

Modern Slavery Statement 2025

This statement is made in accordance with the UK Modern Slavery Act 2015 (the Act) covering British American Tobacco p.l.c. and companies in the British American Tobacco Group.

Approval Process

This Statement has been approved by the Board of British American Tobacco p.l.c. on [14 April] 2026. It was signed by the Chief Executive on behalf of the Board on [14 April] 2026.

The Statement has been approved by the Board of Directors and signed-off by a designated director, of each BAT Group subsidiary company set out below.

Entities in Scope

The BAT Group subsidiary companies that are subject to the requirements under the Act are set out below.

BATLaw Limited

British American Shared Services (GSD) Limited

British American Tobacco (GLP) Limited

British American Tobacco (Investments) Limited

British American Tobacco Exports Limited

B.A.T Services Limited

B.A.T. China Limited

British American Tobacco UK Limited

British-American Tobacco (Holdings) Limited

Nicoventures Retail (UK) Limited

Nicoventures Trading Limited

Inside this document

2

Welcome from our Chief Executive

3

Our Business and Supply Chain

7

Policy Commitments

8

Due Diligence and Risk Management

Identifying risks	8
Understanding risks – Own operations	9
Managing risks – Own operations	10
Understanding risks – Tobacco supply chain	11
Managing risks – Tobacco supply chain	12
Understanding risks – Non-tobacco supply chain	14
Managing risks – Non-tobacco supply chain	15

16

Training and Capacity Building

17

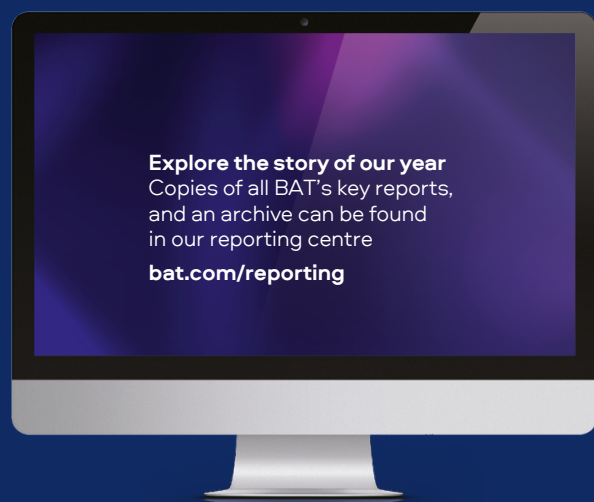
Measuring Effectiveness

19

Approval by BAT Group Subsidiaries

20

Further Information



For downloads and access to our entire reporting suite, for this and prior years, visit www.bat.com/reporting

Our '2025 Combined Annual and Sustainability Report' contains full details on our Sustainability and ESG reporting, performance and highlights for the year.

See our '2025 Reporting Criteria', for more detail on all key definitions and terms used in this report, and our wider Sustainability and ESG performance for the year.

Welcome from our Chief Executive



Our commitment to human rights is fundamental to our purpose.

We aim not only to respect the rights of our employees, partners and communities but to strengthen our approaches to human rights through the way we work and the standards we set.

Our Modern Slavery Statement

Our statement sets out the steps we have taken to prevent modern slavery risks across our business during the year ended 31 December 2025.

With a global footprint, we recognise the potential for exposure to modern slavery within our own operations and our extended supply chain, and we remain committed to identifying risks and taking appropriate steps to address any issues identified.

In 2025, we continued to make progress in this area with key milestones, including:

- achieving our target for 100% of Product Materials[†] and Higher-Risk Indirect Suppliers[†] to have undergone at least one independent labour audit within a three-year cycle;
- adopting enhanced restrictions on contract renewals with farmers where child or forced labour incidents are identified; and
- applying our traceability and segregation processes to remove any tobacco associated with child and forced labour incidents from our products.

With our 2025 sustainability targets reaching maturity, we have set new targets under the 'Communities' pillar of our sustainability strategy to guide our efforts through to 2030.

These targets reflect our commitment to building resilience and supporting the wellbeing of our employees, farmers and suppliers as part of our communities' strategy.

+ For more information on our 2030 targets, see [page 18](#)

Tadeu Marroco
Chief Executive

A handwritten signature in black ink, appearing to read 'Tadeu Marroco', written over a white background.


Our Business and Supply Chain

Our purpose is to create A Better Tomorrow™ by Building a Smokeless World.

Our commitment to human rights

We recognise our role to respect the human rights of all Direct Employees[‡], workers and farmers in our supply chain, as well as members of the local communities in which we operate.

In 2025, we continued to build upon our approach to managing human rights risks within the context of our sustainability strategy.

 Find out more about our **sustainability agenda** in our **2025 Combined Annual and Sustainability Report**

Our business structure and governance

With our Group headquarters located in the UK, we have subsidiary operations around the world, employing more than 47,000 people, of which approximately 700 are seasonal or temporary employees.

Our employees work in a range of roles and environments, including office-based management, manufacturing and operations, trade marketing and distribution, as well as research and development.

The Board of British American Tobacco p.l.c. is collectively responsible to our shareholders for the long-term sustainable success of the Company and for the Group's strategic direction, purpose, values and governance. The Board provides the leadership necessary for the Group to meet its business objectives within an appropriate framework for risk management and internal control.

 Find out more about our **business model** on **pages 2 to 3, 12 to 15, and 177 to 238** of our **2025 Combined Annual and Sustainability Report**

The Board is supported by the Audit Committee, which monitors and reviews the Group's risk management and internal control framework.

The Audit Committee is in turn supported by the Group's Regional Audit Committees, with committees for each of the Group regions and for locally listed Group entities and specific markets, where appropriate, and the Corporate Audit Committee.

Our Management Board, chaired by our Chief Executive, is responsible for overseeing the implementation of Group strategy and policies set by the Board, and for creating the framework for Group subsidiaries' day-to-day operations.

While all our Direct Employees[‡] are required to act in line with the Group's standards relating to human rights, the responsibility for setting the framework for identifying, managing and addressing risks related to human rights, including modern slavery, sits with the Corporate Sustainability team (for strategic delivery) and with the Leaf, Operations, Procurement and Business Compliance teams (for operational delivery). While all Direct Employees[‡] also have a part to play in preventing modern slavery, these teams, together with our suppliers, have primary responsibility for leading and implementing our approach.

On behalf of the Board, the Audit Committee monitors and reviews the risk management and internal control framework of the Group, including risks relating to human rights and compliance with the Group's Standards of Business Conduct.

Managing human rights impacts

Our Double Materiality Assessment (DMA)¹ provides insights on our material sustainability impacts, risks and opportunities (IROs) including topics such as child and forced labour.

 Find out more about our **DMA** on **page 8**

Management of material sustainability topics, including human rights, are also discussed in Committees and forums, such as the:

- Group Sustainability Leadership Team;
- Operations Sustainability Forum;
- Leaf Sustainability Forum;
- Supply Chain Due Diligence Committee;
- HR Leadership Team; and
- Business Integrity Panel.

Issues considered in these forums are raised, where appropriate, at the Management Board level or with the Audit Committee.


The Chief Corporate Officer has overall responsibility for the strategic delivery of the Group sustainability agenda, supported by the Sustainability team, including our Chief Sustainability Officer, and subject-matter specialists across the Group.

Our governance framework allows for the appropriate information, monitoring and oversight of key issues, including those relating to human rights and modern slavery across our business from local business units to Board level.

 Find out more about our **Group strategy, business model, structure and governance** in our **2025 Combined Annual and Sustainability Report**

How we report

Our Sustainability Performance Data Book provides a consolidated overview of our non-financial performance, which incorporates human rights and includes related targets and metrics, relevant reporting standards and frameworks, and the approach and scope used for data collection and assurance.

 For a full description of key terms and definitions, refer to the **BAT 'Reporting Criteria'** in our **2025 Sustainability Performance Data Book** at **bat.com/reporting**

Notes:

1. Although financial materiality has been considered in the development of our Double Materiality Assessment (DMA), our DMA and any conclusions in this document as to the materiality or significance of sustainability matters do not imply that all topics discussed therein are financially material to our business taken as a whole, and such topics may not significantly alter the total mix of information available about our securities.

Our Business and Supply Chain Continued

Our supply chain

Our multi-category portfolio of products includes combustible and Smokeless products. These Smokeless products include Vapour products, Heated Products and Modern Oral nicotine pouches, as well as Traditional Oral products, such as snus and moist snuff. Our supply chain intersects several industries that are exposed to human rights risks, including agriculture, manufacturing and electronics.

➤ For more information on our portfolio, see page 3 of our Combined Annual and Sustainability Report 2025

Tobacco supply chain

Our Group's own Leaf Operations source approximately 77% of our tobacco by contracting directly with c.91,000 farmers. The remainder is sourced from third-party suppliers who contract with approximately 134,000 farmers.

