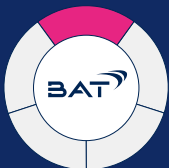


IMPACT AREA:

**THR**

OUR AMBITION

**Migrating adult smokers from cigarettes to Smokeless products.**



# THR continued

THR		Progress tracking			Assured
Targets/ambitions	Metric	2024	2023	2022	
<b>50% of our revenue from Smokeless products</b>	Vapour product revenues (£m)	1,721	1,812	1,436	Y*
	Heated product revenues (£m)	921	996	1,060	Y*
	Modern oral product revenues (£m)	790	539	398	Y*
	Total New Category revenues (£m)	3,432	3,347	2,894	Y*
	Traditional Oral revenues (£m)	1,092	1,163	1,209	Y*
	Total Smokeless revenues (£m)	4,524	4,510	4,103	Y*
	% of our revenue from Smokeless products		17.5	16.5	14.80
<b>50 million consumers of our Smokeless products by 2030<sup>1</sup></b>	Number of consumers of our Smokeless products (million)	29.1	25.5	22.3	Y
<b>Research the risks of our non-combustible products compared to smoking, and publish and invite independent scrutiny</b>	Cumulative total number of peer-reviewed articles and manuscripts published to date	270	198	153	N

## Consumers of non-combustible products – also referred to as Smokeless products (number of, in millions)

**Key Performance Indicator (KPI) definition:** Smokeless products include Heated Products, Vapour Products, Modern Oral and Traditional Oral products. New Category brands include Heated Products, Vapour and Modern Oral products.

The key performance indicator (KPI) is defined as the number of adult consumers using any Smokeless brands at least once a week (apart from the U.S. where only daily users of BAT’s Traditional Oral brands are included).

**Methodology:** We use surveys that collect consumer data via primary research. They are run in selected markets with a monthly sample size of 500 to 2,500 consumers depending on market complexity. The surveys are designed to understand category and brand usage levels. The user numbers for markets where surveys are conducted are derived using population estimates from the World Bank extrapolated by BAT for historical trends, along with category shares and consumer share data.

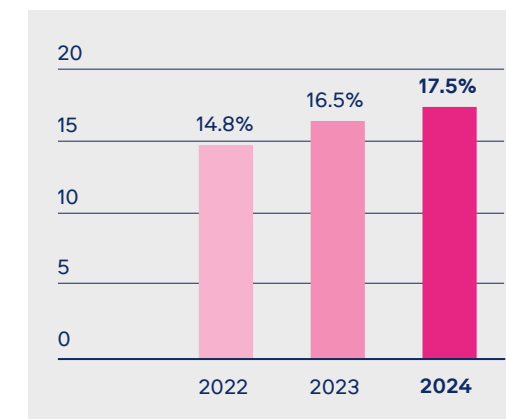
User numbers for the remaining markets, where primary research is not available, are derived from volume trends and consumption from surrogate markets (based on prior 6-month average of sales volume, region, proximity and market structural similarities). Consumption volume from surrogate markets is not from 2024. User numbers are reported for regional clusters as a whole.

**Scope of tracking:** We define adult users as those between the age 18 and 64 years, with the exception of Canada (21 to 79 years), Japan (19 to 79 years), Malaysia and Pakistan (18 to 64 years, Male population only) and the UK (21 to 79 years) and the U.S. (21+ years). BAT’s Smokeless products user pool consists of any Nicotine User of legal age who uses BAT’s Smokeless product brands at least once a week.

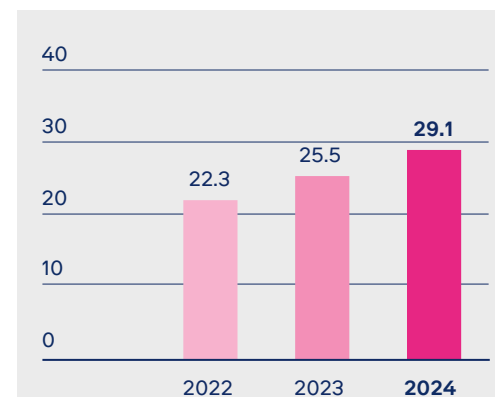
**Use of estimations:** Estimation of these users is based on various consumer surveys that help size the category and the brands within them. The calculation is made as below: Adult population as per World Bank estimates x Percentage of Adult population using the category at least once a week from our Incidence Study x Percentage of weekly users of category using BAT brand at least once a week-from our surveys.

**Notes:**  
 \* Extracted from the Financial Statements audited by KPMG contained within our Combined Annual and Sustainability Report and Form 20-F, 2024.  
 1. Excludes Russia and Belarus

Revenue from Smokeless products (%)



Consumers of Smokeless products (m)



### Summary of progress towards our ambitions

In 2024, revenue from our Smokeless products accounted for 17.5% of Group revenue.

We continue to make progress towards our target of 50 million adult consumers of our Smokeless products by 2030, adding another 3.6 million in 2024 to a total of 29.1 million.

# THR continued

## THR (Marketing and communications)

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Aiming for 100% of our marketing to be responsible</b>	Incidents of non-compliance with marketing regulations resulting in a fine or penalty <sup>1</sup>	2	3	2	Y
	Incidents of non-compliance with marketing regulations resulting in a regulatory warning <sup>1</sup>	0	0	2	Y

## Marketing and Communications

### Incidents of non-compliance with regulations resulting in fine or penalty Incidents on non-compliance with regulations resulting in regulatory warning

**KPI definition:** These metrics are built in reference to the external Global Sustainability Standards Board (GSSB) Global Reporting Initiative (GRI) - sustainability reporting voluntary framework: GRI 417-3.

The reporting guidance refers to the number of incidents of non-compliance with regulations concerning marketing communications (advertising, promotion, and sponsorship) by:

- incidents of non-compliance with regulations resulting in a fine or penalty; and
- incidents of non-compliance with regulations resulting in a warning.

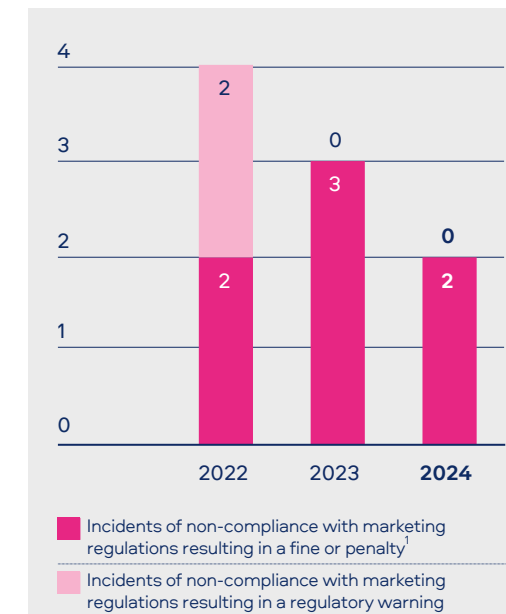
**Methodology:** The data for 'Incidents of non-compliance with regulations resulting in a warning/fine or penalty' is collected through our annual Sustainability Survey, which is distributed via an independent online system managed by a third-party provider.

The survey is completed by local Legal and Corporate & Regulatory Affairs and approved by the Direct Reporting Business Unit Head of Legal or Corporate & Regulatory Affairs. The approval process involves reviewing the information provided by the local team to ensure its accuracy.

Data is collected from January to November. Survey completers and approvers provide an additional update in January to capture any additions or changes in the number or status of reported incidents happening between November and 31 December 2024. This allows the Group to capture 12 months of data. Incidents are only reported here when a fine or warning is issued.

**Data Governance:** At the Group level, completed surveys are reviewed by the third-party managing the survey, and the Group Sustainability Reporting and Marketing Legal teams. Once noted by BAT's Responsible Marketing Committee, the relevant outputs from the Sustainability Survey are sent to the Corporate Audit Committee and included in the Group Combined Annual and Sustainability Report & Data Book.

## Incidents of non-compliance with marketing regulations



### Summary of progress towards our ambition

In 2024, we identified two incidents of non-compliance with local marketing regulations resulting in a fine or penalty and zero incidents of non-compliance with local regulations resulting in a regulatory warning.<sup>1</sup>

**Note:**

1. Incidents of non-compliance with regulations that result in warning or in fine or penalty are dealt with at End Market level. To collect the 'Incidents of non-compliance with regulations resulting in warning/fine or penalty' compliance data, the local team is asked to report any instances or potential instances of breach, which may include allegations of inappropriate marketing, or investigations regarding marketing non-compliance that they are aware of in their market. Incidents are only reported here when a fine or warning is issued.

IMPACT AREA:

# CLIMATE

OUR AMBITION

Transitioning towards  
a low carbon economy.



# CLIMATE continued

## Environment reporting methodology

BAT uses a Global Reporting System, provided as an independent service by a third party, to collect the following data from more than 180 Group reporting units in 85 countries:

- Scope 1 and 2 CO<sub>2</sub>e emissions data and certain categories of Scope 3 emissions (e.g. business travel, transportation and distribution); direct energy including renewable energy and purchased renewable electricity;
- Water withdrawn with breakdown by source;
- Water discharged with breakdown by destination; and
- Waste generation from direct operations with breakdown by destination (e.g. recycling and landfill).

Data collection and reporting are based on an operational control approach.

Operational control means BAT has full authority to implement operational policies and control over daily operations.

Data excludes facilities where BAT does not maintain operational control and new sites at the commissioning phase.

All the above-mentioned data is reported on a monthly basis with the exception of some inputs of Scope 3 emissions being reported on a quarterly basis.

Unless more appropriate datasets are available, we obtain emission factor data from DEFRA which is regularly updated. For consistency purposes we apply these factors globally.

The data submission at the reporting unit level is performed by local Operation Sustainability or Environment and Health and Safety (EHS) teams.

The Environmental performance summary (main KPIs) is subject to approval by a Site Leadership Team Member, with appropriate responsibility for Operations Sustainability/EHS of the respective reporting unit.

Reporting units' submissions are reviewed and approved by Regional Sustainability teams and are further reviewed by the Group Operations Sustainability team.

Data is consolidated for appropriate geography (Group, Region, DRBUs from the reporting unit level), reviewed and reported at least quarterly to appropriate internal stakeholders.

Other KPIs such as the ones that relate to Product Plastic Packaging are derived from a Materials Matrix Excel worksheet and Sales data stored in SAP Test Acceleration and Optimisation (TaO) for all end markets.

Once generated, they are reviewed by the global packaging managers from each category, then signed off both by the respective Heads of Research & Development (R&D) and by the Head of Operations Sustainability Reporting and Compliance Centre of Excellence (COE).

For some of our metrics, we track progress (reduction) against a baseline.

Our baseline years are 2020 for Scope 1, 2 and 3 CO<sub>2</sub>e emissions and 2017 for Water withdrawn and Waste generated metrics.

The baselines are not adjusted in case of closure or acquisition of new sites.

The reporting period of the following KPIs spans from 1 December 2023 to 30 November 2024:

- Scope 1 and 2 CO<sub>2</sub>e emissions
- Energy consumption, including renewable energy and non-renewable energy consumption
- Waste generated, including hazardous waste generated
- Waste recycled
- Water withdrawn, water recycled and water discharge

## Operations Sites

Refers to all facilities within BAT operational control that perform manufacturing activities for commercial purposes. These are cigarette manufacturing factories, sites manufacturing other tobacco products, snus, modern oral and liquids; and green leaf threshing (GLT) tobacco processing sites.

# CLIMATE continued

CLIMATE		Progress tracking			
Targets/ambitions	Metric	2024	2023	2022	Assured
<b>50% absolute reduction in Scope 1 and 2 GHG emissions by 2030 (versus 2020 baseline)<sup>1</sup></b>	Total Scope 1 CO <sub>2</sub> e emissions (thousand tonnes)	<b>237</b>	299	329	Y
	Total Scope 2 CO <sub>2</sub> e emissions (market-based) (thousand tonnes)	<b>74</b>	95	113	Y
	Total Scope 2 CO <sub>2</sub> e emissions (location-based) (thousand tonnes)	<b>325</b>	342	356	Y
<b>– in line with a 1.5°C warming pathway</b>	<b>Total Scope 1 and Scope 2 CO<sub>2</sub>e emissions (thousand tonnes)</b>	<b>311</b>	394	441	N

### Emissions reporting baseline

Currently, we use a 2020 baseline year for emissions reporting, which has a total of 6,422,791 tCO<sub>2</sub>e split as follows:

- Scope 1: 342,034 tCO<sub>2</sub>e.
- Scope 2: 198,830 tCO<sub>2</sub>e market-based (Scope 2: 417,572 tCO<sub>2</sub>e location-based).
- Scope 3: 5,881,927 tCO<sub>2</sub>e.

### CO<sub>2</sub>e emissions

**Methodology:** We use the World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG) Protocol Corporate Standard to guide our reporting of Carbon Dioxide equivalent (CO<sub>2</sub>e) emissions.

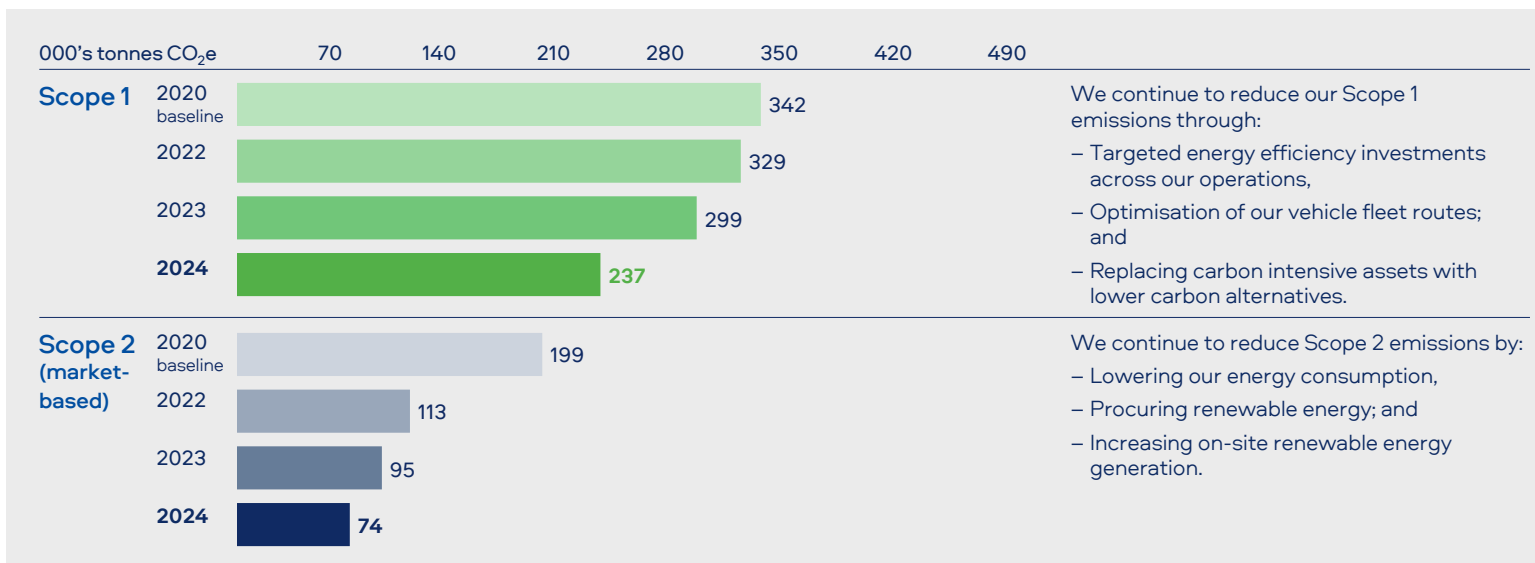
In addition, we use supporting standards including:

- GHG Protocol Scope 2 Guidance, 2015, and
- GHG Protocol Corporate Value Chain (Scope 3) Standard, 2011.

