feature an appropriate health warning currently in use in the market where the relevant tobacco product is sold.

   (b) This provision includes all internal documents, including draft designs for such packaging, where, as a minimum, the space reserved for the relevant health warning is to be clearly identified.
Section B: Media usage standards

1. Print advertising

1. No advertising is to be placed in any printed publication intended for distribution to the general public unless there is a reasonable basis on which to believe that:
   - At least 75% of the readers of such publication are adults; and
   - The proportion of youth who read it is less than 10% of all youth in the country of circulation.

2. (a) It is reasonable to believe that the provision in paragraph 1 above will be met if an independent third party provides verification of readership supported by a relevant study.
   (b) Where independent verification is not available at reasonable cost, a letter is to be sought in advance from the editors of the publication, confirming that at least 75% of readership is adult, and is to be submitted to the local CSR committee covering the relevant market, which may at its discretion give approval for advertisements subsequently to be placed in the publication.

3. (a) No advertisement is to be placed on the packaging or outside cover of a magazine, newspaper or similar publication intended for distribution to the general public. This includes any innovative cover or packaging format.
   (b) Reasonable measures are to be taken to ensure that no advertisement is placed in any printed publications adjacent to material that particularly appeals to youth.

2. Out of home advertising

1. (a) No out of home advertising is to be placed anywhere within 100 metres of the perimeter of a school.
   (b) No out of home advertising, either individually or in deliberate combination with other advertising, is to exceed 35 square metres in total size.

2. (a) Any existing contract for out of home advertising by or on behalf of a Group company which does not meet these provisions as at the date on which these Standards are implemented by that Group company may run its full term, but is not to be renewed or extended unless it provides that, on renewal or extension, subsequent advertising under the contract will meet these provisions.
   (b) In the circumstances of 2(a) above, every reasonable effort is to be made prior to renewal or extension of the contract to transfer sites or otherwise speed up adherence to these provisions where it is possible, legal and practicable to do so.
3. Cinema, film, TV and radio advertising

1. No advertising is to be placed in a public cinema unless:
   - The film being screened is classified for an adult audience only; or
   - Where there is no audience classification system, there is a reasonable basis to believe that access to the screening of the film is limited to adults only.

2. Films or video presentations produced by or on behalf of a Group company featuring advertising are only to be screened in closed venues where the screen is not visible to the general public and where:
   - The film or video is, or is included within, a business communication; or
   - There is otherwise a reasonable basis to believe that access to the screening of the film or video is limited to adults only.

3. No advertising is to be placed on television or radio unless:
   - Access to the channel or programme in which the advertising is placed is restricted to verified adults; and
   - The broadcast is restricted to countries where such advertising is not prohibited by law.

4. There is to be no direct or indirect payment or contribution for the placement of tobacco products, advertisements or items bearing tobacco product branding within the body of any:
   - Motion picture;
   - Television programme;
   - Theatrical production or live performance;
   - Commercial film or video;
   - Video game; or
   - Similar medium,
   where such medium is intended for the general public.

4. Website advertising

1. (a) No advertising is to be placed by or on behalf of any Group company on any website unless:
   - Access to that advertising is restricted to verified adults; and
   - Access is restricted to countries where such advertising is not prohibited by law.

   (b) The initial home or log-in page of any website containing any advertising is to be free of all tobacco product branding unless the name of a tobacco product brand forms part of the website URL (e.g. www.luckystrike.com), in which case such name may be used in plain type on the initial page.
2. (a) Log-ins and passwords are to be used to enable access beyond the initial home or log-in page of a web site containing advertising.
   (b) Log-ins and passwords may only be issued to verified adults.
   (c) Access to a web site containing advertising is not to be enabled simply by clicking a box stating “click here to confirm you are adult” or similar.

5. **Video, audio, telephone and text message advertising**

1. No advertising is to be incorporated within any video or audio cassette, CD, DVD, telephone, e-mail or text message or similar medium unless:
   - The intended recipient of such item or message is a verified adult who has consented to receive advertising; or
   - The item or message is, or is included within, a business communication.

