

### About This Report

As a leader in the tobacco industry, we're committed to *Moving Beyond Smoking*™ and are focused on our **Vision** to responsibly lead the transition of adult smokers to a smokefree future.

To achieve our Vision, we engage with a variety of stakeholders including local, state, and federal elected officials, federal and state regulators, and other government officials, as well as trade associations and public policy organizations. This report examines our public policy activities - including lobbying at the federal, state, and local levels, grassroots activities, and support of public policy organizations, candidates, and political committees — as well as the extensive compliance program we have that governs these activities.

This annual, in-depth report is designed to provide shareholders and the public with a transparent review of Altria's Government Affairs engagement, our official policy positions, and the ethical framework for how we participated in public policy and political arenas in 2024.

We encourage you to examine our Transparency & Integrity **Report** to understand how our fulsome and informative disclosures provide the information necessary to determine whether our activities align with the long-term interests of our\_ shareholders and other stakeholders.













### Table of Contents

	A Note from Our Senior Vice President	Oversight	Board & Management Oversight	<u>25</u>
What's in This Report	What's in This Report	Transparency	Disclosures & Transparency	32
Policy Positions	Public Policy Positions	Engagement	Engaging with Others & Trade Association Affiliations	<b>3</b> 5
Compliance Program	Compliance Program	Leadership	Leadership	. <b>4</b> 4



### A Note from Our Senior Vice President

For many years, Altria has actively demonstrated its commitment to transparency, compliance, and oversight in relation to our public policy and political activities.

When we began providing information about these activities on our corporate website in 2007, we were one of the few companies in the Fortune 500 to do so. Today, we believe that our wide-ranging and in-depth disclosures continue to surpass those of almost every other company. These disclosures, coupled with our robust Political Law & Ethics Compliance Program, have made Altria a longtime, recognized leader in political and lobbying disclosure and compliance.

Given the breadth of our public policy activities, we know that shareholders expect us to be at the forefront of lobbying and political activities transparency. We are proud of our long-standing leadership in and public commitment to this important area of corporate responsibility, as demonstrated by the comprehensive disclosures we have provided for over 18 years.

I encourage you to use the extensive, easily-accessible disclosures in this report to better understand the rationale behind our public policy and political engagements and the comprehensive oversight program we have for those activities.

Sincerely,

**Todd Walker** 

Senior Vice President, Government Affairs and Public Policy Altria Client Services LLC

Our disclosures provide insight into the work we are doing to educate policymakers and interested stakeholders about the importance of tobacco harm reduction and the need for effective, comprehensive, and science-based federal regulation of tobacco products.

### What's in This Report

Engaging in the political and public policy process represents a fundamental aspect of good corporate citizenship, is imperative for our businesses, and promotes the interests of our shareholders, employees, trade partners, adult tobacco consumers, and other stakeholders.

### Public Policy Positions

Making progress toward our Vision requires engaging constructively and responsibly with policymakers at all levels of government. Our aim is to educate them about the vital role legislation and regulation play in advancing harm reduction for adult tobacco consumers and the unintended consequences that arise from prohibitionist policies. In this section, we share our rationale for participating in the public policy process, provide information on our positions on key issues and lobbying priorities, and disclose how we engaged on these issues with government officials in 2024.

→ Jump to that section.

Being fully **engaged** in the public policy process is critical to our **success** and the **achievement** of our Vision.

### Compliance Program

Our robust Political Law & Ethics Compliance Program is designed to comprehensively address our political and public policy activities.

→ Jump to that section.

### Board & Management Oversight

We know that the use of company resources for political and public policy activities necessitates strong governance and oversight by both corporate directors and senior executives. In this section, we discuss the active oversight provided by Altria's Board of Directors and senior management.

→ Jump to that section.



### Disclosures & Transparency





#### Federal & State Lobbying

We disclose our federal lobbying activities and expenses through quarterly reports filed with the U.S. Senate and U.S. House of Representatives. At the state level. Altria Client Services LLC (ALCS), on behalf of Altria's companies, files more than 500 reports each year disclosing our state-level lobbying activities and expenses. We provide direct links to our quarterly federal Lobbying Disclosure Act (LDA) reports as well as links to the databases that contain our state lobbying reports. In addition, we provide the aggregate total of our state and federal lobbying expenses disclosed in these reports.

→ Jump to that section.

#### Federal & State Political Contributions

Since 2007, we have disclosed information regarding political contributions made by each of our companies and our political action committee (PAC).

Jump to that section.



### What's in This Report

# Engaging with Others & Trade Association Affiliations



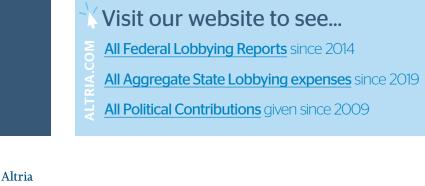
We engage with an array of stakeholders — including retailers, wholesalers, adult tobacco consumers, employees, and public policy organizations — to advocate on public policy issues relevant to our companies. This section details how we work with trade associations and other policy-oriented organizations, as well as how we inform stakeholders about our public policy positions.

→ Jump to that section.

### Leadership

We are a recognized leader in political activities and lobbying transparency. Learn more about the external accolades we have received because of our Political Law & Ethics Compliance Program and our related disclosures.

→ Jump to that section.







### Disclosures at a Glance

We believe our wide-ranging and voluntary disclosures enable shareholders and other stakeholders to understand our work in the public policy and political arenas and to make important judgments about how our activities align with our Vision and Responsibility Focus Areas.

### Lobbying Disclosures

#### **Key Policy Issues**

Learn about our most important policy priorities and our rationale for engaging on these issues.

#### Legislative Engagements

Learn about how we lobbied on our key policy issues in 2024.

#### **Lobbying Policies & Procedures**

Learn about the policies and procedures that govern our lobbying activities.

Access the more than 500 state lobbying reports we file each year as well as our quarterly federal Lobbying Disclosure Act reports.

Find the aggregate annual total of our reported federal lobbying expenditures.

#### State Lobbying Spending

Find the aggregate annual total of our reported lobbying expenses on a state-by-state basis.

#### **Vetting Process for Policy-Oriented Organizations**

Learn about the annual review process for contributions to trade associations and other public policy organizations.

Discover whether our partner policy-oriented organizations are aligned on our key public policy issues and learn about how we resolve any potential misalignments.

Find the comprehensive listing of our significant memberships in trade associations and other public policy organizations as well as a full listing of professional organizations with memberships that are predominantly government officials.

#### Contributions to 501(c)(3) Public Policy **Organizations**

Learn about the 501(c)(3) organizations that we fund, including organizations that engage in the public policy process.

#### Engagement with Stakeholders

Learn about how we engage with stakeholders and our participation in formal and informal coalitions.

#### **Grassroots Communication Channels**

Find information about the three websites and related social media channels we use to facilitate stakeholders' communications with elected officials

Learn about our grassroots (indirect) lobbying activities.

Find links to each of our grassroots social media advertisements placed on Instagram and Facebook.



### Disclosures at a Glance (continued)

### Political Contribution Disclosures

#### Political Contribution Policies & Procedures

Learn about the policies and procedures that govern our political activities and political contributions.

#### **Political Contributions Approval Process**

Learn about the multi-level approval process for all political contributions as well as the guiding principles we use when making such contributions.

#### **Political Contributions**

Find the listing of all of our corporate and PAC political contributions, which is updated twice a year.

Learn about 2024 dues payments that were used for political activities under Section 162(e)(1)(B) of the Internal Revenue Code.

### Oversight Disclosures

#### **Board of Directors Oversight**

Learn about our Board's oversight of our trade association memberships, political contributions, and direct and grassroots (indirect) lobbying activities.

#### Nominating, Corporate Governance & Social Responsibility Committee Charter

Read the charter for our Board's Nominating, Corporate Governance & Social Responsibility Committee, which includes its responsibility to review our policies and programs related to our political and lobbying (direct and indirect) activities and related contributions and expenditures.

Learn about the oversight provided by our senior management.

Learn about our well-established Political Law & Ethics Compliance Program, including our detailed policies, procedures, and other internal controls.

Altria has a nationally recognized, robust Political Law & Ethics Compliance Program with rigorous internal controls and decision-making processes that comprehensively address our lobbying and political activities.





# Public Policy Positions







### Public Policy Positions

Our public policy efforts are focused on advancing our Vision and Moving Beyond Smoking.<sup>TM</sup>

We advocate for harm reduction as the best policy framework to accelerate the U.S. toward a smoke-free future. In our view, regulation of this industry must be rooted in the settled science that smoke, not nicotine. causes almost all tobacco-related death and disease.1 Rather than limit adult consumer choice, policymakers should focus on providing adult tobacco consumers<sup>2</sup> the information, choice, and support they need to either quit or move to smoke-free products proven to be less harmful.3 We believe it is only in regulated markets not illicit markets - that regulators can hold all industry members accountable for driving down underage use.4

That was the vision Congress had when it empowered the Food and Drug Administration (FDA) to regulate tobacco and nicotine products in 2009, and it is a vision that remains within reach today.

But today this harm reduction future is at risk:

- Millions of adult consumers are moving to smokefree options, but the FDA has failed to keep up with that demand, authorizing only a tiny fraction of the products these adult consumers seek.
- Illicit manufacturers have exploited these conditions with a flood of illegal products lacking any FDA



oversight and with no verification that the products won't harm consumers or appeal to kids.

