



Altria

# code of conduct

**Philip Morris USA**  
an Altria Company

*U.S. Smokeless*  
**TOBACCO CO.**  
an Altria Company

*John Middleton*  
an Altria Company

**HELI**   
INNOVATIONS

**NJOY**  
an Altria Company

# Our Cultural Aspiration

## – The Altria Way

The Altria Way is a new articulation of what we value and who we aspire to be – collectively. By showing up and leading The Altria Way, we will create the organization and culture necessary to achieve our long-term Vision.

The Altria Way respects and complements individual identity and operating company affinity. It is a way of working that we commit to pursue - together, with each other and with our external partners and stakeholders.



Altria

### **We shape our future.**

We anticipate and embrace change. We are strategic thinkers, always scanning the horizon and learning. We take initiative and intelligent risk. We make the hard choices, advance the best ideas, and hold ourselves accountable to shared outcomes. We empower others and trust them to deliver.

### **We do what's right.**

We act responsibly and operate with integrity, both individually and collectively. We listen, question, and speak honestly. We collaborate to solve problems. We drive positive change by advocating for what we believe and acting on it, even when it's uncomfortable. We respect those who speak up.

### **We care for each other.**

We earn trust by engaging others with transparency, humility, and respect. We act as owners, rally as one team and have each other's backs. We inspire company pride and a sense of belonging, embracing each other's unique strengths. We welcome newcomers and develop the best, most inclusive and diverse teams.

### **We deliver for our consumers and customers.**

Every choice we make is inspired by our consumers and customers. We work hard every day to exceed their expectations, delivering the highest quality products, unparalleled brand experiences and superior services. Regardless of our role in the organization, when we execute with quality, we deliver.

### **We rise to the challenge, together.**

We are relentlessly focused on our Vision. We have grit – passion and resilience. We are agile, utilizing intellect and judgment. While we strive to succeed, we know that things don't always go our way. We grow as people and teams when we trust one another and overcome challenges together.

whenever we're confronted with a situation where the proper course of action is not clear, we should ask ourselves:

■ is it legal?

■ does it follow company policy?

■ how would it look to those inside and outside the company?

■ is it the right thing to do?

*Notes to Our Code:*

*Throughout our Code, "Altria's companies" or "our companies" refer to Altria Group, Inc. and its subsidiaries.*

*This Code does not alter the terms and conditions of employment, or constitute express or implied contractual obligations or contracts of employment.*

letter from our chief  
executive officer



Colleagues:

This is a dynamic time for Altria and its companies. Our Vision is to responsibly lead the transition of adult smokers to a smoke-free future. And leading The Altria Way includes acting responsibly, operating with integrity, and earning trust by engaging others with transparency, humility, and respect. As the leader in an evolving industry, we have the duty and the opportunity to shape a better future for our adult consumers, employees, and shareholders. Our future success requires that we continue to run our businesses responsibly, equitably and in compliance with all applicable laws, always holding ourselves to high standards of integrity.

All of us must focus on compliance and integrity in our daily work. Our Code is a framework for operating with integrity, providing guidance for how we work and how we behave. It directs us to ask before acting:

- Is it legal?
- Does it follow company policy?
- Is it the right thing to do?
- How would it look to those inside and outside the company?

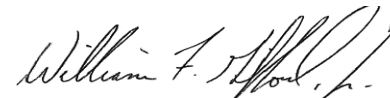
Our policies and related documents complement the Code with details of how we should execute our work. Each of us is responsible for understanding how all these elements relate to our roles at Altria.

Of course, in any organization, some employees will behave in ways that do not align with our Code. In those cases, it is critical that we identify the issue early and respond to it promptly and effectively. Big problems can be prevented... if someone raises their hand and identifies the issue early, so it can be addressed. I support you in that. Speak up. Looking the other way or thinking

that it's "not my problem" is a violation of our Code, our policies, and it puts our companies at risk. Reporting can require courage, but Altria absolutely does not tolerate retaliation. We all have a duty to speak up and report potential compliance issues.

Our commitment to compliance and integrity is especially important at this time in our companies' evolution. In this evolving environment, we must maintain focus on our compliance framework, including the Code of Conduct, to guide us in doing what is right. Maintaining a strong culture of compliance and integrity is essential to our success.

Thank you for helping Altria succeed through your commitment to our culture of compliance and integrity.



Billy Gifford  
Chief Executive Officer  
Altria Group, Inc.



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The Altria logo is a large, three-dimensional sign. It features a 5x5 grid of 25 colored squares on the left side, with colors ranging from dark blue and green to yellow and red. To the right of the grid is a large, light gray rectangular panel with the word "Altria" in a dark gray serif font. The sign is mounted on a base of two horizontal panels, the bottom one being a muted greenish-gray. The background shows a clear blue sky and a grassy field.

Altria

our code





- why do we have a code?
- who must follow our code?
- does our code explain all the standards I need to know?
- what about laws in different countries?



Our Code, and the Principles on which it is based, are a framework for operating with integrity, providing guidance for how we work and how we behave.

### **Why Do We Have a Code?**

- Our Code introduces us to many important laws, policies and procedures we must follow
- It shows us how to spot potential issues in our work
- It identifies resources when we need more information, want advice or wish to report concerns

Our Code is part of our enterprise-wide compliance and integrity program supported by the Altria Group Board of Directors and officers, and by the management of Altria's companies.

The Altria Group Chief Compliance Officer, compliance officers in our companies, and the Compliance & Integrity department oversee our compliance program.

The Altria Group Chief Compliance Officer also reviews the compliance program with Altria's senior officers and the Board of Directors.

### **Who Must Follow Our Code?**

Our Code applies to all employees, including senior management and officers, who work for Altria's companies.

### **Does Our Code Explain All the Standards I Need to Know?**

Our Code is the cornerstone of our commitment to integrity, but it does not discuss every law, policy or procedure that applies to your work. Your company has more specific policies and procedures on the topics in our Code. You can find much of that guidance in your company's policy library. In some cases, that guidance



may be more strict than the standards in this Code, and you should follow that guidance. You must know, understand and follow the rules that apply to your work.

