



Sustainability & Supply Chain Integrity Policy

Universal Leaf Tobacco Company, Incorporated, (“ULT”) is firmly committed to the sustainability and integrity of all aspects of our tobacco supply chain in all areas in which we operate and contract tobacco growers. The foundation of our Sustainability & Supply Chain Integrity Policy includes without limitation our strict compliance with applicable laws; Universal’s Code of Conduct and other compliance policies, Human Rights Policy, Environmental Policy, Water Stewardship Policy and ALP Code; and our commitment to organizational objectives in seven main focus areas:

Good Agricultural Practices

We shall develop, promote and use sound leaf production techniques and strategies which meet our customers’ needs, promote profitability and living incomes for contracted farmers, and support environmental sustainability, biodiversity and resource conservation. ULT shall facilitate and encourage improved living standards for contracted growers and their communities through combinations of measures that may include without limitation the provision of crop inputs, finance and technical support to enhance crop yield and quality, monitoring costs of production, promoting financial literacy, crop and income diversification, and other community programs.

Good Manufacturing Practices

We shall develop, promote and use industry best practices and sound technologies to optimize production in our processing facilities in meeting customer requirements, creating a safe working environment, improving energy efficiency and supporting environmental sustainability.

Environmental Protection

We shall comply with all environmental laws and regulations, following and implementing Universal’s Environmental Policy and Water Stewardship Policy.

Health and Safety

We shall comply with all health and safety laws and regulations, create and maintain a safe working environment and encourage our supply chain partners to do the same in the interest of employees, contractors, contracted farmers, their farm workers and other supply chain stakeholders.

**Tobacco Security, Integrity and Traceability**

We shall implement programs and strategies aimed at enhancing the security of tobacco supply and promoting tobacco quality throughout the supply chain for the purpose of the long-term supply of compliant tobaccos.

Human Rights and Agricultural Labor Practices

We shall respect and adhere to Universal's Human Rights Policy and the Agricultural Labor Practices Code, and promote their implementation in ULT's supply chain.

Social Responsibility

We shall operate in a fair and responsible manner, strive to be a beneficial and constructive supply chain partner to our stakeholders, and address key aspects and concerns of the tobacco industry and the farming and industrial communities in which we operate.

Our business directly and indirectly supports the communities and regions in which we operate by providing local contracted tobacco farmers efficient access to the global tobacco market, offering our employees a fair and safe working environment, and promoting sustainability in our communities and our farmers' communities. We are firmly committed to supporting our customers, our contracted farmers, our employees, our communities and our business partners in the tobacco supply chain through ethical business practices and targeted programs and investments aligned with our organizational objectives.

Our worldwide team of tobacco professionals shall develop local policies and programs, commit organizational resources and educate our workforce to adhere to applicable laws, and applicable policies, including without limitation this Sustainability & Supply Chain Integrity Policy. This policy will be regularly reviewed by the ULT Board and amended as needed.