In India, although tobacco is purchased from farmers at auction, our third-party suppliers are required to provide traceability and monitoring of their farmer base, in line with the requirements outlined in our Leaf Suppliers Manual (LSM) and the Supplier Code of Conduct (SCoC). Our sourcing model provides our directly contracted farmers with a reliable and secure relationship, facilitating a more efficient and reliable supply chain for the Group.

➤ For more information, see 'Understanding risks – Tobacco supply chain' on page 11

Non-tobacco supply chain

Beyond tobacco leaf, we work with approximately 300 Product Materials Suppliers[†] and 25,100 indirect goods and services suppliers globally.

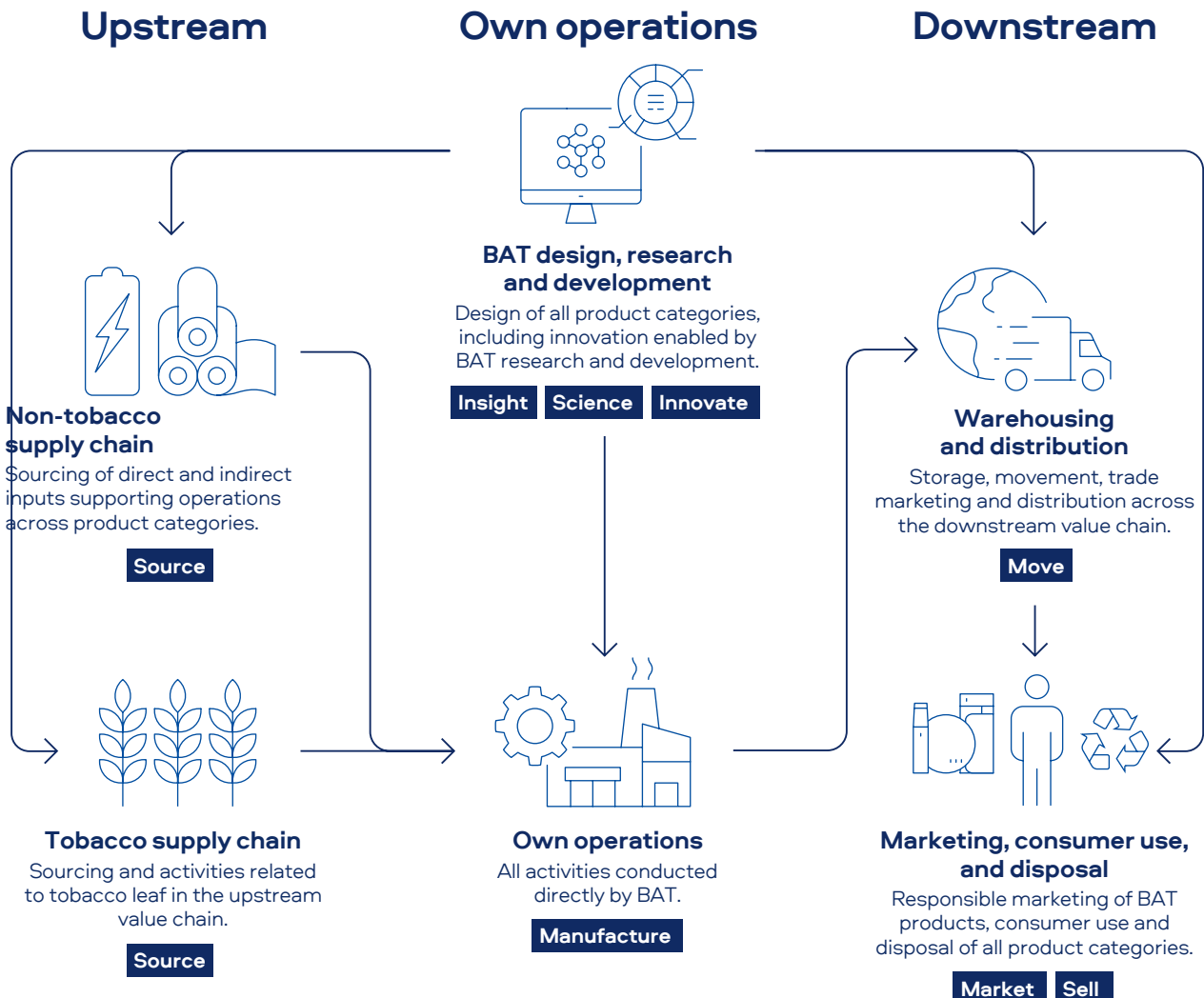
Through our Smokeless products, our supply chains in areas such as consumer electronics and e-liquids continue to grow.

We have a number of suppliers of indirect goods and services that are not product related, such as IT services and facilities management.

As valued business partners, it is crucial that we listen to and engage with our directly-contracted suppliers to build trust and drive progress. Through our supplier engagement, we strive to be a positive influence on how our suppliers manage sustainability risks, including those relating to modern slavery.

➤ For more information, see 'Understanding risks – Non-tobacco supply chain' on page 14

Our value chain

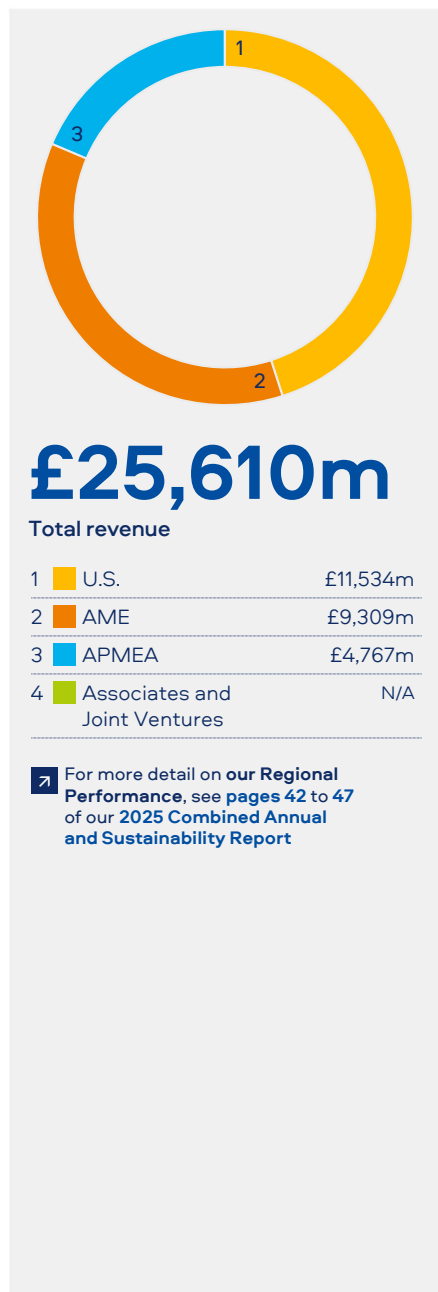


Our Business and Supply Chain Continued

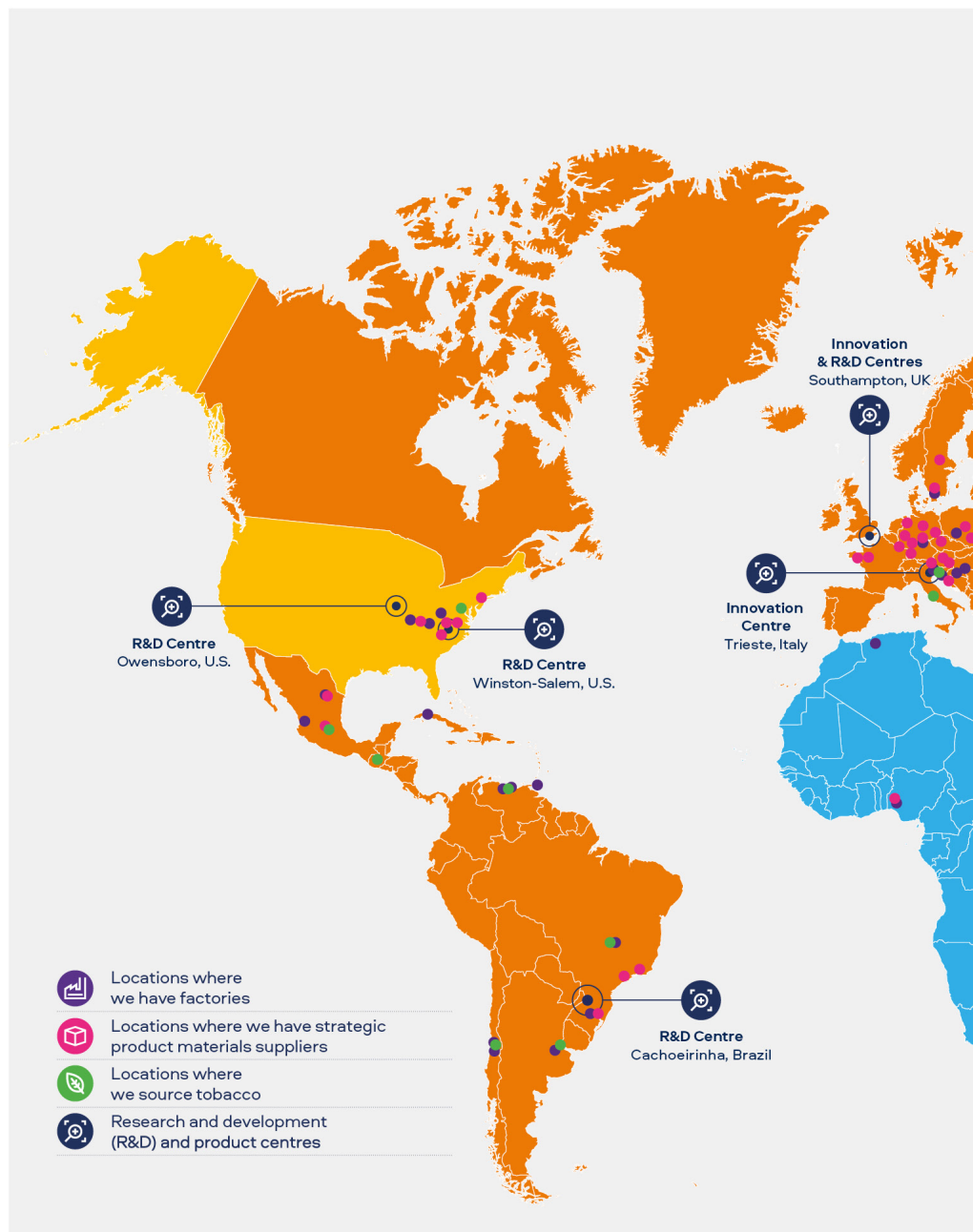
Our business is divided into three complementary regions, maximising opportunities for quality growth in our sector.