2. Where a Group company distributes advertising by telephone, e-mail or text messages, all such messages are to specify that they contain tobacco product advertising.
Section C: Consumer communication

1. Sponsorship

1. Any sponsorship is to adhere to the content provisions in section A of these Standards.

2. No sponsorship is to be provided for any event or activity unless:
   - The sponsorship of the event or activity is for business communication purposes and the event or activity is not open to the general public; or
   - There is otherwise a reasonable basis on which to believe that the participants and audience will be adults.

3. No sponsorship is to be provided for an event or activity unless:
   - There is a reasonable basis on which to believe that the event or activity will not be of particular appeal to youth;
   - Success in the event or activity does not require above average physical fitness for someone of the age group of those taking part; and
   - It is not anticipated that the event will receive public exposure on television, radio, the internet or similar media other than as a news item, unless such exposure adheres to these Standards.

4. The promotion of any sponsored event or activity is to adhere to these Standards.

5. For the avoidance of doubt, these provisions do not apply to any sponsorship which does not have the purpose or intent of promoting any of the Group’s tobacco products.

2. Promotional activity

1. All promotional activity is to adhere to the content provisions in section A of these Standards.

2. (a) Promotional offers and programmes for specific tobacco product brands which appear on primary packaging or at the point of retail sale, or which are distributed by mail or any other means, are to be directed only at adults.

   (b) Where any such promotional offer permits an adult to be accompanied by another person or by other people at a third party event or activity, the offer is to specify that such other person or people must be adult.

3. (a) Promotional activity which involves participants purchasing tobacco products in order to collect and redeem coupons, vouchers or similar is not to be designed or operated in such a way that, in order to participate, the participant is encouraged to consume a substantially higher volume of tobacco products than is normal over the duration of the promotion.

   (b) The definition of appropriate quantities is to be based on General Consumer Survey (GCS) data, factored for the time the promotion is due to run.
4. (a) No promotional activity is to be held by or on behalf of a Group company unless:
   - The activity is for business communication purposes and is not open to
     the general public; or
   - There is otherwise a reasonable basis on which to believe that the
     participants in the activity will be adults.

(b) All individuals invited by or on behalf of a Group company to a promotional event are to be verified adults and, if the invitation permits such individuals to be accompanied by another person or by other people, it is to specify that such other persons or people must be adult.

5. (a) If a celebrity or group of celebrities is invited to attend a promotional activity, that person or group is not to be a bigger attraction than the activity itself, nor is that person or group to appear on any advertising for, or invitation to, that activity, or any other material relating to the activity.

(b) No direct or indirect contribution or payment is to be made to the media to cover any promotional activity and, in all cases, the media are to be advised to consider local advertising restrictions and these Standards if reporting a promotional activity, including in their use of any photographs or pictures featuring advertising or tobacco product branding.

6. (a) Promotional items intended for distribution to consumers are not to feature tobacco product branding unless they are smoking related items.

(b) Promotional items (whether or not smoking related items) intended for distribution to the trade may feature tobacco product branding.

(c) Any promotional items which feature tobacco product branding are to feature a clearly visible health warning which:
   - Is currently in use in the relevant market;
   - Is prominently displayed; and
   - Is not detachable.

(d) No items which are generally marketed to, or intended to be used predominantly by, youth, or which are particularly associated with any sporting or athletic activity, are to be used in conjunction with the promotion of any of the Group’s tobacco products.

7. (a) All promotional packaging or other materials containing advertising are to comply with the health warning requirements applicable to primary packaging as prescribed in section D1 of these Standards.

(b) No cigarette pack covers or sleeves, whether or not they feature tobacco product branding, are to be produced by or on behalf of any Group company without a health warning as prescribed for such packaging in section D1 of these Standards, or as otherwise prescribed by law.

8. Any item of clothing offered for sale or as a promotional item is to be offered only in adult sizes.
9. Reasonable measures are to be taken to ensure that:
   - Free sample tobacco products are only to be offered to verified adults who are consumers.
   - Samples are not offered in view of youth. Usually, this can only be ensured if the sampling is conducted in a segregated area or venue where access is restricted to adults.
   - A maximum of 20 cigarettes or an equivalent quantity of cigars, grams of tobacco or tobacco portions are distributed per individual consumer per day.

10. (a) Unsolicited free samples of tobacco products are not to be distributed by mail, either directly or via a third party.

