

Standards for Compliance & Integrity Programs

Altria Group's Compliance & Integrity Program starts with our Mission & Values as the foundation for how employees conduct themselves.

We established these standards to guide our operating companies and corporate functions in carrying out their compliance and integrity responsibilities, and we regularly evaluate performance against these standards.



1. Each operating company and corporate function must have a specific management structure for carrying out its compliance and integrity activities.
2. Each operating company and corporate function will define appropriate compliance and integrity accountabilities with appropriate business and individual objectives.
3. Each operating company and corporate function will develop an annual Compliance & Integrity Plan outlining the concrete steps it will take during the year to meet these standards. For the operating companies, annual Compliance & Integrity Plans will be reviewed for adherence to the standards by its CEO and by the Corporate Chief Compliance Officer (CCO). For the corporate functions, the plans will be similarly reviewed by its Senior Vice President and the Corporate CCO.
4. The annual Compliance & Integrity Plans will be based on a systematic risk assessment process that identifies potential legal, policy and reputational risks relevant to the business or function. The risk assessment process must incorporate internal and external inputs and link to the strategy, budget and planning cycle of the operating company or corporate function.
5. The senior management of each operating company and corporate function will regularly communicate the importance of compliance and integrity. Strong compliance and integrity messages will be a part of employee orientation and business training programs at every level.
6. Each operating company and corporate function will develop and implement compliance and integrity training and communications programs to educate employees on both their overall obligations and on specific risk areas related to their jobs. These training and communications programs will be reviewed periodically for coverage and effectiveness.
7. Each operating company and corporate function will develop appropriate user-friendly mechanisms for employees to receive guidance on compliance and integrity issues and to report any concerns or problems without fear of retaliation. The purpose and availability of these mechanisms will be communicated to employees, and the effectiveness of these communications will be reviewed periodically.
8. Investigations of, and sanctions for, violations of our policies will be based on consistent standards and procedures.
9. Compliance & Integrity Plans will include, as appropriate, monitoring, auditing, and evaluation tied to the priorities established in the plans and risk assessment processes, and will lead to specific action steps to promote continuous improvement.



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10. Each operating company and corporate function will document its due diligence in carrying out its compliance and integrity responsibilities under the standards.
11. The Corporate CCO will review the Compliance & Integrity Programs developed under the standards regularly with the Risk Oversight Committee and the [Audit Committee of the Board of Directors](#).