Where we have operational control, we include emissions from energy use, Dry Ice Expanded Tobacco (DIET) production processes as well as fugitive emissions and process emissions from onsite wastewater and waste treatment in our CO<sub>2</sub>e emissions reporting.

While we account for the contribution of all 7 GHG gases, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>), we do not disclose the breakdown of CO<sub>2</sub>e data on an individual GHG basis.

### Summary of progress towards our target



**Note:**

1. Compared to a 2020 baseline. Our near-term 2030 science-based targets comprise a 50% reduction in Scope 1 and 2 GHG emissions. The Scope 3 Industrial (non-FLAG) GHG emissions target includes purchased goods and services, upstream transportation and distribution, use of sold products, and end-of-life treatment of sold products. The Scope 3 FLAG GHG emissions target includes FLAG emissions and removals. Combined, these Scope 3 targets comprised 77% of Scope 3 emissions in 2020. Due to the complexity of consolidating Scope 3 data from our suppliers and value chain, we report Scope 3 data one year behind other metrics.

# CLIMATE continued

## CLIMATE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>50% absolute reduction in Scope 1 and 2 GHG emissions by 2030 (versus 2020 baseline)<sup>1</sup></b>	Scope 1 and Scope 2 CO <sub>2</sub> e emissions intensity ratio (tonnes per £m revenue)	<b>11.5</b>	13.3	15.2	Y
	Scope 1 and Scope 2 CO <sub>2</sub> e emissions intensity ratio (tonnes per €m revenue)	<b>9.7</b>	11.5	12.9	Y

– in line with a 1.5°C warming pathway

### Scope 1 emissions

**KPI definition:** Scope 1 includes direct emissions from sources owned or controlled by BAT. These are emissions associated with the use of fuel at facilities under our operational control and by our vehicle fleet, CO<sub>2</sub> used for the production of Dry Ice Expanded Tobacco (DIET), fugitive emissions and process emissions from wastewater and waste treatment on site. Fuels include both renewable, such as wood fuel, biodiesel, etc., and non-renewable ones, such as natural gas, LPG, diesel, coal, etc.

**Methodology:** Data is collected from invoices, internal metering, telematics, fuel cards, and other documentation that is logged within the EHS Reporting Tool. DEFRA Greenhouse Gas Reporting: Conversion Factors 2024 are used to convert to CO<sub>2</sub>e. We consolidate the data on fugitive and other process related GHG emissions, such as from refrigerants and fire suppression agents use (HFCs, PFCs, CO<sub>2</sub>e), anaerobic water treatment on site (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) and waste treatment, such as composting, on site (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O). As per GHG Reporting Protocol only Kyoto component gases are included in our reported Scope 1 emissions. However, we track both Kyoto and non-Kyoto gases as changes in the levels of non-Kyoto gases may increase reportable Kyoto gas emissions. The data

is based on cooling, air conditioning and firefighting equipment refills, disposals and commissioning, data of treated water by quantity and quality of biochemical oxygen demand (BOD), chemical oxygen demand (COD) and measurements of organic content in the treated waste.

The Scope 1 baseline figure does not include fugitive and other process GHG emissions.

### Scope 2 emissions

**KPI definition:** Scope 2 includes indirect emissions associated with purchasing electricity, hot water and steam consumed at our locations. While electricity is the main source, there are a few facilities purchasing steam from third parties and rented offices using central heating at multi-tenant buildings.

**Methodology:** Data is collected from invoices, internal metering and in some instances via the Building Management System (BMS). Scope 2 market-based CO<sub>2</sub>e emissions are calculated from supplier-specific emissions factors. To ensure reported market-based CO<sub>2</sub>e emissions meet the 'Good quality criteria' as per GHG Protocol Scope 2 Guidance, we specify market-based factors only when these are supported by contractual instruments. Regarding the procurement of electricity and renewable energy, we take information from unbundled energy

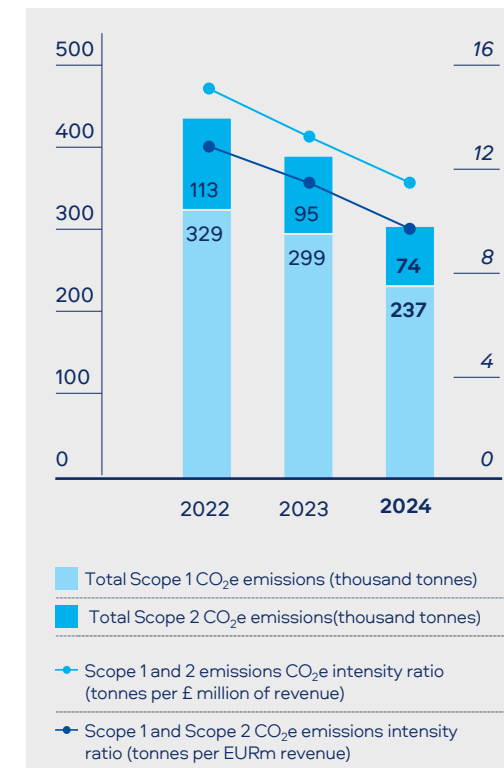
attribute certificates such as International Renewable Energy (I-RECs), Guarantees of Origin (GoOs), etc., or use green electricity products from an energy supplier (supported by energy attribute certificates) or supply under Power Purchase Agreements.

**Use of estimations:** Whenever supplier-specific market-based factors are not available, Scope 2 CO<sub>2</sub>e emissions are calculated using the European Association of Issuing Bodies (AIB) residual mix factors 2023, where available. If not, International Energy Agency (IEA) 2024 country specific emissions factors are used for the calculation. Location-based Scope 2 CO<sub>2</sub>e emissions are calculated using IEA 2024 country specific emissions factors.

### Emission intensity ratio

**Methodology:** Scope 1 and 2 emissions intensity ratio (tCO<sub>2</sub>e per million GBP) is calculated as the sum of Scope 1 and Scope 2 (market-based) CO<sub>2</sub>e emissions divided by revenue in £m and €m. Note: revenue is net of duty, excise and other taxes.

## Scope 1 and Scope 2 emission reduction (absolute and intensity)



### Summary of progress towards our targets

Our combined Scope 1 and 2 (market-based) GHG emissions<sup>1</sup> are decreasing year on year. In 2024, we reduced our Scope 1 and 2 GHG emissions by 21.2% compared to 2023 (42.6% versus 2020 baseline).

Scope 1 GHG emissions decreased by 20.8% compared to 2023 (30.7% versus 2020 baseline). Scope 2 GHG emissions decreased by 22.6% compared to 2023 (63.0% versus 2020 baseline).

#### Note:

1. Compared to a 2020 baseline. Our near-term 2030 science-based targets comprise a 50% reduction in Scope 1 and 2 GHG emissions. The Scope 3 Industrial (non-FLAG) GHG emissions target includes purchased goods and services, upstream transportation and distribution, use of sold products, and end-of-life treatment of sold products. The Scope 3 FLAG GHG emissions target includes FLAG emissions and removals. Combined, these Scope 3 targets comprised 77% of Scope 3 emissions in 2020. Due to the complexity of consolidating Scope 3 data from our suppliers and value chain, we report Scope 3 data one year behind other metrics.

# CLIMATE continued

CLIMATE continued		Progress tracking			Assured
Targets/ambitions	Metric	2024	2023	2022	
<b>Using renewable methods for tobacco curing</b>	% of total tobacco sourced cured with renewable fuels and methods (sustainable wood+biomass+sun cured+air cured)	<b>87</b>	85	83	N
<b>Increase in the amount of renewable energy we source to 50% by 2030</b>	Total energy consumption (GWh)	<b>1,996</b>	2,182	2,344	Y
	From activities for which the Group is responsible (GWh)	<b>1,135</b>	1,292	1,435	N
	Resulting from the purchase of energy by the Group for its own use (GWh)	<b>861</b>	890	909	N
	Energy consumption intensity (GWh per £m revenue)	<b>0.077</b>	0.080	0.085	Y
	Energy consumption intensity (GWh per EURm revenue)	<b>0.065</b>	0.070	0.072	Y
	Total non-renewable energy consumption (GWh)	<b>1,096</b>	1,350	1,574	Y
	Total renewable energy consumption (GWh)	<b>900</b>	832	771	Y
	Renewable energy as a % of total direct energy use	<b>45.1</b>	38.1	32.9	N

## Energy consumption

**KPI definition:** Energy consumption is reported in line with GRI 302, Energy, 2016, Disclosure 302-1, Energy consumption within the organisation. This includes energy use resulting from:

- Activities for which the Group is responsible including energy from the combustion of fuel at our facilities and in fleet vehicles and energy generated at our facilities using non-fuel technology, e.g. solar; and
- Purchased electricity, steam and hot water by BAT for use at our facilities and fleet vehicles.

**Methodology:** Energy consumption is calculated from raw data of fuel, electricity, hot water and steam consumption submitted by reporting units across the Group in the EHS Reporting Tool. The data used in the calculations are the same as for Scope 1 and 2 CO<sub>2</sub>e emissions. Reported data of fuel use are reported in different units of measurement (e.g. tonnes, litres, m<sup>3</sup>, etc.) and are converted into an appropriate metric for conversion using the DEFRA 2024 factors.

Although the specifications of fuels and their calorific values may differ across various sites, the same DEFRA calorific values and emission factors are uniformly applied throughout BAT for consistency.

Purchased electricity, hot water, and steam, along with energy generated on-site from non-fuel technologies, are reported in energy units (kWh or GJ). Therefore, no specific conversion factor is needed. According to the official definition, the conversion between Joules and Watts is 1 Watt = 1 Joule per second. Energy consumption (GJ) = Non-Renewable Energy (GJ) + Renewable Energy (GJ)

## Energy consumption intensity ratio (GWh per £m/€m)

**Methodology:** Energy consumption intensity ratio (GWh per million GBP/ EUR) is calculated as Energy consumption in GWh divided by Revenue in £m and €m.

## Renewable energy

**KPI definition:** Renewable energy includes:

- Energy generated from renewable fuels at our sites (e.g. wood fuel, and biomass fuels) and in fleet vehicles, owned or leased (e.g. biodiesel); and
- Purchased renewable electricity, hot water and steam; and
- Renewable energy generated on site using non-fuel technology (e.g. with photovoltaic installations or solar water heaters).

**Methodology:** Renewable energy generated from fuels is calculated from data inputs in different units of measurement (e.g. tonnes, litres) and 2024 DEFRA emission factors.

Purchased renewable electricity, hot water and steam as well as renewable energy generated on site from non-fuel technologies is reported in energy unit (kWh or GJ), and therefore do not require conversions.

% of Renewables in Energy Consumption is calculated as Renewable Energy (GJ)/Direct Energy (GJ).

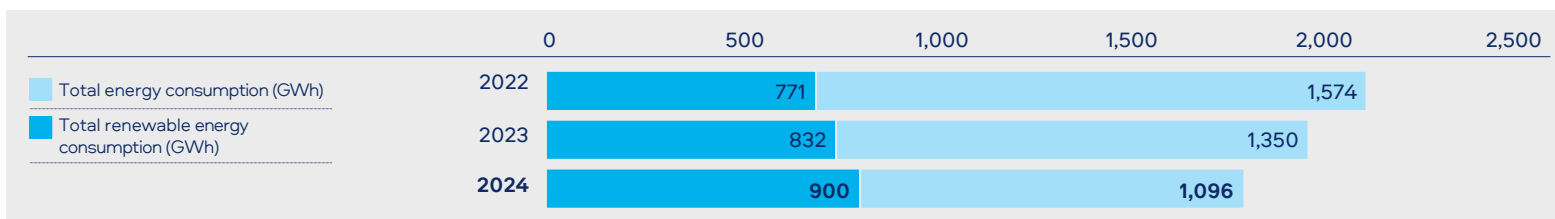
## Non-renewable energy consumption (GWh)

**KPI definition:** Non-renewable energy includes:

- Energy generated from non-renewable fuels at our sites (e.g. natural gas, diesel, fuel oil) and in fleet vehicles, owned or leased (e.g. petrol, diesel); and
- Purchased standard grid electricity, hot water and steam.

**Methodology:** Non-renewable energy generated from fuels is calculated from data inputs in different units of measurement (e.g. tonnes, litres) and 2024 DEFRA emission factors. Purchased standard grid electricity, hot water and steam in energy unit (GJ), and therefore do not require conversions.

## Increasing the use of renewable energy in our operations



# CLIMATE continued

## Scope 3 emissions

**Definition:** Scope 3 emissions are all other indirect emissions that occur in our upstream and downstream activities, such as business travel, waste management and the value chain.

+ For more information see **Simplified Scope 3 Methodology** document on: [bat.com/reporting](https://bat.com/reporting)

## Scope 3 biogenic emissions

**Definition:** CO<sub>2</sub>e emissions from the combustion or biodegradation of biomass.

## Scope 3 FLAG emissions

**Definition:** FLAG emissions are greenhouse gas emissions from activities in the forest, land, and agriculture (FLAG) sector. They include a wide range of emissions from activities that occur on-farm and upstream, such as the manufacture of fertilizers. According to the SBTi, they account for almost a quarter of global emissions.

## Biomass

**Definition:** Any material or fuel produced by biological processes of living organisms, including organic non-fossil material of biological origin (e.g. plant material), biofuels (e.g. liquid fuels produced from biomass feedstocks), biogenic gas (e.g. landfill gas), and biogenic waste (e.g. municipal solid waste from biogenic sources).

## Scope 3 reporting

**Scope of Reporting:** Below we provide a comparison of our 2024 and 2023 GHG Emission Inventories and provide a high-level explanation for the changes in our GHG emission reporting within the year.

**In 2024, due to the submission of the new Scope 3 FLAG and Scope 3 Industrial (Non-FLAG) targets to SBTi for validation and to aid comparability, we have restated total Scope 3 GHG emissions and Scope 3 Category 1 Purchased Goods and Services, with the Category components broken out for ease of comparability.**

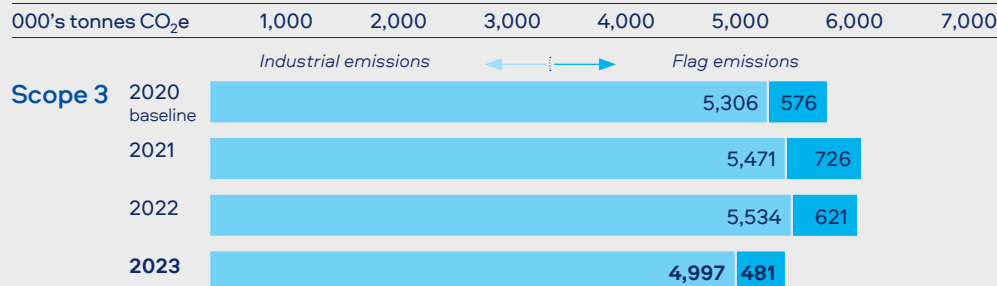
In addition, we have:

- Included adjustments to Category 4 Upstream Transportation and Distribution which include storage, warehousing and Well to Wheel adjustments;
- Included Category 9 Downstream Transportation and Distribution emissions associated with the storage of our products in the downstream retail network;
- Reported Total Biogenic emissions including Category 1 and 11 contributions following the separation of reportable emissions and Biogenic emissions; and
- Presented Category 15 for the first time as we have collected the necessary data.