Our in-depth marketplace analysis delivers insights on consumer trends and segmentation, which facilitates our geographic brand prioritisation across our regions and markets. As consumer preferences and technology evolve rapidly, we are also leveraging our global digital hubs and innovation centres.

Revenue by region



Our supply chain and operations

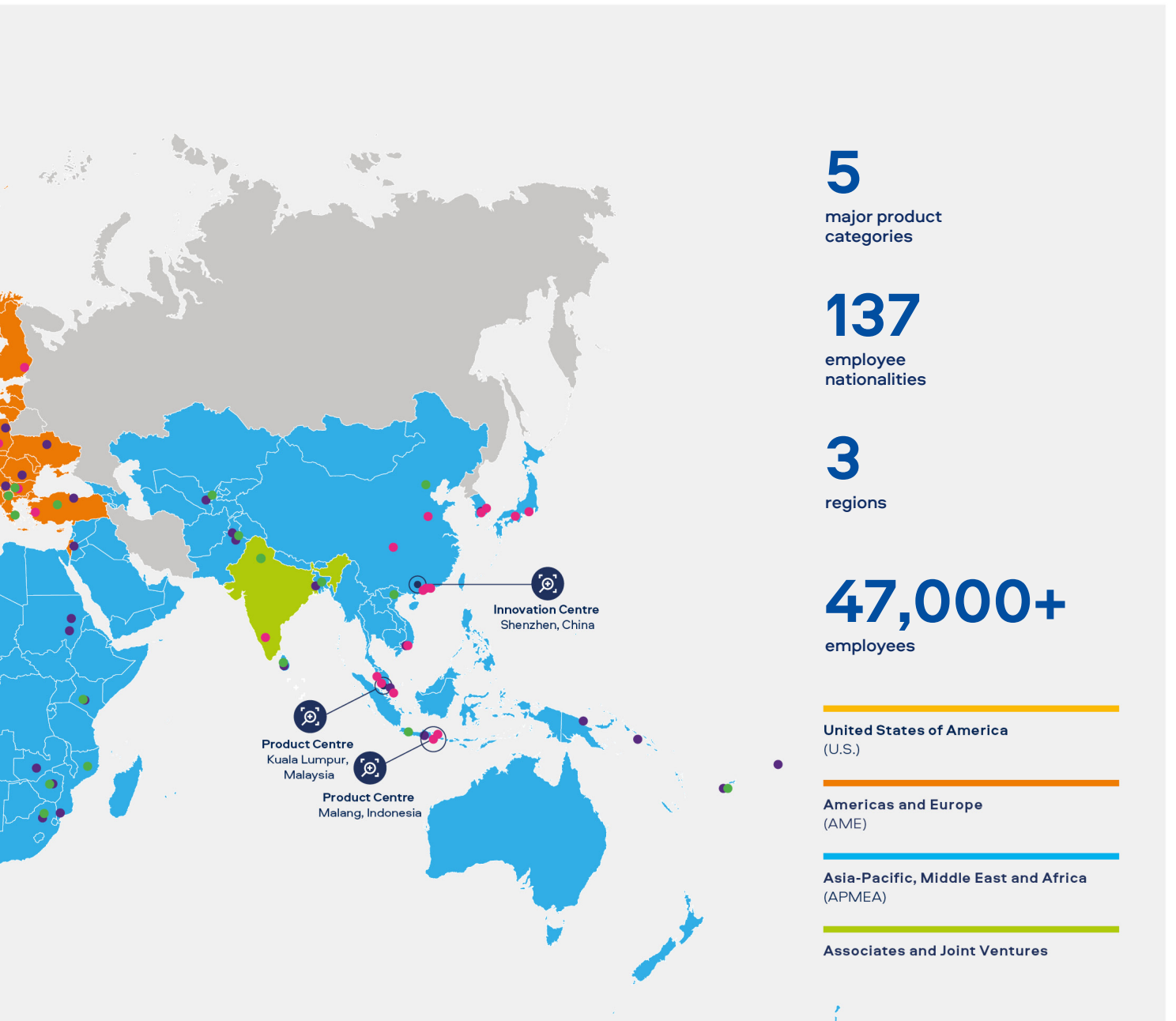


Our Business and Supply Chain Continued

BAT-owned manufacturing facilities ¹				
	U.S.	AME	APMEA	Total
Fully integrated manufacturing	1	13	22	36
Other processing sites (including leaf threshing and Other Tobacco Products ²)	—	6	9	15
Sites manufacturing other products (including Snus, Modern Oral and Liquids)	2	5	—	7
Research and development facilities	1	2	3	6
Total	4	26	34	64

Notes:

- 1. As of 31 December 2025.
- 2. Other Tobacco Products include but are not limited to roll-your-own, make-your-own and cigars.



Policy Commitments

We have policies, principles and standards to manage human rights and modern slavery risks across our supply chains.

Commitments, policies, standards and controls

We remain committed to respecting fundamental human rights as affirmed by the Universal Declaration of Human Rights.

This includes respecting the rights of:

- our employees;
- the people we work with; and
- the communities in which we operate.

Our approach is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), which are grounded in the human rights standards first articulated in the Universal Declaration of Human Rights and clarify how these rights apply in the context of business activities.

Our Standards of Business Conduct (SoBC) and our Supplier Code of Conduct (SCoC) (indicated by * in the table below), which contain our policies for human rights, including modern slavery, are reviewed and endorsed by the Board, for local adoption and implementation by relevant Group companies.

Both the SoBC and SCoC are reviewed annually to ensure they reflect developing standards and are in line with best practice. The versions currently in force were updated in 2025 and made effective on 1 April 2026.

Policies and Procedures	Key Stakeholder Groups
Standards of Business Conduct (SoBC)* Available at www.bat.com/principles	Our people Governments and wider society
Supplier Code of Conduct (SCoC)* Available at www.bat.com/principles	Customers Suppliers Governments and wider society
Group SoBC Assurance Procedure	Our people
Leaf Supplier Manual (LSM)	Suppliers Governments and wider society
Group Code of Human Rights in Tobacco Farming	Our people Governments and wider society Suppliers

Standards of Business Conduct (SoBC)

The standards of integrity we are committed to upholding are enshrined in our SoBC. These include our Respect in the Workplace chapter and Human Rights chapter, which align with the UNGPs and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

We seek to ensure our operations are free from slavery, servitude and forced, compulsory, bonded, involuntary, trafficked or exploited migrant labour.

+ For more information on how we **communicate the SoBC and monitor compliance**, see **pages 10 and 16**

Supplier Code of Conduct (SCoC)

The SCoC complements our SoBC by defining the minimum standards expected of our suppliers, including for respecting human rights. The SCoC applies to all our suppliers.

‘Suppliers’ means any third party that supplies or provides direct product materials or indirect goods or services to any BAT Group Company, including consultants, independent contractors, agents, manufacturers, primary producers, sub-contractors, distributors and wholesalers.