### **What About Laws in Different Countries?**

Some of our companies conduct business and/or are located outside the United States. Those businesses may be subject to U.S. and/or non-U.S. laws. In addition to following our Code, it is your responsibility to know and follow all laws that apply to your business activities, including non-U.S. laws.

If you have questions, contact the Law department for guidance before taking action.



doing what's right



- 
- A high-angle photograph of a modern building's interior. The space is characterized by large glass walls and railings. On the left, a glass railing overlooks a rooftop garden with a grid of small plants. In the center, a series of colorful, translucent panels (red, orange, yellow, green, blue) are suspended vertically. Below, a set of stairs with glass railings leads down to a lower level. In the foreground, several orange armchairs are arranged in a circle on a light-colored floor. The overall atmosphere is bright and airy, with natural light streaming in from the large windows.
- our shared responsibilities
  - additional responsibilities for managers and supervisors

Our Code is a commitment to do what is right. Each employee must uphold this commitment.

### Our Shared Responsibilities

Whenever we're confronted with a situation where the proper course of action is not clear, we should ask ourselves:

- Is it legal?
- Does it follow company policy?
- Is it the right thing to do?
- How would it look to those inside and outside the company?

If you're unsure about the answer to any of these questions, seek guidance from one of the resources listed in the "Asking Questions and Raising Concerns" section before taking any action.

### Additional Responsibilities for Managers and Supervisors

Managers and supervisors must always:

- Set a good example and show what it means to act with integrity
- Promote a culture where employees feel comfortable asking questions and raising concerns



- Discuss compliance with employees so they have adequate knowledge, training and resources to follow our Code's standards
- Support employees who in good faith raise questions or concerns about compliance and integrity, and never retaliate or tolerate retaliation against them



asking questions and  
raising concerns





- duty to speak up
- altria's companies do *not* tolerate retaliation

Our commitment to compliance and integrity includes speaking up when we should.

### Duty to Speak Up

Speak up if:

- You are unsure about the proper course of action and need advice
- You believe that misconduct has taken place or is about to take place
- You believe that you may have been involved in misconduct

We all have an obligation to speak up. It is the right thing to do and allows our companies to quickly address potential issues.

### *How Can I Speak Up?*

There are many options for speaking up. Supervisors are usually a good place to start.

Other resources include:

- Your supervisor's supervisor
- Department management
- Your company's compliance officer
- The Compliance & Integrity, Human Resources or Law departments
- The Altria Group Chief Compliance Officer
- The Integrity HelpLine or WebLine
- The function with the appropriate expertise (e.g., Finance or Procurement)



Q: I think one of my coworkers violated a company policy, but I can't be sure. I am not an expert on the subject. What should I do?

A: You should always speak up if you think misconduct has taken place. You are not responsible for getting enough information to be sure, only for reporting in good faith what you observed.



### *What are the Integrity HelpLine and WebLine?*

Both are 24-hour-a-day, seven-day-a-week resources that are operated by an independent company to help our companies respond to your concerns. If you are unsure where to go to ask questions, uncomfortable about using one of the other resources identified in our Code, or wish to raise a concern anonymously, use the Integrity HelpLine or WebLine. Employees inside the United States or Canada can call the Integrity HelpLine at **1-877-781-9324** or submit a report online at **[www.AltriaIntegrityWebLine.com](http://www.AltriaIntegrityWebLine.com)**.

### *What Happens When I Use the Integrity HelpLine or WebLine?*

When you use the Integrity HelpLine or WebLine, a specialist will make a detailed summary of the information you provide. The specialist will forward the summary to Altria's companies to review, respond and resolve.

### *Can I Report Anonymously?*

Yes, and all anonymous reports are strictly maintained as such. However, giving your name usually helps the company better investigate the issue. If you choose to report anonymously, you will receive a tracking number so that you can check back on the status of your report.

### *Will My Report Be Confidential?*

Our companies maintain the confidentiality of your report to the extent possible. However, they may disclose the information as necessary to investigate and address the situation appropriately.

### *What Happens When a Compliance Violation Occurs?*

Those who fail to follow our Code, policies or procedures are subject to disciplinary action. At a minimum, this means counseling, but it could include termination of employment. Certain compliance violations may also subject the offenders to civil or criminal prosecution.



### **Altria's Companies Do Not Tolerate Retaliation**

By seeking advice, raising a concern or reporting suspected misconduct, we are following our Code and doing the right thing. Our companies do not tolerate retaliation against anyone who makes a report in good faith.

Retaliation can include things like reassignment, demotion or termination of employment as a result of making a good faith report. It can also include more subtle things like excluding someone from specific work activities.

Employees who engage in retaliation will be subject to disciplinary action. If you suspect retaliation over reporting a compliance and integrity issue, report the situation immediately to one of the resources listed in the “How Can I Speak Up?” section of our Code.



Q: I think my supervisor is doing something that our Code says is wrong. I'm afraid to make a report about her conduct because she might make my job more difficult for me. What should I do?

A: If you don't feel comfortable discussing it with her directly, you should report the matter right away to one of the other resources listed in our Code. You shouldn't fear any consequences for making a good faith report. Our companies do not tolerate retaliation.

# employment and workplace guidance





- fair employment
- health, safety and security
- workplace conduct



# 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.

## **Diversity and Non-Discrimination**

Our goal is to attract, develop and retain diverse employees at all levels. To meet this goal, our companies value and seek diverse perspectives. We make all employment decisions based on merit, and in accordance with applicable laws. We prohibit discrimination based on race, color, religion, sex, age, national origin, sexual orientation, disability, citizenship status, marital status, veteran status, gender identity or any other legally protected characteristic. This includes providing reasonable accommodation for employees' disabilities or religious beliefs and practices.

## **Harassment-Free Work Environment**

As part of our commitment to a positive work environment, we expect all employees to treat everyone with integrity and respect regardless of level or differences. We prohibit all forms of harassment based on race, color, religion, sex, age, national origin, sexual orientation, disability, citizenship status, marital status, veteran status, gender identity or any other legally protected characteristic.