   (b) Tobacco products may be distributed by mail or by courier following a request for a sample, or following a complaint about product quality, provided that:
      - The person making the request is a verified adult who is a consumer; and
      - Reasonable measures are taken to ensure that the product is delivered into the hands of the verified adult consumer who requested it.

11. For the avoidance of doubt, these provisions do not apply to any promotional activities and events which do not have the purpose or intent of promoting any of the Group’s tobacco products to consumers.

3. Direct consumer contact

   1. Direct consumer contact relating to tobacco products is only permitted with verified adults.

   2. Any consumer representative engaged by or on behalf of a Group company in direct consumer contact relating to tobacco products is:
      - To be verified as adult before appointment;
      - Not to operate in venues which have particular youth appeal or clientele;
      - To advise people whom they contact that they work for or on behalf of a tobacco company or related business and are only authorised to engage with adults; and
      - To dress in a manner appropriate to the venue, and in line with locally acceptable standards of common decency.

   3. (a) Direct consumer contact by telephone relating to a tobacco product is permitted if:
      - The contact is with a verified adult and verification has been undertaken according to the procedures in section C4 of these Standards.
      - No advertising or promotional message is delivered, or offer made, until age verification has taken place.
(b) Responses to consumer complaints and product information enquiries may be given before age verification is completed in order to establish the nature of the complaint or request and advise the consumer of the likely response once verification procedures are complete.

(c) Any welcome or waiting message associated with a consumer hotline or call centre is to explain that, in accordance with the British American Tobacco International Tobacco Products Marketing Standards, the hotline or centre is unable to give information about tobacco products to people who are not verified adults.

4. Age verification procedures

1. (a) If a government prescribed or approved method of age verification already exists in a market, this is to be adopted as the default procedure for use with tobacco products.

(b) In the absence of the above, and subject to paragraph 7 below, the recommended verification procedure outlined in paragraphs 2 to 5 below is to be followed.

2. (a) The recommended standard of documentary evidence for age verification purposes is photographic ID or comparison of a signature with that on an official document. The following official documents are acceptable as proof of age:
   - Valid passport;
   - Valid driver’s licence;
   - Current national identity card;
   - Legible photocopies of the above official documents.

(b) Group companies may specify similar official documents as acceptable proof of age, subject to the approval of the relevant Regional CSR committee.

3. (a) The following procedure applies to age verification when face to face with an individual:
   - A visual check that the person is likely to be adult;
   - If in doubt, request the individual’s date of birth; and
   - If any doubt remains, request provision of any of the age verification documents specified in paragraph 2(a) above.

(b) In all cases, verbal confirmation is to be sought that the person is willing to receive promotional messages or information about tobacco products.

4. (a) The following procedure applies to adult verification when the individual is not present in person:
   - A verbal or written request for the individual’s date of birth; and
   - A request to provide any of the age verification documents specified in paragraph 2(a) above, with an explanation that this is necessary before any promotional activity can be conducted.

(b) In all cases, verbal or written confirmation is to be sought that the person is willing to receive promotional messages or information about tobacco products.
5. If practicable, a copy of the age verification document, or at least the document number, is to be kept on file for a period of 12 months from the date of contact.

6. (a) If a person has been verified as adult, user IDs and/or passwords may be issued to enable him/her to identify himself/herself as a verified adult during subsequent contacts.

(b) It is the responsibility of the person receiving the user ID or password to keep it secure and to ensure that it is not made available to youth.

7. (a) Given local variations in literacy and social and cultural factors, an age verification procedure cannot be identified that will be practicable and effective throughout every market in which the Group’s business is conducted. Accordingly, Group companies, or clusters of Group companies may, subject to the approval of the relevant Regional CSR committee, formulate appropriate procedures relevant to their market or markets.

(b) This is not to be used as a means of circumventing the letter or intent of these Standards. Any alternative age verification procedure is to provide the best possible means in the circumstances of avoiding the possibility of inadvertent marketing to youth.

8. Where these Standards stipulate that an activity is only permitted with verified adults:

- Responsibility rests with a Group company for ensuring that any person conducting age verification for or on behalf of that Group company is fully aware of the age verification requirement and the relevant age verification procedure;
- Responsibility for ensuring adherence to the applicable age verification procedure rests with the individual or organisation seeking to conduct that activity; and
- Responsibility for the accuracy of any information and any age verification document provided rests with the individual providing that information and/or document.
Section D: General

1. Packaging

1. (a) Cigarettes are only to be sold in packages containing at least ten cigarettes, except as outlined in paragraph 2 below.