- The FDA has vet to shift course on authorization to provide more legal options for adult consumers, nor has it used its vast enforcement tools to hold major illicit market actors accountable.
- As the illicit market has grown, so too have risks to kids and adults – with illicit actors marketing products obviously meant to appeal to kids and lacking basic consumer protections for adults.
- In the meantime, advocates for prohibition-based policies continue to push supply-side restrictions proven to trigger large illicit markets, including the illicit vapor market the FDA has yet to bring under control.

■ The FDA has done little to address widespread misinformation among adult smokers and health care providers, majorities of whom believe, contrary to fact, that smoke-free products are just as harmful as cigarettes.

While this regulatory crisis is a major threat, it is also an enormous opportunity for policymakers to leap forward toward harm reduction. As we explain in greater detail over the next few pages, a smoke-free future can still be achieved if the FDA adopts harm reduction as the proper framework of regulation, which would mean-

- **authorizing** a legal marketplace of smoke-free products to meet adult consumer demand:
- **enforcing the law** on any illicit market actors defying FDA authority;
- driving down underage use through active oversight of regulated industry;
- **educating adult consumers** on the benefits of FDA-authorized smoke-free products over cigarettes; and
- **taking illicit markets seriously** when considering any policies that limit, rather than expand, adult consumer choice

With these policies, we believe order can be restored to the tobacco and nicotine markets, underage rates can decline even further, and adult smokers will have what they need to leave cigarettes for good.



<sup>&</sup>lt;sup>1</sup> FDA, "Nicotine: The Addictive Chemical in Tobacco Products."

<sup>&</sup>lt;sup>2</sup> As used in this Report, "adult consumers" refers to adult tobacco consumers 21 and older.

<sup>&</sup>lt;sup>3</sup> Wackowski, Olivia, et al. Perceptions about levels of harmful chemicals in e-cigarettes relative to cigarettes, and associations with relative e-cigarette harm perceptions, e-cigarette use and interest. Addiction. 23 May 2023; Delnevo, Cristine, et al. Communication Between US Physicians and Patients Regarding Electronic Cigarette Use. JAMA. 15 April 2022.

<sup>&</sup>lt;sup>4</sup> National Research Council and Institute of Medicine. (2015). Understanding the U.S. illicit tobacco market: Characteristics, policy context, and lessons from international experiences. National Academies Press.

### Key Policy Issues for Us in 2024

#### **Delivering on Harm Reduction for Adult Consumers**

Harm reduction cannot succeed without building a robust marketplace of regulated smoke-free options proven to be less harmful.

Read more.

#### Combatting Illicit Markets Through Effective Enforcement

A thriving underground market in tobacco products is a serious threat to effective regulation and public health.

Read more.

#### **Driving Solutions that Reduce Underage Use**

Harm reduction starts with preventing underage use of all tobacco products.

Read more.

#### **Educating on Why Prohibition is the Wrong Choice**

The best approach to tobacco regulation is harm reduction, not prohibition.

Read more.

#### **Advocating for Reasonable Tax Policy**

Tax policy continues to be an active area of interest for stakeholders, and our focus is on persuading policymakers to adopt reasonable approaches to taxation that take illicit markets into account.

Read more.





### Delivering on Harm Reduction for Adult Consumers

Congress understood that smoke-free products have the potential to end smoking-related death and disease when it granted the FDA regulatory authority over all tobacco and nicotine products in 2009.5 With a view toward helping adult consumers move to less harmful options. Congress explicitly empowered the FDA to establish a market of authorized smoke-free products provided manufacturers can demonstrate their products are less harmful for adults and unlikely to attract youth.6

Since 2009, however, the FDA has authorized far too few reduced harm options to meet the rapid migration of adult consumers to smoke-free products like vapor and nicotine pouches. Over 27 million American adults are using vapor products, nicotine pouches, and other smoke-free products, but 31.5 million Americans still smoke cigarettes.<sup>7</sup> The FDA has received millions of smoke-free product applications, but as of the end of 2024 the agency had authorized just three vapor product brands and only one nicotine pouch brand, rejecting or prolonging review on the rest.8 Despite overwhelming evidence that flavors play an important

role in moving smokers away from cigarettes to smokefree alternatives, the FDA has authorized only tobaccoand menthol-flavored vapor products.

The result has been an outbreak of illicit market activity on a scale that puts FDA regulation at risk of systemic failure. In 2024, more than 60% of adult vapers were sourcing from illicit markets, using products made by Chinese manufacturers bypassing every aspect of FDA regulation.

Altria has been a leader in the industry calling for the FDA to urgently address this crisis, which we believe cannot be resolved without fundamentally reforming the pathways for authorized smoke-free products to reach the market:

Establishing a Robust Market of Authorized Smoke-Free Products. We have engaged with many stakeholders inside and outside government to focus on the root cause of the illicit market: an FDA system that has resulted in far too few authorized products to meet adult consumer demand.9 We have advocated that to combat the

illicit market, the FDA must expand and guicken the pathways for smoke-free products to reach the market. Our support of adult consumer choice extends to state legislatures, including our opposition to categorical bans on flavored smokefree products, and our advocacy for exemptions on flavor restrictions for products that receive FDA authorization.

Using Regulation of Legal Products to Minimize Underage Use. We have also educated policymakers on how authorization maximizes the FDA's power to protect against underage use. To receive authorization, regulated manufacturers must not only demonstrate their products are unlikely to attract kids — they must also commit to extensive post-market surveillance and marketing plans that minimize the risks of underage use, up to and including removal of authorized products from the market.<sup>10</sup> The FDA exerts no such power over illicit market actors evading FDA regulation altogether.

For decades we have been committed to offering adult smokers better alternatives and ensuring a regulatory framework to determine if those products offer lower risk and how to appropriately communicate about them. That future is here, and at Altria we embrace it.



<sup>&</sup>lt;sup>5</sup> Institute of Medicine. (2001). Clearing the smoke: Assessing the science base for tobacco harm reduction. National Academies Press.

<sup>&</sup>lt;sup>6</sup> FDA, "Premarket Tobacco Product Applications;" U.S. Department of Health and Human Services, "How Tobacco Smoke Causes Disease: The Biology and Behavioral Basis for Smoking-Attributable Disease," Centers for Disease Control and Prevention (US), 2010.

Altria Client Services LLC Adult Tobacco Consumer Tracker (ALCS ATCT). \*Age 21 or older, 04 2024 prevalence estimates are calculated based on reported past 30-day usage of cigarette, e-vapor and oral tobacco products, and are based on January 2024 to December 2024 data. Oral tobacco products include moist smokeless tobacco, snus, chewing tobacco and oral nicotine products.

<sup>8</sup> FDA Searchable Tobacco Products Database, (accessed Mar. 10, 2025).

<sup>9</sup> https://www.altria.com/-/media/Project/Altria/Altria/about-altria/federal-regulation-of-tobacco/regulatory-filings/documents/ALCS-Comments-to-Submission-of-FDA-Import-Data-Oct-14-2024.pdf.

<sup>10 21</sup> U.S.C. § 387i(d).

### Delivering on Harm Reduction for Adult Consumers (continued)

Correcting Misinformation About Smoke-Free **Products**. We believe it is not enough for the FDA to authorize proven reduced-harm options for adult consumers — it must also actively combat misinformation about the comparative benefits of authorized smoke-free products. We have communicated extensively with the FDA about the major public health risks of remaining silent as millions of adult consumers and their health care providers continue to erroneously believe that authorized smoke-free products are as harmful as cigarettes.<sup>11</sup> In recent years, the FDA has acknowledged that misinformation is a "public health crisis" generally,12 and FDA leadership has acknowledged the presence of this phenomenon with smoke-free products.<sup>13</sup>



<sup>11</sup> https://www.altria.com/-/media/Project/Altria/Altria/about-altria/ federal-regulation-of-tobacco/regulatory-filings/documents/ ALCS-Comments-to-Docket-No-FDA-2014-D-0447-090924.pdf; https://www.altria.com/-/media/Project/Altria/Altria/about-altria/ federal-regulation-of-tobacco/regulatory-filings/documents/RUF-Misinformation-Letter-052423.pdf; https://www.altria.com/-/media/ Project/Altria/Altria/about-altria/federal-regulation-of-tobacco/ regulatory-filings/documents/ALCS-Letter-to-FDA-081822.pdf.



<sup>&</sup>lt;sup>12</sup> FDA. Remarks by FDA Commissioner Robert Califf to the National Food Policy Conference (10/12/22).

<sup>&</sup>lt;sup>13</sup> King BA, et. al., "Addressing Misperceptions About the Relative Risks of Tobacco Products Among Adults Who Smoke," Addiction, 2023, 118(9):1603-1605

### Combatting Illicit Markets Through Effective Enforcement

A thriving underground market in tobacco and nicotine products is a serious threat to both effective regulation and public health. Along with fundamental reform of the pathways for authorized products to reach the market, we are advocating for the FDA, other federal agencies, and the states to combat the illicit market through rigorous enforcement of existing laws.

Altria has led the industry for decades in advocating for strong enforcement tools to prevent the growth of illicit markets, including our active support for the federal Contraband Cigarette Trafficking Act and the Prevent All Cigarette Trafficking (PACT) Act, as well as for extensive licensing and other requirements that are now well-embedded at the state and local levels.