All Group suppliers must act to ensure their operations are free from child labour and from forced, bonded, involuntary, trafficked or unlawful migrant labour.

We expect our suppliers to take clear ownership of embedding the SCoC and to carry out effective human-rights due diligence across their supply chains. By doing so, they help create safer, more transparent and more resilient supply chains, which ultimately strengthens their own operations and supports shared, sustainable growth.

Available in multiple languages, the SCoC is shared as part of our onboarding process.

➤ Further information about **our SoBC and SCoC** can be found on bat.com/principles

Standards and controls

To support the effective implementation of our policy commitments, we have a number of standards, procedures and controls in place, including:

- **SoBC Assurance Procedure** defines how all reports of alleged SoBC breaches should be investigated and remediated fairly and objectively. This includes a four-step process, involving an initial assessment, in line with data privacy and employment laws, followed by an investigation plan, implementation, reporting of findings and closure.
- **LSM** sets out the detailed standards we expect our suppliers to follow. These include a range of criteria relating to standards in agricultural practices, such as agrochemicals compliance and the prevention of child labour.
- **Group Code of Human Rights in Tobacco Farming** outlines the core human rights standards that we expect all the Group’s Own Leaf Operations to implement. The Code applies to all employees and the Group’s own Leaf Operations, and is informed by the UNGPs and other international standards. It complements our Global SCoC, LSM and SoBC. All relevant BAT Leaf employees and directly contracted farmers receive training on this Code.

Due Diligence and Risk Management

Double Materiality Assessment (DMA)¹

Findings of our DMA

Our DMA¹ draws from multiple sources, including our value chain maps, stakeholder engagement insights, and inputs from internal experts and external users of sustainability disclosures. The former sustainability risk register was also used as a baseline reference to support the identification of sustainability-related impacts, risks and opportunities (IROs).

The results of our DMA have identified that child and forced labour impacts and risks are material for our supply chains. We continue to monitor these IROs, in the context of responding to evolving regulatory, market and stakeholder expectations and supporting our long-term resilience.

Following the development of a longlist of IROs, internal stakeholders reviewed and refined it through workshops, drawing on their expertise and stakeholder interactions. External stakeholders were engaged where needed to provide deeper insights and capture investor perspectives.

The assessment of these IROs enables us to identify where mitigation efforts may be most needed. IROs were scored on an inherent basis² to provide a clear view of potential risk exposure prior to mitigation, with mitigation actions considered separately as part of ongoing risk management.

We view saliency as aligned with the concept of impact materiality. Accordingly, the identification of our material human rights-related IROs was informed by an assessment of our salient human rights issues.

 Find out more about our DMA on pages 70 to 75 of our [2025 Combined Annual and Sustainability Report](#)

Global risk landscape

Agricultural and tobacco supply chain risk landscape

The agricultural sector as a whole is an area of attention for human rights-related risks. The sector is associated with large numbers of temporary workers, use of family labour in small-scale farming and high levels of rural poverty.

The ILO estimates that the agricultural sector accounts for 12.3%³ of all incidents of forced labour and 61%⁴ of all child labour globally. Debt bondage can also be a particular concern if farmers take out loans to invest in harvesting crops, but do not have a guaranteed buyer or price – leaving them vulnerable to debt risk.

Non-tobacco supply chain risk landscape

As a whole, the manufacturing sector is estimated by the ILO to account for 18.7%³ of forced labour. For child labour, the ILO's latest estimates indicate that the broader industry sector (which includes manufacturing, mining and construction) accounts for 13%³ of all cases globally.

Key forced labour risks identified in the manufacturing sector as a whole relate to excessive working hours and production targets, payment of high recruitment fees, illegal retention of passports and, in some cases, illegal imprisonment and beatings of workers.²

Human rights risks for indirect goods and services depend on the sector and country of operation. According to the ILO, around 10%³ of forced labour is estimated to occur within service sectors. For child labour, the ILO's latest estimates indicate that the wider services sector (which includes domestic work in third-party households, small-scale commerce and other informal service activities) accounts for 27%⁴ of all cases globally.

We recognise that some countries and circumstances present higher risks for human rights issues, such as where regulation or enforcement is weak or where levels of corruption, criminality or unrest are high.

Notes:

1. Although financial materiality has been considered in the development of our Double Materiality Assessment (DMA), our DMA and any conclusions in this document as to the materiality or significance of sustainability matters do not imply that all topics discussed therein are financially material to our business taken as a whole, and such topics may not significantly alter the total mix of information available about our securities.
2. The IROs were assessed on an inherent basis, which means that the mitigation actions were not taken into consideration in the assessment.
3. ILO (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, ILO, Geneva, 2017.
4. ILO & UNICEF (2025). Child Labour: Global Estimates 2024, Trends and the Road Forward.

Due Diligence and Risk Management Continued

Understanding risks – Own operations

Fair recruitment for our employees

Our commitment to fairness and inclusivity is embedded throughout the recruitment process, helping to promote equal access to opportunities and mitigate human rights risks for our employees worldwide.

The hiring process is managed by our Talent and Global Business Services teams, which work to implement Group-wide standards, bearing in mind local deviations due to local regulatory requirements and contexts.

Prospective employees undergo rigorous pre-employment checks in accordance with local standards. The standards apply to all permanent, fixed-term, part-time and full-time employees. Where recruitment agencies are involved, only recruitment through vetted vendors is permitted.

Group companies due diligence

Our SoBC mandates that Group companies and employees (and any employment agencies, labour brokers, or third parties they retain to act on our behalf) will not:

- require workers to pay recruitment fees, take out loans or pay unreasonable service charges or deposits as a condition of employment; and/or
- withhold or require workers to surrender identity papers, passports or permits as a condition of employment.

Where national law or employment procedures require use of identity papers, these must be used strictly in accordance with the law.

If identity papers are retained or stored for reasons of security or safekeeping, this will only be done with the informed and written consent of the worker, which should be genuine, and with unlimited access for the worker to retrieve them, at all times, without any constraints.

Every year, all our employees and Group Companies must formally confirm that they have complied with the SoBC. Individuals must complete our annual SoBC sign-off, in which they reaffirm their commitment and adherence to the SoBC and declare or update any personal conflicts of interest.

Our Group Companies complete an annual assessment against our key audit controls in which they confirm that their area of business, or market has adequate procedures in place to support SoBC compliance.

The audit controls also require human rights risk assessments and risk mitigation action plans in higher-risk countries where we operate, and for processes to be in place to demonstrate that human rights risks are managed effectively in the workplace and supply chain.

Monitoring human rights in our own operations

We use a third-party human rights database to assess the risk level faced by our own operations. Assessment outcomes and resulting action plans for our own operations that are deemed to be higher-risk are considered by our Board Committees.

In 2025, 20¹ countries where we have own operations were identified as higher-risk locations for human rights. Our own operations in these countries underwent additional assessments to evaluate their compliance with relevant Group policies and standards.



Note:

1. Bangladesh, Cameroon, China, Colombia, Honduras, Indonesia, Iraq, Kenya, Lebanon, Mali, Mozambique, Nigeria, Pakistan, Papua New Guinea, Philippines, Saudi Arabia, Sudan, Türkiye, Uganda and Venezuela, Zimbabwe.

Due Diligence and Risk Management Continued

Managing risks – Own operations

Providing safe spaces to ‘Speak Up’

Our SoBC make it clear that our employees, business partners and suppliers should speak up if they have a concern about actual or suspected wrongdoing.

We do not tolerate harassment, victimisation or reprisals of any kind against anyone raising a concern and such conduct is itself a breach of our SoBC.

Anyone can raise concerns (anonymously, if preferred) through our confidential, independently managed online and telephone Speak Up channels, available 24 hours a day in local languages. Employees can also speak to Human Resources, their line manager or a Designated Officer.

Investigating and remediating workplace breaches

Our SoBC set out how allegations of wrongdoing or SoBC breaches should be investigated and dealt with fairly and objectively.

In 2025, we received 284 reports of alleged SoBC breaches relating to our Respect in the Workplace and Human Rights Policies.

Upon investigation, actual breaches were found to have occurred in 72 cases related to Respect in the Workplace issues.

Actions were taken in response, including disciplinary actions that resulted in 41 people leaving the organisation.

In 73 cases, no evidence of wrongdoing was found. The remaining cases were still under investigation at the end of the year.

Global Living Wage employer

We seek to deliver fair, equitable and transparent compensation to all employees globally. In 2025, we continued to uphold our commitment to fair pay principles by maintaining our independent accreditation from Fair Pay Workplace, for providing equal pay for work of equal value¹.

We continue to be certified as a Global Living Wage employer by the Fair Wage Network (FWN), following our two-year certification awarded in 2024. Although formal re-certification was not required in 2025, we conducted an internal review which confirmed that all Direct Employees² across BAT are paid at or above the applicable living wage². This review maintained global coverage, spanning over 100 countries.