**Harassment** includes anything that creates an offensive, hostile or intimidating work environment for another person. It may include:

- Making offensive racial, ethnic, religious, age-related, sexual orientation-related or sexual jokes or insults
- Distributing or displaying offensive pictures or cartoons
- Using email, voicemail, text messages, social media or electronic devices to transmit derogatory or discriminatory information
- Making unwelcome sexual advances, requests for sexual favors, unwanted physical contact or repeated, unwelcome sexual suggestions

If you observe or experience discrimination or harassment, you should report the situation. We do not tolerate retaliation against anyone who makes a report in good faith.



Q: One of my coworkers frequently makes suggestive comments about my appearance and touches me in ways that make me uncomfortable. I've asked him to stop repeatedly, but he won't. What can I do?

A: You should report his conduct immediately to your supervisor, your department manager, the Human Resources, Compliance & Integrity, or Law departments, the Integrity HelpLine or the Integrity WebLine. This kind of behavior has no place in our workplace, and we won't tolerate it.

# 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. We are committed to complying with applicable laws and company policies regarding employee health and safety.

## **Workplace Safety**

All of us are responsible for supporting our companies' efforts to maintain a safe workplace. This means we must know and comply with all applicable workplace health and safety laws and company policies. We also must be alert to potential safety risks and report any hazards or incidents.

## **Drugs and Alcohol in the Workplace**

Being under the influence of alcohol or drugs or improperly using medication or other substances can diminish our ability to perform safely and at our best. Work requires clear thinking and the ability to react quickly to protect the safety of our coworkers and consumers.

Our companies strictly prohibit the use of drugs and alcohol in a manner that adversely affects our work or the workplace. This prohibition may apply even in some situations outside company facilities, for example, while representing our companies or while operating a company-owned, leased or rented vehicle. Company policies provide more detailed guidance governing the possession and use of drugs and alcohol at work. All of us must know and follow these policies.

### Violence and Weapons in the Workplace

A safe and secure work environment also means a workplace free from violence. Threats, intimidation and acts of violence have no place at our companies and are not tolerated. Weapons are *never* allowed in the workplace without prior authorization.



Q: My supervisor often tells me to work faster to meet a deadline, even though it means skipping a few steps in the work procedure. The steps I'm skipping aren't likely to cause a workplace safety issue, but I'm still worried. Should I follow my supervisor's directions?

A: No. We are all responsible for working safely and preventing injuries in our workplace. Following company policies and work procedures helps prevent accidents, harm to us and our coworkers, and product quality issues. You should explain your concerns to your supervisor. If this does not correct the issue, promptly report your concern to one of the other resources listed in our Code.

# workplace conduct principle

Our companies are committed to ethical, honest and respectful employee conduct. Employees must obey applicable laws and company policies.

## Conflicts Of Interest

We must avoid conflicts of interest, or even the appearance of a conflict, by making unbiased decisions.

A conflict of interest generally arises when a personal, financial or other activity or relationship affects our ability to make loyal and objective business decisions on behalf of our companies.

If you have a potential conflict of interest, you must disclose the situation in writing to your company's compliance officer, the Altria Group Chief Compliance Officer or the Compliance & Integrity department. Having a conflict is not necessarily a violation of our Code, but failing to disclose it is.

Some of the more common potential conflicts of interest are:

### *Outside Employment and Affiliations*

Activities outside of work, such as outside employment and affiliations, can create potential conflicts of interest. Unless you get the written approval of your supervisor and your company's compliance officer, you should avoid:

- Working for or providing services to anyone with whom you deal as part of your job
- Engaging in outside work for, or affiliations with, competitors, customers or suppliers



*Employment and Affiliations of Family Members and Personal Relationships*

The work and affiliations of family members, or those with whom you live or have a close personal, romantic or financial relationship can also create conflicts of interest. Notify your supervisor and obtain the approval of your company's compliance officer if any such individual:

- Works within the Altria family of companies or performs services for any competitor, customer, or supplier
- Has any business dealings with you, anyone working in your business function or anyone who reports to you

If you are unsure about who is considered a family member, err on the side of caution, and disclose to obtain the appropriate approvals.



Q: I work closely with several suppliers. Recently, a supplier representative asked me to do some consulting work for his company on the weekends. I could really use the extra money. Can I take the work?

A: Most likely, no. However, if you believe the facts would not give rise to a conflict of interest, you should disclose the situation to your supervisor and your company's compliance officer and seek approval before proceeding.

### *Boards of Directors*

If you are asked to serve on the board of directors, an advisory board or a committee, or in any similar capacity, for an organization that could create a conflict of interest or the appearance of a conflict of interest as described previously, you must disclose it and obtain written approval from your company's compliance officer before accepting. If you are uncertain whether the request raises a conflict of interest, contact the Compliance & Integrity department.

### *Financial Investments*

Be careful that your financial investments and those held by your close relatives do not create or appear to create conflicts of interest. If you suspect an investment might do so, you should avoid the investment or seek guidance prior to making the investment. If you already have the investment, you should promptly disclose it to your supervisor and your company's compliance officer.

Some specific investments that require disclosure and approval from your supervisor and company compliance officer include:

- Holding a substantial financial interest in a competitor, customer or supplier
- Investing in a supplier if you, or someone you directly supervise, are involved in selecting, negotiating with, or managing the supplier
- Investing in customers with whom you or someone you supervise directly does business
- Any investment that might conflict, or appear to conflict, with your ability to do your job or with the interests of any Altria company

An investment is *not* a substantial financial interest:

- If it is less than one percent of the value of the outstanding equity securities of a public company
- If it is worth less than U.S. \$25,000 (or the local equivalent) in a privately-owned company

Publicly-traded mutual funds, index funds or similar poolings of securities, where the individual investor has no say in which investments are included, generally do not present conflicts and do not require approval.

