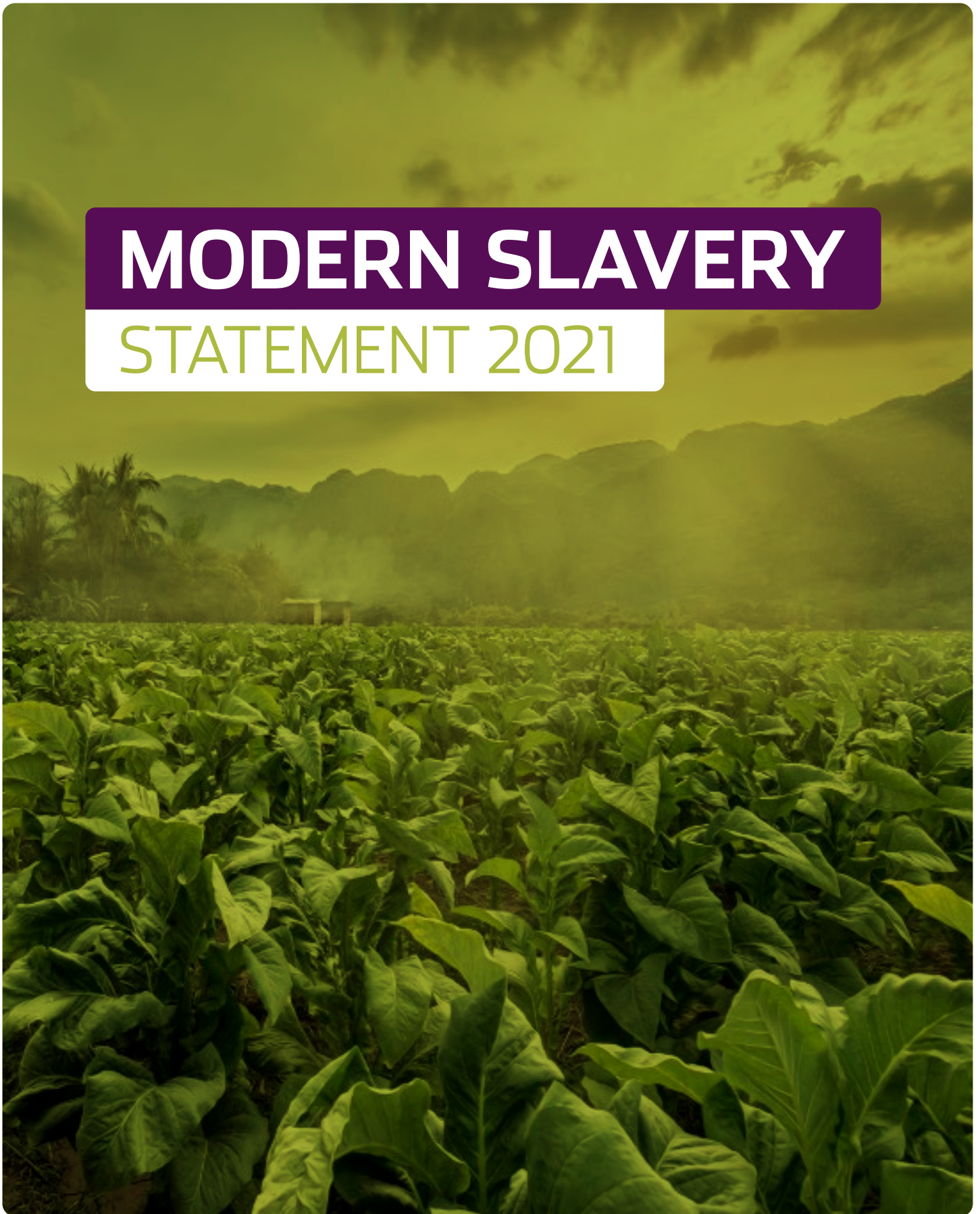


# MODERN SLAVERY

STATEMENT 2021



# MODERN SLAVERY

## STATEMENT 2021

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Imperial Tobacco Australia Limited ACN 088 148 681 (ITA) is the Australian trading subsidiary in the Imperial Brands p.l.c. group of companies (Imperial Brands) and a reporting entity within the meaning of sections 4 and 5 of the Modern Slavery Act 2018 (Cth).