[Find out more about our approach to reward on page 118 of our 2025 Combined Annual and Sustainability Report](#)

Notes:

1. Employees performing the same work or work of equal value are paid equitably and any differences in pay are for objective reasons, e.g. location and not influenced by factors such as gender and/or ethnicity.
2. Our definition of a 'living wage' is aligned with the UN Global Compact definition: "living wage is the local remuneration received for a standard work week that enables workers and their families to meet their basic needs".

Delivery with Integrity

Rooted in our value of ‘Do the right thing’, the Delivery with Integrity programme guides how our people deliver business results, using a risk-based approach that empowers employees to exercise ethical judgements and comply with our SoBC.

Supported by zero tolerance for retaliation and extended protection for reporters and investigators, the programme encourages our employees to report concerns and non-compliances with our SoBC through multiple Speak Up channels. To monitor the effectiveness of our programme, we track all Speak Up reports, investigation outcomes, and disciplinary actions undertaken. The programme is subject to annual testing of policy and control compliance, internal audits and included in our Risk Register. Appropriate management actions are implemented in the event any non-compliance is identified.

Across our global operations, Group Companies confirm on an annual basis that adequate procedures are in place to support SoBC compliance, covering topics like anti-bribery, anti-corruption, sanctions, and competition. These assessments are monitored by our Finance, Legal and Compliance functions and reported to the Audit Committee. Every year, all Group employees are required to complete SoBC training and confirm that they have complied with the SoBC and disclose or update actual or potential conflicts of interest.

Ultimately, Delivery with Integrity is part of BAT’s Compliance Framework, designed to enhance compliance across our business by mitigating risks, keeping controls updated to best practices and regulation, training our employees to raise awareness, and promoting ethical decision-making. The Framework contains processes to manage misconduct and breaches of the SoBC, monitor, and report on disciplinary actions as appropriate.



Due Diligence and Risk Management Continued

Understanding risks – Tobacco supply chain

Maintaining standards through assessments

In our tobacco sourcing countries, we conduct Human Rights Impact Assessments (HRIAs) and In-depth Assessments (IDAs) as appropriate to identify potential issues, using a risk-based approach. These assessments are carried out in line with the UNGPs and conducted by independent human rights experts.

Since the first HRIA was conducted in 2019, we have completed 10 HRIAs, engaging with 5,239 rights-holders. The assessments covered themes, such as the potential risk of child labour, health and safety, workers' rights and farmer livelihoods.

Having conducted HRIAs in our key tobacco sourcing countries, we are now focusing on IDAs. These assessments capture both social and environmental topics, offering a more integrated understanding of the issues affecting our tobacco supply chain. By the end of 2025, 23 suppliers in 18 countries had undergone IDAs. Local Leaf Operations take appropriate steps to seek to address the issues identified in IDAs and provide updates to the Group as appropriate.

Grievance mechanisms

We seek to promote a culture of openness among our contracted farmers and workers on our directly-contracted farms, encouraging them to raise issues related to human rights with no risk of retribution. Recognising the role of grievance mechanisms in understanding and addressing the concerns of rights-holders, we track access to grievance mechanisms across our Thrive Supply Chain[†], which in 2025 showed that 100% of farmers and farm labourers reported having access to at least one type of grievance mechanism. Of the 245 grievances raised in 2025, 100% were reported as resolved by the end of the growing season.

The following grievance mechanism channels are available to farmers and workers:

- Feedback during regular meetings with farmers/workers or their representatives;
- Third-party owned telephone hotlines;
- Grievance boxes; and
- BAT's formal Speak Up channel that has a hotline, email address and online portal.

In addition, farmers, workers and third-party suppliers also have access to external grievance channels, including farmer associations and unions, local NGOs and government-led mechanisms.

We continue to assess the accessibility, usability, and relevance of our grievance mechanisms by consulting closely with farmers and workers.

Thrive system and the Sustainable Tobacco Programme (STP)

Our Thrive system covers over 94% of the total tobacco leaf purchased in 2025 by volume and gathers data on topics including human rights. All participants are required to conduct annual evaluations, providing insights that inform our strategy and guide the development of our action plans.

We also participate in the Sustainable Tobacco Programme (STP) to promote responsible tobacco growing practices. The STP is an industry-wide initiative developed in collaboration with other manufacturers to bring together best practices and drive continuous improvement. Participation in the STP is a contractual requirement for all our third-party tobacco suppliers. The STP mandates an annual self-assessment covering key themes, including Governance; Human and Labour Rights; and Livelihoods.

[Find out more at sustainabletobaccoprogram.com](https://sustainabletobaccoprogram.com)

Farmer Sustainability Management (FSM) and Agri360 platforms

To enhance and simplify our monitoring capabilities, we are currently transitioning from the legacy Farmer Sustainability Management (FSM) system to Agri360. The new platform enables Leaf sustainability teams to tailor questions and parameters, providing greater flexibility and customisation. Over 30% of the Agri360 criteria are related to human rights, including child and forced labour and working conditions.

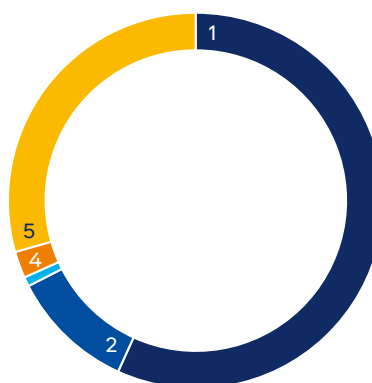
Field Technicians conduct farm visits, interviewing farmers and farm workers to check for child and forced labour incidents amongst other things and upload the data to Agri360, which tracks any Prompt Actions[‡] necessary for remediation identified.

Following the identification of an actual or suspected non-compliance, the local Leaf Operations follow a defined process, stopping the non-compliance and recording and reporting the issue. They work with the farmer to agree and document corrective actions, and conduct unannounced follow-up visits to check that the actions are completed.

All data is centrally tracked and analysed to provide appropriate oversight and to implement management action when needed.

Our third-party tobacco suppliers are expected to monitor their contracted farmers and to report their findings, including Prompt Actions[‡], in our Thrive system.

Thrive-reported Prompt Actions[‡] in 2025



Categories	% breakdown
1 Handling, use and storage of agrochemicals	56.8
2 Green tobacco sickness	10.7
3 Wood-related issues	0.8
4 Child labour	2.3
5 Others	29.4

[‡] Further details on remediation actions in relation to child labour are discussed on pages 12 and 13

Due Diligence and Risk Management Continued

Managing risks – Tobacco supply chain

Overview

The majority of our tobacco (77% by volume) is sourced by BAT Group’s own Leaf Operations through contracts with c.91,000 farmers, who receive on-the-ground support from our expert Field Technicians through all crop stages. Our engagement with directly contracted farmers enables us to build strong, trusted relationships. Our approach focuses on working alongside families and communities to develop longer-term solutions that respect the local context and the realities of small, family-run farms.

Reporting and resolving incidents of child and forced labour

Our definition of child labour used to identify child labour incidents is aligned to the International Labour Organization’s definition of child labour.

We monitor 100% of our directly contracted farmers on child and forced labour risk and prevention. In 2025, 48 incidents of child labour were reported across 43 farms (representing 0.02% of total farms) in our Thrive Supply Chain[†]. The majority of incidents were related to stitching and/or stringing tobacco green leaves. 100% of incidents were reported as resolved during the growing season.

In addition, zero incidents of forced labour were reported in our Thrive Supply Chain[†] in 2025.

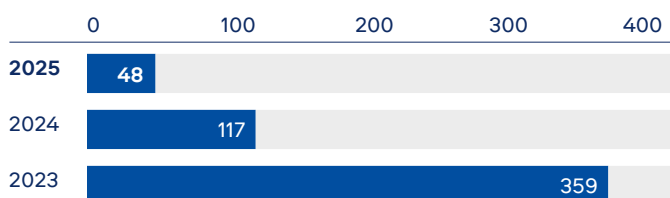
Whenever child labour is identified, our first step is to protect and support the child. This includes removing the child from the work activities, working with the family and farmer, providing suitable remediation, and retraining the farmer. In parallel, we apply our traceability and segregation processes to separate and remove any tobacco associated with the incident to help maintain a supply chain free from identified cases of child and forced labour.

In 2025, building on our aim for zero child and forced labour, we adopted enhanced restrictions on contract renewals with farmers where child or forced labour incidents are identified. Re-engagement is conditional upon the farmer’s active participation in remediation activities, as defined by the local Leaf Operations.

As part of our continued efforts to address child labour, we conduct root cause analyses to inform tailored remediation plans as well as prevention and mitigation strategies.

We set out detailed guidance procedures in our Group Code of Human Rights in Tobacco Farming and monitor outcomes associated with the Code.

Number of child labour incidents identified



We acknowledge the challenges in monitoring child and forced labour on farms and understand that incidents may not always be detected or reported. We remain committed to addressing these complex issues.