The material changes to Scope 3 categories are driven by improved life cycle emissions information, as well as the aforementioned updates to FLAG targets and Biogenic emissions.

+ For more information see **Simplified Scope 3 Methodology** document on: [bat.com/reporting](https://bat.com/reporting)

## Summary of progress towards our target



We continue to reduce our Scope 3 emissions and in 2024, we submitted two new near-term Scope 3 targets to the Science Based Targets Initiative (SBTi) for validation:

- Forest, Land and Agricultural (FLAG) target covering emissions related to the land sector.
- Industrial (non-FLAG) target covering all other relevant emissions. Prior year numbers have been restated accordingly.

# CLIMATE continued

- **30.3% reduction in Scope 3<sup>1</sup> FLAG GHG emissions and 42% absolute reduction in Industrial (non-FLAG) GHG emissions by 2030** (submitted to SBTi for validation as 1.5°C aligned in September 2024)
- **Net Zero GHG emissions in our value chain by 2050** (submitted to SBTi for validation as 1.5°C aligned in September 2024)

- **50% reduction in Scope 1 and 2 GHG emissions by 2023<sup>3</sup>** (vs 2020 baseline) - approved in July 2022 by the SBTi
- **50% reduction in Scope 3 GHG emissions by 2030<sup>3</sup>** (vs 2020 baseline) - approved in July 2022 by the SBTi
- **Net Zero by 2050 across our value chain** (ambition)

2024 BAT Group Greenhouse Gas Emissions						
Emission Source	Total Emissions (Thousand Tonnes CO <sub>2</sub> e)					Assured
	2024	2023	2022	2021	2020	
Total Scope 1 CO <sub>2</sub> e <sup>2</sup>	237	299	329	325	342	Y
Total Scope 2 CO <sub>2</sub> e Market-based	74	95	113	170	199	Y
Total Scope 2 CO <sub>2</sub> e Location-based	325	342	356	393	418	Y
Total Scope 3 CO <sub>2</sub> e <sup>1</sup>	N/A	5,479	6,155	6,198	5,882	Y
For 2023, Scope 3 GHG emissions are reported one year later						
Total Scope 3 Industrial (Non-FLAG) emissions	N/A	4,997	5,534	5,471	5,306	N
Total Scope 3 FLAG emissions	N/A	481	621	726	576	N
Category 1: Purchased Goods and Services (Total)	N/A	3,563	4,088	4,188	3,953	N
Category 1: Purchased Goods	N/A	1,768	1,981	1,973	1,970	N
Category 1: Purchased Services	N/A	1,117	1,212	1,143	1,091	N
Category 1: Purchased Tobacco Leaf	N/A	678	895	1,071	892	N
Category 2: Capital Goods	N/A	81	140	142	172	N
Category 3: Fuel and Energy Related Emissions	N/A	176	179	197	164	N
Category 4: Upstream Transportation and Distribution	N/A	308	377	373	348	N
Category 5: Waste Generated in Operations	N/A	3	5	8	9	N
Category 6: Business Travel	N/A	87	33	19	18	N
Category 7: Employee Commuting	N/A	62	71	75	67	N
Category 9: Downstream Transportation and Distribution	N/A	16	19	22	21	N
Category 11: Use of Sold Products	N/A	225	252	257	209	N
Category 12: End-of-Life Treatment of Sold Products	N/A	142	161	225	231	N
Category 14: Franchises	N/A	1	1	1	5	N
Category 15: Investments	N/A	815	828	691	685	N
Total Scope 3 Biogenic emissions	N/A	1,580	1,780	1,968	2,494	N
Total Category 1 Biogenic emissions	N/A	1,090	1,263	1,437	1,947	N
Total Category 11 Biogenic emissions	N/A	491	517	531	547	N

2023 BAT Group Greenhouse Gas Emissions					
Emission Source	Total emissions (thousand tonnes CO <sub>2</sub> e)				
	2023	2022	2021	2020	Assured
Total Scope 1 CO <sub>2</sub> e	267	308	325	342	Y
Total Scope 1 CO <sub>2</sub> e emissions, including fugitive emissions	299	329	N/A	N/A	Y
Total Scope 2 CO <sub>2</sub> e Market-based	95	113	170	199	Y
Total Scope 2 CO <sub>2</sub> e Location-based	342	356	393	418	Y
Total Scope 3 CO <sub>2</sub> e <sup>3</sup>	N/A	6,045	6,496	6,907	Y
For 2022, Scope 3 GHG emissions are reported one year later					
Total Scope 3 CO <sub>2</sub> e Reportable Emissions	N/A	4,611	4,814	4,817	N
Total Scope 3 CO <sub>2</sub> e Net Biogenic Emissions (including biogenic removals)	N/A	1,433	1,682	2,090	N
Category 1: Purchased Goods and Services (Total)	N/A	4,301	4,660	5,120	N
Category 1: Purchased Goods	N/A	1,890	1,905	1,898	N
Category 1: Purchased Services	N/A	818	839	972	N
Category 1: Purchased Tobacco Leaf	N/A	1,402	1,733	2,061	N
Category 1: Other Purchased Goods and Services	N/A	191	183	189	N
Category 2: Capital Goods	N/A	140	142	172	N
Category 3: Fuel and Energy Related Emissions	N/A	179	197	164	N
Category 4: Upstream Transportation and Distribution	N/A	370	365	348	N
Category 5: Waste Generated in Operations	N/A	5	8	9	N
Category 6: Business Travel	N/A	33	18	18	N
Category 7: Employee Commuting	N/A	71	75	67	N
Category 9: Downstream Transportation and Distribution	N/A	15	17	17	N
Category 11: Use of Sold Products	N/A	769	788	756	N
Category 12: End-of-Life Treatment of Sold Products	N/A	161	225	231	N
Category 14: Franchises	N/A	1	1	5	N

**Notes:**

1. Refer to note 1 on page 9.
2. A category of Scope 1 direct greenhouse gas (GHG) fugitive emissions result from the direct release to the atmosphere of GHG compounds from various types of equipment and processes. Our 2020 and 2021 Total Scope 1 CO<sub>2</sub>e GHG emissions do not include fugitive emissions as this data is not available.
3. See note 1 on page 81 of the 2023 Combined Annual and Sustainability Report.

# CLIMATE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
% of suppliers of purchased goods and services by spend, to set Science-Based Targets (SBTs) by 2025	% of suppliers of purchased goods and services by spend to set Science-Based Targets (SBTs) by 2025	23.5	15.0	13.0	N

### Near-term science based target

**Definition:** GHG reduction targets are in line with what the latest climate science deems necessary, which is to limit warming to 1.5°C above pre-industrial levels and to be achieved within a five to ten year time frame from the date of submission to the SBTi.

### Long-term science based target

**Definition:** GHG reduction targets in line with what the latest climate science deems is necessary to reach Net Zero at the global or sector level in 1.5°C pathways before 2050.

### Net Zero GHG emissions

**Definition:** Reducing greenhouse gas emissions to as close to zero as possible, with any remaining emissions re-absorbed from the atmosphere, by oceans and forests for instance.

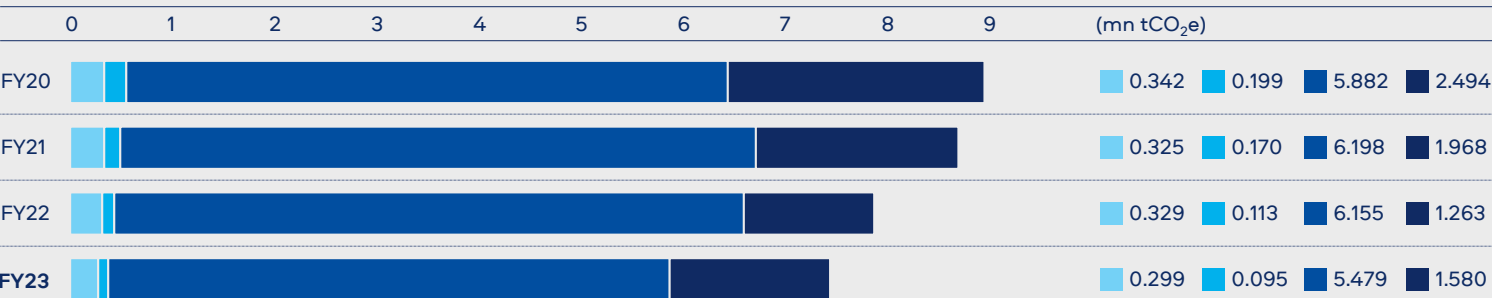
Setting corporate Net Zero targets aligned with meeting societal climate goals means:

- 1 Reducing scope 1, 2 and 3 emissions to zero or a residual level consistent with reaching Net Zero emissions at the global or sector level in eligible 1.5°C scenarios or sector pathways; and
- 2 Neutralising any residual emissions at the Net Zero target date – and any GHG emissions released into the atmosphere thereafter.

### Breakdown of BAT's GHG Emission

7.42<sup>1</sup>

Total million tonnes of CO<sub>2</sub>e



**Note:**  
1. Based on 2023 numbers

### Response Rate for CDP Supply Chain

BAT **94%**

CDP Global Average **40%**

### Summary of progress towards our target

We invited 726 suppliers representing 74.5% of our purchased goods and services emissions, to respond to the CDP Supply Chain programme.<sup>1</sup>

We recorded a 94% response rate,<sup>2</sup> which is above the global average CDP response rate of 40%.

Data collected through the programme enables us to better understand our suppliers' progress on emissions reductions and prioritise our own actions, informing our Supplier Climate Enablement programme.

Our target for 20% of our purchased goods and services suppliers by spend to have set SBTs by 2025, has been achieved one year in advance.

By year-end 2024, 23.5% of suppliers had SBTs in place, and an additional 17.3% have committed to setting them.

We will continue to monitor and report progress.

**Notes:**

1. This is a 21% increase compared to 2023.
2. Excluding Russia and Belarus. More details about changes to the Group related to Russia and Belarus are available on page 339 of the 2024 Combined Annual and Sustainability Report.

IMPACT AREA:

# NATURE

OUR AMBITION

Contributing to a Nature  
Positive<sup>1</sup> future.



**Note:**

1. According to The Nature Positive Initiative, 'Nature Positive' is a goal which refers to measurable outcomes that contribute to halting and reversing nature loss with significant benefits to society (<https://www.naturepositive.org/about/the-initiative>).

# NATURE continued

NATURE		Progress tracking			
Targets/ambitions	Metric	2024	2023	2022	Assured
Forest Positive in the tobacco supply chain by 2025	Hectares of forests planted and verified for conservation and for Forest Net Positive	131.6	68.8	27.6	N
Deforestation and Conversion Free tobacco supply chain by 2025	% of wood used in Thrive Supply Chain with deforestation and conversion free (DCF) status	98.5	96.5	95.5	N

## Biodiversity and ecosystems

### Deforestation

**Definition:** Deforestation is defined as loss of natural forest as a result of i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation.

This definition pertains to no-deforestation supply chain commitments, which generally focus on preventing the conversion of natural forests.

Severe degradation (scenario iii in the definition) constitutes deforestation even if the land is not subsequently used for a non-forest land use.

Loss of natural forest that meets this definition is considered to be deforestation regardless of whether or not it is legal.

The Accountability Framework Initiative's (AFI) definition of deforestation signifies 'gross deforestation' of natural forest where 'gross' is used in the sense of 'total; aggregate; without deduction for reforestation or other offset.'

Source: AFI <https://accountability-framework.org/use-the-accountability-framework/definitions/>

### Conversion

**Definition:** Change of a natural ecosystem to another land use or profound change in a natural ecosystem's species composition, structure, or function.

Deforestation is one form of conversion (conversion of natural forests).

Conversion includes severe degradation or the introduction of management practices that result in a substantial and sustained change in the ecosystem's former species composition, structure, or function.

Change to natural ecosystems that meets this definition is considered to be conversion regardless of whether or not it is legal.

Source: AFI <https://accountability-framework.org/use-the-accountability-framework/definitions/>

### Forest Positive

**Definition:** The conservation / reforestation programme is considered Forest Positive when:

- The area is at least 0.5 ha;
- Selection of species is mainly aimed at maximising biodiversity with native species;
- Where applicable to the ecosystem selected, the trees planted should be able to reach 5m height and the canopy should be bigger than 10% of the planted area; and
- The planted area must be monitored at least one year after the planting date to verify survival rate of the site and the number of trees that survived since planting.

The planting of production forests for wood, fibre, bioenergy and non-timber products like fruits, herbs and honey do not fall under forests for conservation.

### % of wood used in Thrive supply chain with deforestation and conversion free (DCF) status

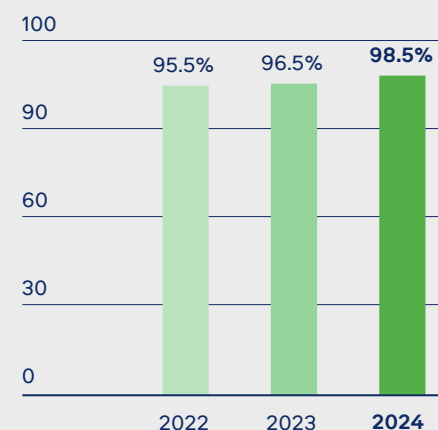
**KPI definition:** As stated in the Biodiversity Operational Standard on Tobacco Farming, we follow the AFI ([accountability-framework.org](https://accountability-framework.org)) definitions of deforestation and conversion as well as the CDP Forest Guiding Criteria and the Proforest Guidance for Deforestation and Conversion Free (DCF) report. We combine different levels of evidence and deforestation/conversion monitoring methods to trace and classify wood as DCF (with a cut-off date of 31 December 2020). Wood should be traceable to at least sub-national jurisdiction level and should be from:

- Sources certified under an acceptable scheme;
- Wood production forests monitored for deforestation and conversion or authorized natural managed forests with management plans; and
- A sourcing area classified as low risk for deforestation and conversion based on geospatial and/or local risk assessments conducted by third parties.

**Methodology:** This is an indicator reported via our Thrive programme, covering over 93% of the tobacco purchased in 2024 and includes on the ground assessments for wood traceability, volume and the type of wood. Refer to page 31 for information on our Thrive programme.

## Deforestation and Conversion Free tobacco supply chain by 2025

% of wood used in Thrive Supply Chain<sup>1</sup> with deforestation and conversion free (DCF) status



### Summary of progress towards our target

In 2024, we monitored 100% of directly contracted farmers (approximately 90,500) for deforestation and natural ecosystem conversion. We also trained our farmers and field technicians on best practices for resource preservation, such as the use of sustainable wood for tobacco curing, forest conservation biodiversity, integrated pest management and soil and water management.

**Note:**

1. Our ambitions cover all tobacco we purchase for our products ('tobacco supply chain'); which is used in our combustibles, Traditional Oral and Heated Products. Our metrics, however, derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 93% of the tobacco we purchased by volume in 2024 ('Thrive Supply Chain').

