



Human Rights Policy

Respect for Human Rights

Contraf-Nicotex-Tobacco GmbH (CNT) operates within the tobacco and nicotine industries and understands that its operations have potential human rights impacts on stakeholders. CNT is conducting business in a responsible and sustainable manner and respects the human rights of all individuals impacted by their operations, including employees, contractors and external stakeholders.

CNT consider “human rights” to be all internationally recognized human rights in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work. CNT also commits to the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In line with upholding CNT’s vision for quality, innovation, agility and sustainability, CNT aims to ensure that employees in all operations are aware of the relevant identified salient human rights risks and impacts; listening to stakeholders and communities whose human rights may be affected and continuously work towards improving systems and processes to implement this Policy.

CNT including its subsidiaries worldwide, adhere to the applicable laws and regulations in the countries where business activities are conducted. Where mandatory national law and international human rights standards differ, or where they are in conflict with each other, CNT will seek ways to respect all international human rights to the greatest extent possible.

Scope of Policy

This Policy applies to employees working directly for CNT and its subsidiaries worldwide. The Policy expands upon and works in conjunction with the CNT Code of Conduct and Sustainable Tobacco Programme Policy to provide more detail on CNT’s Human Rights Policy. CNT will continue to implement its Human Rights Policy internally and with its supply chain.

Due Diligence

CNT makes human rights due diligence an essential and integrated part of their business processes. Where possible CNT will build upon its existing practices and programmes to guide future due diligence efforts. If human rights breaches are identified in relation to a supplier, and the supplier has no clear time-bound plan for corrective action, persistently fails to act or make measurable improvements, then business with that supplier may be ceased.

CNT aim to prevent, mitigate, and where appropriate, remedy negative human rights impacts that are caused, or contributed to by the company. In situations where CNT are directly linked to

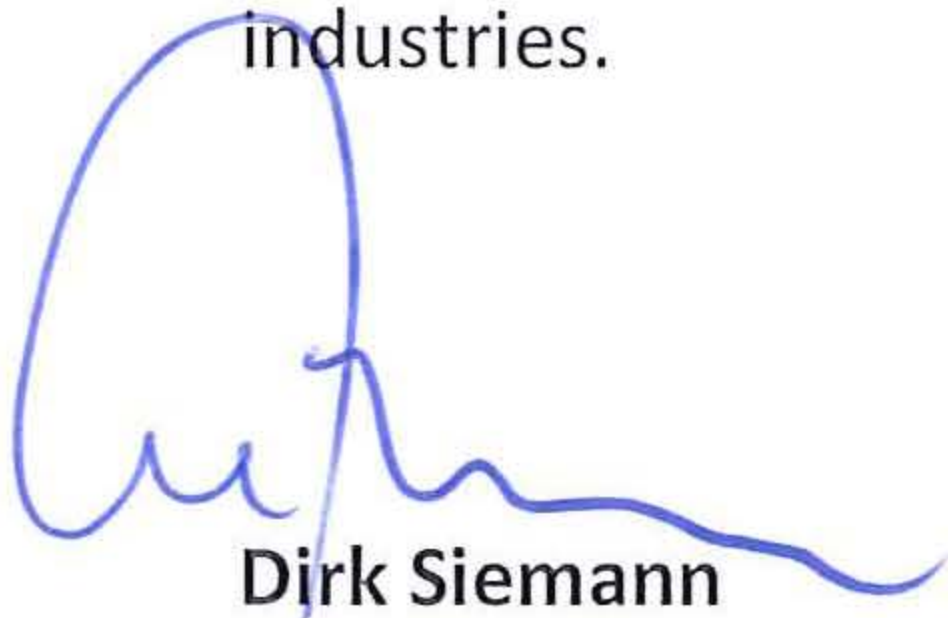
negative human rights impacts due to activities in their supply chain, they will seek to use commercial leverage to prevent or mitigate those impacts.

Grievance Mechanism

CNT currently operate their own internal grievance mechanism which was developed in line with internal requirements to ensure that any reported grievances are addressed effectively. CNT aim to further develop their grievance mechanism to enable human rights complaints to be reported and addressed without any prejudice to the aggrieved person(s).

Reviews

CNT understands the need for dynamic and innovative thinking regarding their policies and business practices. CNT is going to regularly review and continuously develop these policies to ensure best practices are determined and implemented that are relevant within the tobacco and nicotine industries.



Dirk Siemann



Torsten Siemann



Sascha Siemann

CONTRAF-NICOTEX-TOBACCO GmbH (CNT)
Management Board
August 2020