Partnerships and community-based programmes are essential in our approach to respecting human rights. By bringing together key stakeholders, we can co-develop solutions to help bring about lasting change. We support a range of long-term programmes to support the prevention of child labour and enhance livelihoods across our tobacco-growing regions.

Child labour prevention in tobacco-growing regions

Across our tobacco growing regions, we run initiatives aimed at reducing the risk of child labour by strengthening education and supporting the resilience of farmers and their communities.

In Argentina, the Brazos Abiertos programme, delivered in partnership with a local foundation, supports children and adolescents across rural tobacco growing communities. It offers safe recreational and learning spaces during school holidays. In 2025, the programme supported more than 37,000 children and adolescents. Similarly, BAT Mexico’s Florece programme established day schools that provide a supportive environment for the children of tobacco field labourers.

In Venezuela, the Child Labour Prevention Programme focuses on awareness raising in tobacco-growing communities, engaging children, parents, teachers, growers, and public officials through educational sessions, workshops, and cultural events.

BAT Pakistan has partnered with a local NGO, which ran 50 summer camps in 2025, involving over 2,400 children in educational activities during school holidays. Located across our tobacco growing sourcing regions in Pakistan, the camps are supported by social mobilisation sessions to promote the value of education and raise awareness about child labour risks. BAT Bangladesh runs a similar programme, encouraging school attendance. In 2024 and 2025, it delivered sports days and awareness activities in collaboration with more than 80 schools.

“ We organise summer camps during harvest season; a period when children are most at risk of child labour, providing engaging activities and protecting their wellbeing. ”

Wardah Khan

Leaf Business Development Manager, BAT Pakistan



Due Diligence and Risk Management Continued

Enhancing farmer livelihoods

Supporting farmer livelihoods helps to address underlying drivers of human rights risks in our tobacco supply chain and supports positive social and economic outcomes for farming communities.

Earning a sustainable living income reduces farmers' vulnerabilities to exploitation, including child and forced labour while also making farming more attractive to the next generation.

Stable incomes also help farmers maintain safer working conditions and better meet safety and environmental standards.

Enabling living incomes

We have been conducting annual living income analysis since 2022, based on the Anker Methodology¹, a recognised gold standard for estimating fair wages and incomes for agricultural workers and smallholder farmers.

In several markets, we are working with local stakeholders, including universities and research institutions, to conduct local living income studies using region-specific data for greater accuracy and relevance.

The results support the creation of action plans to target key income drivers, such as reducing production costs, increasing yield, and diversifying incomes. Feedback from farmers is provided to our directly-contracted and third-party tobacco suppliers, who manage action plans.

We also participate in the STP Living Income Working Group, which is developing a methodology for assessing and addressing farmer living income, using voluntary input from tobacco suppliers.

Looking ahead, we are expanding our focus on supporting livelihoods for farmers in our tobacco supply chain by aiming for 90% of farming households to be engaged in livelihood improvement programmes in priority geographies by 2030².

Supporting farmers throughout the growing cycle

Our Thrive system covers over 94% of the total tobacco leaf purchased in 2025 by volume and gathers data on topics including human rights. All participants are required to conduct annual evaluations, providing insights that inform our strategy and guide the development of our action plans.

Our Field Technicians are pivotal in human rights management across our directly contracted farmer base.

They visit our contracted farmers approximately once a month during the growing season. They act as a direct link between the farmers and the Group's own Leaf Operations, building trusted relationships and working with the farmers to develop their skills, promote better yields and maintain standards.

Our suppliers provide similar support services for their contracted farmers.

Find out more about **how we support farmers** on [page 122](#) of our [2025 Combined Annual and Sustainability Report](#)

Promoting income diversification

We support crop diversification programmes which are adapted to local environmental and socio-economic realities, helping farmers build resilience and access new income opportunities.

In 2025, 93.5% of our farmers in the Thrive Supply Chain[‡] were reported to have diversified crops. In 2025, approximately 126,000 farmers, farm labourers and local community members have been trained on crop diversification.

Several smaller-scale initiatives are underway to identify potential crops for additional income.

Note:

1. www.ankerresearchinstitute.org/anker-methodology
2. Bangladesh, Kenya, Mexico and Pakistan.

Building resilient communities

We have developed a range of pilot programmes on women's empowerment, rural development, and access to healthcare, clean water, and sanitation.

For example, BAT Bangladesh's Probaho, now in its sixteenth year, provides safe and clean drinking water to rural communities where supplies have previously been scarce or contaminated.

To date, Probaho has installed 120 filtration plants across 24 districts in arsenic and salinity-affected regions in Bangladesh. These plants are capable of supplying around 600,000 litres of safe drinking water daily to over 300,000 people.

Read about our **farming communities** on [pages 121 to 124](#) of our [2025 Combined Annual and Sustainability Report](#)

Empowering women in agriculture: Fabiane's journey

In 2023, BAT Brazil launched its Women Empowerment Programme to further equip women with the skills and confidence to play a more active role in farm management and decision-making while inspiring a new generation of women to succeed in family farms and seize opportunities in agribusiness.

Each session gathers small groups for training tailored to participants' interests, covering seedling production, crop management, agronomic practices, financial literacy, and product quality standards. In the last crop year, more than 120 women have participated in the programme.

Fabiane, who grew up in a farming household and now works alongside her husband on a farm, has experienced the programme's benefit first-hand. Through the programme, she has deepened her expertise in tobacco farming and taken a leadership role in managing operations.

As a key tobacco sourcing market, BAT Brazil continues to support women's roles in the future of agriculture.

“
Now, I calculate production costs, make smarter investments and contribute to decision-making.”

Fabiane Schroeder

Participant in BAT Brazil's Women Empowerment Programme



Due Diligence and Risk Management Continued

Understanding risks – Non-tobacco supply chain

Social due diligence in our non-tobacco supply chain

We are committed to conducting our due diligence in accordance with the UN Guiding Principles for Business and Human Rights and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We take a risk-based approach to social due diligence in our product materials supply chain and have prioritised key human rights risks within our supply chain based on these international standards.

Since 2020, we have partnered with leading organisations such as Intertek, Sedex and Ecovadis to support our due diligence programme. We are also a supporter member of the Responsible Business Alliance (RBA).

Scope of social due diligence

All Product Materials[†] and Higher-Risk Indirect Suppliers[‡] are in scope for our labour audits. Product Materials Suppliers[‡] are those who supply goods used in our products, such as filters, paper, adhesives, liquids, devices and batteries.

For the purpose of social due diligence, machinery and point of sale materials were considered 'higher-risk' and therefore, included in scope. By aligning our suppliers' risk profiles with the geographical and industry expertise of our audit partners, we have met our target for 100% of Product Materials[†] and Higher-Risk Indirect Suppliers[‡] to have undergone at least one independent labour audit within a three-year cycle.

We continue to leverage our assessment of audit results to categorise risk levels and inform future actions and engagement initiatives.

Triage process

All in-scope suppliers are evaluated through an independent risk assessment, covering relevant human rights issues, including working conditions. The outcome of the risk assessment determines the type of the audit assigned, which can be either a third-party on-site audit or a third-party verified self-assessment.

Responsible mineral sourcing

Our electronics supply chain includes multiple layers of suppliers, which creates additional challenges for managing human rights risks.

Our SCoC applies to all our suppliers and outlines the actions we expect them to take in relation to responsible mineral sourcing.

While we do not source directly from mine sites or smelters, we commit to taking appropriate steps to seek to verify that our supply chain is free from conflict minerals.

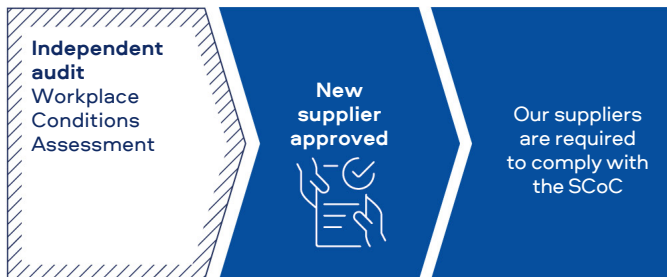
We are also working with our suppliers to strengthen our due diligence for high-risk minerals in line with the OECD Guidance.

Being a supporter member of the RBA provides us with access to cross-industry initiatives, such as the Responsible Minerals Initiative, through which we have visibility of smelters' audits. Findings are reported annually in our Conflict Minerals Report.

