# Product Stewardship Framework

**Product Stewardship at BAT is at the core of our ambition of A Better Tomorrow™ by ensuring our products support tobacco harm reduction initiatives for adult tobacco and/or nicotine consumers.**

## What is Product Stewardship at BAT?

At BAT, we are committed to ensuring that our products are developed and manufactured responsibly. For that purpose, BAT defined and implemented a rigorous framework for its product stewardship: it reflects the group's commitment to have products that meet consistently high quality and safety standards. Product stewardship guides the development and testing of all our products, ensuring we have a rigorous and systematic approach.

Within our product stewardship activities, we conduct toxicological and safety risk assessments of the ingredients and materials proposed for all new and current tobacco and nicotine-containing products We also conduct our own scientific research programmes in support of our products, apply ongoing scientific and regulatory developments to our product assessments, and participate in scientific engagement with external stakeholders.

## How do we steward our products?

Our toxicologists use published, peer-reviewed literature and government databases of accepted information as a starting point. When additional needs for scientific information are identified, scientific studies are designed and conducted to fully assess new and current products.

BAT conducts robust product stewardship across all product categories and tailors these assessments to the characteristics unique to each product type.

### Vapour and Tobacco Heating Products

Vapour and tobacco heating products are first stewarded at an ingredient and material level, carefully assessing each ingredient and material that is used in a product. For vaping products, ingredients to be included in e-liquids must be at minimum food grade, with nicotine being pharmaceutical grade. Similarly, for tobacco heating products, all non-tobacco ingredients must be at minimum food grade or food-contract grade.

Beyond toxicological assessments of ingredients and materials, device safety is also carefully assessed during product development. Prototypes and final products are tested against and must pass several international safety standards. In addition, a process commonly known as a design failure mode and effect analysis guides the

design of products through a series of prototypes, which leads to a final commercial device.

## Modern Oral Nicotine and Snus Products

Modern oral nicotine and snus products are also first stewarded at an ingredient and material level. Each ingredient and material to be included must be at minimum food grade or food-contact grade. Additionally, in modern oral the nicotine must be pharmaceutical grade.

## Combustible Tobacco Products

By their nature, combustible tobacco products pose well known inherent health risks. Through our knowledge and continuing analyses of our products' compositions, patterns of use and potential hazards, we continue to apply robust stewardship practices and procedures before bringing a product to market. Combustible products are first stewarded at an ingredient and material level. Thus, we review each proposal of new ingredients or design features under our applicable product stewardship processes.