# NATURE continued

## NATURE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Deforestation and Conversion Free tobacco supply chain by 2025</b>	% of directly contracted farmers' wood fuels that are from sustainable wood sources	<b>100</b>	99.99	99.99	Y
<b>Deforestation Free pulp and paper supply chain by 2025</b>	% of pulp and paper materials sourced with low risk of deforestation <sup>1</sup>	<b>86.3</b>	69.3	N/A	N

### % of directly contracted farmers' wood fuels that are from sustainable wood sources

**KPI definition:** Sustainable wood sources are defined as: wood resources harvested in such a way that does not cause deforestation of natural ecosystems. This may include wood sourced from existing tree plantations or managed natural forest, identified invasive exotic species that have not been planted and timber by-products, such as sawdust, branches and twigs.

**Methodology:** The data collected is based on 100% (which is more than 90,500) of the directly contracted farmers monitored in the Group's own Leaf Operations), of which 53% make use of wood for curing. The percentage reported represents sustainable wood used by those farmers. This data excludes farmers that our third-party suppliers source from. The Field Technician is responsible for the data collection from the farmer in each farm visit. The Field Technician verifies the wood quantity and species and / or evidence given by the farmer, including documents, as invoices or any other paper forms, verifies the existence of forest plantation on-farm, measures the wood pile as applicable and perform a visual check. Finally, data is signed off from farmers and Field Technicians and logged into the monitoring systems.

### % of pulp and paper materials sourced with low risk of deforestation

**KPI definition:** Relates to proportion of volumes (in tonnes) of pulp and paper products sourced, covering board and paper used in primary and secondary packaging for all products, fine paper for cigarettes and Heated Products and cellulose acetate tow for filters.

We apply a materiality threshold, resulting in more than 98% of total pulp and paper volumes sourced being in scope of our assessment.

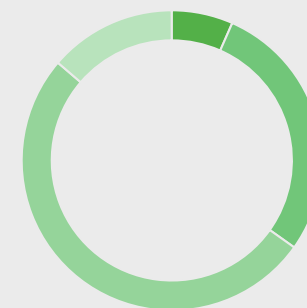
**Methodology:** In line with the AFI, volumes are assessed as deforestation free (Deforestation Free/DF) when the suppliers of those volumes can demonstrate that the base material is sourced with low risk of deforestation (with a cut-off date of 31 December 2020).

Low risk means the volume is either certified through chain of custody schemes providing full assurance from a supplier that has achieved an "A/A-" rating in their CDP Forest disclosure for the timber commodity and 100% of volume was disclosed as DF, was traceable to a low-risk sourcing area, or was traceable to a high-risk sourcing area with the production unit monitored as DF. We enhanced this metric in 2024, to align to the latest frameworks.

**Note:**

1. We enhanced the methodology of this metric in 2024, therefore the prior year numbers are not directly comparable.

## Deforestation Free pulp and paper supply chain by 2025



Volume certified through Chain of Custody schemes providing full DF assurance	<b>7%</b>
Volume sourced from suppliers with a CDP Forest disclosure rating of 'A/A-' and 100% of volume was disclosed as DF	<b>28%</b>
Volume traceable to low-risk sourcing areas	<b>51%</b>
Volume traceable to high-risk sourcing areas with production units monitored as DF	<b>0%</b>
Volumes not yet possible to classify as low risk of deforestation	<b>14%</b>

### Summary of progress towards our target

In 2024, we updated our approach to determine DF status for our pulp and paper supply chain, which consists of:

- Gathering information on suppliers, management systems, their performance, mill locations and volumes and deforestation compliance;
- Assessing suppliers against internal criteria and international good practice; and
- Identifying improvement actions to inform supplier engagement scope and action plans.

# NATURE continued

NATURE continued					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>General tobacco supply chain data</b>	% of tobacco volumes sourced from BAT Leaf operations	<b>73</b>	73	63	N
	Approx. number of directly contracted tobacco farmers	<b>90,500</b>	91,196	81,285	N
	Approx. number of farmers supplying third-party leaf suppliers	<b>156,861</b>	154,579	194,561	N
	% of tobacco volumes covered by Thrive assessments	<b>93.2</b>	94.0	84.0	N
<b>Soil and water management practices in our tobacco supply chain</b>	% of tobacco hectares reported to have appropriate best practice soil and water management plans implemented	<b>87</b>	81	82	Y
<b>General environmental data</b>	% of BAT manufacturing sites production volume with ISO 14001	<b>27</b>	34	44	N
	% of BAT manufacturing sites production volume with ISO 9001	<b>60</b>	46	56	N

## Purchased tobacco

### Leaf Reporting Methodology - Environment

As tobacco-growing seasons vary around the world, all Leaf data is based on the most recent crop cycle at the time of reporting, instead of the crop grown in the calendar year. Tobacco volumes are based on the volume of crop bought from our directly contracted farmers and those of our third-party suppliers.

### Farmer Sustainability Management (FSM)

**Definition:** Our Farmer Sustainability Management (FSM) system is a digital platform that supports the work of our Field Technicians by enabling a consistent approach to farm monitoring and overall sustainability management.

### % of tobacco hectares reported to have appropriate best practice soil and water management plans implemented

**Methodology:** Reported via our Thrive assessments covering all directly contracted farmers and third-party suppliers, which represented over 93% of the tobacco purchased by volume in 2024. As tobacco-growing seasons vary around the world, data is based on the most recent crop cycle at the time of reporting, instead of the crop grown in the calendar year. Through training our Thrive farmers become aware of best practices in soil and water management.

Data collected for our directly contracted farmers is done so by Field Technicians who visit our directly contracted farmers regularly during the growing season. The Field Technicians conduct interviews with farmers and observe soil and water management practices on the farm. Some examples of these practices are the use of green manuring/cover crop, use of minimum/zero tillage, planting over wide base high ridges, use of drainage channels to avoid water-logging and erosion, among others.

Details of each visit are recorded in our FSM digital app by the Field Technician and are formally acknowledged by the farmer. Established controls are in place for data validation, including unannounced visits carried out by individuals who do not usually visit farms regularly, with the main purpose of checking information previously collected by the Field Technician. Our third-party suppliers collect data via their own farm monitoring system.

**Data governance:** Data is tracked and analysed by the Global Leaf ESG team to ensure appropriate oversight and drive management action as appropriate. All completed Thrive assessments are reviewed and validated by a third party and suppliers are required to declare that the information reported is complete and accurate.

### % of BAT manufacturing sites production volume with ISO 14001

**Definition:** Relates to production volume from BAT owned manufacturing sites with ISO 14001 certification, which was 27% in 2024. Manufacturing sites are cigarette manufacturing factories, sites manufacturing other tobacco products, snus, modern oral and liquids. ISO 14001 is the internationally recognised standard for environmental management systems.

### % of BAT manufacturing sites production volume with ISO 9001

**Definition:** Relates to production volume from BAT owned manufacturing sites with ISO 9001 certification. Manufacturing sites are cigarette manufacturing factories, sites manufacturing other tobacco products, snus, modern oral and liquids. ISO 9001 is the internationally recognised standard for quality management.

# NATURE continued

## NATURE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>35% reduction in water withdrawn by 2025 (vs 2017 baseline)</b>	Total water withdrawn (mn m <sup>3</sup> )	<b>2.73</b>	3.16	3.50	Y
	% reduction in water withdrawn – vs 2017 baseline	<b>47.4</b>	39.2	32.6	N
	Total water withdrawn from water utility supplies (mn m <sup>3</sup> )	<b>1.75</b>	2.01	2.30	N
	% withdrawn from water utility supplies	<b>63.9</b>	63.6	64.0	N
	Total water withdrawn from fresh water sources (mn m <sup>3</sup> )	<b>0.05</b>	0.05	0.05	N
	% withdrawn from fresh surface water sources	<b>2.0</b>	1.5	1.0	N
	Total water withdrawn from groundwater sources (mn m <sup>3</sup> )	<b>0.9</b>	1.1	1.2	N
	% withdrawn from groundwater sources	<b>34.1</b>	35.0	34.0	N
	Total water withdrawn from Water Stress areas (mn m <sup>3</sup> )	<b>1.06</b>	1.44	0.49	N
	% water withdrawn from Water Stress areas	<b>39.0</b>	46.0	14.0	N
	% water withdrawn from non water stressed areas	<b>61.0</b>	54.0	86.0	N
	Number of operations sites in Water Stress areas with/without water management policies	<b>23/0</b>	24/0	16/0	Y
	Total water consumption (mn m <sup>3</sup> )	<b>1.44</b>	1.63	1.84	N

## Water

### Water withdrawn

**KPI definition:** We use the GRI 303: Water and Effluents 2018 Standard to guide our water withdrawn definition and methodology. Water withdrawn includes all water drawn from surface water, including harvested rainwater, groundwater, seawater, or a third party water for any use within our direct operations. Water is used in manufacturing processes, utilities, and for social and horticultural purposes, provided these activities are confined to our company premises. It does not include irrigation in agriculture, e.g. in leaf growing.

**Methodology:** Water withdrawn data is collected via the EHS reporting system. Sites collect data for water withdrawn based on invoices from suppliers and internal metering, which at major sites is performed in real time via building

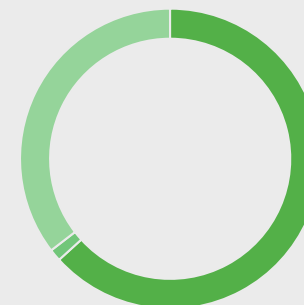
management systems (BMS). Small offices apply estimates based on area occupied or headcount. Our 2017 baseline figure for water withdrawn is 5.20 million cubic meters.

### Number of operations sites in areas of high-water stress with and without water management policies

**KPI definition:** This disclosure is aligned to EU Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation) and addresses Additional Adverse Sustainability Indicator 8. Exposure to areas of high water stress: water stress is an indicator of competition for water resources and is generally defined as the ratio of demand for water by human society divided by available water.

**Methodology:** We use the WRI Aqueduct Water Risk Atlas baseline setting to identify if our sites are located in areas of high-water stress. The Aqueduct Water Risk Atlas defines areas of high water stress as 'regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%)' as per baseline water stress default scheme. The assessment is performed annually. In 2024, 23 of our operations sites in 15 countries were identified as being in water stress areas. 100% of our operations sites located in water stress areas have water management policies in place. In addition, all of our 23 operational sites in water stress areas are either AWS (Alliance for Water Stewardship) certified or have been audited as part of ongoing AWS certification, which means they are governed by a formal site-specific water stewardship policy.

## Where we sourced our water from in 2024



2.73

Total water withdrawn (mn m<sup>3</sup>)

From water utility supplies	64%
From fresh surface water sources	2%
From groundwater sources	34%

### Summary of progress towards our target

We achieved our 2025 target for reduction in water withdrawn two years ahead of schedule. We continue to work on maintaining this target, achieving a 47.4% reduction in 2024 (against our 2017 baseline).

# NATURE continued

## NATURE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Water discharge by destination</b>	Total water discharged (mn m <sup>3</sup> )	<b>1.29</b>	1.53	1.70	Y
	Fresh surface water (mn m <sup>3</sup> )	<b>0.18</b>	0.19	0.20	N
	Brackish surface water/seawater (mn m <sup>3</sup> )	<b>0.004</b>	0.004	0.022	N
	Groundwater (mn m <sup>3</sup> )	<b>0.016</b>	0.028	0.028	N
	Third-party destinations (mn m <sup>3</sup> )	<b>1.10</b>	1.31	1.40	N
<b>30% water recycling rate by 2025</b>	Total water recycled (mn m <sup>3</sup> )	<b>1.03</b>	1.02	1.02	Y
	% of total water recycled	<b>27.5</b>	24.4	22.6	N

### Water discharge

**KPI definition:** We use the GRI 303: Water and Effluents 2018 Standard to guide our water discharge definition.

Water discharge includes effluents, used water, and unused water released to surface water, groundwater, seawater, or a third party. Water can be released into the receiving waterbody either at a defined discharge point or dispersed over land in an undefined manner or transported in tanks.

**Methodology:** The data for water discharge with breakdown by destination (third party, fresh water, brackish water, and groundwater) is collected via the EHS reporting system. Sites collect data for water discharges based on internal metering or invoices from services suppliers. In the absence of metering, estimates are applied based on water withdrawn volumes and typical water consumption of equipment and processes.

### Water recycled

**KPI definition:** For the Water recycled KPI, which is excluded from 2018 edition of the GRI 303: Water and Effluents 2018 Standard, we use the definition from CDP Water Security guidance.

Water recycled includes water and wastewater used more than once before being discharged from the organisation's boundary, so that water demand is reduced. Recycled water can be used in direct operations for watering lawns, cleaning or within utilities, e.g. for cooling, boiler feed etc.

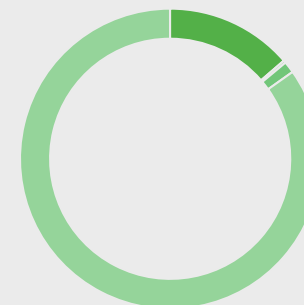
Water recycled does not include harvested rainwater.

**Methodology:** Water recycled data is collected via the EHS reporting system. Sites collect data for water recycled based on internal metering, which at major sites is performed in real time via building management systems (BMS). Where measurements are not yet in place, water recycled is estimated based on equipment specification and standard operating parameters.

### % water recycled

**Methodology:** Water recycling rate (%) is calculated as water recycled (m<sup>3</sup>) divided by total water demand, which is water recycled (m<sup>3</sup>) plus water withdrawn (m<sup>3</sup>).

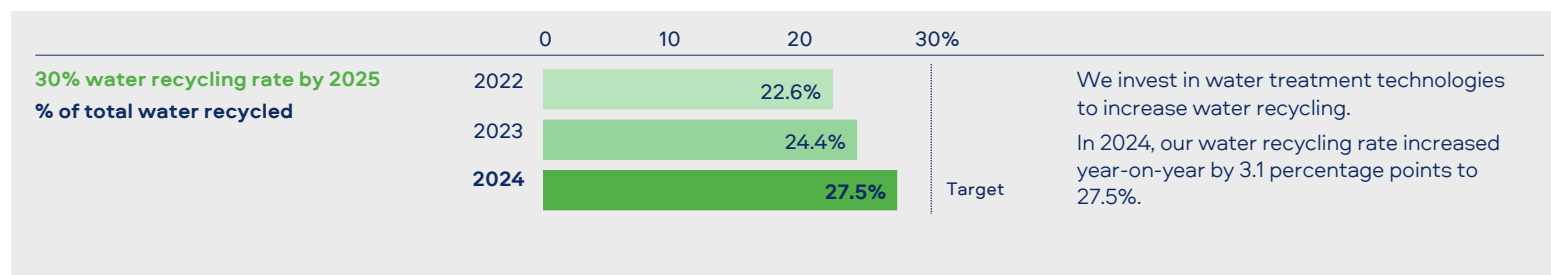
## Where we discharged our water in 2024



**1.29**  
Total water discharged (mn m<sup>3</sup>)

Fresh surface water	<b>0.18</b>
Brackish surface water/seawater	<b>0.004</b>
Groundwater	<b>0.016</b>
Third-party destinations	<b>1.10</b>

## Summary of progress towards our target



# NATURE continued

## NATURE continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>100% of operations sites to be Alliance for Water Stewardship (AWS) certified by 2025</b>	% of operations sites that are AWS certified	<b>91.0</b>	68.8	36.4	N
	Total number of operations sites with AWS certification	<b>51</b>	44	24	N
<b>Emissions to Water*</b>	<p><b>2024*:</b></p> <ul style="list-style-type: none"> <li>– 12% operations sites measure phosphates in water discharged.</li> <li>– 24% operations sites measure nitrates content in water discharged.</li> <li>– 3% operations sites measure pesticides content in water discharged.</li> </ul> <p><b>2023:</b></p> <ul style="list-style-type: none"> <li>– 60% of the facilities reported not using priority substances and 74% reported not having them in storage.</li> <li>– out of 48 priority substances, 44% are reported as not used, 44% are reported as not stored.</li> </ul>				Y

### Emissions to water

**KPI definition:** ‘Emissions to water’ refers to direct emissions of:

- Priority substances as defined in article 2(30) of directive 2000/60/EC; and
- Direct nitrates, phosphates and pesticide as defined in directives 2000/60/EC, 91/676/EEC, 91/272/EEC and 2010/75/EU.