This statement by ITA covering the full financial year ending 30 June 2021 reports on potential modern slavery risks in ITA's operations and supply chains and outlines actions taken to address those risks.

This is the second statement ITA has produced to comply with the Modern Slavery Act 2018 (Cth). ITA's board of directors approved this statement under section 13(2)(c) of the Modern Slavery Act 2018 (Cth) on 3rd May 2022 and it is signed on ITA's behalf by Pratik Kumar Ganguly.

# ITA'S COMMITMENT

## MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Imperial Brands recognises the importance, influence and duty it has in promoting respect for human rights. ITA's policy is to respect and support the dignity, wellbeing and human rights of its employees, the workers in its supply chain and the communities in which ITA operates. ITA is committed to conducting its business in a responsible and sustainable way, seeking to mitigate potential risk of human rights abuses both within its direct operations and supply chain.

Modern slavery includes all forms of trafficking in persons, slavery and slavery-like practices, and child labour.

Like all businesses, ITA runs the risk of being exposed to modern slavery either within its direct operations or indirectly through its supply chain. ITA recognises that managing this risk is a multi-stakeholder issue, one which requires engagement with suppliers and other key stakeholders associated with ITA's business, including customers, employees and NGOs.

ITA's commitment to human rights, including modern slavery and forced labour, extends through several policies, including a Code of Conduct and Supplier Code. These documents set out the foundations to ITA's approach to human rights, which all its employees, suppliers and business partners are required to adhere to.

Modern slavery and human rights has been identified as one of our top five priority ESG issues along with consumer health, climate and energy, farmer livelihoods and welfare, and waste. A sustainability strategy frames the way ITA manages these issues and is aligned with the UN Sustainable Development Goals, which aims to have a transformational impact on the world by 2030.

ITA has been strengthening its approach to gain greater insight into risk relating to modern slavery and developing a robust human rights governance due diligence framework. ITA is committed to raising awareness and improving processes in its business and supply chains and its progress against this commitment is detailed throughout this statement.

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The ITA Board of Directors approved this statement on 3rd May 2022.

**Pratik Kumar Ganguly**

Director, Imperial Tobacco Australia Limited



For more information on our sustainability strategy and detailed approach to human rights please visit: [www.imperialbrandspc.com/sustainability](http://www.imperialbrandspc.com/sustainability)



# OUR BUSINESS AND SUPPLY CHAINS

We recognise that, along with our direct operations, our supply chain has the potential for human rights abuses, and we are committed to working with our suppliers and business partners to improve supply chain standards.

# OUR BUSINESS AND SUPPLY CHAINS

## OUR BUSINESS

### STRUCTURE

ITA is a public company registered in Australia with its principal place of business and registered office at John Player Special House L4 4-8 Inglewood Place Norwest NSW.

ITA is the Australian trading subsidiary of Imperial Brands and its ultimate holding company is Imperial Tobacco Limited which is registered in the United Kingdom.

ITA employed approximately 237 people in Australia during the reporting period ending 30 June 2021.

### OPERATIONS

Imperial Brands is the fourth largest international tobacco group of companies, operating across 120 markets. It manufactures and sells conventional tobacco products (such as cigarettes and rolling tobacco), smoking accessories (including cigarette papers) and potentially less harmful next generation products (NGPs) (such as e-cigarettes, heated tobacco products and snus).