   (b) Fine cut or other loose tobacco, including any smokeless product, is only to be sold in packages containing ten grams of tobacco or more.

   (c) Tobacco portions, including pre-portioned smokeless products, are only to be sold in packages of ten portions or more.

2. Cigarettes may be sold in packages of at least five cigarettes in the circumstances set out in the British American Tobacco 5+ Pack Standard (see Appendix).

3. Samples of tobacco products may be provided in smaller quantities to a verified adult who is a consumer, or to the trade, if reasonable steps are taken to ensure that it is impracticable for that consumer or member of the trade to store them for later use or to sell or re-distribute them in quantity.

4. (a) No incentives or branded materials are to be provided to support the sale of single cigarettes by the trade.

   (b) Where any unbranded materials are provided which may be used in relation to the sale of single cigarettes, such materials are to feature a clearly visible health warning currently in use in the relevant market.

5. (a) All tobacco products offered for sale are to carry an appropriate health warning:
   - On all primary packaging; and
   - On all printed cartons and / or over-wraps, where these obscure the health warnings on the packaging within.

   (b) Health warnings are not required on transparent packaging material, if the health warning is clearly visible on the primary packaging beneath.

   (c) In the absence of a health warning specified by law in a market, a warning which complies with the British American Tobacco Health Warnings on Cigarette Packaging policy is to be applied.

   (d) This provision also applies to packaging facsimiles used for display purposes.

6. Before any claim on any primary packaging relating to the performance or functional attributes of any tobacco product is made, it is to have been substantiated by appropriate scientific, technical or consumer research.
2. Youth access

1. (a) British American Tobacco is committed to the enactment and enforcement of minimum age restrictions for the lawful sales of tobacco products in every market where its tobacco products are sold.

   (b) Group companies are to support efforts by appropriate authorities, manufacturers of tobacco products, distributors and retailers to ensure the effective enforcement of such restrictions.

2. Group companies are to make sustained efforts, in co-operation with governments and other regulatory agencies, customers and others to prevent youth access to tobacco products and to seek ways in which to reinforce and give effect to measures that will prevent sales of tobacco products to youth.

3. (a) Group companies reserve the right to impose sanctions, up to and including the withholding of supply of tobacco products and/or promotional support, from any retailer, wholesaler or distributor who is proven to have:

   ▪ sold tobacco products to youth in contravention of local law; or
   ▪ had knowing or reckless involvement in the sale of counterfeit or contraband tobacco products.

   (b) It is recommended that, where local laws allow, Group companies include within their supply and sale agreements a provision entitling them to withhold supply in these circumstances.

4. If sales of tobacco products to consumers are conducted over the internet, by telephone or by any other non-direct contact means, the seller is to take reasonable measures to confirm that the purchaser is an adult before confirming the sale.

5. Reasonable measures are to be taken to prevent sales to youth from vending machines.
Appendix

British American Tobacco 5+ Pack Standard

In many markets, for economic reasons and the nature of the retail trade, a significant number of consumers buy single cigarettes, not packs. We are opposed to this because of the issues of youth access, lack of health warnings and product integrity and therefore never supply loose or single cigarettes to retailers. The problem arises when our packs are broken up further down the retail chain.

We believe our 5+ Pack Standard offers a way to help tackle the problem. It says cigarettes may be sold in packs of at least five cigarettes but only in markets where:

- More than 33% of consumers most often purchase single cigarettes. The measurement criteria should be the British American Tobacco General Consumer Survey conducted according to Oracle standards;
- The appropriate regulatory authority has been informed;
- The Group business has explained how the Standard is part of a longer term strategy to migrate consumers over time towards packs containing a minimum of 10 cigarettes. The strategy must be based on local empirical data with clearly defined milestones;
- The relevant British American Tobacco Regional Director has approved and the decision endorsed by the Regional CSR committee;
- The Group business is expected to demonstrate after no more than two years that application of the Standard has lead to a sustained decrease in the proportion of single stick sales; and
- Any 5+ packs must comply with all local packaging laws or regulations on health warning labelling and, in the absence of these, with the Group’s own policy.