Priority substances are excluded from the scope of this disclosure. Phosphates, nitrates, and pesticides are in scope for 2024 reporting.

**Methodology:** In 2024, we continued developing our reporting capabilities on emissions to water for phosphates, nitrates, and pesticides. As outlined in Directive 2000/60/EC, we seek to prevent or reduce emitting pollutants through our water discharges.

This year, we focused our assessment on operational sites with wastewater treatment plants that measure phosphates, nitrates, and pesticides in discharged water.

Monitoring these pollutants in discharged water aims to support the prevention or reduction of pollution incidents. Our operations sites conduct sampling following recognised sampling protocols and laboratory analysis in external accredited labs governed by local regulations. The frequency of analyses varies per site, from quarterly to annually. We performed semi-quantitative assessment across our 59 operations sites. Assessment is focused on operations sites with wastewater treatment plant. The 2024 assessment is reported in the table above.

**Data governance:** BAT operates control measures globally in line with its Group procedures for hazardous substances management designed to avoid any uncontrolled emissions to water, soil, or groundwater across its operations.

### % of operations sites AWS certified

**KPI definition:** AWS certification refers to independent certification against the Alliance for Water Stewardship (AWS) Standard 2.0.

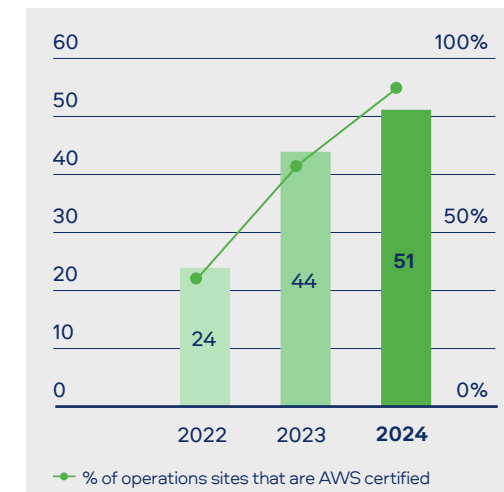
All certified BAT operating sites have successfully completed the five steps of the AWS standard guidance:

- 1 Familiarisation with the AWS standard.
- 2 Register in the AWS standard system.
- 3 Registering with AWS.
- 4 Implement the AWS standard.
- 5 Work with Water Stewardship Assurance Services (WSAS) to complete the certification process, including an on-site audit.

Sites are considered certified when the AWS Certificate is available on the AWS website within the reporting period.

**Methodology:** % of AWS certified operations sites is calculated as number of operations sites that hold AWS certificate divided by total number of operations sites, which excludes three sites that have been granted exemption due to local circumstances.

Total number of operations sites with AWS certification



### Summary of progress towards our target

In 2024, an additional eight sites in our direct operations were successfully AWS certified, bringing the total number of certified sites to 51 or 91% of our operations sites.

**Note:**

\* Due to a change in methodology, the 2023 and 2024 numbers are not directly comparable.

IMPACT AREA:

# CIRCULARITY

OUR AMBITION

Reducing the use of  
virgin raw materials.



# CIRCULARITY continued

## CIRCULARITY

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
100% of our total packaging to be reusable, recyclable or compostable where facilities exist by 2025	% share of reusable, recyclable or compostable packaging	97	94	92	N
100% take-back schemes for New Category devices, in all markets where these are sold	% of New Category markets with take-back schemes in place	100	100	100	N
	Number of markets with take-back schemes for New Category products	64	64	50	N

### Reporting Methodology - Packaging and take-back scheme data

The reporting period for our packaging data spans from 1 December 2023 to 30 November 2024. The reporting period for our take-back schemes spans from 1 December 2023 to 30 November 2024.

### % packaging recyclable, reusable or compostable

**KPI definition:** This KPI measures the share of materials used in primary and secondary packaging that is either reusable, recycle ready or compostable across sold products in each reference reporting year.

By packaging we mean materials used to wrap or protect our goods. Examples of primary and secondary packaging are all the cigarette pack elements, film used to wrap cigarette packs or closing tapes of shipment boxes applied by BAT factories, the boxes our devices come in or the pulp trays used to secure a device in a box. Tertiary packaging items applied by logistics partners or retailers outside our control, for example plastic pallets, are out of scope.

### Reusable packaging

Packaging which has been designed to accomplish, or proves its ability to accomplish, a number of trips or rotations in a system for reuse.

### Recycle-ready packaging

Packaging that is intentionally designed and produced to enable recycling where infrastructure exists based on material choices and global guidance.

### Composting

A packaging or packaging component is compostable if it is in compliance with relevant international compostability standards and if its successful post-consumer collection, sorting and composting is proven to work in practice and at scale. We use a composting aerobic process designed to produce compost from packaging

**Methodology:** While there are no means to trace what happens with packaging materials at their end of life due to the number of end markets in which our products are sold, variations in consumer behaviour and local infrastructure to process waste at end of life, this KPI focuses on the potential for reuse, recycling or composting of our packaging.

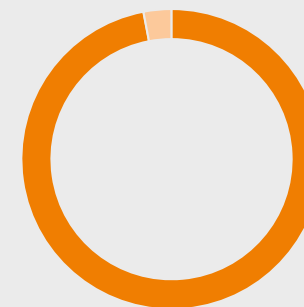
To calculate the share of recyclable, reusable and compostable packaging (in %), we calculate the volume (in tonnes) of reusable, recyclable, recycle ready or compostable packaging materials that have been used in our factories for sold products and divide it by the overall volume (in tonnes) of all packaging materials used in sold products for the reporting period.

Our packaging's recyclability calculation excludes about 1.7% of the total material used in our packaging, representing exclusions due to regulatory requirements in certain markets and adhesives used in packaging.

## Our packaging composition<sup>1</sup>

97%

Share of reusable, recyclable or compostable packaging



Reusable, recyclable or compostable packaging	97%
Others	3%

### Summary of progress towards our targets

Our target is for 100% of our total packaging to be reusable, recyclable or compostable where facilities exist by 2025, which we remain on track to achieve.

We are moving from multi-material laminates to single-material packaging or laminates where feasible.

**Note:**

1. Our packaging's recyclability calculation excludes about 1.7% of the total material used in our packaging, representing exclusions due to regulatory requirements in certain markets and adhesives used in packaging.

# CIRCULARITY continued

## CIRCULARITY continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>25% reduction in waste generated in own operations by 2025 vs 2017 baseline</b>	Total waste generated (thousand tonnes)	<b>110.58</b>	114.94	126.00	Y
	% reduction in waste generated	<b>31.0</b>	28.2	21.3	N
	Hazardous waste and radioactive waste generated (thousand tonnes) <sup>1</sup>	<b>1.20</b>	1.59	1.75	Y
	Total waste disposed (thousand tonnes)	<b>13.20</b>	14.29	19.69	N
	Waste to energy/incineration with energy recovery (thousand tonnes)	<b>10.59</b>	10.86	11.74	N
	Waste incinerated without energy recovery (thousand tonnes)	<b>1.18</b>	1.36	1.73	N
	Waste otherwise disposed (thousand tonnes)	<b>0.03</b>	0.01	0.00	N
<b>&lt;1% of waste to landfill by 2025</b>	Waste sent to landfill (thousand tonnes)	<b>1.40</b>	2.06	6.22	N
	% waste sent to landfill from direct operations	<b>1.3</b>	1.8	4.9	N
	% of operations sites reporting zero waste to landfill	<b>71.2</b>	68.8	52.0	N
<b>90% recycling rate of total waste generated by 2025</b>	Total waste recycled (thousand tonnes)	<b>97.3</b>	100.7	106.0	Y
	% of waste recycled	<b>88.1</b>	87.6	84.3	N

### Circular economy

**Definition:** The circular economy is an economic model that is regenerative by design. The aim of this model is to retain the value of the circulating resources, products, parts and materials by creating a system with innovative business models that allow for renewability, long life, optimal (re)use, refurbishment, remanufacturing, recycling and biodegradation. By applying these principles, organisations can collaborate to design out waste, increase resource productivity and maintain resource use within planetary boundaries.

### Waste generated

**KPI definition:** We follow the GRI 306: Waste 2020 Standard for defining and calculating waste data.

The parameter 'waste generated from our direct operations' is aligned with Disclosure 306-3, Waste generated.

**Methodology:** Data for waste from our direct operations is collected via the EHS reporting system.

At the reporting unit level, waste is split by type of material, non-hazardous and hazardous, and further by end destination: recycling, incineration with and without energy recovery and landfill. This includes the data for waste generated from production and other operational processes as well as waste from on-site construction and building modification.

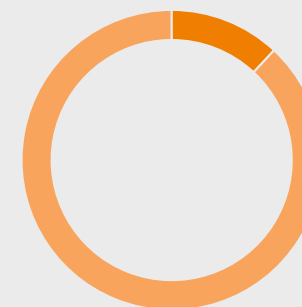
Reporting units collect data for amounts of waste generated based on declarations from suppliers or internal measurement, e.g. at weighbridges. For small offices, waste generation is estimated based on area occupied or headcount. Classification of waste for hazardous and non-hazardous is performed as per local legal requirements. Reporting units are required to track waste up until its final destination and receive records on waste management route (e.g. recycling, landfill) from suppliers. Data is provided in tonnes where possible, and if not, it is converted into tonnes. Our 2017 baseline figure is 160,124 tonnes.

**Data governance:** Data, reported by reporting units, is reviewed by Regional and Group Operations Sustainability team thorough variance analysis and benchmarking between sites with similar footprint. Data consolidated at appropriate geography (Group, Region, cluster of countries) is reported internally on a quarterly basis.

## Tackling waste in our operations in 2024

**110.58**

Total **waste generated** (thousand tonnes)



Total waste disposed	<b>13.2</b>
Total waste recycled	<b>97.3</b>

**Note:**

1. BAT does not have radioactive waste, however, this is in the PAI metric scope.

# CIRCULARITY continued

## Hazardous waste and radioactive waste generated

**KPI definition:** We follow the GRI 306: Waste 2020 Standard for defining and calculating waste data, including hazardous waste. Hazardous waste is waste that poses a physical hazard, health hazard, or environmental hazard.

**Methodology:** Detailed classification of waste as hazardous and non-hazardous is performed by reporting units as per local legal requirements.

## Waste sent to landfill

**KPI definition:** Our definition of waste to landfill is aligned with GRI 306: Waste 2020 Standard.

Waste to landfill is waste generated from our direct operations that is deposited at authorised landfill sites. This waste disposal route excludes uncontrolled waste disposal such as open burning and dumping.

Due to difference in infrastructure maturity in different geographies, the types of waste that are sent to landfill vary from one reporting unit to another.

## % of waste to landfill

**Methodology:** % of waste to landfill is calculated as waste to landfill (tonnes) divided by waste generated (tonnes).

## Waste recycled

**KPI definition:** Our definition of waste generation is aligned with GRI 306: Waste 2020 Standard, while the definition of Waste Recycled covers both Waste Recycled and Waste Preparation for Reuse as per GRI 306: Waste 2020 Standard.

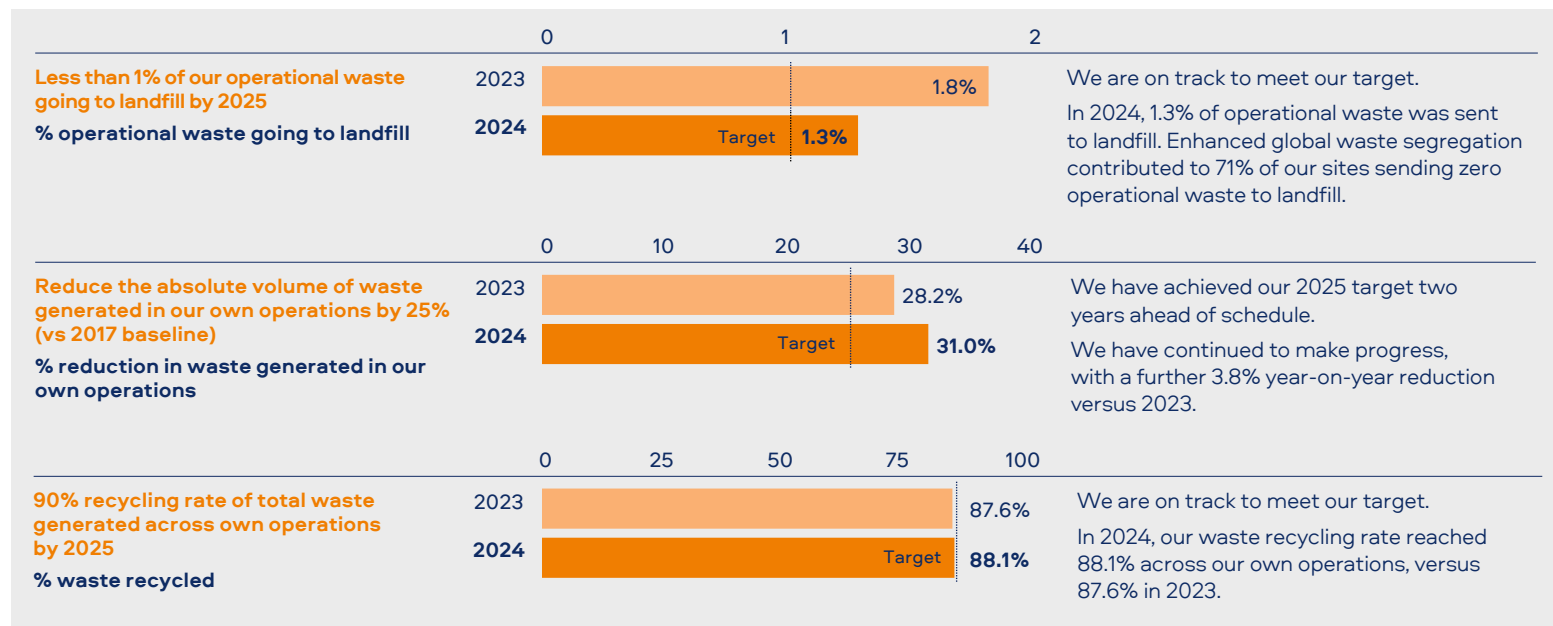
Recycling is the operation applied to items or materials that have become waste to ensure they fulfil a purpose in place of new items or materials that would otherwise have been used for that purpose. This does not include energy recovery, neither via incineration, nor via conversion into fuel.

## % of waste recycled

**Methodology:** % of waste recycled is calculated as Waste Recycled (tonnes) divided by Waste Generated (tonnes).

Our target is to recycle 90% of waste by 2025.

### Summary of progress towards our targets



IMPACT AREA:

# COMMUNITIES

OUR AMBITION

Supporting the  
livelihoods and resilience  
of our communities.