ITA only imports and distributes conventional tobacco products and smoking accessories in Australia. It does not manufacture these products locally. ITA also does not participate in the NGP market due to Australian regulatory restrictions on NGPs. ITA's imports mostly originate from Taiwan or the European Union through supply contracts entered with related Imperial Brands companies. However ITA also imports and distributes in Australia some products from businesses that are not part of Imperial Brands.

ITA distributes its imported products to 3200 wholesalers and retailers. ITA has agreements with 2 logistics companies which facilitate this distribution.

ITA's board of directors have primary responsibility for the governance of ITA. Various committees and sub-committees support ITA's directors in monitoring its performance, risk and compliance including with human rights and sustainability.



# OUR BUSINESS AND SUPPLY CHAINS

## OUR SUPPLY CHAINS

Imperial Brands establishes relationships of trust and integrity with its suppliers globally. Imperial Brands expects its suppliers to conduct their business in an ethical and responsible manner and comply with all applicable laws and regulations. The respect for human rights is predominantly enabled through Imperial Brands' requirements for supplier standards, business conduct and employment practices. Imperial Brands' Supplier Code and Code of Conduct sets out the behaviours Imperial Brands expects its suppliers to demonstrate.

**ITA has two distinct supply chains namely tobacco leaf supply and non-tobacco materials supply which includes supply of general goods and services. Usually Imperial Brands sources and manufactures goods for supply to ITA. However ITA also sources a small amount of manufactured tobacco products directly from other businesses. ITA then either distributes the products to its Australian wholesale or retail customers.**

We have two distinct supply chains consisting of tobacco leaf supply and non-tobacco materials supply which includes NGP and general goods and services supply.



### TOBACCO LEAF SUPPLY

Imperial Brands takes a responsible approach to sourcing tobacco and works with suppliers and their farmers to address its ESG responsibilities.

All tobacco suppliers of Imperial Brands must participate in the Sustainable Tobacco Programme (STP). The STP has been designed to enable suppliers to report on the steps they are taking to produce a sustainable quality supply of tobacco leaf. The STP also provides the opportunity for farmers to improve labour standards, raise standards of living and address environmental challenges by sharing knowledge on good agricultural practices.

Imperial Brands sources tobacco globally primarily through large international tobacco merchants. Imperial Brands has a global sourcing footprint, which covers Africa, Americas, Asia and Europe. Of these, the major tobacco sourcing countries include Brazil, India, China and others in Asia and Sub-Saharan Africa.

The vast majority of tobacco leaf, 97%, is sourced from third party suppliers, with the remaining balance coming from small vertical operations of Imperial Brands in Madagascar and Laos.

In the reporting period ending 30 June 2021, Imperial Brands purchased more than 150,000 tonnes of tobacco leaf from 34 countries around the world. In the last five years or so Imperial Brands has rationalised its supplier base and considers it to be very stable.

**c.150,000**

tonnes of tobacco leaf  
purchased from 34 countries



### NON-TOBACCO MATERIALS SUPPLY

The non-tobacco materials (NTM) Imperial Brands directly buys include paper, filters, glue and ingredients for tobacco products. Imperial Brands sources these goods from its direct suppliers.

Imperial Brands also has indirect suppliers who provide services and goods such as IT hardware and software, professional and corporate services and provision of utilities. This includes procurement for facilities management.

All key strategic direct and indirect suppliers are managed by global procurement central category teams and smaller suppliers are managed by local procurement teams.

In the reporting period ending 30 June 2021, Imperial Brands had some 325 direct material suppliers, 70 of which are managed centrally by its global procurement team and 255 managed by its local procurement teams. Of Imperial Brands' direct material supplier base, approximately 85% of its main spend is with 21 suppliers. There was a total of 19,000 suppliers on the Approved Supplier List for Imperial Brands which includes both direct and indirect suppliers.

**c.19,000**

suppliers on our approved  
direct and indirect supplier list

# GOVERNANCE AND POLICIES

As a global business we recognise the role we have in promoting respect for human rights, including the prevention of modern slavery.

