Altria Standards for Compliance & Integrity Program

Altria Group Inc. ("Altria") has established the following standards ("Altria Standards") to guide its operating and service companies in carrying out their compliance and integrity responsibilities. We regularly evaluate performance against these standards.

The Compliance and Integrity department and Compliance Officers will document our due diligence in carrying out our responsibilities under the Altria Standards, which are grouped according to the following three core objectives: i) anticipate and mitigate compliance risk, ii) detect and respond to allegations of non-compliance, and iii) promote a culture of compliance and integrity.

- Anticipate and Mitigate Compliance Risk:

    1. The Compliance & Integrity Program ("C&I Program") starts with the Altria Code of Conduct ("Code") as a framework for operating with integrity, providing guidance for how we work and how we behave. The Code and company policies build upon that foundation to establish standards of conduct and promote a culture that encourages ethical conduct and compliance with laws. Across Altria, we will maintain clear standards of conduct, internal controls, policies and procedures that are reasonably capable of reducing the likelihood of non-compliance and apply throughout the organization.

    2. Across Altria companies, ultimate oversight of the C&I Program will reside with the Audit Committee of Altria's Board of Directors ("Audit Committee"), and responsibility for execution of the C&I Program will reside at various other levels in the organization, including:

        i.   the Risk Oversight Committee

        ii. the Policy Governance Sub-Committee

        iii. the Altria Chief Compliance Officer ("CCO"), who has a direct line of communication to the Audit Committee

        iv. high-level personnel who will serve as operating and service company compliance officers

        v.   the Compliance & Integrity Department ("C&I Department")

        vi. specific individuals with day-to-day operational responsibilities and accountabilities and, as appropriate, additional resources at the operating or service company level

Altria Standards for Compliance & Integrity Program

3. Across Altria's companies, we will engage in periodic, systematic risk assessments to identify potential compliance risks relevant to the business and establish and implement plans to reduce those risks.

4. The C&I Department will periodically evaluate the effectiveness of the overall C&I Program and make modifications as necessary.

- Detect and Respond to Allegations of Non-Compliance

5. The C&I Department will maintain and publicize user-friendly mechanisms for employees to receive guidance on compliance and integrity issues and to report any concerns or problems anonymously, if they choose, without fear of retaliation.

6. Across Altria companies, investigations of, and sanctions for, violations of the Altria Code, policies, and the law will be based on consistent standards and procedures. We will monitor, audit and take reasonable steps to detect, respond to and prevent such violations.

- Promote a Culture of Compliance & Integrity

7. Across Altria companies, we will regularly communicate the importance of compliance and integrity to all levels of the organizations. We will implement effective training programs to educate employees on both their overall obligations and on specific compliance risk areas related to their jobs.

8. Across Altria's companies, employees will be expected to uphold compliance and ethics values and be evaluated based on how they model behaviors in line with company values. Persons who do not uphold such values will be subject to appropriate discipline, including dismissal.