When making an investment decision, ask yourself:

- Would the investment affect any decisions I will make for our companies?
- How would the investment look to others within the company?
- How would it look to someone outside the company, such as a customer, supplier, or the media?

## *Corporate Opportunities*

We may not use company property or information, or our position within the company, for personal gain or the personal gain of another. This also means we cannot take business opportunities that we learn about through our work for our personal benefit.

In addition, we may never:

- Engage in the same line of business as one of Altria's companies
- Take or refer to others an opportunity that may benefit our companies



Q: A supplier's sales representative offers me a holiday gift basket filled with fruits, chocolate and a \$50 gift card to a local restaurant. Can I accept the gift card?

A: No, you may never accept cash or cash equivalent, such as a gift card. Even though this may seem like a small matter, you must politely return the gift card to the representative with an explanation of company policy.

### *Giving and Receiving Gifts and Entertainment*

Our suppliers and customers are vital to the success of Altria's companies. We must base our relationships with these and other third parties on sound business decisions and fair dealings. While business gifts and entertainment can build goodwill, they can also make the recipient biased (or give the appearance of bias) and in some circumstances may raise concerns under U.S. or non-U.S. anti-bribery/anti-corruption laws. In short, gifts and entertainment can create actual or apparent conflicts of interest as well as other legal and compliance concerns, so we must use good judgment when giving or receiving them.

Gifts and entertainment are anything of value, including discounts, travel expenses, loans, cash, favorable terms on any product or service, services, prizes, transportation, use of vehicles or vacation facilities, stocks or other securities, participation in stock offerings, home improvements, tickets and gift certificates.

Altria's companies discourage employees giving or accepting gifts or entertainment. It is permissible only in limited circumstances. Some of our companies and functions have more restrictive standards on gifts and entertainment and special procedures may apply in certain situations. Review your company's policies. In addition, at a minimum, any gift you give or receive must:

- Be legal and consistent with our Code and company policies
- Be tied to legitimate business purposes (for example, business is discussed as part of the entertainment provided)
- Not be cash or a cash equivalent like gift certificates and gift cards



Q: I want to give one of our best customers a special gift to say thanks. I have access to some tennis tournament tickets that I know she'd appreciate, but it is against her company's policy for her to accept them. She doesn't care about the policy. Can I give her the tickets?

A: No. If you know that giving a gift will violate the policy of the recipient's company, you may not give the gift. Just as we want others to respect our standards, we respect theirs. To be safe, before you give a gift, ask the recipient if it is within their company's rules.





- Not be offered for something in return or otherwise influence the recipient's ability to make objective business decisions
- Not cause your business contact to violate his or her employer's standards
- Be properly recorded and accounted in company financial records

In addition, gifts should not be excessive in value. For more information on prior approval requirements, limitations, value amounts, exclusions and reporting requirements, review your company's policies.

Offering gifts or entertainment to government officials is governed by much stricter rules. See the "Gifts and Entertainment to Government Officials" section of our Code for more information.







Q: I have a very large extended family, and am worried about the possibility that a family member could create an actual or potential conflict of interest for me without my knowledge. Do I need to monitor the activities of all my family members to make sure their activities do not result in an actual or apparent conflict of interest for me?

A: You're generally not responsible for learning about the activities of all family members. However, you should be concerned with those circumstances that you do know about. And, if you learn that a family member presents an actual or potential conflict, you must disclose the situation immediately.

financial guidance





- fiscal compliance, asset management and cash management
- procurement and supplier management



# 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.

### Money Laundering and Contraband

Our companies do not condone, facilitate or support contraband or money laundering. We help the government prevent illegal trade involving our companies' products. We take measures to avoid receiving payments that are the proceeds of crime.

Contraband is goods traded in violation of tax, customs or intellectual property laws.

Money laundering is a process by which individuals or entities try to conceal illicit funds, or otherwise make the source of their illicit funds look legitimate.

You must know and follow your company's policies on acceptable forms of payment. You also must be aware of red flags that may signal contraband or money laundering. Consult company policies for more information.





### **“Know Your Customer” and Business Partner Due Diligence**

We want to do business with firms or individuals that conduct business with integrity and in compliance with all applicable laws. Consult company policies for standards on selecting and approving customers and other business partners. At a minimum, you should:

- Assess and, where appropriate, confirm that the parties you’re working with maintain a genuine business presence and are engaged in legitimate trade
- Communicate your company’s compliance expectations and be alert to your business partners’ practices
- Evaluate business partners that will act as representatives of our companies or perform activities outside the U.S. by conducting due diligence in line with the risk level of the engagement or relationship
- Report any violations of your company’s compliance policies
- Report suspicious transactions or activities

### Accurate Books and Records, and Financial Disclosure

Our companies' credibility is judged in many ways. One way is the integrity of our books, records and accounting. Altria and its companies are committed to providing complete, accurate and timely information, in all material respects, about their financial condition and business results. If you're responsible for financial reporting, you must:

- Follow generally accepted accounting principles
- Ensure that our companies' books and records accurately and fairly reflect all transactions
- Properly record all company funds
- Cooperate with our internal and external auditors



Q: It is the last week in the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asks me to record a sale now that won't be finalized until next week. I guess this won't hurt anyone. Should I do what he says?

A: Definitely not. Costs and revenues must be recorded in the correct time periods. Sales generally are not complete until there is evidence of a sales agreement, title has passed, and the sales price can be determined and is reasonably collectible.





Even if you are not involved in preparing financial information, you must report business information that is complete, accurate and timely. This includes information relating to costs, sales, shipments, hours worked, work activity logs, vouchers, bills, expenses, test data, regulatory data and all other important company information.

You must never:

- Deliberately make a false or misleading entry in a report or record, or encourage or facilitate someone else to do so
- Alter or dispose of company records contrary to established policies and procedures (see the “Records and Information Management” section of our Code for more information)
- Sell, transfer or dispose of company assets without proper documentation and authorization
- Say or write anything about our transactions that would assist a customer or supplier in preparing false or misleading financial statements



Senior financial officers and other managers responsible for accurate books, records, accounting and disclosure of financial information have a special duty to meet these standards, including establishing internal controls in their areas of responsibility to prevent and detect unauthorized, unrecorded or inaccurately recorded transactions.