But, the regulatory system in the U.S. is being overwhelmed by foreign manufacturers flooding the U.S. with flagrantly illegal products lacking any FDA oversight. In response, in 2024 Altria:

- Undertook marketplace research confirming the scale and scope of the illicit vapor market and shared that research publicly.<sup>14</sup>
- Communicated extensively with the FDA and other federal agencies on the need for a

comprehensive enforcement plan focused on using the agency's most powerful enforcement tools against the marketplace actors most responsible for building the illicit market.<sup>15</sup>

- Engaged with Congress on the urgent need for effective enforcement of the Tobacco Control Act, including support for legislative solutions to improve enforcement.
- Supported the implementation of federal legislation enacted in 2022 that gave the FDA full authority over synthetic nicotine products, a phenomenon that emerged with the express intent to avoid FDA regulation.
- Advocated for closing other major loopholes in the regulatory system.
- Supported enactment of state legislation requiring all vapor manufacturers to verify compliance with the Tobacco Control Act enabling states to publish directories of products for legal sale.

Momentum towards effective enforcement accelerated significantly in 2024. Among other things, Congress held multiple hearings focused on the urgent need for enforcement; the FDA and the Department of

Justice announced the formation of a multi-agency task force focused on enforcement against illicit vapor manufacturers; U.S. Customs and Border Protection announced multiple major seizures of illicit products at the border; and multiple states either enacted enforcement-focused legislation or undertook major enforcement actions against illicit market actors.<sup>16</sup>





<sup>&</sup>lt;sup>14</sup> https://www.altria.com/-/media/Project/Altria/Altria/about-altria/government-affairs/public-policy-positions/CA-EDP-Report.pdf.

https://www.altria.com/-/media/Project/Altria/Altria/about-altria/federal-regulation-of-tobacco/regulatory-filings/documents/ALCS-Letter-to-CTP-040524.pdf.

<sup>&</sup>lt;sup>16</sup> See, e.g., Sabah Meddings, "The \$22 Billion Vape Industry is About to Get Even Messier,". Bloomberg, Feb. 3, 2025.

# Driving Solutions that Reduce Underage Use

Harm reduction starts with preventing underage use of all tobacco products.

Underage use of traditional tobacco products is at the lowest level in a generation.<sup>17</sup> While underage e-vapor use continued to decline in 2024, illicit vapor products have resulted in these rates persisting at significantly higher levels than other products.<sup>18</sup>

For decades, we have advocated for strong federal and state underage prevention legislation. This has included lobbying efforts to persuade states to expand their minimum age laws to include e-vapor and alternative nicotine products before the FDA asserted jurisdiction over these products.

In 2019, we led the industry in advocating that Congress raise the federal minimum age of purchase to 21 for all tobacco products. Because data show that most high school e-vapor users get these products from social sources,19 increasing the legal age of purchase to 21 has reduced social access points in high schools, and we believe it has helped reduce underage use of e-vapor products. See an example of our advocacy materials on this issue. Bipartisan legislation raising the minimum age of purchase for all tobacco products to 21 became law at the end of 2019 and applies to all tobacco products, including cigarettes, cigars, moist smokeless tobacco, as well as e-vapor and alternative nicotine products.

In 2024, we continued to advocate for states to bring state and federal minimum age policy into alignment by making the same change in their laws. As of December 31, 2024, 43 states plus Washington, D.C. and Puerto Rico have raised their minimum age of purchase for tobacco products to 21. We lobbied in favor of every minimum age bill enacted in the states in the past six years, 35 in all. We expect to continue to lobby on this issue in the states that have not yet made this important change in policy.

Today, however, the single biggest threat to reducing underage use further is the emergence of an illicit market in vapor and other alternative nicotine products that operate entirely outside FDA regulatory oversight. 2024 saw the emergence of illicit e-vapor products with features obviously meant to appeal to youth, including products with embedded video games.<sup>20</sup> We have rooted our extensive advocacy aimed at combatting the illicit market on data showing that legal, regulated markets are far superior to illicit markets at preventing underage use.





National Survey on Drug Use and Health, 2002-2022.

<sup>18</sup> FDA, "2024 Findings on Youth Tobacco Use."

<sup>&</sup>lt;sup>19</sup> Altria Client Services analysis of Population Assessment of Tobacco and Health (PATH) Study, Wave 3 data (2015-16).

<sup>&</sup>lt;sup>20</sup> Jennifer B. Unger et. al., "Vaping Devices with Video Games," Substance Use & Misuse, Vol. 59, 2024, Iss. 14.

# Educating on Why Prohibition is the Wrong Choice

We share the goal of reducing tobacco-related death and disease. But we believe prohibition is not the answer. In fact, a large majority of Americans believe the best approach to tobacco regulation is harm reduction – preventing underage use and providing adult smokers the information, support, and choice they need to quit or move to less harmful, smoke-free alternatives.<sup>21</sup>

#### We're making major progress without prohibition.

Underage smoking rates are the lowest in a generation.<sup>22</sup> Adult smoking rates are the lowest on record.<sup>23</sup> New smoke-free products with the potential to substantially reduce risk for adult smokers who switch are now available. All of this progress has been made through regulation of legal products made and sold by regulated entities operating within the legal system.

**Prohibition doesn't work.** Prohibition has a long history of failure. Banning the legal sale of products with large consumer demand leads to illegal, unregulated markets

replacing legal, regulated ones. That means consumers will buy and consume products lacking regulatory oversight.

**Prohibition is harmful.** Prohibition puts public health at risk because it often leads to an upswell in products made and sold outside the regulatory system.<sup>24</sup> It creates major law enforcement and criminal justice problems,<sup>25</sup> harms vulnerable communities, and leads to losses in government revenue that funds important programs.<sup>26</sup>

#### There is a much better path forward: Harm Reduction.

While nicotine is addictive, it's the exposure to smoke — not nicotine – that causes most tobacco-related disease.<sup>27</sup> We believe policymakers should continue to focus on underage prevention to drive underage usage rates further down. But, they should also help the 31.5 million Americans who smoke by providing them access to authorized less harmful, smoke-free alternatives and accurate information about these products.

In 2024, we continued to work with an array of stakeholders to advocate against prohibition-based proposals that threaten to exacerbate a burgeoning illicit market and undermine the legal, regulated system. Building from the **comments** we submitted in 2023 in opposition to the FDA's **Proposed Rules on Menthol** Cigarettes and Flavored Cigars, we worked to expand a broad coalition of voices to bring their perspectives to elected officials and other key stakeholders. This included representatives from the retail and wholesale communities, labor unions, criminal justice reform advocates, law enforcement, progressive and conservative policy groups, and tobacco growers.

In addition, we advocated in the states against proposals to ban the legal sale of all flavored tobacco products. Using research we conducted in multiple states to better understand the marketplace impact of state flavor bans, we successfully opposed state-based flavor bans in every state that considered them.



<sup>&</sup>lt;sup>21</sup> Altria Client Services Tobacco Harm Reduction (THR) Engagement Survey fielded nationwide from October 31, 2023 through November 20, 2023 among n=1,503 general population adults 21+ (MOE +/- 2.3%), n=406 adults 21+ who smoke cigarettes (MOE +/- 4.8%), n=300 other health care providers (MOE +/- 5.6%), and n=300 policy professionals (MOE +/- 5.6%). Results have been weighted by age, gender and tobacco product usage to match current U.S. population data.

<sup>&</sup>lt;sup>22</sup> National Survey on Drug Use and Health 2002-2020.

<sup>&</sup>lt;sup>22</sup> CDC, National Health Interview Survey; Series 10. Summary Health Statistics Reports (1997-2012), Tables of Summary Health Statistics (2013-2020), Biannual Early Release Estimates (2019-2024).

<sup>&</sup>lt;sup>24</sup> Jeffrey Miron & Jeffrey Zwiebel, Alcohol Consumption During Prohibition, 1991

<sup>&</sup>lt;sup>25</sup> Rand, Spending on illicit drugs in US nears \$150 billion annually, August 2019.

<sup>26</sup> Heritage Foundation, Heritage Explains: Overcriminalization; ACLU, Congress Takes Much Needed Step Forward on Over-Criminalization; NACDL, Overcriminalization.

<sup>&</sup>lt;sup>27</sup> FDA, "Nicotine Is Why Tobacco Products Are Addictive".

### Advocating for Reasonable Tax Policy

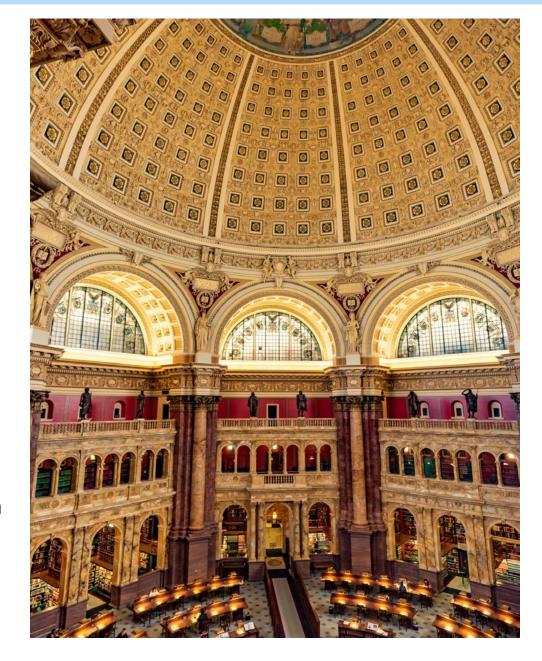
Tobacco products are subject to very high tax rates. On average, taxes, fees, and settlement payments add more than 100% to the price of cigarettes. These high tax rates have contributed to substantial illicit market activity, which imposes significant costs on Americans – lost tax revenue, more crime, and less regulatory control.<sup>28</sup>

Nevertheless, some continue to advocate for increasing excise taxes even further, while the illicit market in vapor and other alternative nicotine products continues to expand rapidly. In our view, the main priority for policymakers today should be to urgently enact solutions to the illicit markets that have emerged in recent years. For tax policy, that means refraining from tax increases likely to spur illegal conduct. We continue to advocate against tax increases on already highly taxed traditional tobacco products based on data showing that excise taxes:

- are unstable sources of revenue for states:
- worsen income and wealth inequality;
- lead to illicit markets; and
- hurt legitimate retailers.