# GOVERNANCE AND POLICIES



## RISK OF MODERN SLAVERY PRACTICES IN ITA'S OPERATIONS AND SUPPLY CHAINS

As outlined above, Imperial Brands and some other businesses manufacture and supply products to ITA. ITA then distributes them to its Australian wholesale or retail customers.

ITA considers that there is low risk of modern slavery practices in its downstream supply chains. This is because ITA does not manufacture any products, it imports all its products, and distribution is based in Australia and controlled by ITA. Australian workplace and employment laws apply to ITA which ITA backs with strong workplace health and safety policies.

## ACTIONS TAKEN BY ITA TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### Governance

The governance structures of Imperial Brands around its environmental, social and governance (ESG) responsibilities includes its ESG Committee. This is a cross-functional committee and includes representatives from People & Culture, Corporate Affairs, Procurement, Investor Relations, Leaf Sustainability, Science, Research and Development, Health and Safety, Governance, Manufacturing, Sales, Group Communications and Group ESG.

The committee met twice during the year and among other ESG topics, discussed the ongoing work to strengthen human rights governance. This included updates from the Manufacturing Operations Director on progress being made on the manufacturing modern slavery self-assessments as well as progress updates on the Sustainable Tobacco Programme developments from the Head of Leaf Purchasing and Agronomy.

The committee also discussed the ongoing developments of KPIs and in particular the need for KPIs to demonstrate the effectiveness of Imperial Brands' human rights due diligence. This is something ITA anticipates reporting further on for the 2022 reporting period.

### Policies

A Code of Conduct is embedded throughout all Imperial Brands entities and, relevantly, drives ITA's responsible approach. The code is aligned with policies, internal controls and risk management processes that underpin ITA's strategy.

Commitment to human rights is a fundamental part of the Code of Conduct and the Supplier Code of Imperial Brands. These documents set out the foundations to ITA's approach to human rights, which all ITA employees, suppliers and business partners are required to adhere to. ITA complies with applicable human rights laws.

The Policy and approach of Imperial Brands is guided by the international human rights principles in line with the International Bill of Human Rights, the International Labour Organization's (ILO) core conventions and the principles and guidance contained within the United Nations Guiding Principles on Business (UNGP) and Human Rights.

ITA recognises that, along with its direct operations, ITA's supply chain has the potential for human rights abuses, and ITA is committed to working with its suppliers and business partners to improve supply chain standards.

ITA's respect for human rights is predominantly enabled through Imperial Brands requirements for supplier standards, business conduct and employment practices. The Supplier Code, based on the Code of Conduct, sets out the behaviours ITA expects suppliers to demonstrate.

Through procurement and sales processes, suppliers and ITA customers (including retailers) are required to comply with the Supplier Code and Modern Slavery Act 2018. Imperial Brands only selects and does business with suppliers who can demonstrate that they operate in a manner consistent with the standards and Code of Imperial Brands. ITA also expects suppliers to ensure that their own business partners meet similar standards.

ITA's Australian procurement contracts have express terms obliging its suppliers to ensure that there are no human rights abuses, trafficking or slavery in their supply chains and businesses. These procurement contracts require the suppliers to immediately notify ITA of suspected modern slavery practices occurring in their supply chains. The contracts also bind the suppliers to the Supplier Code.

The trading terms and standard terms of ITA bind its Australian customers to the Code of Conduct. These terms also have provisions similar to the procurement contracts in that they too require the customers to purge their supply chains and businesses of modern slavery and to report any suspected modern slavery practices.

Compliance with the Code and Supplier Code is monitored through the due diligence processes. Imperial Brands commissioned an independent, expert led review for 2021 of its Codes and policies. The recommendations will be designed to ensure that human rights and modern slavery are being addressed in line with legislation and best practice.