### Insider Trading

Many of us may have inside information simply by virtue of our position. Securities laws make it illegal for those with material inside information about a company to buy or sell its securities (stocks, bonds, options, etc.). Never trade based on material inside information about our companies or any customer, supplier or other company.

Material inside information refers to non-public information that a reasonable investor would likely consider important in deciding whether to buy or sell a security. Chances are, if something leads you to want to buy or sell stock, the information may be material. Information about plans to do or not do something also may be material inside information.



Q: I accidentally told a close friend about an upcoming acquisition that could affect our stock price. What should I do?

A: You should inform the Law department immediately of the disclosure of information. You should also immediately tell your friend that this is material inside information and that it can't be revealed to anyone until the news has become public. You should warn your friend not to buy or sell stock in either our or the other company. If you or your friend buys or sells stock based on this information, you both could be in violation of securities laws.

Material inside information might include:

- Financial information, including earnings, forecasts, dividends and financing
- Significant business developments, including volume and share, significant product or contract information, and acquisitions or joint ventures
- Major developments in litigation or government actions
- Non-public information about another company, customer or supplier

If you have inside information, you may not trade until the information is made public through established channels and enough time has passed for the information to be absorbed by the public. Certain employees who have regular access to inside information generally must limit their trading of company securities to specified “window periods.” However, even trading in these window periods is prohibited if you possess material inside information.

Never “tip” or reveal material inside information to anyone, including spouses, coworkers, brokers, etc. Even seemingly routine discussions could be considered tipping. “Tippers” can be prosecuted even if they did not trade themselves and made no profit at all.

For more information, consult the Law department.

### Company Property and Resources

Company assets are intended to help us achieve business goals. We must use good judgment so that company assets are not misused or wasted. Be alert to and report any situations or incidents that could lead to the loss, waste, misuse or theft of company property, resources and funds.

Company property and resources include such things as facilities, equipment, vehicles, technologies, network systems, company records and company funds.

Company funds include both cash and its equivalents, such as checks, postage, charge cards, vouchers and negotiable instruments.

Time is another important resource. All of us should make the best use of company time and devote our attention to pursuing our companies' business objectives. All employees are expected to fulfill their job responsibilities. Those required to report the hours they work must do so truthfully and accurately.





# 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.

As part of our goal to invest in business partners who lead, Altria's companies seek to develop strong working relationships with suppliers who focus on cost, quality, service and compliance. Those of us responsible for selecting suppliers must do so based on merit and after conducting appropriate due diligence.

Our companies seek to do business with suppliers who comply with laws and act in a manner consistent with our commitment to compliance and integrity. If you manage a supplier, you must know and understand their contractual obligations and your company's expectations for that supplier. If you suspect that a supplier is acting in a manner not consistent with these expectations and obligations, you should report it.

### Child Labor and Forced Labor

Altria's companies do not condone the unlawful employment of children in the workplace, nor do we condone forced labor. We promote these objectives within our companies' supply chains. For example, contracts with suppliers require compliance with all applicable laws, including those addressing child and forced labor.

We expect all employees to know and follow our companies' policies in these areas.



# guidance on business operations





- antitrust and fair competition
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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.

## Competition Laws

Our companies believe in operating with integrity, trust and respect. We demonstrate passion to succeed by competing vigorously – but fairly. Therefore, you must adhere to applicable competition laws (sometimes known as antitrust laws).

Competition laws prohibit attempts to monopolize markets by unfair or illegal means. A company with market power, for example, must not try to eliminate competition or prevent others from entering the market.

Competition laws also prohibit certain agreements that unreasonably limit trade. This includes agreements to fix prices or not deal with a particular customer or supplier.

To avoid illegal agreements with competitors, we should never discuss with them:

- Fixing prices (e.g., minimums or maximums, margins, or stability)
- Fixing terms related to promotions, credit or other terms and conditions of sale
- Dividing markets, customers or territories
- Limiting production
- Rigging a competitive bidding process or otherwise agreeing to the price of a good or service
- Boycotting (e.g., a customer or supplier)



Other activities may also raise competition law issues.

Always consult the Law department before:

- Discussing business with a competitor
- Discussing exclusive dealing arrangements
- Tying or bundling together different products or services (including providing incentives to a buyer of one product to also buy a second product)
- Setting prices below cost
- Engaging in trade association activities or setting industry standards
- Setting resale prices
- Offering different prices or terms to customers who compete with one another
- Engaging in activities that may make it difficult for competitors to obtain needed inputs or sell their products







Q: An employee of a competitor lives in my neighborhood. At a block party, we talked about our families over a drink, but then the discussion turned to the market. The sales representative pulled out her company's price list and showed it to me. She pointed at a product and said, "If you agree to not sell your version of this product below this price over the next year, I'll give you my word that we won't charge less for ours." What should I have done?

A: You should have ended the conversation immediately when it turned to the market and reported the situation to the Law department right away.

Careless conduct can violate the law. What might appear to be ordinary business contact, such as a discussion with a competitor at a trade association meeting, can lead to a possible competition law violation. You generally should not discuss business with competitors and should avoid unnecessary contact with competitors.

Our Code and related company antitrust policies apply wherever you are located and conduct business.

### **Unfair Business Practices**

We do not compete by engaging in unfair practices.

Examples of prohibited conduct include:

- Making false or misleading statements about competitors
- Stealing or misusing trade secrets
- Inducing customers to break contracts with competitors
- Paying bribes

### Information about Competitors

To compete in the marketplace, it is often necessary to collect competitive information. We do so lawfully and consistent with company policies on gathering such information.

Never attempt to obtain or use:

- A third party's confidential or proprietary information, including confidential or proprietary information another employee has regarding a prior employer, without their permission
- A competitor's confidential information that someone offers to sell or give



Q: One of my coworkers used to work for a competitor. I'd like to ask him about his former employer's sales and marketing practices. I think the information could really give our company a competitive advantage in the market. Is this okay?