We also believe that as the FDA makes more progress establishing a market in authorized smoke-free alternatives, policymakers should bring all stakeholders to the table to comprehensively modernize excise tax codes to reflect the continuum of risk. In our view, risk-based taxation reform should be holistic — and focus especially on the smoke-free product categories adult consumers have already moved to, including vapor, nicotine pouches, and moist smokeless tobacco products, which today comprise over 27 million adult consumers.

In 2024, 13 states proposed increasing cigarette excise taxes, five states proposed increasing cigar taxes, 14 states proposed increasing e-vapor taxes, 10 states proposed increasing nicotine pouch taxes, and three states proposed increasing taxes on moist smokeless tobacco. Of these legislative proposals, two states enacted a cigarette excise tax increase, one state enacted a cigar excise tax increase, one state enacted a moist smokeless tobacco excise tax increase, three states enacted a nicotine pouch excise tax increase, and three states enacted an e-vapor excise tax increase.





<sup>&</sup>lt;sup>28</sup> U.S. State Department, "The Global Illicit Trade in Tobacco: A Threat to National Security," 2015.

### Speaking Out on Other Issues We Care About

**Corporate Tax.** Prior to tax reforms enacted in 2017, the U.S. had the highest corporate tax rate in the developed world. To help American businesses grow, thrive, and compete, in 2024 we continued to advocate for maintaining a globally competitive corporate tax rate and the current tax rate for dividends. A lower corporate tax rate has enabled U.S. companies to better compete in today's globalized marketplace and has increased incentives to invest here at home, benefiting American workers, consumers, and small businesses.

We are a longtime member of the **Reforming America's** Taxes Equitably (RATE) coalition, a 501(c)(4) nonprofit, and other organizations that support the existing corporate tax rate. In 2024, we continued to engage with various federal legislators in opposition to proposals that would raise the corporate tax rate.

**Agricultural Issues.** In 2024, we advocated in support of the **Temporary Agricultural Program**, known as the H-2A foreign labor program, which is vital to agriculture

production across the country. Tobacco farmers utilize H-2A labor to provide an adequate workforce to produce crops, but regulations proposed by the Department of **Labor** would make the program even more cumbersome and costly for farmers. While we support reforms to the program to make it more effective and efficient for farmers, we shared our concerns with the proposed regulations with various members of Congress.







# Political Law & Ethics Compliance Program

While transparency is foundational to our effective compliance regime, the strong oversight mechanisms embedded into our Political Law & Ethics Compliance Program are equally important. Consequently, our extensive, nationally regarded compliance program is designed to mitigate legal, ethical, and reputational risks that could otherwise arise from our lobbying and political activities.

As a starting point, our Political Law & Ethics Compliance Program is grounded in our comprehensive Code of Conduct, which provides guidance for how we work and how we engage with others. The program also incorporates best-in-class policies, practices, and procedures that help us comply with the many federal, state, and local laws related to our public policy and political activities.

In addition, we have established internal controls and multilayered decision-making processes to comprehensively address potential risks. Consistent with best practices, we also systematically review our political activity compliance program to confirm its effectiveness. As a result, Altria is recognized as a leader for our commitment to political transparency and accountability.





# Policies & Procedures Guiding Our Involvement in the Public Policy Process

A myriad of federal, state, and local laws and regulations govern our public policy engagements, including laws that regulate direct lobbying, grassroots (indirect) advocacy, support of public policy organizations, and other interactions with government officials

We are committed to complying with all laws regulating our political and public policy engagements, and we have established specific controls and oversight mechanisms for these activities. Our policies and procedures apply to interactions with government officials, including both direct and grassroots (indirect) lobbying activities, as well as our support of third-party organizations, such as trade associations and other policy-oriented organizations.

Our detailed compliance policies and procedures help Altria to participate in the public policy process in ways that enhance shareholder value, are consistent with our Vision and our Responsibility Focus Areas, and do not create legal, reputational, or ethical risks for our companies.

Among many significant requirements, our policies prohibit all employees from:

directly lobbying government officials without approval from both the ALCS Law Department and the ALCS Government Affairs Department;

- facilitating grassroots (indirect) lobbying activities without approval from both the ALCS Law Department and the ALCS Government Affairs Department; and
- providing corporate contributions to nonprofit organizations that are engaged in direct or grassroots (indirect) lobbying or political activities, including trade associations and other public policy organizations, without receiving the proper review and approval by the ALCS Law Department.

We also provide guidelines for all **suppliers** through our **Supplier Code of Conduct**. Our Supplier Code of Conduct bars suppliers from providing any entertainment or gifts to government officials for or on behalf of an Altria company and also prohibits suppliers from making any direct or indirect political contributions or expenditures for or on behalf of an Altria company.





### Policies & Procedures Guiding Our Involvement in the Political Process

Altria and our PAC make political contributions to candidates, political party committees, leadership PACs, and other political committees, provided such contributions are legally permissible and consistent with company policy.

Since 1978, our PAC, now known as AltriaPAC, has allowed employees and shareholders to voluntarily pool their contributions to support candidates who understand the legislative and regulatory issues important to us. AltriaPAC is a non-partisan and issue-oriented PAC. It supports the campaigns of candidates for state and federal office, other PACs, and party campaign committees. In states where permitted by law, we may make political contributions using corporate treasury funds.

Federal, state, and local laws impose significant restrictions on the political activities of corporations and their PACs. We have comprehensive policies and procedures that serve to provide direction to employees who engage in the political process.

Under these policies, our employees are prohibited from:

- providing political contributions in anticipation of, in recognition of, or in return for an official act:
- seeking or receiving direct or indirect reimbursements for personal political contributions or expenses;
- pressuring or coercing fellow employees to make personal political contributions: and
- rewarding another employee or making employment decisions based in whole or in part on that employee's personal political contributions.



### Approval Process for Political Contributions



Before we make any political contribution, we determine that it is legally permissible and in the best interests of our companies and our shareholders. We conduct regular trainings, compliance system reviews, and internal audits so that all PAC and corporate political contributions are made in accordance with the law and our internal policies.

We use several guiding principles when selecting which candidates or committees receive PAC or corporate political contributions. Although no single issue or criterion determines whether a candidate. or committee receives a contribution, we consider whether they:

- share an interest in understanding our businesses and issues critical to our success:
- share a philosophy consistent with our Vision and Our Cultural Aspiration;
- demonstrate a commitment to governance, participating collaboratively in the democratic process, and constructive dialogue regardless of political philosophy;
- have constituent relationships with our facilities in their district or state:
- serve on a legislative committee with jurisdiction over issues of interest to us:

- are a member of congressional or state legislative leadership; and
- facilitate engagement opportunities and build relationships with a diverse range of candidates.

PAC or corporate political contributions are made without regard to the private political preferences of any employee. Each state or local corporate political contribution made by Altria requires written advance approval from:

- the relevant ALCS State Government Affairs Managing Director;
- the ALCS Vice President for State Government Affairs:
- the ALCS Senior Vice President for Government Affairs and Public Policy: and
- an ALCS Senior Assistant General Counsel.

Corporate political contributions over \$100,000 require the written approval of our General Counsel or their designee. PAC contributions are individually approved by the AltriaPAC Board of Directors, who are employees of the Altria family of companies.



# Political Law & Ethics Compliance Program

#### The Board of Directors for AltriaPAC

In 2024, the members of the Board of Directors for AltriaPAC held the following positions within the Altria family of companies.