[Find out more about our approach to responsible minerals sourcing in our 2025 Conflict Minerals Report](#)

Due diligence process for Product Materials[†] and Higher-Risk Indirect Suppliers[‡]

New suppliers



Existing suppliers



Independent supplier audits process

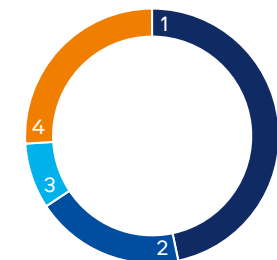


On-site audits' outcome

278 suppliers audited in 2025 out of which:

New audits	82
Re-audits	196

On-site audits and verified self-assessments



% breakdown of non-compliances¹ raised during on-site audits relating to:

1	Health and Safety	46.8
2	Working Hours	19.0
3	Adequate Wages	8.4
4	Other	25.8

Note:

- Any issue identified in an audit constitutes a 'non-compliance', ranging from minor to major issues and represent the distribution of findings across all on-site audits, not the number of suppliers with issues.
- 'Other' includes matters such as the environment, business ethics, management systems.

Due Diligence and Risk Management Continued

Managing risks – Non-tobacco supply chain

Breakdown of audits

Since 2023, 526 in-scope suppliers in 57 countries have undergone at least one labour audit:

- Tier 1 Product Materials Suppliers[†]: 384;
- Lower-tier Product Materials Suppliers[‡]: 37; and
- Indirect suppliers: 105.

In 2025, 278 independent labour audits were carried out. 82 were first time audits and 196 were re-audits of existing suppliers due to previous audit performance.

+ For more information on the **scope of audits**, see [page 14](#)

Managing audit findings

We continue to embed social audits into our supplier engagement and monitoring processes. If an in-scope supplier is identified to fall below our minimum standards, we support the supplier to develop an action plan and monitor progress.

If a supplier does not show the necessary improvements despite our efforts, termination of the contract is considered as a last resort. Audit escalations are reviewed at our Supply Chain Due Diligence Committee and local relevant risk forums.

Through this process, 16 suppliers made sufficient improvements to meet our standards and eight were removed from our supply chain as a last resort in 2025. Learnings from our audit programme and engagement with suppliers continue to inform how we manage supplier relationships.

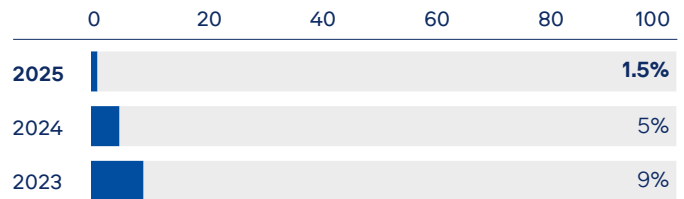
In 2025, our social audit programme recorded a notable improvement as the proportion of suppliers rated as unsatisfactory fell from 9% at the end of 2023 to 5% by close of 2024, and further declining to 1.5% by the end of 2025.

The table below provides an overview of the key measures we use to engage, assess and support our suppliers across the non-tobacco supply chain.

Measures deployed to support responsible supplier management	
Measure	Main goal of the measure
Supplier Verified Self-Assessment Questionnaires	Identify social risks and compliance gaps via self-reported supplier input, which are verified through third parties.
Recognition of existing audits	Leverage existing audits for our audit in-scope suppliers for streamlined independent oversight.
Independent third-party social audits	Verify compliance at supplier sites
Grievance and engagement mechanisms	Ongoing worker feedback and complaints resolution
E-learning and webinars	Build awareness of rights and responsibilities in a scalable way
On-site capacity building (workshops)	Improve systems on-site via coaching and training
Corrective action plans follow ups	Ensure audit or assessment findings are remediated and systems are improved
Supplier summits/workshops	Share best practice and build relationships with suppliers
Industry collaboration strategies	Tackle systemic risks through collective action
Certification schemes	Provide independent validation of standards
Human rights risk assessments	Identify and mitigate human rights risks across suppliers in specific geographies and categories/products/commodities

Social audit programme improvements

% of suppliers rated as unsatisfactory



We are proud of this progress, which helps reduce exposure to social risks and supports better working conditions across our supply chain.

We will continue to enhance our approach to respecting the human rights of the workers in our supply chain. Looking forward to 2030, our target is to have all our prioritised non-tobacco suppliers engaged in our enhanced approach to Human Rights Due Diligence (HRDD), through which we will deploy a mix of tailored initiatives depending on their risk categorisation. Our prioritisation will be guided by our risk-based approach, informed by multiple sources and responsive to changes in the external landscape. This includes third-party risk intelligence and insights from our due diligence activities.

This underscores our commitment to proactive engagement, addressing risks and driving continuous improvement across our supply chain.

Training and Capacity Building

Training our employees

Ensuring our employees can easily access and understand our SoBC policies is fundamental to establishing effective implementation and compliance.

The SoBC and related procedures and guidance documents (including the Speak Up channels) are available to BAT personnel on the Company's internal site.

Annually, all our employees undergo SoBC training as part of the Group compliance sign-off procedure. The SoBC training content included modern slavery topics for all employees in the 2025 programme.

In 2025, 100% of Group company employees completed the SoBC training and sign-off.

100%

Number of Group company employees who completed the SoBC training and sign-off



+ For more social performance metrics and operational data see [page 17](#)

Human rights training for farmers and their communities

Our Group's own Leaf Operations and third-party suppliers in our Thrive Supply Chain[†] provide human rights training for farmers and community members, with a focus on child labour and workers' rights. In 2025, more than 358,000 attendees received this training.

Child labour training, developed in line with the UNGPs, is also available through our internal training platform.

Across Leaf Operations, training materials are developed and aligned with internal requirements and our Group Code of Human Rights in Tobacco Farming.

358,000+

Number of attendants engaged in human rights training, with emphasis on forced labour and child labour^{1,2}



Supplier engagement and training

We have a relationship with approximately 300 Product Materials Suppliers[‡] and 25,100 indirect goods and services suppliers, some of whom are small businesses operating in developing countries where standards, such as for human rights and health and safety, are still evolving.

We value our partnerships with these suppliers and support them in improving their practices. If issues arise during our audits, the relevant supplier is responsible for implementing corrective actions. We provide oversight and resort to disqualification only as a last resort.

In 2025, we delivered a series of external capability-building and training engagements to strengthen supplier performance. This included partnering with RBA to deliver a joint webinar training to our New Category suppliers, conducted in both Chinese and English. The webinar focused on audit readiness and corrective action planning based on results.

We also held a Sustainability Summit in Mexico, attended by leadership teams from over 30 suppliers to strengthen capabilities on social and environmental topics.

Sustainability College in Bangladesh

In 2025, BAT Bangladesh launched the Sustainability College to strengthen capabilities among strategic suppliers. The three-day programme engaged 19 strategic suppliers through classroom learning, factory visits, and e-modules covering topics such as labour law and health and safety. A key focus of the programme was to enhance suppliers' HRDD and social audit readiness, supporting replication in other markets.



Notes:

1. Our ambitions and targets cover all tobacco we purchase for our products ('tobacco supply chain'), which is used in our combustibles, traditional oral and Tobacco Heated Products. Our metrics, however, derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 94% of the tobacco purchased by volume in 2025 ('Thrive Supply Chain').
2. The decrease in human rights training attendees in 2025 reflects a reduction in the size of the farmer base.

Measuring Effectiveness

Measuring progress

Progress is assessed against the key performance indicators (KPIs) outlined in the table below.

KPIs, alongside monitoring of strategic plans and emerging risks and best practice, are regularly reviewed at senior level through our governance framework and committees, including:

- Board Audit Committee, comprising independent Non-Executive Directors;
- Corporate Audit Committee and Regional Audit Committees;
- Operations Sustainability Forum, chaired by our Operations Director; and
- Supply Chain Due Diligence Committee, chaired by our Group Head of Procurement.

We continue to improve and strengthen our approach to tackling modern slavery, and adapt to evolving circumstances.

Next steps

Tobacco supply chain: We will continue our assessment of HRDD strategies across our Leaf Operations, including reviewing processes, procedures and training capabilities.

Non-tobacco supply chain: We are evolving our HRDD approach to leverage a wider mixture of tools to be deployed across our non-tobacco supplier base, in line with the supplier's risk profile. We are also deepening our engagement with suppliers to reinforce the need for HRDD across our upstream supply chain. Minerals will be our priority area of focus for 2026.

Our 2025 performance			
KPI	2025 performance	2024 performance	More information
% of employees that completed annual SoBC sign-off	100	100	Page 16
Cumulative number of Human Rights Impact Assessments (HRIAs) completed, aligned with the UN Guiding Principles	10	10	Page 11
% of Product Materials [†] and Higher-Risk Indirect Suppliers [†] that have undergone at least one independent labour audit within a three-year cycle.	100	91	Page 11
% of Group companies assessed for human rights risks	100	100	Page 9
% of farms in our Thrive Supply Chain [†] monitored for child labour	100	100	Page 12
Attendances at human rights training delivered by BAT Group's own Leaf Operations and third-party suppliers	358,504	417,628	Page 16

Measuring Effectiveness Continued

Our 2030 targets

The table below presents our updated and new targets and ambitions for 2030, as they relate to:

- Child and forced labour;
- Improving farmer livelihoods; and
- Supplier engagement.