A: You should consult the Law department before making any such inquiries. We respect our competitors and always compete fairly and with integrity. That includes respecting the confidentiality of trade secrets or other intellectual property.

# 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.

Our communications with stakeholders about our business should be clear and honest. To that end, our communications should only contain information that is approved for external use. Be careful not to discuss topics in a way that is inconsistent with our companies' positions and actions.

If you have questions, our companies' websites are a reliable source of relevant information for you to use.

## **Investor and Media Relations**

It is important that we provide reliable information about our operations, positions, policies, practices, performance and outlook. Only Designated Spokespersons may communicate on behalf of our companies with the investment community or the media without prior approval. This includes online communications and social media. The messages and means of communicating externally must be approved in advance.

### Disclosure of Company Funding

From time to time, Altria's companies provide funding or other support to organizations for research, external communications and other activities. At a minimum, we expect these organizations to disclose our support in the same way they would for any other company. However, in some situations, your company policies may require additional disclosures that go beyond what the recipients ordinarily provide for other donors. If you are involved in providing support or donations, consult your company policy to determine any appropriate disclosures for your particular situation.





# environmental compliance principle

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

To help our companies meet their environmental commitments, we should know and comply with all environmental laws, regulations and policies that apply to our jobs. Additionally, we are committed to reducing the environmental impact of our activities and promoting the sustainability of the natural resources on which we depend.

You are expected to:

- Conduct business in accordance with all applicable environmental laws, regulations, policies and company commitments
- Support our goal to implement environmentally sustainable practices where feasible. Understand the environmental consequences of your actions and look for ways to reduce or eliminate any negative consequences

# importing and exporting principle

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

Various laws and regulations govern importing and exporting of goods, services, technologies or information. You must be sure that all imports and exports comply with these requirements. In addition, you must always provide accurate and truthful information to customs and tax officials. Before you engage in these activities, you should consult with your import/export support or the Law department.

## Trade Restrictions and Export Controls

Some countries, including the United States, impose restrictions on dealings with certain countries, entities and individuals.

These restrictions take many forms, including bans on:

- Imports from or exports to a sanctioned country
- Transshipments through a non-sanctioned country to a sanctioned country, or vice versa
- Travel to or from a sanctioned country
- Financial transactions and dealings, including investments involving a sanctioned country or restricted individuals and entities

An export is not limited to the transfer of a physical commodity – it can include sharing services or technology (such as technical data or other information) with a national of another country by email, discussions or facility visits. This is known as a deemed export.



Before engaging in any international dealings, you should contact the Law department or your import/export support to make sure you understand and can comply with all trade restrictions and export controls.

### **Anti-Boycott Laws**

It is against the law to cooperate with any request concerning unsanctioned or illegal boycotts or restrictive trade practices. We should not take any action, furnish any information or make any declaration that could be viewed as participation in an illegal boycott. In addition, U.S. law requires us to report any suspected boycott requests to the U.S. government. Non-U.S. countries may have similar reporting requirements. You should immediately notify the Law department if you suspect you may have received any boycott-related request.

# 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.

## **Gifts and Entertainment to Government Officials**

Gifts and entertainment offered or provided to government officials raise special risks and may be prohibited by law. You should never offer or provide gifts or entertainment to a government official unless you are in compliance with all applicable company policies and have received prior approval from the Law department.

A gift involving a government official is defined very broadly and can include anything of value, such as refreshments, meals, receptions, entertainment, transportation, offers of employment, and tickets to attend a function, dinner, social event, sporting event, charitable event, or cultural event.

Government officials include officials of U.S. and non-U.S. governments. In the United States, government officials include anyone serving in or employed by a federal, state or local government body or agency, such as elected officials, appointed officials, and civil servants.

Examples include:

- Legislators and governors
- Employees of public universities or local school systems
- Employees of federal, state or local governments

Outside the United States, government officials include the same types of officials and may also include:

- Employees or representatives of companies owned or controlled, in whole or in part, by non-U.S. governments
- Members of royal families
- Officers or employees of public international organizations such as the United Nations or the World Bank
- Officials and employees of political parties
- Candidates for political office
- Any other private person acting in an official capacity for or on behalf of the government (e.g., a consultant hired by a government entity to work on its behalf)





Q: My neighbor is running for the local school board. I want to use the office copier to make copies of her campaign flyer to pass out over the weekend. May I?

A: No. While you are free to volunteer for your neighbor's campaign, you cannot use company property or equipment for personal political activities. Also, you must volunteer on your own time.

## Political Contributions

### *Corporate Political Activity*

The laws of the United States and certain other countries set strict limits on contributions by corporations to political parties and candidates. You may not make any direct or indirect political contribution or expenditure on behalf of your company unless authorized in writing and policies allow it. This includes contributions to candidates, office holders, political parties and other political committees. Contributions can include many different things, such as buying tickets to a political fundraising event, providing goods or services to a political campaign event or paying for campaign advertising.

### *Personal Political Activity*

We encourage employees to engage in the political process and support the political candidates and parties of their choice. However, you must do so using your own resources. You may not use company funds or resources for personal political activities. You must not suggest or imply that you are acting on behalf of our companies when you make a personal political contribution.

## Lobbying

Lobbying activities may require registration and/or reporting and may be subject to other restrictions. The term lobbying covers many kinds of activity, including:

- Contacts with legislators, regulators, executive branch officials or their staffs
- Communications with U.S. government officials or employees at the federal, state or local level or non-U.S. government officials or employees
- Efforts to influence legislative or administrative action
- Providing gifts or entertainment to government officials or employees

Before engaging in any lobbying activities, you must first consult with the Government Affairs and Law departments.



Q: I'm working closely with a government employee on a project. Next week, he'll be traveling to our offices for a planning meeting. I'd like to take him to lunch while he is visiting as a business courtesy. Is it okay to take him out to an inexpensive lunch?