Vice President, Total Rewards & Aviation

Altria Client Services

- Vice President, Procurement & Accelerated Business Solutions
   Altria Client Services
- Senior Director, Federal Government Affairs

Altria Client Services

- Senior Manager, Political Programs Altria Client Services
- Senior Assistant General Counsel & Managing Director of Political Law & Ethics Programs

Altria Client Services

- Senior Manager, Government
   Affairs Operations & Compliance
   Altria Client Services
- Senior Director, Section Sales
   Altria Group Distribution Company
- Senior Director, Federal Government Affairs

Altria Client Services

Vice President & Associate
 General Counsel
 Altria Client Services

 Vice President, Corporate Research, Development & Engineering

Altria Client Services

Managing Director, Communications

Altria Client Services

- Vice President, Sales Strategy Altria Group Distribution Company
- Vice President, Enterprise Technology & Chief Information Officer

Altria Client Services

- Vice President, Field
   Sales Eastern Region
   Altria Group Distribution Company
- Vice President, Field
   Sales Western Region
   Altria Group Distribution Company
- Senior Director, Account Sales Altria Group Distribution Company
- Senior Director, Account Sales Altria Group Distribution Company
- Vice President, Advanced Analytics

Altria Client Services

Vice President, Regulatory Engagement

Altria Client Services

- Vice President & Controller Altria Group
- President & Chief Executive Officer NJOY
- President & Chief Executive Officer Philip Morris USA
- Vice President & General Manager PM USA Marketing
   Philip Morris USA
- Vice President, Manufacturing
  U.S. Smokeless Tobacco Company









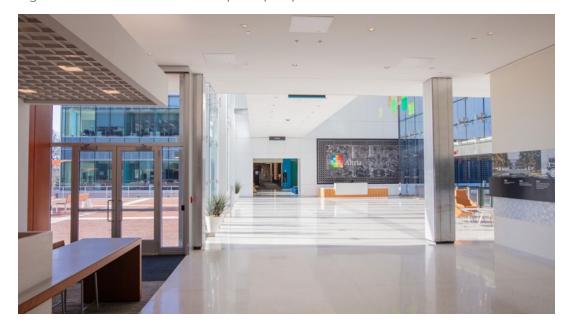
### Board & Management Oversight

Shareholders and the public should have confidence that a corporation's lobbying and political activities do not create unnecessary legal, ethical, or reputational risks. That is why Altria's Board of Directors and senior management oversee such activities, including direct and grassroots (indirect) lobbying, political contributions, and our engagement with third-party organizations.

#### **Board Oversight**

As is detailed in its charter, our Board's Nominating, Corporate Governance and Social Responsibility Committee (NCGSR Committee), which is comprised solely of independent directors, actively oversees our participation in the political and public policy process and our Political Law & Ethics Compliance Program.

At least three times each year, our Board or the NCGSR Committee receives regular updates from senior management regarding Altria's public policy focus areas as well as our legislative, political, and regulatory activities. These updates include discussions about our direct and grassroots (indirect) lobbying, political contributions, and our engagements with third-party organizations that are involved in the public policy arena.



### **Excerpt from NCGSR Committee Charter**

In the furtherance of this purpose, the Committee shall have the following authority and responsibilities:

#### **Corporate Responsibility and Public Policy**

- to review social, environmental, political, legislative and public policy issues and trends affecting the Company and key stakeholders' perspectives on these issues;
- to review the Company's corporate responsibility and public policy positions, programs, and goals;
- to review the state of the Company's relationships with key stakeholders, including the impact of business operations and business practices on the communities where the Company does business;
- to review the Company's policies and programs related to philanthropic, political and direct or indirect lobbying activities and related contributions and expenditures;
- to review the Company's environmental, social and governance (ESG)-aligned corporate responsibility focus areas, goals and progress, including review of related periodic reporting, targets and other metrics used to measure performance and progress; [and]
- to review significant communications of public affairs and corporate responsibility initiatives.



### Board & Management Oversight (continued)

#### **Management Oversight**

In addition to the oversight provided by the Altria Board of Directors, our senior executives also provide meaningful oversight of our government affairs activities.

The ALCS Senior Vice President of Government Affairs and Public Policy, who reports directly to Altria's CEO, leads the Government Affairs Department and oversees all of our legislative, political, and public policy activities. The role of our Government Affairs Department is to advance our **Vision** by engaging with federal, state, and local government officials and other relevant stakeholders. Our Government Affairs Department includes Federal Government Affairs. State and Local Government Affairs Enforcement and Brand Integrity, and Government Affairs and Public Policy, each of which is led by a vice president.

The ALCS Senior Vice President of Government Affairs and Public Policy and the Government Affairs vice presidents collaborate with our leadership team and other company leaders to develop our public policy priorities and then implement and manage our lobbying, political, and public policy activities in support of these priorities.

Additionally, these Government Affairs executives meet regularly with Altria's leadership team and other company leaders, as well as our Board of Directors, to discuss legislative, political, and public policy developments, ensuring that senior executives throughout Altria are aware of these activities, which provides additional oversight.

Working closely with our CEO, Law Department, and Compliance & Integrity Department, the ALCS Senior Vice President of Government Affairs and Public Policy also regularly assesses whether our Political Law &

Ethics Compliance Program appropriately addresses our political and public policy activities and evaluates the potential legal, reputational, or ethical risks associated with our activities.



Lobbying and Political Activity Transparency & Integrity Annual Report 2024 | 28



### Disclosures & Transparency

Our transparency efforts and the extensive disclosures contained in this Transparency & Integrity Report are guided by a single purpose: to demonstrate to our shareholders and other stakeholders that we engage ethically and responsibly in the public policy and political arenas. In thoughtfully implementing and periodically expanding our transparency and disclosure regime, we consistently focus on presenting data that is clear, incisive, and necessary for shareholders and other stakeholders to make such judgments.

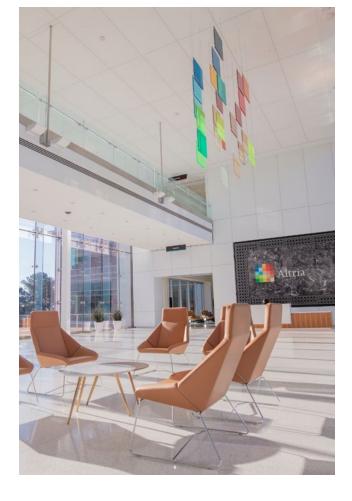
Altria voluntarily makes extensive disclosures regarding:

- federal, state, and local political contributions;
- federal and state lobbying expenditures;
- direct and grassroots (indirect) lobbying; and
- third-party contributions.

We believe our **Transparency & Integrity Report** demonstrates that we are focused on governance, transparency, compliance with applicable laws, and avoiding reputational and related risks.

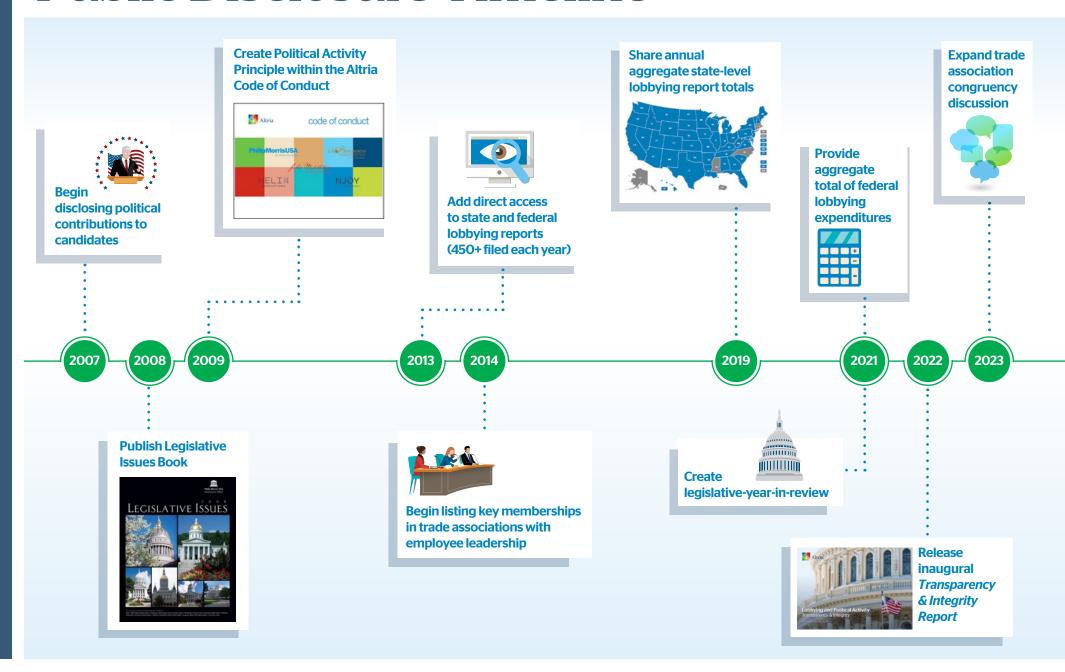
#### Regular Review of Disclosures

We have long been at the forefront of efforts to provide expanded transparency into corporate engagement in the public policy and political arenas. Since we first began providing this information in 2007, we routinely examine how we can enhance our voluntary disclosures. We also regularly engage with shareholders and other stakeholders to understand evolving expectations in this area. We will continue to identify opportunities to provide leadership on these issues and to enhance our existing disclosures.





### Public Disclosure Timeline





# Federal Lobbying Reports & Expenditures

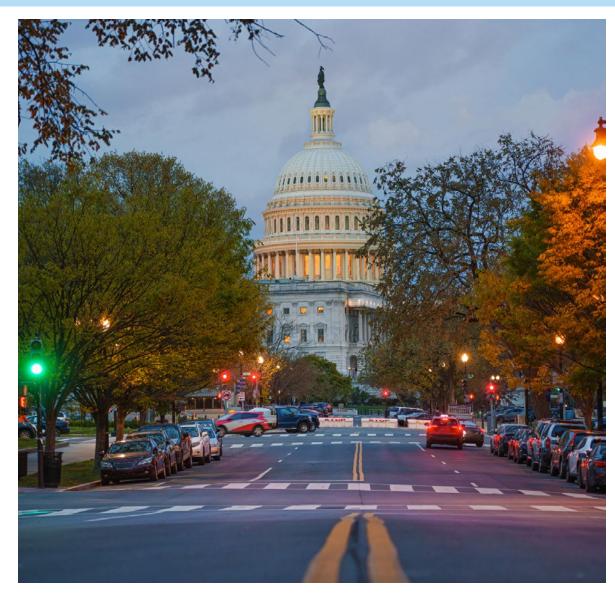
As required by the federal Lobbying Disclosure Act (LDA), since 1996, we have filed reports with the U.S. Senate and U.S. House of Representatives on a quarterly basis disclosing our federal lobbying activities and expenses. Copies of all quarterly LDA reports for the last 10 years — filed since January 2014 — can be found here.