These targets reflect our continued commitment to building resilient communities across our supply chains and lay the foundation for measurable progress.

Informed by our experience and an evolving understanding of community-related impacts, our 2030 targets were designed to set a clear direction for respecting human rights and advancing farmer livelihoods.

Our performance against these targets will be reported in our FY26 Combined Annual and Sustainability Report and our Modern Slavery Statement.

Dashboard key

UPDATED

Indicates that an existing target/ambition has been updated, while retaining the same underlying principles or ambition. The core intent of the original target remains, but the wording, scope, or metrics may have been refined.

NEW

Indicates a target that is entirely new and not linked to or derived from any current target. This is a new target introduced as part of the evolution of our Sustainability Strategy.

RETIRED

Indicates targets that are discontinued, typically because they have reached their stated end year (e.g., 2025) or have been superseded by a new or updated target.

Targets Dashboard					
Target Theme	Current 2025 Targets	Key	New/Updated 2030 Targets and Ambitions	Key	Comments
Child and forced labour	– Aiming for zero child labour incidents in our tobacco supply chain ¹ by 2025	RETIRED	Zero tolerance for child and forced labour in our supply chain ²	UPDATED	As our business transitions from combustibles to Smokeless products, we are expanding our ambition to cover both our tobacco and non-tobacco supply chain.
Improving farmer livelihoods	– Supporting prosperous livelihoods for all farmers in our tobacco supply chain	RETIRED	90% of farming households engaged in livelihood programmes in priority geographies	NEW	We are broadening our focus on supporting farmers' livelihoods by engaging them in livelihood programmes.
Supplier labour assessments	– 100% of Product Materials [‡] and Higher-Risk Indirect Suppliers [‡] having an independent labour audit within a three-year cycle by 2025	RETIRED	100% of prioritised non-tobacco suppliers engaged in our enhanced Human Rights Due Diligence Framework	NEW	We continue to enhance our approach to respecting the human rights of the workers in our supply chain by proactively engaging with our suppliers, taking appropriate steps to address the risks identified and driving continuous improvement in our supply chain. Our prioritisation will be guided by our risk-based approach, informed by multiple sources and responsive to changes in external landscape. This includes third-party risk intelligence and insights from our due diligence activities.

Notes:

1. Our ambitions and targets cover all tobacco we purchase for our products ('tobacco supply chain'), which is used in our combustibles, Traditional Oral and Heated Products. Our metrics, however, derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 94% of the tobacco we purchased by volume in 2025 ('Thrive Supply Chain').
2. Due to the complex and systemic nature of child and forced labour, this represents an ongoing ambition rather than a time-bound target.

Approval by BAT Group Subsidiaries

This statement has been approved by the Board of Directors, and signed by a designated director of each relevant BAT Group subsidiary company.

Approval by BAT Group Subsidiaries		
Company	Date of Board Approval	Designated Director
BATLaw Limited	2 April 2026	Ruth Wilson
British American Shared Services (GSD) Limited	31 March 2026	Jean-Pierre Cussac
British American Tobacco (GLP) Limited	2 April 2026	Samuel Ferreira Cortez
British American Tobacco (Investments) Limited	30 March 2026	Zafar Khan
British American Tobacco Exports Limited	31 March 2026	Elena Romanyuk
B.A.T Services Limited	2 April 2026	Ruth Wilson
B.A.T. China Limited	2 April 2026	Ruth Wilson
British American Tobacco UK Limited	31 March 2026	Rob Ferris
British-American Tobacco (Holdings) Limited	30 March 2026	Zafar Khan
Nicoventures Retail (UK) Limited	31 March 2026	Rob Ferris
Nicoventures Trading Limited	30 March 2026	Zafar Khan

Further Information

About this statement

This is our ninth statement in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by British American Tobacco (BAT) p.l.c. and Group companies, during the year ending 31 December 2025, to prevent modern slavery and human trafficking in our business and supply chain.

References in this statement to 'British American Tobacco', 'BAT', 'we', 'us' and 'our' refer to British American Tobacco Group operating companies, collectively or individually as the case may be.

The material in this statement is not provided for product advertising, promotional or marketing purposes. This material does not constitute and should not be construed as constituting an offer to sell, or a solicitation of an offer to buy, any of our products. Our products are sold only in compliance with the laws of the particular jurisdictions in which they are sold.

Forward-looking statements

This statement contains forward-looking statements, including "forward-looking" statements made within the meaning of the U.S. Private Securities Litigation Reform Act of 1995. These statements are often, but not always, made through the use of words or phrases such as "believe," "anticipate," "could," "may," "would," "should," "intend," "plan," "potential," "predict," "will," "expect," "estimate," "project," "positioned," "strategy," "outlook," "target," "being confident" and similar expressions. These include statements regarding our intentions, beliefs or current expectations concerning, among other things, our operations and strategies based on the economic and business circumstances occurring from time to time in the countries and markets in which the Company operates.

In particular, these forward-looking statements include, among other statements, statements regarding BAT's business objectives, as well as certain statements (i) regarding BAT's new sustainability targets through 2030, (ii) BAT's commitment to conducting social due diligence in the non-tobacco supply chain in accordance with certain international guidelines and standards, (iii) BAT's target to have all prioritised non-tobacco suppliers engaged in its enhanced approach to Human Rights Due Diligence (HRDD) and (iv) BAT's expectations to continue to improve and strengthen its approach to tackling modern slavery and adapting to evolving circumstances in the tobacco supply chain and the non-tobacco supply chain.

All such forward-looking statements involve estimates and assumptions that are subject to risks, uncertainties and other factors. It is believed that the expectations reflected in this statement are reasonable but they may be affected by a wide range of variables that could cause actual results to differ materially from those currently anticipated. Among the key factors that could cause actual results to differ materially from those projected in the forward-looking statements are uncertainties related to the following: the impact of increased competition from illicit trade and illegal products; changes or

differences in domestic or international economic or political conditions; the impact of adverse domestic or international legislation and regulation of tobacco, New Categories and other regulation; the impact of supply chain disruptions; adverse litigation and external investigations and dispute outcomes and the effect of such outcomes on the Group's financial condition; the impact of significant increases or structural changes in tobacco, nicotine and New Categories related taxes; the inability to develop, commercialise and deliver the Group's New Categories strategy; adverse decisions by domestic or international regulatory bodies, including disputed taxes, interest and penalties; the impact of serious injury, illness or death in the workplace and those who work with business; the ability to maintain credit ratings and to fund the business under the current capital structure; translational and transactional foreign exchange rate exposure; direct and indirect adverse impacts associated with climate change (both physical and transition); the ability to deliver a viable circular business model in response to global demand, combined with increasing regulatory, stakeholder and consumer pressure; and the Group's ability to defend against Cyber & Digital actions that result in loss of confidentiality, availability or integrity of systems and data.

The forward-looking statements reflect knowledge and information available at the date of preparation of these materials, and the Group undertakes no obligation to update or revise these forward-looking statements, whether as a result of new information, future events or otherwise. Readers are cautioned not to place undue reliance on such forward-looking statements. Additional information concerning these and other factors can be found in BAT's filings with the US Securities and Exchange Commission (SEC), including the Annual Report on Form 20-F filed on February 13, 2026 and Current Reports on Form 6-K, which may be obtained free of charge at the SEC's website, <http://www.sec.gov> or BAT's website, www.bat.com.

‡Definitions relevant to this report

The following definitions provide more information on the terms used throughout this report.

Direct Employees are permanent employees employed directly by BAT Group companies. It does not include employees on a leave of absence, employees on unpaid sick leave, interns, students, apprentices, or fixed-term contractors employed by third-party service providers. iNovine (our Retail businesses in Croatia and Bosnia and Herzegovina) are not in the scope of the analysis.

Product Materials Suppliers: Our directly-contracted suppliers who provide materials for the manufacturing of our products.

Prompt Action: A prompt action refers to an issue that has been identified by a Field Technician which is deemed to require an immediate response due to its nature.

Higher-Risk Indirect Suppliers: Our directly-contracted suppliers who supply machinery and point of sale materials.

Lower-tier Suppliers: Suppliers, with whom we have a commercial relationship, who supply materials or products to our Tier 1 Suppliers.

Tier 1 Suppliers: Directly contracted suppliers of final products or product materials.

Thrive Supply Chain: All directly contracted farmers and certain of our third-party suppliers, who together represented over 94% of the tobacco we purchased by volume in 2025. Our Thrive programme collects data and indicators on an annual basis across a number of issues, including human rights, from our Thrive Supply Chain.

Explore the story of our year.

Go online and find downloadable versions of this report, along with our performance summary and other content – all accessible on desktop, tablet and mobile:

 bat.com

 youtube.com/welcometobat

 [@BATplc](https://twitter.com/BATplc)