# GOVERNANCE AND POLICIES



## SPEAKING-UP

ITA expects all its employees and business partners to act with integrity in accordance with the standards of behaviour described in the Code of Conduct. If there are ever any concerns, including those related to human rights and labour issues, they can be raised independently via a Speaking Up service.

Issues raised for Imperial Brands during the year included allegations of unprofessional behaviour, pay concerns, breach of company credit policy, inappropriate use of company funds and unauthorised payment of consultants.

During the year, no incidents of modern slavery or forced labour were identified through ITA's whistleblowing procedures or grievance mechanisms. ITA recognises that whilst no incidents were identified this does not mean issues do not potentially exist, especially further away from ITA's direct sphere of influence. ITA therefore remains committed to further enhancing its approach and understanding, recognising that this is a continuous, collaborative and evolving process.

Over the last ten years, Imperial Brands' on-going commitment to human rights has included: undertaking Human Rights Impact Assessment to better understand the salient human rights in relation to its business and global supply chains; strengthening policy commitments and standards; monitoring and due diligence; and more recently reviewing how robust these policies are.

Through recent stakeholder engagement, modern slavery and the broader management of human rights risk were identified as one of the priority sustainability issues for Imperial Brands. Building on the work done to date, ITA is committed to implementing a robust human rights framework within Imperial Brands, which, in turn, will support a strengthening ITA's processes for identifying, managing and mitigating human rights risk.

Imperial Brands is a founding member of the Slave Free Alliance (SFA) and continues to support the international charity Hope for Justice, in their pursuit of a slave free world.

SFA subject matter experts were commissioned to conduct a policy gap analysis and review of the policies and processes Imperial Brands has in place to mitigate against the risk of modern slavery. The review included stress testing processes, interviews with subject matter experts and testing the application of global policies on the ground. Imperial Brands has subsequently developed a Human Rights governance framework working with an external expert to strengthen ITA's due diligence procedures. This work continued in the 2021 reporting period and now extends to how ITA addresses human rights in business and modern slavery risk in all of its functions.

Whilst a number of good practices were identified, including due diligence within the supply chain, several recommendations have been made by SFA which Imperial Brands has begun implementing. These recommendations are detailed throughout this Statement.



## SPEAKING UP

There are several ways for our employees to raise concerns, including via their people manager and local human resources team.

Employees and third parties can also raise a concern anonymously or independently through the automated Confidential Reporting System which can be accessed via the QR code. There is also a local toll free line and the a list of numbers can be accessed here.

Further information can be found in our [Speaking Up Policy](#).



For further information on how we are addressing the issue of child labour and modern slavery in the supply chain please visit our website:

<https://www.imperialbrandsplc.com/sustainability/download-documents.html>

# ASSESSING THE EFFECTIVENESS OF ITA'S ACTIONS

Our ongoing commitment to human rights includes a desire to make a positive impact within our suppliers tobacco growing communities. The key tool used is the Sustainable Tobacco Programme (STP).





# ASSESSING THE EFFECTIVENESS OF ITA'S ACTIONS



## SELF-ASSESSMENT

During the 2021 reporting period Imperial Brands conducted a detailed modern slavery review project across its manufacturing sites to better understand the workforce demographics across its operations.

Recognising that the risk of modern slavery is likely to be greater during in-direct recruitment of personnel onto Imperial Brands sites, the assessment mapped out part-time, contract, seasonal and short term labour, along with the types of roles third party contractors undertake on the sites. The project then assessed what policies and processes Imperial Brands has for the recruitment of local labour and where potential gaps may be.

All Imperial Brands manufacturing sites were required to complete a detailed self-assessment which contained questions on policies, local risk, accountability, training, labour sourcing, working conditions, third party workforce, supply chain management, auditing and reporting.

As a result of the self-assessment, every manufacturing site has been obliged to implement action plans, which range from training, policy developments and communication. Progress against action plans are monitored through a set of modern slavery leading indicators. Each site has nominated an accountable individual to ensure the implementation of the action plan and has been reporting progress to the Manufacturing Leadership Team on a monthly basis.