A: This may be permissible, but you first must get permission from the Law department – no matter how inexpensive the lunch. The rules governing the types of gifts and entertainment we can offer government employees are much more strict than those governing our interactions with business colleagues.

### **Charitable/Nonprofit Contributions that Involve Government Officials or Political Activities**

Altria's companies are committed to supporting the communities in which we live and work. Therefore, we may choose to make charitable or nonprofit contributions involving government officials or political activities. However, to ensure compliance with the law and company policies, only designated individuals may make such contributions and only after receiving the necessary approvals.

### **Bribery and Corruption**

We have zero tolerance for bribery and corruption. Never offer or give a bribe to anyone, anywhere, for any reason, and never retain or permit a third party to do so.

Bribery means offering or giving anything of value for the purpose of either obtaining or retaining business or some other competitive advantage, or otherwise improperly influencing a business or official decision.

The laws of many countries, including the U.S., prohibit both commercial bribery and bribery of government officials. A violation of these laws is a serious criminal offense and could subject our companies and employees to fines, loss of business privileges and imprisonment.

You must:

- Never make an unauthorized payment or gift to any party, including a government official
- Keep accurate books and records that describe all payments
- Never make a false or misleading entry in company books

You should report any actual or suspected bribery to the Law department. If you believe a third party with whom an Altria company has a relationship is taking part in such activities, you should report it.



### Facilitating Payments

Facilitating payments are payments or gifts made to government officials to further routine nondiscretionary government actions. The payments generally are nominal amounts made to encourage routine government action, not to obtain new business, retain current business or obtain a business decision. Altria's companies prohibit the use of facilitating payments, except where the payment is necessary to avoid a credible threat of imminent physical harm.

### Conducting Business with Government Customers

Special rules apply when we conduct business with government customers, whether at the federal, state or local level in the U.S. or outside the U.S.

When bidding on or providing goods or services under a government contract, consult with the Law department.

Remember these basic rules:

- Never seek or accept another entity's confidential bid information
- Know and follow anti-kickback and anti-bribery/anti-corruption rules, including restrictions on gifts and entertainment
- Understand "most favored customer" pricing requirements and verify compliance
- Adhere to the contract's quality, quantity and testing requirements
- Ensure billings are accurate, complete and in compliance with all rules and regulations, including time and cost allocations
- Never initiate employment discussions with a current or former government official without first consulting the Law department
- Recognize circumstances under which your communications with government officials may raise issues under procurement lobbying laws, and seek advice from the Law department



Q: I was told that I could hire a consultant to take care of getting all the permits we need from a non-U.S. government. The consultant I hired requested a \$40,000 retainer and said that he would use the money to “help move the process along.” Since we don’t really know where the money is going, should we worry about it?

A: Yes. You must ask where that money is going and for what purpose it will be used. You must also require documentation of the consultant’s expenditures. You should take reasonable steps to guard against use of this money for a bribe. Seek the advice of the Law department.

## Government Inquiries and Investigations

We often interact with government agents responsible for enforcing the law. If such a person requests information from you, provide only honest and accurate information.

Contact the Law department if you receive a request for information from a government agency that is outside your ordinary course of dealings with that agency. Also, be sure to preserve records relevant to the request.

Your company may have specific policies relating to site visits or requests for information from a government agency. Be sure to know and understand these 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.

Our companies are committed to responsibly marketing our products to adult consumers. To support this goal, you must:

- Ensure that marketing materials and programs comply with all legal requirements, our Code, policies, practices and commitments
- Hold advertising agencies and product development and marketing consultants to these standards
- Never make misrepresentations about our companies' products, including the health effects of those products
- Substantiate all claims about our companies' products before you make any claims
- Never market our companies' products to underage persons



# 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.

Every day, our companies' reputations for regulatory compliance and quality are in our hands. To provide high quality products, you must:

- Be in full compliance with all applicable laws, regulations and company quality standards
- Adhere to company production and quality control procedures

- Follow all procedures for the manufacturing, storing, handling and shipping of products
- Maintain monitoring systems to detect potential product defects and violations of laws and company policies

If you learn of a product regulatory or quality issue, report it immediately to your supervisor, the management of your department or business unit, your company's Quality department, the Compliance & Integrity department, the Integrity HelpLine or the Integrity WebLine.

# research principle

Our companies conduct a variety of research. All research must be conducted in a manner consistent with company policies and applicable laws. Research must be approved in advance and conducted in accordance with company policies and applicable laws.

To help our companies responsibly meet their business goals, we have established standards for conducting research. These standards are intended to promote consistent, high-quality studies and to protect the safety and privacy of study participants. They also help to protect confidential company information and intellectual property that may be used and developed in such studies.

If you conduct or commission research, be sure to follow company research policies. Before you engage in these activities, you should consult your research support.

# guidance on information and records





- intellectual property
- management, protection and use of company records and information
- privacy

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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.

## **Our Proprietary Information and Intellectual Property**

We regularly produce valuable ideas, strategies, financial analyses and other business information. This proprietary information (also known as intellectual property) is owned by our company.

Intellectual property is generally intangible property, such as research, technical data and materials protected by copyright, trademark, trade secret, patent and other laws.

Some examples of proprietary information are:

- Sales, marketing and other corporate databases
- Marketing and sales strategies and plans
- Strategic plans and financial analyses
- Business proposals
- New product development
- Formulas
- Trade secrets



It is up to all of us to safeguard this information. Even when there may seem to be a legitimate business need to share proprietary information with someone outside the company, you first must get management's approval and make sure there is a written confidentiality agreement approved by the Law department.





### Third-Party Proprietary Information and Intellectual Property

We respect the proprietary information of our customers, suppliers, competitors and other third parties. This means you may not:

- Bring to work or use any proprietary information belonging to a prior employer
- Accept or use anyone else's proprietary information except under an agreement approved by the Law department
- Load unlicensed software on any company computer
- Use or copy documents and materials that are copyrighted without permission from the copyright owner or the Law department

### Unsolicited Ideas

You may be approached by persons outside the company with ideas or suggestions they think our companies should use. These ideas can involve products, flavors, ingredients, packaging, promotions, advertising, processes, equipment, business methods and other topics. Use of such unsolicited ideas can raise legal risks. You should not accept or in any way encourage offers of unsolicited ideas. If you do receive one, follow your company's specific process or notify the Law department.