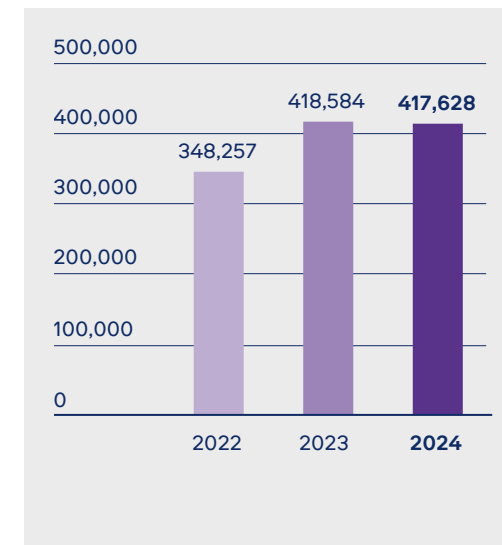
Sustainability Performance

# COMMUNITIES continued

## FARMING COMMUNITIES

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Aiming for zero child and forced labour in our tobacco supply chain** by 2025</b>	% of farms monitored for child labour	100	100	99.99	Y
	% of farms with incidents of child labour identified	0.05	0.15	0.38	Y
	Number of child labour incidents identified	117	359	942	Y
	% incidents of child labour identified and reported as resolved by the end of the growing season	100	100	100	Y
	% of farmers that received training/capacity building on child labour issues	98.50	98.08	96.40	N
	Number of attendants engaged on human rights training, with emphasis on forced labour and child labour	417,628	418,584	348,257	N
	Number of incidents of forced labour identified	0	0	6	N
	% reported as resolved by end of the growing season	N/A*	N/A	100	N

Number of attendants engaged on human rights training, with emphasis on forced labour and child labour



## Human rights

### Child labour

**Definition:** Our definition of child labour is aligned to how the International Labour Organization (ILO) defines the term, namely that the work deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development (<https://www.ilo.org/ipec/facts/lang--en/index.htm>). Reported via our Thrive annual reports covering all directly contracted farmers and farmers supplying our third-party suppliers, representing over 93% of total tobacco purchased in 2024. As tobacco-growing seasons vary around the world, data is based on the most recent crop cycle at the time of reporting, instead of the crop grown in the calendar year.

**Methodology - Child labour KPIs:** Data in relation to our contracted farmers is collected by BAT Field Technicians (Field Technicians) who visit our directly contracted farmers

approximately once a month during the growing season. Details of each visit are recorded in our Farmer Sustainability Management (FSM) digital app by the Field Technician and are formally acknowledged by the farmer. If any child labour case is identified, it is reported in the system and treated as a critical prompt action. For the case to be closed, this is followed by an unannounced visit shortly after to observe whether this is repeated, and a remediation plan agreed with the farmer. The remediation plan varies from case to case, considering the individual circumstances.

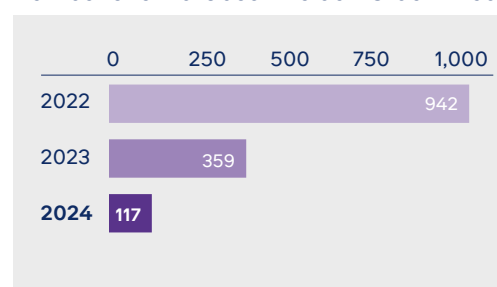
Our third-party suppliers collect data via their own farm monitoring system.

**Data governance:** Once the data is collected in the field, the country team analyse the data and approves it, or reopens the questions for discussion with the farmers. After that, the data is reported in Thrive and made available to the Global Leaf ESG team. The data is also reviewed by an independent third party.

### % of farmers who received training/capacity building on child labour issues

**Methodology:** Percentage of directly contracted farmers who were engaged on human rights training or in capacity building on child labour issues. See Reporting Criteria for Number of people engaged via training.

### Number of child labour incidents identified



### Summary of progress towards our targets

We monitor 100% of our directly contracted farmers on child labour risk and prevention. In 2024, 117 incidents of child labour were reported on 0.05% of farms in our Thrive Supply Chain\*\*. The majority of incidents were related to stitching and/or stringing tobacco green leaves. 100% of incidents were reported as resolved during the growing season. In cases of recurring incidents, a farmer's contract is not renewed for the next season. There were zero recurring incidents this year.

In addition, zero incidents of forced labour were reported in our Thrive Supply Chain\*\*.

**Notes:**

\* In 2024 no incidents of forced labour were identified, therefore this metric is not applicable for this year.

\*\* This is our ambition, which cover all tobacco we purchase for our products ('tobacco supply chain'); which is used in our combustibles, Traditional Oral and Heated Products. Our metrics, however, derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 93% of the tobacco we purchased by volume in 2024 ('Thrive Supply Chain').

Sustainability Performance

# COMMUNITIES continued

FARMING COMMUNITIES continued					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Access to grievance mechanisms for farmers and farm labourers in our Thrive Supply Chain<sup>1</sup></b>	% of farms monitored for grievance mechanisms	100	100	100	Y
	% of farmers and farm labourers reported as having access to at least one type of grievance mechanism	97.96	99.93	99.30	N
	Proportion of grievances that were reported as resolved	100	100	100	N
<b>Human rights impact assessments (HRIAs), aligned to the UN Guiding Principles for Business and Human Rights</b>	Cumulative number of HRIAs completed in tobacco sourcing countries	10	10	10	N
	Cumulative number of rights-holders engaged as part of the HRIAs	5,239	5,239	5,239	N
	Cumulative number of STP In Depth Assessments (IDA) in countries BAT sources from	12	5	4	N
	Cumulative number of BAT Leaf Suppliers assessed in the IDA	16	7	6	N

**% of farms monitored for grievance mechanisms**

**KPI definition:** Reported via our Thrive annual reports covering all directly contracted farmers, their workers and farmers supplying our third-party suppliers, representing over 93% of our total tobacco leaf purchases in 2024.

The following grievance mechanism channels are available to farmers and workers:

- Feedback during regular meetings with farmers/workers or their representatives;
- Third-party owned telephone hotlines
- Grievance boxes; and
- BAT's formal Speak Up channel that has a hotline, email address and online portal.

In addition, farmers, workers and third-party suppliers also have access to external grievance channels including farmer associations and unions, local NGOs and government led mechanisms.

**Methodology:** Operational grievances collected during farmer meetings are acted upon by BAT's operational staff. Grievance data collected through other BAT provided channels is collated, analysed and categorised by designated senior management.

The country team will then address the grievance according to its sensitivity.

Field Technicians monitor the number of farmers and workers with access to grievance mechanisms and visit the farms regularly during the growing season.

**Data governance:** Access to grievance mechanisms and grievances raised is reported in Thrive and made available to the Global Leaf ESG team for review.

If required, appropriate action plans are implement. The data is also reviewed by an independent third party. Our third-party leaf suppliers collect data via their own farm monitoring system. All in-scope suppliers report their results via Thrive.

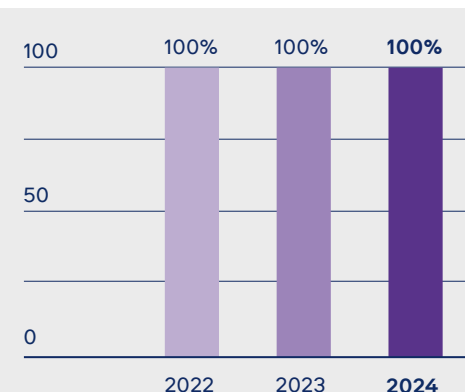
**Human rights impact assessments (HRIAs)**

**Definition:** HRIAs a in-depth assessments (IDAs), which are conducted by using a risk-based approach, in line with the United Nations Guiding Principles.

While HRIAs are focused specifically on human rights, IDAs have a wider scope, covering other social and environmental topics.

These assessments follow a defined process for identifying, assessing, and developing appropriate responses to identified impacts and progress is tracked as appropriate.

Percentage of farms monitored for grievance mechanisms



**Summary of progress towards our ambitions**

We track access to grievance mechanisms across our Thrive Supply Chain.<sup>1</sup> In 2024, 97.96% of farmers and farm labourers reported having access to at least one type of grievance mechanism channel. Of the 307 grievances raised in 2024, 100% were reported as resolved by the end of the growing season.

**Note:**

1. Our metrics derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 93% of the tobacco we purchased by volume in 2024 (Thrive Supply Chain).

Sustainability Performance

# COMMUNITIES continued

FARMING COMMUNITIES continued					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Working to enable prosperous livelihoods for all farmers in our tobacco supply chain</b>	% of farmers in our Thrive Supply Chain reported to grow other crops for food or as additional sources of income	<b>94.1</b>	93.3	92.8	Y
	% of potential increase in yields from BAT hybrid tobacco varieties	<b>20</b>	20	20	N
	Number of people engaged via training on crop diversification	<b>138,272</b>	91,817	87,206	N
	Number of people engaged via farm business management training	<b>116,123</b>	78,238	89,294	N
	Number of people engaged via training on women's empowerment	<b>112,929</b>	67,186	29,366	N

**% of tobacco farmers reported to grow other crops for food or as additional source of income**

**KPI definition:** Reported via our Thrive annual reports covering all directly contracted farmers and farmers supplying our third-party suppliers, representing more than 93% of our total tobacco leaf purchases in 2024. As tobacco-growing seasons vary around the world, data is based on the most recent crop cycle at the time of reporting, instead of the crop grown in the calendar year. Crop diversification figures may vary year-on-year, depending on the commercial outlook in the countries where the crops are grown, including the viability of other crops. Other crops include, but are not limited to, types of fruit and vegetables, as well as wheat, maize, bean, sorghum and soy.

**Methodology:** Data for our contracted farmers is collected by Field Technicians who visit our directly contracted farmers approximately once a month during the growing season. The Field Technicians make observations on other crops grown on the farm. Details of each visit, including the other crops grown, date, time and GPS coordinate, are recorded by the Field Technicians and acknowledged by the farmers in the Farmer Sustainability Management (FSM) digital app, which is used to monitor some of BAT's social metrics.

Once the data is collected in the field, the end-market team analyses the data and seeks any clarifications, as needed. Unannounced visits are carried out by individuals who do not usually visit farms regularly, with the main purpose of checking information previously collected by the Field Technicians.

**Data governance:** The data is then reported in Thrive and is made available to the Global Leaf ESG team, for appropriate oversight and to drive management action, if required. The data is also reviewed by an independent third party.

Our third-party Leaf suppliers collect data via their own farm monitoring system. All in-scope suppliers report their results via Thrive.

**Number of people engaged via training**  
**KPI definition:** Topics for training in 2024 included child labour prevention, workers rights, labour laws and standards, farm business management, crop diversification techniques, and women's empowerment. This includes in-person group, individual and remote training sessions. An attendance list and / or formal evidence that the people received the training is required. Attendance and / or distribution lists are managed at the market-level and captured through physical paper lists or responses in farmer monitoring systems like FSM.

**Methodology:** Reported via our annual Thrive assessment covering all BAT-contracted farmers and farmers supplying our third-party suppliers, representing over 93% of our total tobacco purchased by volume in 2024. The number of people engaged includes farmers, as well as farm labourers and local community members. This includes training provided by Field Technicians during farm visits, organised group training, field days and presentations, and training delivered remotely. Please note the same individual can be trained more than one time during the year.

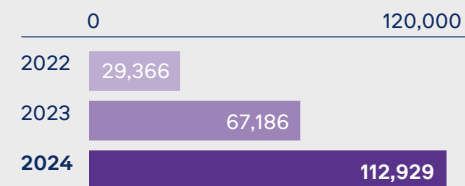
**Data governance:** The data is reported in Thrive and is tracked and analysed centrally for senior oversight and drive management action. The data is also reviewed by an independent third party.

Our third-party leaf suppliers collect data via their own farm monitoring system. All in-scope suppliers report their results via Thrive.

Training breakdown

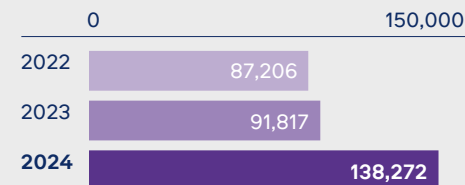
**+112,900**

Number of people engaged via **training on women's empowerment**



**+138,200**

Number of people engaged via **training on crop diversification**



Sustainability Performance

# COMMUNITIES continued

## FARMING COMMUNITIES continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
Farmer Due Diligence in our Thrive Supply Chain <sup>1</sup>	Number of non-compliance incidents	5,663	6,704	9,806	N
	% reported as remediated and resolved	100	100	100	N

### Farmer livelihoods

#### Leaf Reporting Methodology - Social

As tobacco-growing seasons vary around the world, all leaf data is based on the most recent crop cycle at the time of reporting, instead of the crop grown in the calendar year.

#### Sustainable Tobacco Programme (STP)

**Definition:** The Sustainable Tobacco Programme (STP) is an industry-wide initiative that seeks for agricultural supply chain due diligence and drive positive impacts on social and environmental pillars through sustainable agriculture practices, including references to the UN Guiding Principles on Business and Human Rights.

Suppliers report annually on progress and are submitted to in-depth assessments.

STP due diligence helps members and participants to identify risks, prioritise actions, and pursue paths for positive change and sustainable development in tobacco growing communities worldwide.

### Thrive

**Definition:** Thrive is our sustainable agriculture and farmer livelihoods programme for all our directly contracted farmers and those of our third-party suppliers. In addition to the STP, Thrive captures further data to enable the measurement of adoption of best practices and performance of internal and external KPIs supporting BAT commitments. Thrive focuses on the farm and farming communities and aims to ensure that:

- All our contracted farmers have a viable livelihood;
- Farming is seen as a preferred profession, particularly for rural youth; and
- Within farming, tobacco is seen as a valuable crop to grow.

#### Prompt Actions

**Definition:** A prompt action refers to an issue that's been identified by a Field Technician which is deemed to require an immediate response due to the its nature.

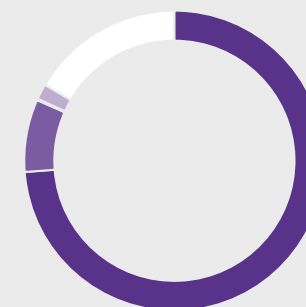
### Number of Thrive reported non-compliance incidents identified and % reported as remediated and resolved through farmers' monitoring

**KPI definition:** Data relates to Thrive Supply Chain and is collected by Field Technicians who visit our contracted farmers approximately once a month during the growing season. The Field Technicians conduct interviews with farmers and workers and observe conditions and practices on the farm. Details of each visit are recorded in our Farmer Sustainability Management (FSM) digital app by the Field Technician and are formally acknowledged by the farmer. Incidents can refer to non-compliance with our own internal standards regarding sustainable agricultural practices, child labour prevention and use of PPE in tobacco growing.

Third-party leaf suppliers make use of their own monitoring systems and adopt similar procedures and also report Prompt Actions. Controls are in place for the creation of prompt actions if any non-compliances are identified.

Prompt actions are tracked and analysed centrally to ensure appropriate oversight and drive management action, if required.