# DUE DILIGENCE PROCESSES

Our focus in 2021 was to strengthen our due diligence framework and embed the awareness of responsibility for human rights across all functions within the business.

# DUE DILIGENCE PROCESSES



ITA conducts due diligence within its direct operations and supply chains to demonstrate that its policies and processes are being adhered to and to understand where there may be gaps in its controls.

## We have:

- Strengthened governance through the formation of a cross-functional Human Rights Compliance Working Group. Membership of the group includes representatives from Group Legal, Governance, Internal Audit, Leaf Sustainability, Procurement, Global Supply Chain (GSC), Sustainability and People and Culture. One of the key achievements of this group was to strengthen the Human Rights Due Diligence Framework for the business.
- Conducted a review and benchmark of all key policies that address human rights issues to identify areas for improvement.
- Developed a central register to capture global human rights reporting and due diligence requirements.
- Assessed employee training needs, and provided in-depth training to key personnel across the business via an accredited online course delivered by a third party.

## DIRECT OPERATIONS

ITA's direct operations are monitored and audited using a risk-based approach. Where there is considered a risk, internal audits can include an assessment of labour practices, health and safety procedures in place as well as assessing local employee awareness of and training in the following: the Imperial Brands Code of Conduct; International Marketing Standards; Whistleblowing Policy; and Grievance Policy.

In 2020, we were able to conduct an audit of our factory in Laos. The audit included verification of appropriate controls to assure respect for human rights which included: modern slavery, child labour, forced labour, disciplinary practices, working conditions and whistleblowing. No related concerns were raised. We were unable to conduct audits in 2021 due to travel restrictions.



# DUE DILIGENCE PROCESSES

## TOBACCO LEAF SUPPLY

Similar to other agricultural industries, the risk of human rights abuses, including child labour and modern slavery is highest in ITA's tobacco growing supply chain. Addressing issues such as child labour and modern slavery require a multi-stakeholder response; no single entity can address issues in isolation.

In collaboration with key stakeholders including the industry, suppliers and NGOs, Imperial Brands uses three main avenues to address the issue of child labour.

In collaboration with key stakeholders including the industry, suppliers and NGOs, Imperial Brands uses three main avenues to address the issue of child labour.

1

The Leaf supplier programme known as the **Sustainable Tobacco Program (STP)**; the Human and

Labour Rights section of STP is a critical element for the respect of human rights and is aligned with the relevant ILO conventions and the UN Guiding Principles on Business and Human Rights.



2

**Leaf Partnership Projects**; working directly with suppliers of Imperial Brands to fund

projects in tobacco growing communities to help tackle some of the root causes of human and labour rights issues.



3

Imperial Brands actively supports the **Eliminating Child Labour in Tobacco Growing Foundation (ECLT)**, which aims to tackle the

root causes of child labour by improving access to education and providing alternatives to childhood working. It also has an advocacy role, raising awareness with governments and communities to galvanise positive action.





# DUE DILIGENCE PROCESSES

## SUSTAINABLE TOBACCO PROGRAMME

All suppliers from whom Imperial Brands sources tobacco are required to participate in the industry wide STP. The STP is a framework for continuous improvement and involves an annual self-assessment questionnaire, focused independent reviews and subsequent improvement plans if required.

The STP covers ESG areas and encourages the implementation of good agricultural practices.

The STP contains specific guidance and indicators related to human and labour rights including: whether any children have been employed on farms; questions relating to schooling in terms of access, and adherence to regulation and legislation.

The STP annual assessment is part of the formal supplier relationship management of Imperial Brands and it forms part of the suppliers' ratings that Imperial Brands uses to determine along with quality, cost and value.

Where a supplier persistently fails to demonstrate how they are managing their ESG responsibilities in a certain sourcing origin, Imperial Brands considers ceasing purchases from that sourcing origin. This is a last resort as Imperial Brands prefers to work in partnership to raise standards.