In 2024, we reported aggregate federal lobbying expenses of \$13.23 million in our LDA filings. Our quarterly reports include both internal expenses related to our federal lobbying, trade association dues used for lobbying, as well as payments made to our consultant lobbyists. Our LDA reports also list each bill and policy issue we lobbied on during the reporting period.

While our payments to consultant lobbyists are included in the expenditures reported on our LDA reports, our consultant lobbyists also file independent LDA reports which disclose the payments they have received and a listing of each bill and policy issue they lobbied on for us.

To view our consultant lobbyists' reports for Altria, you can use the U.S. Senate database and enter "Altria" in the "Client" field or use the U.S. House of Representatives database and enter "Altria" in the "Client Name" field (under Advanced Search). As described above, all consultant payments are already reflected in the expenditure totals contained in Altria's LDA filings.

More information about the LDA and its requirements can be found on the websites of the U.S. Senate and U.S. House of Representatives.



### Federal & State Political Contributions

In the U.S., we may contribute to candidates or political committees using either funds raised by our voluntary, non-partisan employee PAC, AltriaPAC, or corporate treasury funds. Since 2007, we have disclosed information on our website regarding political contributions made by each of our companies and AltriaPAC.

Twice a year, we disclose all PAC and corporate political contributions made in the U.S to:

- candidates
- political parties
- PACs
- caucus committees
- independent expenditure committees (also known as Super PACs)
- tax-exempt entities organized under section 527 of the Internal Revenue Code (also known as 527 organizations) and

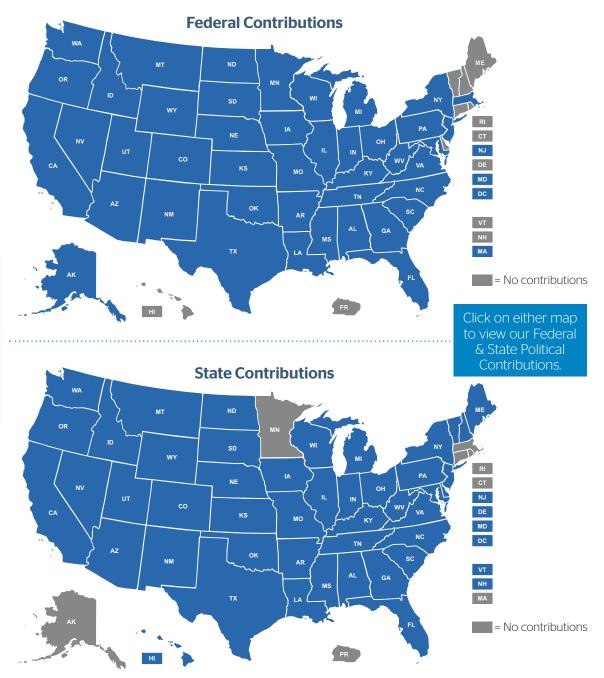
ballot measure committees.

**Find our Political Contributions for the** last 15 years here.

**Update Political** Contribution Disclosures 2x per year.

In the interest of transparency, our website discloses federal, state, and local political contributions the company has made for the last 15 years, since January 2009.

Note: The Ste. Michelle Wine Estates PAC ended its operations in September 2021, due to the sale of Ste. Michelle Wine Estates by one of Altria's subsidiaries. In the interest of completeness and transparency, contributions made by the Ste. Michelle Wine Estates PAC prior to the change in ownership of the wine company continue to be disclosed on Altria.com.



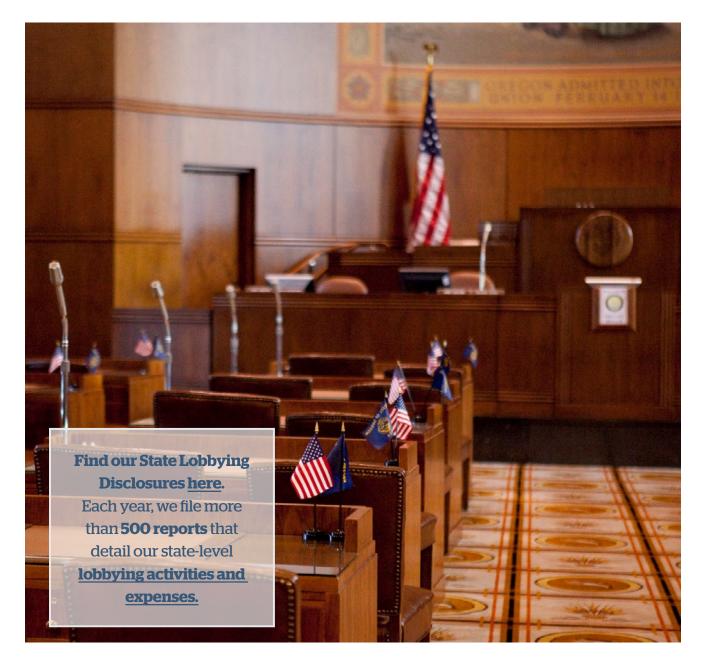


### State Lobbying Reports & Expenditures

Almost every state requires lobbyists and organizations that employ lobbyists to file regular reports regarding their activities. Typically, the reports require the disclosure of lobbying-related expenses, legislative issues that are being lobbied, and gifts that have been provided to legislators and other government officials. The majority of states also require the reporting of grassroots (indirect) lobbying activity and expenses.

Since 2013, we have disclosed information about our state lobbying activities by creating direct access to the government databases that contain each of the lobbying reports that we are required to file with state regulators. Many of these databases contain reports going back 10 years or more, allowing interested individuals to obtain information on our activities across a considerable time period.

In addition, as a supplement to these direct links, since 2019, we have provided the yearly total, on a state-bystate basis, of our reported state lobbying expenses as disclosed on these recurring lobbying reports. Our aggregate lobbying-related expenditures from 2019 through 2024 are disclosed in an easily accessible and user-friendly interactive map. Combined with the links to all of our state lobbying reports, this information gives shareholders significant insight into our direct and grassroots (indirect) lobbying activities.



### Contributions to Third Parties

Like other major corporations, we are members of various 501(c) organizations that may independently engage in political activities.

Each year, for all contributions to 501(c)(4) social welfare organizations and for contributions to 501(c)(6) trade associations that exceed \$50,000, we request each organization report to us the portion of our dues or similar payment that was used for political activities, making it non-deductible under Section 162(e)(1)(B) of the Internal Revenue Code. While we prefer to make political expenditures directly rather than through third-party groups, we annually disclose this information as it may be reported to us.

Based on the responses we received from such 501(c) organizations, no portion of our 2024 contributions was used for political activities.

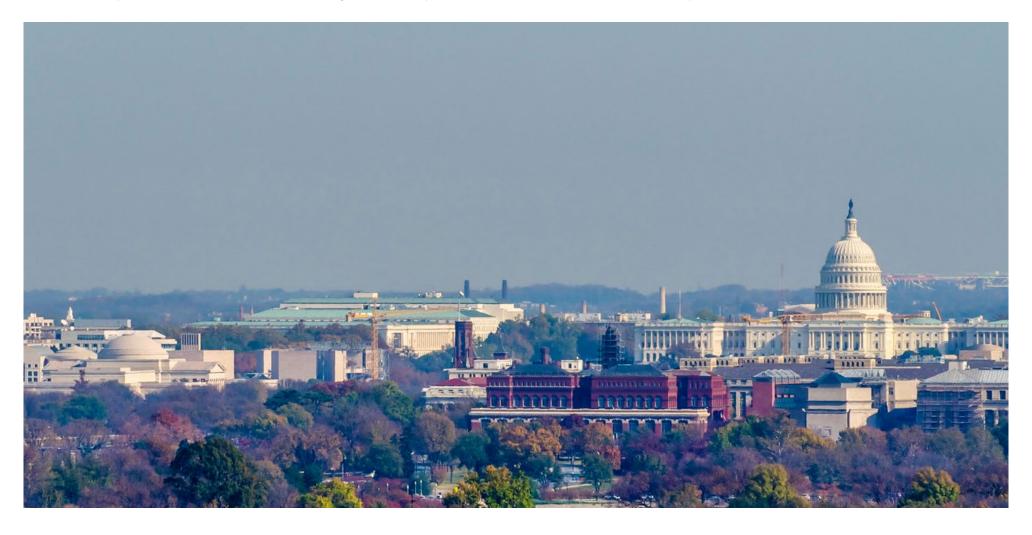




TABLE OF CONTENTS





# Engaging with Others & Trade Association Affiliations

We advocate on public policy issues relevant to our companies by engaging responsibly with many other stakeholders, including 501(c)(4) social welfare organizations, 501(c)(6) trade associations, and organizations of elected officials.