### 2024 Thrive-reported prompt actions



Types of non-compliance incidents reported in Thrive	% breakdown
Handling, use and storage of agrochemicals	73.81
Not following PPE guidance for harvesting	7.81
Controls to ensure use of sustainable wood	0.16
Controls for preventing child labour	1.66
Others	16.56

**Note:**

1. Our metrics derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 93% of the tobacco we purchased by volume in 2024 (Thrive Supply Chain), packaging

Sustainability Performance

# COMMUNITIES continued

## EMPLOYEE COMMUNITIES

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>100% of farmers and workers with sufficient personal protective equipment (PPE) for agrochemical use and tobacco harvesting*</b>	% of farmers reported to have sufficient PPE for agrochemical use	<b>98.99</b>	99.99	99.90	Y
	% of farmers reported to have sufficient PPE for tobacco harvesting	<b>94.27</b>	99.70	99.59	Y
	Number of people engaged via training on agrochemical health and safety	<b>200,389</b>	175,244	154,923	N
	Number of people engaged via training on harvesting health and safety	<b>201,137</b>	208,913	170,337	N
	Total number of attendants engaged via health and safety training	<b>401,526</b>	384,157	325,260	N

### % of farmers reported to have sufficient PPE for agrochemical use and for tobacco harvesting

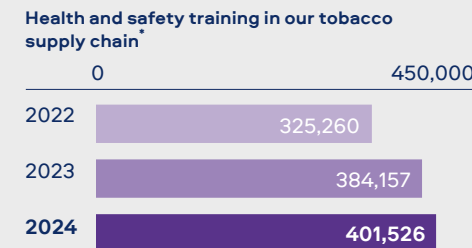
**KPI definition:** Reported via our Thrive assessments, as described above. Sufficient PPE is defined as a minimum of one full set of PPE per individual and per type of activity (agrochemical use, tobacco harvesting, and handling green tobacco leaves) for all relevant farmers and farm workers.

**Note:**  
\* Our ambitions cover all tobacco we purchase for our products (tobacco supply chain\*); which is used in our Combustibles, Traditional Oral and Heated Products. Our metrics, however, derive data from our annual Thrive assessment, which includes our directly contracted farmers and those of our third-party suppliers, which represented over 93% of the tobacco we purchased by volume in 2024 (Thrive Supply Chain).

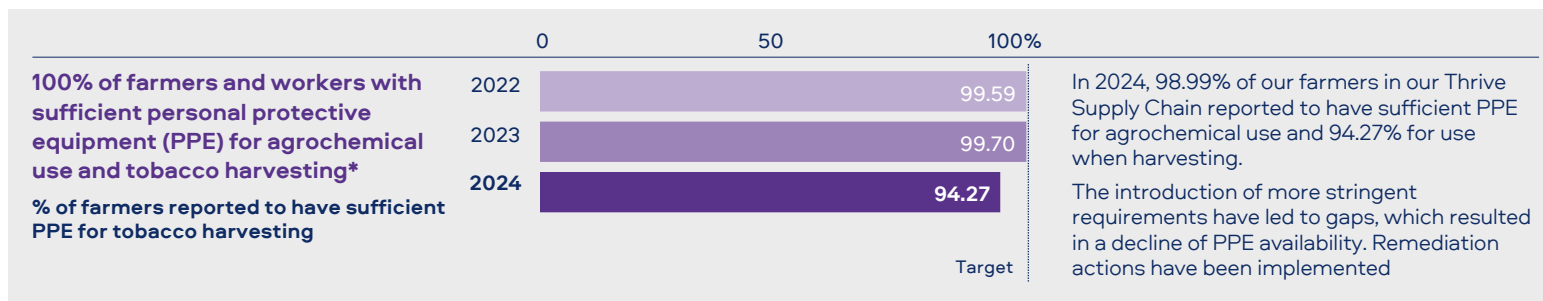
### Training breakdown

**+401,500**

Number of **attendants** engaged via **health and safety training**



### Summary of progress towards our ambitions



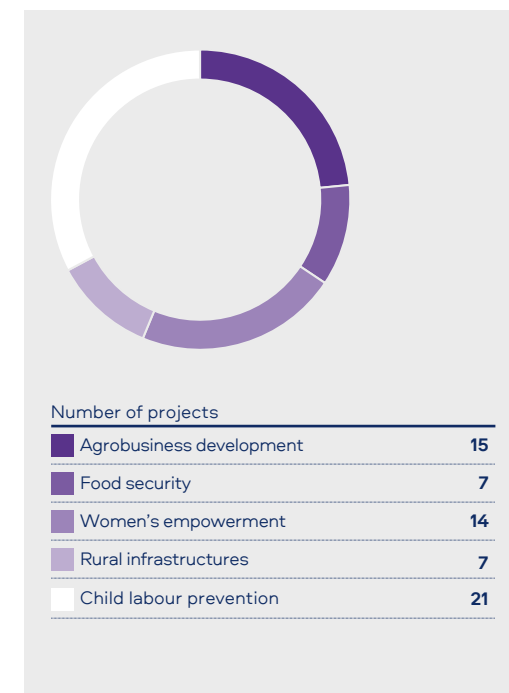
Sustainability Performance

# COMMUNITIES continued

## FARMING COMMUNITIES

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
Support through charitable donations and community investment programmes in the countries where we operate	Cash contributions (£m)	7.39	12.90	12.60	N
	In-kind contributions (£m)	0.28	1.87	0.34	N
	Total contributions (£m)	7.67	14.77	12.79	N
	Amount contributed in the UK only (£m)	0.97	0.98	0.99	N
	<b>Breakdown of total cash and in-kind spend by sustainability impact area:</b>				
	– % relating to Climate	0.9	N/A	N/A	N
	– % relating to Nature	11.6	N/A	N/A	N
	– % relating to Circularity	0.7	N/A	N/A	N
	– % relating to Communities	81.1	N/A	N/A	N
	– % relating to Other	5.7	N/A	N/A	N
	Number of community investment programmes focused on supporting agrobusiness development, food security and women’s empowerment	37	27	27	N
	– Number of countries where these programmes are rolled out	15	15	15	N
	Number of community investment programmes focused on supporting rural infrastructure, including access to clean drinking water, solar energy and healthcare	21	20	11	N
	– Number of countries where these programmes are rolled out	13	10	9	N
	Number of community investment programmes focused on child labour prevention	7	5	3	N
	– Number of countries where these programmes are rolled out	6	5	3	N

## Community Investment by project type



### Community investment contributions

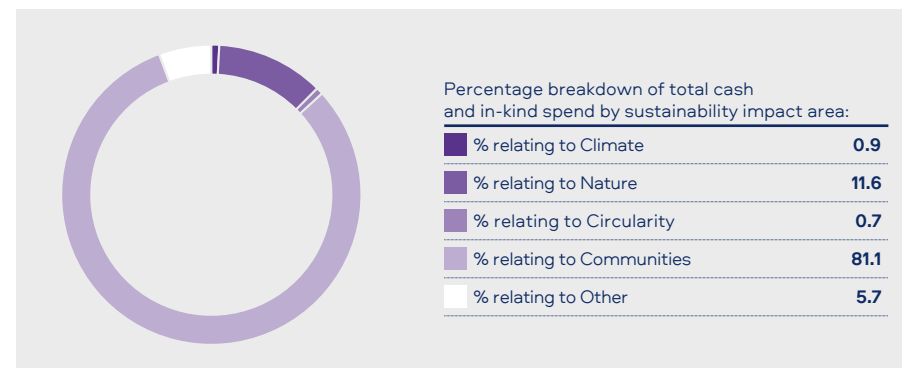
**KPI definition:** Community investments are defined as voluntary activities, beyond our commercial and core business activities and our legal obligations, that seek to contribute to the economic, social and environmental sustainability of the countries and communities in which we operate.

**Methodology:** The data for Community investment contributions is collected through our annual Sustainability Survey, which is distributed via an independent online system managed by a third-party provider.

Data is collected from January to November. A reconciliation occurs in January to capture any additions or changes that took place between November and 31 December 2024. This allows the Group to capture 12 months of data.

**Data governance:** The survey is completed by local Legal and Corporate & Regulatory Affairs and approved by the Direct Reporting Business Unit Head of Legal or Corporate & External Affairs. The approval process involves reviewing the information provided by the local team to ensure its accuracy. At the Group level, completed surveys are reviewed by the third-party managing the survey and Group Sustainability Reporting team.

## Community Investment by Sustainability Impact Area



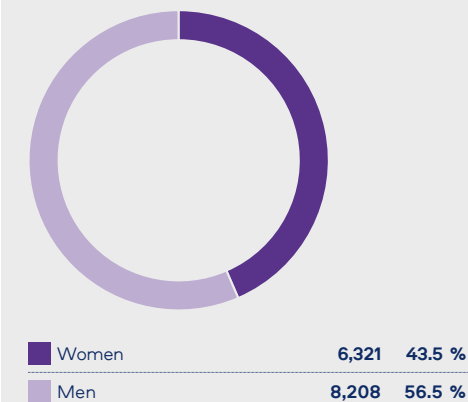
Sustainability Performance

# COMMUNITIES continued

EMPLOYEE COMMUNITIES					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
Group employees	Total number of Group employees	48,955	46,725	50,397	N
	Of these, number of temp/seasonal employees	430	262	224	N
<b>Employee breakdown by gender:</b>					
	Number of women	16,667	15,437	16,490	N
	% female representation Group-wide	34.0	33.0	32.7	N
	Number of men	32,282	31,280	33,907	N
	% male representation Group-wide	65.9	66.9	67.3	N
<b>Employee breakdown by level:</b>					
	Non-Management (women)	10,346	9,730	10,683	N
	Non-Management (men)	24,074	23,365	25,377	N
	Management-grade (women)	6,321	5,707	5,807	N
	Management-grade (men)	8,208	7,915	8,530	N
	Senior Leadership teams (women)	600	520	514	N
	Senior Leadership teams (men)	1,043	1,028	1,146	N
	Senior Leadership teams (SLT) -total	1,643	1,548	1,660	N
	SLT (women) as % of total	36.5	33.6	31.0	Y
	SLT (men) as % of total	63.5	66.4	69.0	N
<b>Employee breakdown by region:</b>					
	Asia Pacific, Middle East and Africa (APMEA)	11,518	11,085	11,582	N
	Men	8,713	8,566	9,045	N
	Women	2,805	2,519	2,537	N
	Americas and Europe (AME)	33,263	31,904	34,669	N
	Men	20,640	20,099	21,991	N
	Women	12,617	11,797	12,678	N
	United States of America (USA)	4,174	3,736	4,146	N
	Men	2,929	2,615	2,871	N
	Women	1,245	1,121	1,275	N

Strengthening gender diversity across BAT

Employee breakdown by level in 2024 (Management grade)



Sustainability Performance

# COMMUNITIES continued

EMPLOYEE COMMUNITIES continued		Progress tracking			Assured
Targets/ambitions	Metric	2024	2023	2022	
45% women in Management roles by 2025	% female representation in Management roles	43.5	41.9	40.5	Y
40% women on Senior Leadership teams by 2025	% female representation on Senior Leadership teams	36.5	33.6	31.0	Y
By 2025 achieve at least a 50% spread of distinct nationalities within all Key Leadership teams <sup>1,2</sup>	% of Key Leadership teams with at least a 50% spread of distinct nationalities	92.0	100	100	Y
Women among all employees Group-wide	% female representation Group-wide	34.0	33.0	32.7	N

## Employees, diversity and culture

### % female representation in Management roles

**KPI definition:** Management-grade employees include all employees at job grade 34 (excluding the Management Board) or above, as well as any global graduates. The gender of each employee is typically recorded at the point of hire. The percentage of female representation in Management roles is calculated by dividing the number of female Management-grade employees by the total number of Management-grade employees.

### Non-Management

**Definition:** Non-Management includes all employees at job grade 33 or below.

### Senior Leaders

**Definition:** Senior Leaders referred to in the ethnicity agenda includes the Management Board and direct reports of a Management Board member (i.e. MB and MB-1).

### % female representation on Senior Leadership teams

**KPI definition:** The Senior Leadership team is defined as employees in Management Grades 37–41.

**Methodology:** The percentage of female representation on Senior Leadership teams is calculated by dividing the number of female Management Grade 37-41 employees by the total number of Management Grade 37-41 employees. For comparability, we have restated prior year numbers.

### % of Key Leadership teams with at least a 50% spread of distinct nationalities

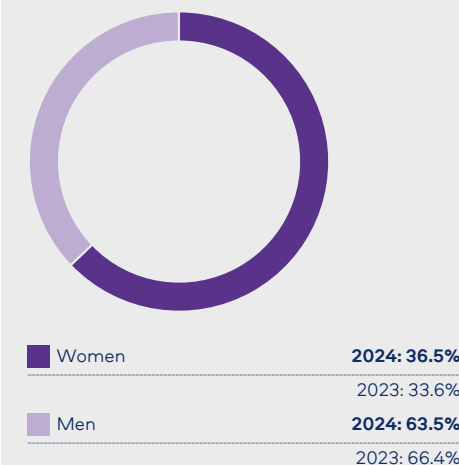
**KPI definition:** A Key Leadership team is categorised as the group of direct reports that report into a Management Board member.

**Methodology:** The number of Management Board (MB) members that have at least a 50% spread of nationalities within their Key Leadership teams (MB-1 members only), as a percentage of the total number of Management Board members.

The 50% spread of distinct nationalities is satisfied if at least half of a given MB's Key Leadership team members are of distinct nationalities. The nationality of each employee is typically recorded at the point of hire. U.S. employees hired by Reynolds prior to its merger with BAT did not disclose nationality at point of hire and therefore these employees are excluded from the calculation.

## Strengthening gender diversity across BAT continued

Employee breakdown by level in 2024 (Senior Leadership teams)



### Summary of progress towards our targets<sup>1</sup>

In 2024, 36.5% of roles on Senior Leadership teams were held by women. In addition to increasing the number of roles held by women, our aspirations focus on the diversity of nationalities and ethnicities within our workforce.

To make further progress, we need a more balanced representation in our leadership pipeline. This requires a clear focus on inclusion and equality through active listening and employee engagement.

**Notes:**

- These Group-wide targets do not represent quotas. For each vacancy, the most suitable candidate, regardless of their gender or ethnicity, should be hired. We also recognise that there may be local requirements or other circumstances that need to guide our hiring practices in various locations where we operate.
- While our nationalities target was achieved for 2023 and reported in 2024, we aim to replace this aspiration in future years, in line with our evolving understanding and the progression of the Diversity & Inclusion agenda.