In the 2021 reporting period Imperial Brands continued to work with the industry to enhance the STP. The STP indicators and guidance were reviewed to better align with the UNGP on Business and Human Rights and the UN Sustainable Development Goals.

The programme has been restructured to better enable the identification of risks and opportunities based on the geographical location of suppliers to Imperial Brands. Suppliers are encouraged to provide details on what they are doing to mitigate the risk and maximise positive impact. Suppliers will also provide measures they have in place to determine how successful these interventions are.

This risk-based approach allows Imperial Brands to better support the suppliers with interventions as well as further enhance transparency and reporting of sustainability impacts and practices in the agricultural supply chain.

The STP has been focused into eight themes: Water; Human and Labour Rights; Crop; Climate Change; Livelihoods; Natural Habitats; Soil Health; and Governance. A phased roll out of the questionnaires began in September 2020 and ITA will continue to report on progress.

The STP indicators and guidance were reviewed to better align with the UNGP on Business and Human Rights and the UN Sustainable Development Goals.



# DUE DILIGENCE PROCESSES

## NTM SUPPLY

The Supplier Qualification Programme is the first screening process for all new NTM suppliers. This involves suppliers completing a self-assessment which includes questions on business conduct, environmental management, and labour practices including discrimination, child and forced labour, freedom of association, remuneration, working hours and health and safety.

Once on board, the Internal Audit team of Imperial Brands undertakes a phased cycle of onsite supplier validation audits using a risk-based approach. Internal Audit follows a detailed Supplier Audit Risk and Control Matrix which includes the supplier providing evidence for their management of ESG issues including how the supplier communicates their own Code of Conduct and grievance policies across their operations, how they conduct audits and act on findings and detail on measures to ensure employee health and safety.

All new suppliers or supplier sites are subject to a mandatory audit. This applies to both centrally managed and locally managed suppliers. All suppliers of Imperial Brands are required to sign-up to our Code of Conduct.

Imperial Brands has regular meetings throughout the year with all its centrally managed suppliers where any concerns can be raised. Imperial Brands ceases its relationship with a supplier if they continually fail to demonstrate how they are managing their ESG responsibilities.

## SERVICES AND GOODS SUPPLY

The SFA identified areas for improvement for the goods and services supply of Imperial Brands, including facilities management. These suppliers are termed indirect suppliers and do not undergo the supplier qualification programme. Where Imperial Brands has run a tender process, Imperial Brands requests the supplier to provide policies relevant to the services that they will supply which may include those addressing the labour practices, forced labour and child labour (in the case of service outsourcing or goods manufacture); and Imperial Brands reviews them as part of the selection process.

For larger service requirements, for example a new outsourced service or a move of service provision to a different geography, or goods manufacture, Imperial Brands would typically conduct a site visit as part of the selection process. Imperial Brands does not carry out regular onsite audits of its indirect suppliers; any site visits would be ad-hoc and defined on a case-by-case basis if an area of ESG risk has been identified.

Imperial Brands contracts do, however, include the right to audit, and the ongoing requirement that the supplier and their subcontractors comply with the Imperial Brands Code of Conduct, applicable laws and applicable policies throughout the contract term.

**All new suppliers or supplier sites are subject to a mandatory audit. This applies to both centrally managed and locally managed suppliers. All suppliers of Imperial Brands are required to sign-up to our Code of Conduct.**



## EXTERNAL ALLEGATIONS AND REMEDIATION

We are committed to investigating potential human rights issues identified within our supply chain and direct operations. We take any allegations relating to human rights, including modern slavery, extremely seriously.



# EXTERNAL ALLEGATIONS AND REMEDIATION



Imperial Brands is committed to investigating potential human rights issues identified within its supply chain and direct operations. Imperial Brands takes any allegations relating to human rights, including modern slavery, extremely seriously. Imperial Brands engages both internally and with the relevant external stakeholders, which may include suppliers and NGOs to investigate allegations and respond to the issues raised.