# 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.

## Records and Information Management

We must manage company records and other recorded information properly and according to business needs, company policies and legal requirements.

When managing company records, you must:

- Create company records responsibly
- Protect company records and company information from inappropriate access or disclosure
- Preserve company records and company objects as required for legal proceedings or investigations

- Retain company records as needed for regulatory or other business reasons
- Dispose of company records securely and only after you have satisfied applicable record retention obligations





Q: I know that I'm supposed to preserve records that might be needed for possible legal proceedings or investigations, but how do I know which of my records fall into this category?

A: Review the Legal Hold Notices that apply to you in order to determine which categories of information in your records need to be preserved. If you're unsure which Legal Hold Notices apply to you, contact the Law department or Records Management department for guidance. If you are unsure if a company record is subject to a Legal Hold Notice, preserve the record and contact the Law department. Failure to comply with a Legal Hold Notice could subject you and the company to civil and criminal penalties.

### Information Systems Use and Network Security

Our companies' operations depend on reliable information systems. These include computer hardware, software, smart phones, networks, and the information that runs on them. Therefore, you must:

- Refrain from using information systems, telephone, voicemail or email in a way that could be harmful or embarrassing to our companies
- Use company information systems primarily for company business purposes; keep personal use to a minimum and in line with our Code and policies
- Protect the security of our information systems, including information and resources used to access company networks, such as IDs and passwords, pass codes and building-access badges



Never use company information systems to:

- Transmit, download or view materials that might be considered offensive, derogatory, defamatory, harassing, obscene, sexually explicit or otherwise vulgar
- Improperly disseminate copyrighted or licensed materials or proprietary information
- Transmit unauthorized chain letters, advertisements or solicitations
- Install or download software without permission from the Information Services department

Be careful when creating records using these information systems. Electronic communications you create using company information systems are not private. Records of electronic communications, subject to applicable law, are monitored and will be used for company purposes.



Q: I sometimes email my spouse to make personal plans, such as who will pick up the kids after work. Am I allowed to use the company's information systems for this kind of thing?

A: Yes, as long as your personal use is minimal and consistent with the guidelines set out in this section.

# 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.

## Privacy of Employee Information

Altria's companies keep employee personal information confidential. Personal information may include government-issued identification numbers, full date of birth, bank account numbers or credit or debit card numbers. If you have access to personal information

about coworkers or applicants, you must treat it appropriately and confidentially. Never provide anyone access to this information unless they are authorized to access it and have a clear business need to know the information.

### Privacy of Supplier, Customer and Consumer Information

We are all responsible for protecting the privacy and security of information that suppliers, customers or consumers entrust to us. If you don't have a business reason to access this information, you should not attempt to do so. When you have a legitimate business reason to access the information, take steps to protect against its unauthorized release or use. You must also require any third parties who have access to such information to protect that information and comply with company information security requirements and other applicable contractual provisions.

If you discover or suspect a breach of this type of confidential information, report it immediately to the Computer Security Incident Response Team (CSIRT) at 804-274-7111.





# waivers of our code

In limited and appropriate circumstances, the Altria Group Chief Compliance Officer (or other authorized person) may grant a waiver of a provision of our Code. Waivers of our Code for executive officers may be made only by the Board of Directors and will be promptly disclosed as required by law or regulation.

# acknowledgement

Adhering to applicable laws and the highest standards of integrity is fundamental to our business success.

Compliance does not just happen. It requires commitment from all of us. You demonstrate your commitment by acknowledging the following:

1. I have read and understand the Altria Code of Conduct (“Code”).
2. I understand that more detailed guidance is provided in other resources, such as the Policy Library, and I know how to access them.
3. I understand that I am responsible for knowing and complying with the Code, and all policies, procedures or other guidance that apply to me.
4. I understand that I have a duty to speak up, and I will report any suspected violation of the Code, company policies or law.
5. I understand Altria’s policy against retaliation and won’t take any retaliatory action against any individual who reports a concern in good faith.
6. I understand that I may be subject to disciplinary action if I violate the Code, any of my company’s policies or the law.
7. I understand that I am obligated to disclose and update any potential conflicts of interest.

# internal contacts and integrity helpline/webline

## Internal Contacts

If you need advice or information about the Altria Code of Conduct, you may contact the following resources directly:

- Your company's compliance officer
- The Altria Group Chief Compliance Officer
- The Law, Finance, Compliance & Integrity or Human Resources departments

## Integrity HelpLine / WebLine

Use the Integrity HelpLine or WebLine if:

- You are uncomfortable about using one of the other resources identified in the Code
- You raised a concern and are not satisfied
- You are unsure where to go for information
- You wish to raise an issue anonymously

## Contact the Integrity HelpLine / WebLine:

For employees inside the United States or Canada, call **1-877-781-9324** or submit a report online at **[www.AltriaIntegrityWebLine.com](http://www.AltriaIntegrityWebLine.com)**.

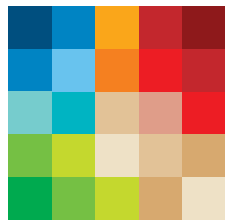
For employees in all other locations, download the list of **toll-free numbers** from **[www.AltriaIntegrityWebLine.com](http://www.AltriaIntegrityWebLine.com)** or follow the instructions to submit a report online.

You can use the HelpLine/WebLine anonymously, unless you are calling from one of the jurisdictions where local laws restrict such practices, such as the European Union ("EU"), where you are encouraged to provide your contact information when reporting concerns.

Additionally, some countries limit the use of the HelpLine/WebLine for reporting certain types of irregularities. If you are not sure about restrictions in your location, ask the HelpLine/WebLine representative or consult your location's privacy guidelines.







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