

## Code of Conduct Principles

Altria and its companies provide all employees compliance guidance through our Code of Conduct, clear company policies and compliance training matched to their job responsibilities.



### Employment & Workplace Guidance

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#### Fair Employment Principle

Our companies strive to attract and retain diverse, talented and dedicated employees. We are committed to equal employment opportunity and affirmative action. We treat applicants and employees fairly and prohibit unlawful discrimination.

#### Health, Safety and Security Principle

Our companies strive for a culture where employees work toward the goal of an injury-free career. We are committed to preventing workplace injuries and illnesses as well as complying with applicable laws and company policies regarding employee health and safety.

#### Workplace Conduct Principle

Our companies are committed to employee conduct consistent with our [Mission & Values](#). Employees must obey applicable laws and company policies.

### Financial Guidance

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#### Fiscal Compliance, Asset Management and Cash Management Principles

Our companies are committed to fiscal responsibility. Employees must:

- Conduct business consistent with fiscal controls, company policies and applicable laws.
- Protect and safeguard company assets. The acquisition, use, disposal, removal and lease of assets must be authorized and properly classified and tracked.
- Protect company cash assets and effectively manage and control cash receipts and payments.

#### Procurement and Supplier Management Principle

Employees must describe a valid business purpose, competitively value the work, and obtain appropriate approval before committing to a purchase. Employees must then manage the supplier to confirm it is fulfilling the contract and delivering the agreed products or services before approving payment.

### Guidance on Business Operations

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#### Antitrust and Fair Competition Principle

Our companies must comply with the laws that promote competition and protect trade secrets. We must avoid business activities or conduct that would unlawfully restrict competition. We must not misuse others' trade secrets or proprietary information.

#### Communications Principle

Our companies are committed to communicating clear, accurate, timely, appropriate and substantiated information about our businesses. Only Designated Spokespersons are authorized to communicate publicly on behalf of the company.



## Code of Conduct Principles

### **Environmental Compliance Principle**

Our companies are committed to complying with applicable environmental laws and regulations and to reducing the environmental impact of our activities.

### **Importing and Exporting Principle**

Employees who exchange goods, services, technologies or information with entities located in foreign countries or with foreign nationals must understand and comply with the laws and company policies that govern those activities.

### **Political Activity Principle and Interacting with Governments**

Our companies pursue a responsible approach to working with government officials regarding issues that may affect us. Only authorized persons may interact with government officials on behalf of our companies. They must comply with all applicable laws, regulations and policies.

### **Product Communication Principle**

Our companies will responsibly provide information that helps the intended audience in making informed decisions regarding the purchase and use of their products, in compliance with all applicable laws.

### **Product Regulatory and Quality Principle**

Our companies are committed to providing superior branded products that meet applicable legal and regulatory requirements and consumer expectations. We are committed to meeting all applicable legal, regulatory and product quality requirements. We must all notify appropriate responsible employee(s) about any potential legal, regulatory or quality issues.

### **Research Principle**

Our companies conduct a variety of research. All research must be conducted in a manner consistent with Altria's Mission and the role of the company to which it pertains. Research must be approved in advance and conducted in accordance with company policies and applicable laws.

## Guidance on Information & Records

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### **Intellectual Property Principle**

Our companies' products, services, and technologies contain and use valuable intellectual property. Intellectual property helps distinguish our products and services and helps us maintain a competitive advantage. Employees must protect and properly use the intellectual property and confidential information of our companies. Employees must also respect the intellectual property rights of others.

### **Management, Protection and Use of Company Records and Information Principle**

Employees must manage, protect, segregate when appropriate, and preserve records and information in accordance with applicable laws and company policies.

### **Privacy Principle**

Our companies strive to protect personally identifiable information we maintain from unauthorized access, destruction, use, modification and disclosure. Personally identifiable information about employees, suppliers, consumers and customers should be collected, used, maintained, transferred, shared, disclosed and disposed of in compliance with applicable law.