## MALAWI

In June 2020 Imperial Brands responded to a claimant law firm's allegations of human rights issues in the Malawian tobacco supply chain, which included allegations relating to child and forced labour. In December 2020 a claim was filed in the High Court against Imperial Brands plc and a number of its subsidiaries by a group of tobacco farm workers. ITA is unable to comment in detail as this is ongoing litigation which is being defended.

# MODERN SLAVERY TRAINING AND AWARENESS

Our modern slavery e-learning course has been developed to support employees understand the issue and explain how to raise concerns on suspected or actual human rights abuses. The program is available in 15 languages.

# MODERN SLAVERY TRAINING AND AWARENESS



The Imperial Brands Code of Conduct sets out the responsible behaviours expected from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. It also includes Imperial Brands' respect for human rights.

The Code of Conduct is available in over 30 languages and is published in full on the Imperial Brands corporate website. The Supplier Code, which is aligned to the Code of Conduct is available in 19 languages. All employees of Imperial Brands are required to undertake Code of Conduct training either via an e-learning module or face-to-face training. Code of Conduct training continues to be rolled out to all new employees.

Our modern slavery e-learning course has been developed to support employees in understanding the issue and explaining how to raise concerns on suspected or actual human rights abuses. Since its launch in 2018 the course has been completed by 93% of our priority target population and includes the management group and key personnel from across our business functions.

During the 2021 reporting period Imperial Brands continued to train employees on the issue of modern slavery. In addition to the mandatory modern slavery e-learning course Imperial Brands also targeted training workshops to specific functions including Procurement and Leaf Sustainability.

ITA conducted modern slavery training for its senior executives in the 2021 reporting period. This period also saw ITA gain further awareness about its obligations under the Modern Slavery Act 2018 (Cth) through its work with external lawyers and consultants.

ITA is reviewing its training needs analysis to ensure it provides adequate training on modern slavery.

The Code of Conduct is available in over 30 languages and is published in full on the Imperial Brands corporate website. The Supplier Code, which is aligned to the Code of Conduct is available in 19 languages.





## NEXT STEPS FOR THE 2022 REPORTING PERIOD

We remain committed to strengthening our approach to addressing modern slavery in our operations and supply chain and recognise that this is a continuous, collaborative and evolving process.

# NEXT STEPS FOR THE 2022 REPORTING PERIOD



ITA is committed to strengthening its approach to addressing modern slavery in its operations and supply chain and recognising that this is a continuous, collaborative and evolving process.

## ITA's priorities for the 2022 reporting period are:

Exploring the use of **gap analysis** to better identify ITA's progress with achieving its anti-slavery initiatives.



Assessing available **ethical supplier screening** products for improved surveillance of modern slavery risks in ITA's supply chains.



**Audit of the manufactured tobacco product supplies** from businesses outside Imperial Brands.



**Preparation of a procurement questionnaire** to better assist ITA, its suppliers and customers to identify modern slavery risks in the supply chains.



Preparation of a **questionnaire for ITA's trading partners** to better assist ITA to identify modern slavery risks in its downstream supply chains.



Preparation of a **template for investigations of modern slavery** practices occurring in ITA's supply chains.



Devising **internal audit processes** to identify potential control weaknesses for ITA in combatting modern slavery.



Considering **engagement of a suitable not-for-profit partner** to combat modern slavery practices.



**Ongoing training programmes** for ITA employees.

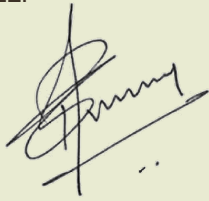


**Refresher training** for ITA employees on existing policies.



## **APPROVAL**

The ITA Board of Directors approved this statement on 3rd May 2022.



**Pratik Kumar Ganguly**  
Director, Imperial Tobacco Australia Limited

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