These organizations may engage in activities such as educational initiatives, professional development and training, public policy research and outreach, and direct or grassroots (indirect) lobbying.

We provide information on these engagements to help our shareholders and other stakeholders understand why we engage with these organizations, how we evaluate our relationship with such organizations, and how we resolve any potential misalignment.

Like most major corporations, we are members of **carefully vetted** policy-oriented organizations **focused on issues** that affect our businesses.

We develop and maintain partnerships with third-party organizations that share our views on issues important to our companies and that effectively and responsibly research, communicate, and advocate on those issues.

Before we partner with any organization, including trade associations and other membership organizations,

we carefully consider whether our support of the organization is in the best interest of our companies and whether our partnership would raise any legal, reputational, or ethical concerns.





### Engaging with Others & Trade Association Affiliations (continued)

We support third-party organizations in a variety of ways, including providing financial contributions, and, for key organizations, authorizing our employees to hold volunteer leadership roles, such as serving on a board of directors, committee, or advisory council.

Listed below are the 35 diverse national and state trade associations and policy-oriented membership organizations where our senior executives and Government Affairs employees served in leadership roles in 2024. Given our close partnership with these entities, we consider them to be the principal trade associations and other policy-oriented organizations with which we engage.

We appreciate the volunteer service of our employees and value our partnership with these leading organizations, which often service as a forum for sharing views and exchanging ideas on policy issues important to us.

- Congressional Black Caucus Foundation
- Congressional Black Caucus Institute
- Congressional Hispanic Caucus Institute
- Congressional Hispanic Leadership Institute
- Convenience Distribution Association
- Institute for Legal Reform, U.S. **Chamber of Commerce**
- Korean American Grocers Association
- National Association of Business **Political Action Committees**
- National Association of Convenience Stores
- National Association of Manufacturers
- National Association of Tobacco Outlets
- National Black Caucus of State Legislators

- National Hispanic Caucus of State Legislators
- Private Enterprise Advisory Council, American Legislative Exchange Council
- Public Affairs Council
- Q Street
- American Red Cross of Virginia
- Arizona Chamber of Commerce & Industry
- Arizona Petroleum Marketers Association
- California Business Roundtable
- California Manufacturers & Technology Association
- California Taxpayers Association
- Chamber RVA
- Energy & Convenience Association of Nevada

- Idaho Association of Commerce & Industry
- James River Association
- Maine Energy Marketers Association
- New England Convenience Stores and **Energy Marketers Association**
- New Jersey Clean Communities
- Pennsylvania Food Merchants Association
- Southern Wholesalers Association
- Texas Association of Business
- Texas Association of Mexican American **Chambers of Commerce**
- Texas Taxpayers and Research Association
- Virginia Chamber of Commerce



# Membership in Trade Associations & Other Policy-Oriented Organizations

To help advance our Vision and educate policymakers on FDA regulation of tobacco and the public policies necessary for harm reduction to succeed, we engage with various organizations of elected officials.

In 2024, we financially supported the following organizations whose membership primarily consists of elected officials, policymakers, and law enforcement personnel:

- American-Irish Legislators Society of New York
- California Latino Legislative **Caucus Foundation**
- California Legislative Irish Caucus
- California Statewide Law **Enforcement Association Consumer Protection & Public Safety Foundation**
- Conference of Western **Attorneys General**
- Congressional Black **Caucus Foundation**
- Congressional Black Caucus Institute

- Congressional Hispanic Caucus Institute
- Congressional Hispanic Leadership Institute
- Council of State Governments
- County Sheriffs of Colorado
- Democratic Attorneys **General Association**
- Democratic Governors Association
- Federal Law **Enforcement Officers** Association Foundation
- Institute for State Policy Leaders
- Latino Caucus of California Counties

- Law Enforcement **Action Partnership**
- Mexican American Legislative Caucus
- Minnesota State Sheriffs' Association
- New York State Sheriffs' Association
- Nevada Sheriffs' & Chiefs' Association
- National Association of Latino **Elected & Appointed Officials**
- National Association of **State Budget Officers**
- National Black Caucus of State Legislators
- National Hispanic Caucus of State Legislators

- National Lieutenant **Governors Association**
- National Organization of Black Law Enforcement Executives
- National Sheriffs' Association
- New York State Conference of Italian-American **State Legislators**
- Oregon State Sheriffs' Association
- Police Officers Association of Michigan
- Republican Attorneys **General Association**
- Republican Governors Association

- Republican Main **Street Partnership**
- **Sheriff Association** of New Jersey
- Sheriffs' Association of Texas
- South Dakota Sheriffs' Association
- State Legislative **Leaders Foundation**
- The Council of State Governments
- Western Caucus Foundation



## Oversight of Trade Associations & Other Policy-Oriented Organizations

Each year we carefully consider our membership in each national and state trade association and policyoriented organization that we support.

Before we provide funding to such organizations, the contribution is reviewed and approved by the ALCS Law Department, as well as by a vice president in the Government Affairs Department. In our annual evaluation of our support of third-party organizations,

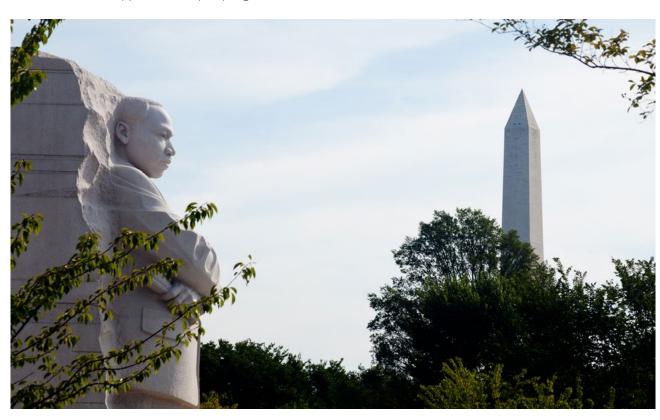
we examine whether each organization is effectively addressing the issues of concern to our businesses, and on balance, serving the long-term interests of our companies and shareholders.

This means assessing whether:

• the organization is effectively advancing positions important to our businesses:

- their involvement on other issues is not inconsistent with our interests;
- they hold themselves to high standards of conduct; and
- our participation in an organization can positively influence how it operates.

Additionally, our NCGSR Committee, which is comprised solely of independent directors, receives updates on our engagement with 501(c)(6) trade associations and 501(c)(4) social welfare organizations active on public policy issues. These updates help provide additional oversight of our work with such organizations.





### Assessing Potential Misalignment



In order to responsibly participate with 501(c)(4) social welfare organizations and 501(c)(6) trade associations, we regularly assess the alignment of their activities and advocacy strategies with our Cultural Aspirations and public policy priorities.

Because of the complexity of most legislative and regulatory issues, we realize we may disagree on one or more issues, while agreeing on others. In such cases, we attempt to find common ground where possible. While we may not necessarily agree with every position taken by an organization we support financially, we determine whether the intended use of a contribution is consistent with our **Vision** and **Our Cultural Aspiration** before contributing to any such group. We also carefully review each organization to determine whether our partnership could raise any legal, ethical, or reputational concerns.

We monitor where and to what extent the organizations we support may be misaligned with our positions on public policy issues. As with any large membership group, differing perspectives are inevitable and disagreements and misalignments are unavoidable, especially considering that these policy-oriented organizations represent hundreds or even thousands of diverse members. Where there may be disagreement, we consider all factors to determine whether our continued membership is impracticable and whether we should continue our partnership with the organization.

If an organization we support adopts a public policy position that we do not agree with, we may voice our objection to it and choose to not participate in advocacy related to that subject. We may also choose to utilize our influence and work to bring change to the organization.

In other cases, we may actively lobby against the position of an organization of which we are a member or determine that our continued membership in the organization is impracticable, in which case we would withdraw our membership and end our financial support of that organization.

In 2023, we began reporting on our examination of the positions taken by the principal trade associations and other public policy-oriented organizations we disclose to formally determine whether they are aligned with us on our most important legislative priorities. For many of these organizations, our support is not related to public policy matters; instead, we support many of these organizations to help advance their leadership and legislative training programs. Consequently, many of the listed organizations have not taken public positions on our key public policy issues.

#### Click on the boxes below to view our assessment based on each of our key public policy issues.

**Delivering on Harm Reduction** for Adult Consumers

**Combatting Illicit Markets** Through Effective **Enforcement** 

**Driving** Solutions that Reduce **Underage Use** 

**Educating on Why Prohibition** is the Wrong Choice

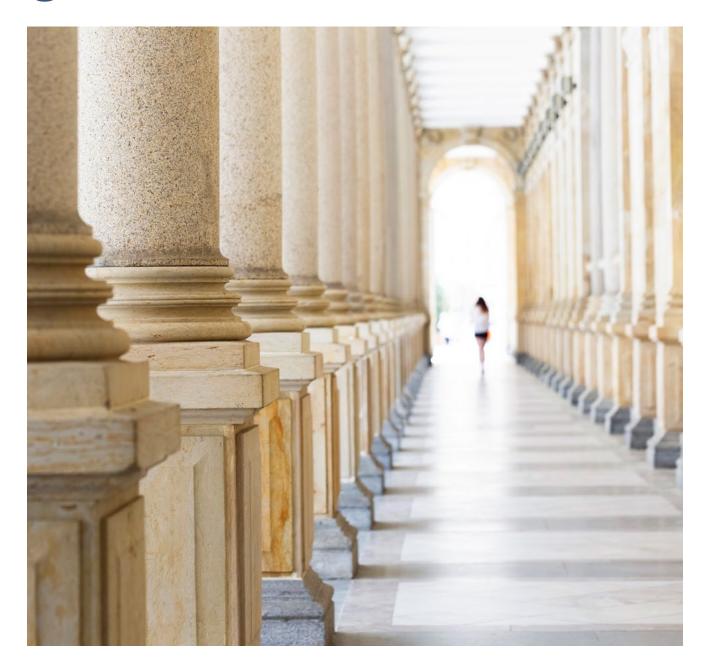
**Advocating for** Reasonable **Tax Policy** 

# Coalition Engagement

In addition to engagements with established trade associations and public policy organizations, Altria participates in formal and informal coalitions and committees to help communicate our views on public policy issues that affect our businesses.

When we participate in coalitions, we expect, at a minimum, that the coalition will disclose our support in the same way it would for any other company. However, in some situations, company policies may require additional disclosures that go beyond what the recipients ordinarily provide for other donors. We further disclose our coalition involvement as may be required by federal, state, or local lobbying laws and regulations.

> We support lobbying coalitions and policyoriented organizations that we believe can help us advance our **Vision** and make progress on our **Responsibility Focus Areas**.



# Grassroots Activities & Employee Engagement

Altria informs stakeholders — including retailers, wholesalers, tobacco growers, suppliers, adult consumers, and employees — of our public policy positions to protect and promote shared interests. We often provide our stakeholders with materials that describe our positions on issues, and when appropriate, may ask our stakeholders to share their views with government officials.

In 2024, we continued to support three websites and their related social media handles for grassroots-related activities. Consistent with our internal policies, each of these entities clearly identifies our companies' involvement.



#### **Tobacco Issues**

**Tobacco Issues** provides information on current legislative and regulatory issues for tobacco retailers. trade members, and tobacco growers.







### Citizens for **Tobacco Rights**

Citizens for Tobacco Rights provides our adult tobacco consumers with information on proposed legislation and regulations.

You may also connect with Citizens for Tobacco Rights on Facebook, X (formerly Twitter), and Instagram.





### Voices for **Consumer Choice**

**Voices for Consumer Choice** provides adults 21+ with information on legislative and

regulatory issues related to adult consumer choice.

You may also connect with Voices for Consumer Choice on Facebook, X (formerly Twitter), and Instagram.











## Grassroots Activities & Employee Engagement (continued)

### Detailed Disclosure of **Grassroots Advertisements**

Further information on our social media activities can be found using Meta Ad Library, which provides a complete, searchable collection of ads that have been placed on any Meta-related app (such as Facebook or Instagram). Using the Meta Ad Library, interested individuals can view a copy of each ad as well as relevant information about the ad.

The library of ads from Citizens for Tobacco Rights is available here and includes all ads placed since April 2018. The ads from Voices for Consumer Choice are available **here** and includes all ads placed since March 2021. You can see each of the grassroots (indirect) lobbying communications from these sites using these links. In 2024, Tobacco Issues did not place any ads on Facebook or Instagram.

### **Grassroots Engagements**

In 2024, members of Citizens for Tobacco Rights from across the U.S. sent over 16,000 communications. to federal, state, and local lawmakers. Since the inception of Citizens for Tobacco Rights in 2011, we have encouraged adult tobacco consumers to make their voices heard on issues such as tobacco excise tax increases and flavor bans. We educate our 560,000+ members and inform them of emerging legislative and regulatory issues where they live.



Voices for Consumer Choice empowers adults to protect their right to make their own choices about the legal products they buy. Voices for Consumer Choice members sent almost 3,000 communications to lawmakers at the federal, state, and local levels in 2024.

### Voter Engagement

Voting is foundational to our democracy, and we have long supported efforts to encourage employees and adult tobacco consumers to vote. Prior to elections, we often sponsor internal and external non-partisan voter education and awareness campaigns that stress the importance of voting and encourage our employees and others to make their voices heard on Election Day. These efforts are designed to help individuals register to vote and participate in the electoral process by providing information about voter registration, early voting, polling locations, and candidates for state and federal offices.

In 2024, we encouraged adult tobacco consumers and members of **Voices for Consumer Choice** to vote in the November elections. Additionally, we encouraged our employees residing in our facility states of Virginia and Kentucky to vote in the elections held in those states. We provided information and voter resources about key deadlines, registration, and methods for voting in their state

### Employee Engagement

We also encourage our employees to participate as individual citizens in civic affairs. For example, we encourage employees to actively engage in the political process and support the political candidates and parties of their choice. However, employees must do so on their own time and with their own resources. Under our policies, company funds or resources may not be used for personal political activities.







### Leadership

We continue to be nationally recognized for our lobbying and political activities transparency. We are immensely proud that the Center for Political Accountability-Zicklin Index of Corporate Political Disclosure and Accountability (CPA-Zicklin Index) has rated Altria in the top tier of companies for our voluntary disclosure of political activities for the last 12 years. Further, since 2016, we have earned one of the CPA-Zicklin Index's top five rankings.

In 2024, the CPA-Zicklin Index ranked Altria third among the top 1,000 companies in the FTSE Russell Index in terms of the voluntary disclosures of our political spending and designated the company as a "trendsetter" in this area. This marks the ninth consecutive year we have received this competitive designation. The FTSE Russell 1000 Index consists of the 1,000 largest companies in the U.S. equity market. We have also been recognized for our disclosures related to our public policy activities. In December 2023, a Sustainable Investments Institute report found that Altria was one of only seven companies in the S&P 500 that provided investors with information on statelevel lobbying expenditures and was one of two such companies that provided "consequential narratives on [its] corporate policy priorities."

Since the creation of the Center for Political Accountability-Zicklin Index in 2011, Altria has been rated in the top tier of companies for our voluntary **disclosure** of political activities.



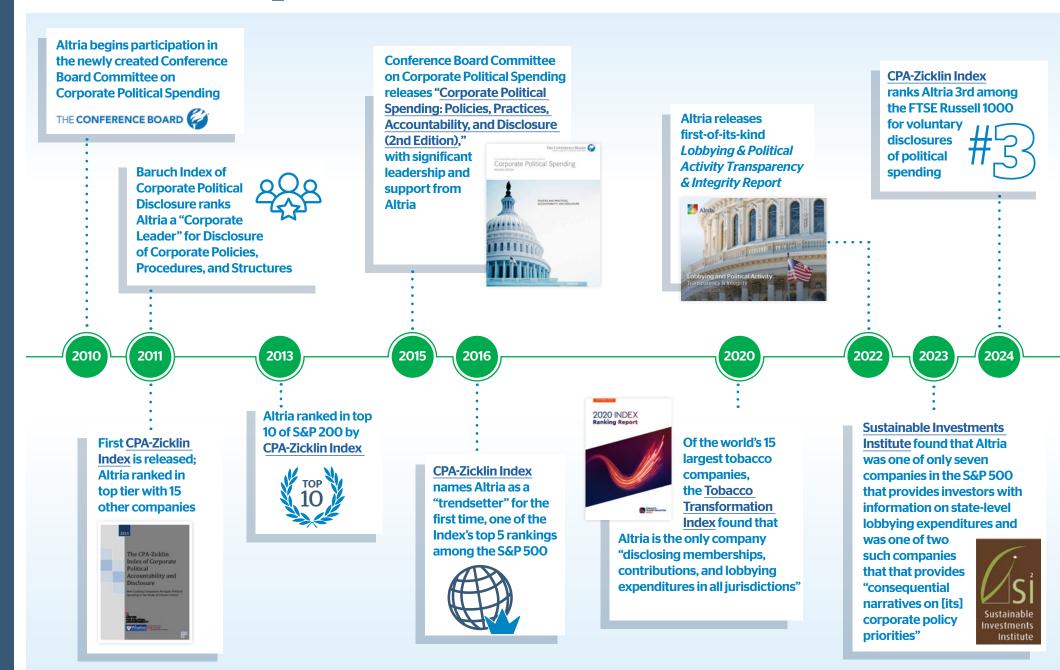
Additionally, the **Tobacco Transformation Index** has repeatedly found Altria to be a leader in lobbying and political activities transparency and has **previously noted** that "only Altria provides comprehensive details concerning lobbying and political engagement activities as they relate to tobacco harm reduction" – finding that our company "goes beyond its obligations by publishing details on its own website."

We are also proud of our longtime work with The Conference Board's Committee on Corporate Political Spending, a committee of corporations dedicated to accountability, education, and engagement on issues of political activity. Through our leadership role on this committee and through other constructive engagements, we hope to provide leadership on these issues within the broader corporate community.



### Leadership

Our commitment to both transparency and compliance and our leadership in this area have long been recognized by various third-party organizations.



Certain statements in this report are "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995. Such forward-looking statements are based on current plans, estimates and expectations and projections, and are not guarantees of future performance. They are based on management's beliefs, projections, or expectations that involve a number of risks and uncertainties, any of which could cause actual results to differ materially from those expressed in or implied by the forward-looking statements. Altria undertakes no obligation to publicly update or revise any forward-looking statement in this report. The risks and uncertainties relating to the forward-looking statements in this report include those described in Altria's publicly filed reports, including our Annual Reports on Form 10-K and Quarterly Reports on Form 10-Q.

If you have questions about our report, please feel free to **contact us**.