Sustainability Performance

# COMMUNITIES continued

EMPLOYEE COMMUNITIES continued		Progress tracking			Assured
Targets/ambitions	Metric	2024	2023	2022	
<b>Ethnic Diversity</b>	% ethnically diverse groups in total workforce	<b>68.5</b>	66.0	64.0	N
<b>Increase the Ethnically Diverse proportion of our Senior Leaders to 40% by 2027</b>	% ethnically diverse groups in Senior Leaders	<b>34.9</b>	36.6	N/A	N
<b>Employee retention</b>	Voluntary turnover for all employees Group-wide (number and %)	<b>3,018</b>	4,048	5,467	N
		<b>6.3</b>	8.1	10.5	N
<b>Global Unadjusted Gender Pay</b>	Global unadjusted gender pay gap (%)	<b>15.0</b>	14.0	N/A	Y
<b>Maintain at least 40% proportion of women on the Board of BAT p.l.c.</b>	% women Directors on the Board of BAT p.l.c. as at 31 December 2024	<b>50.0</b>	45.5	33.3	N
<b>Ethnicity balance on the Board of BAT p.l.c.</b>	% ethnic minority Directors on the Board of BAT p.l.c. as at 31 December 2024	<b>40.0</b>	27.0	20.0	N

### Ethnically Diverse Groups

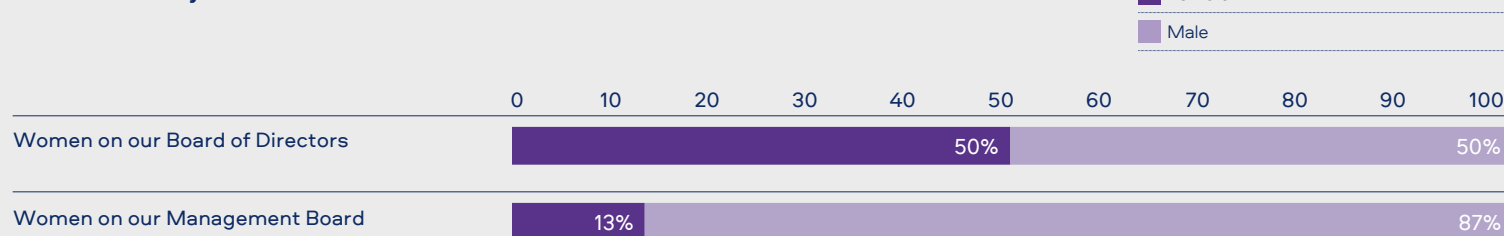
**Definition:** Ethnically Diverse groups includes global ethnic groups: six global 'Ethnically Diverse' groups were determined considering BAT's global market footprint: Asian, Black, Hispanic/Latin American, Indigenous, Mixed and Other Ethnic Groups. Individuals identified as White, those that have 'Preferred not to Disclose' and individuals that have 'Not Disclosed' i.e, their ethnicity field remains blank, are not captured in the data set 'Ethnically Diverse' groups.

### Global Unadjusted Gender Pay Gap

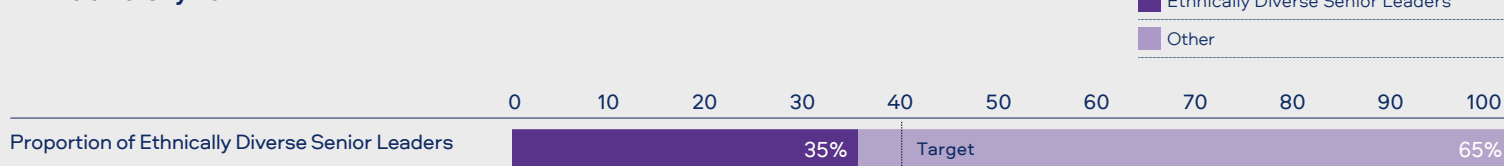
**KPI definition:** The unadjusted salary gap refers to the overall difference in average earnings between women and men in the global workforce, without accounting for factors such as job type, experience, or other relevant factors that could influence earnings.

**Methodology:** Our global unadjusted pay gap analysis covers all our direct employees, (over 43,000 employees) in more than 100 locations, considering base salary and 'on target' variable pay opportunities as of 1 July 2024. Employees on secondment are calculated based on their home markets salary rather than their seconded markets salary.

### Gender diversity 2024



### Ethnic diversity 2024



### Board diversity

#### % women Directors on the Board of British American Tobacco p.l.c.

**KPI definition:** Includes all members of the Board of Directors of British American Tobacco p.l.c. as of 31 December 2024.

#### % Directors on the Board of British American Tobacco p.l.c from an ethnic minority background

**KPI definition:** Includes all members of the Board of Directors of British American Tobacco p.l.c. We apply the UK Office for National Statistics' criteria for Black, Asian and Minority Ethnic.

Sustainability Performance

# COMMUNITIES continued

## EMPLOYEE COMMUNITIES continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
Employee engagement	Employee engagement index score in our global 'Your Voice' survey	84	80	N/A	N
	Difference to FMCG comparator group	4	1	N/A	N
	Proportion of Group employees that responded	92	94	N/A	N
Aim for zero accidents Group-wide year on year	Number of work-related accidents resulting in injury to employees and contractors	73	99	116	N

### Employees, diversity and culture

#### % employee engagement score in our global 'Your Voice' survey

**KPI definition:** Employee Engagement Index focuses on the employees' connection to their organisation, marked by committed effort to achieve goals (being engaged) in environments that support productivity (being enabled) and maintained personal wellbeing (feeling energised).

#### % difference to FMCG comparator group

**Methodology:** Scores are benchmarked against the global comparator group for Fast Moving Consumer Goods (FMCG) companies.

### Health and safety

#### Healthy and safety - reporting methodology

Health and safety data covers all BAT sites and off-site work-related activities, including Leaf, business travel and Trade Marketing & Distribution and is reported from December 2023 to November 2024.

Data covers employees and contractors under the direction, supervision or control of BAT only.

Data reported for employees only covers those that have an employment relationship with BAT. Data related to contractors includes contractors that work under our direct supervision.

Data is collected monthly (e.g. working hours) or ad hoc (upon occurrence of an accident) via the c360 H&S System by market EHS managers, for all BAT markets. Data is reviewed by the market and Region and approved by the Centre. On-site and remote audits are performed on the data on an annual basis (EHS Compliance Reviews/Road Map Assessments). The audit results are reviewed and verified by local, Regional and Group senior leadership. Commuting is excluded from the reported figures.

#### Work-related accidents resulting in injury to employees and to contractors

**KPI definition:** Work-related accident means an incident in the course of work, which leads to physical harm. In the course of work means that the incident happened while at work (BAT location, sales, field activities, etc.) and while engaged in a work-related activity.

Commuting accidents: (i.e. accidents on the way to work and while returning home after work) are considered "Non work related" and not reported. Local regulations may require it to be recorded as a work-related accident, and this is adhered to at all times.

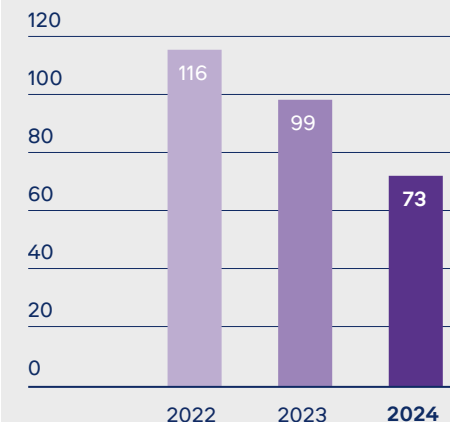
– Lost Time Injury (LTI): Defined as any work-related injury which prevents the injured employee from returning to work i.e. unable to return to work due to the nature of their injuries, excluding the shift on the day of the occurrence.

– Restricted Work Case (RWC): Any work-related injury which does not result in any lost time i.e. LTI, but due to the nature of their injuries, restrictions or modifications are made to an injured persons normal working task/s. This includes any restrictions made on the day of the incident/injury and any future days, until the person is fully recovered, such as light duties or restricted duties.

– Fatality: Any work-related incident that results in the loss of life of an employee or contractor under the direction, supervision, and control of BAT.

– Serious Injury: Is defined as any work-related injury, which results in any of the following: (a) Hospitalisation for more than 36 hours; (b) Amputation of any part of the body, and includes both a traumatic amputation injury at the time of an accident and surgical amputation as a consequence of the injuries sustained in an accident; (c) Fracture of any bone but not the fingers, thumbs, and toes; (d) Loss of vision temporary or permanent; (e) Dislocation of any joint except the joints of the fingers, thumbs, and toes; and (f) Major burn.

### Number of work-related accidents



#### Summary of progress towards our ambition

More than half of the work accidents in our business operations tend to occur outside of BAT premises.

In Trade Marketing and Distribution (TM&D), where there are high risks of road traffic accidents, attacks and assaults, we manage risks through driver safety and security programmes.

In 2024, 88% of our sites achieved zero accidents. Where accidents do occur, each one is investigated and action plans are implemented.

Sustainability Performance

# COMMUNITIES continued

## EMPLOYEE COMMUNITIES continued

Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Aim for zero accidents</b>	Lost time incidents (LTIs)	<b>43</b>	58	75	N
<b>Group-wide year on year continued</b>	Restricted Work Case (RWC)	<b>9</b>	20	8	N
	Lost time incident rate (LTIR)	<b>0.12</b>	0.17	0.19	Y
	Occupational illness cases	<b>0</b>	0	0	N
	Occupational illness rate	<b>0</b>	0	0	N

### Occupational Illness

**Definition:** An abnormal condition or disorder, other than one resulting from occupational injury, caused, at least in part, by demonstrated exposure to environmental factors present in the workplace (as defined by an occupational health specialist or doctor). It includes impacts on mental health, acute and chronic illnesses or illnesses that may be caused by inhalation, absorption, ingestion, or direct contact with irritants. All cases must be reported, this includes cases even if there is no lost work time. This is something which occurred in more than an instant of time, including prolonged or multiple exposures.

All cases are reported in BAT EIR system. See the health and safety preamble for a full description of the data collection and verification process.

### Lost Time Incident (LTI) and Restricted Work Cases (RWC)

**KPI definition:** For Lost Time Incident (LTI) and Restricted Work Case (RWC) definitions, see 'Work-related accidents resulting in injury to employees and to contractors'.

Both LTIs and RWCs are reported for employees and contractors under the direction, supervision or control of BAT. A Serious Injury involving a company employee or contractor under the direction, supervision and control of BAT is also considered as an LTI. Fatalities are excluded.

**Methodology:** LTIs and RWCs are reported via the BAT EIR system by market EHS managers for:

- (i) Employees on company owned or rented premises or off-site performing work-related activities;
- (ii) Employees in their own, or company owned or rented vehicles engaged on company businesses;
- (iii) Temporary or contract employees under the direction, supervision and control of BAT engaged in company business.

A BAT employee or contractor under the direction, supervision or control of BAT visiting another site, who has an injury during the visit that results in an LTI or RWC, will have the LTI or RWC recorded against the site where the injury occurred. See the health and safety preamble for a full description of the data collection and verification process.

### Total Recordable Incident Rate (TRIR)

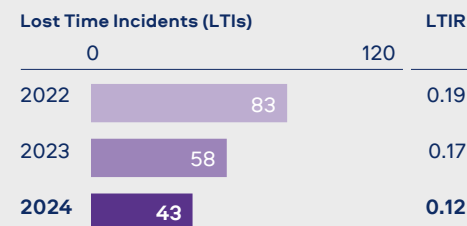
**KPI definition:** Total Recordable Incident Rate (TRIR), also referred to as a Lost Time Incident Rate (LTIR), the number of LTIs + RWCs, including those classed as serious injuries but excluding fatalities, related to a common exposure base of 100 full-time workers during one year.

**Methodology:** This rate is calculated as: (number of lost workday cases x 200,000, i.e. base for 100 full-time equivalent workers, working 40 hours per week, 50 weeks of the year) / total hours worked by all employees and contractors working under direct BAT supervision during the reporting period. See the health and safety preamble for a full description of the data collection and verification process.

## Reducing incidents across our business

# 0.12

### Lost Time Incident Rate (LTIR) 2024



### Summary of progress towards our ambition

In 2024, we recorded the lowest Total Recordable Incidents Rate since 2020. In 2024, there was a 26% reduction in reported incidents, bringing them down from 99 in 2023 to 73 in 2024.

This data is supported by a 26% reduction in LTI's compared to the same period last year, mainly driven by a reduction in vehicle-related accidents (41%); manual handling related incidents (42%); and attacks and assaults (64%). In 2024, 88% of our sites achieved zero accidents.

Sustainability Performance

# COMMUNITIES continued

EMPLOYEE COMMUNITIES continued					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
<b>Aim for zero accidents</b>	No. of serious injuries (employees)	<b>8</b>	12	22	Y
<b>Group-wide year on year continued</b>	No. of serious injuries (contractors)	<b>13</b>	9	11	Y
	Total number of serious injuries and fatalities	<b>22</b>	25	36	N
	No. of fatalities (employees)	<b>0</b>	2	1	Y
	No. of fatalities (contractors)	<b>1</b>	2	2	Y
	Total number of fatalities	<b>1</b>	4	3	N
	No. of fatalities to members of public involving BAT vehicles	<b>1</b>	3	1	Y

**Methodology:** Data reported for employees also includes contractors under the direction and control of BAT on company owned or rented premises, or an off-site location, or in company owned or rented vehicles, or private vehicle being used for company business.

Data for contractors includes independent contractors involved in or performing work in connection with a BAT business activity. All data is consolidated on a monthly basis in order to check performance, trend and all necessary assessments, such as training necessities, security upgrades, and new safety guidelines. On-site and remote audits are performed on an annual basis (EHS Compliance Reviews/Road Map Assessments). See the health and safety preamble for a full description of the data collection and verification process.

**Fatalities to members of public involving BAT vehicles**

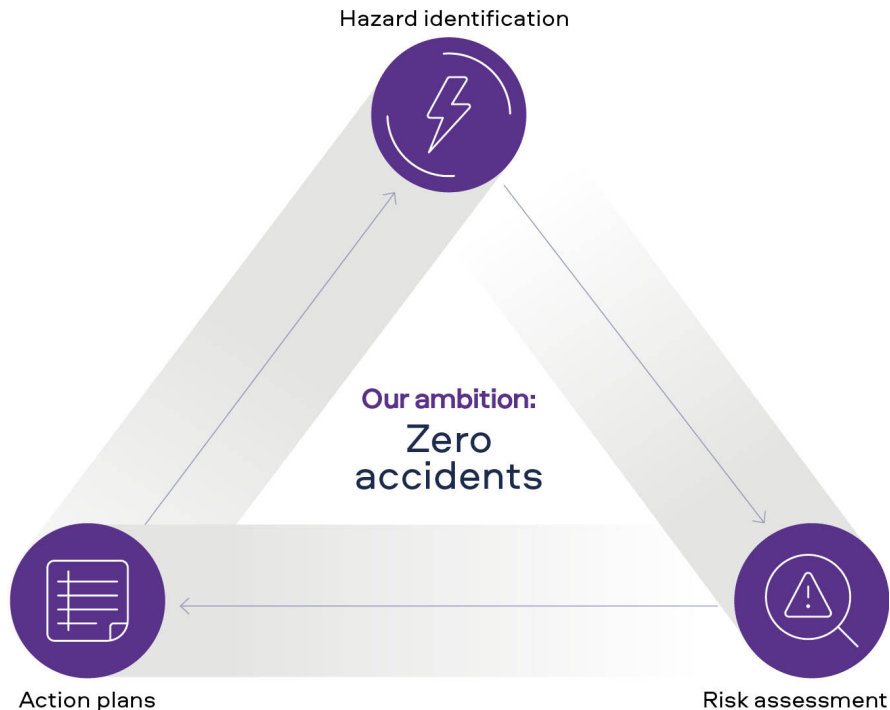
**KPI definition:** This includes:

- A BAT vehicle is a company owned or rented vehicle.
- A member of the public is any person except BAT employees, contractors and visitors.

See the health and safety preamble for a full description of the data collection and verification process.

**Methodology:** All data is consolidated on a monthly basis in order to check performance, trends and all necessary assessments, such as training necessities, security upgrades, and new safety guidelines. On-site and remote audits are performed on a yearly basis (EHS Compliance Reviews/Road Map Assessments).

Our health and safety approach



**Fatalities and serious injuries to employees and contractors**

**KPI definition:** A serious injury is defined as any work-related injury, which results in any of the following:

- Hospitalisation for more than 36 hours;
- Amputation of any part of the body, and includes both a traumatic amputation injury at the time of an accident and surgical amputation as a consequence of the injuries sustained in an accident;
- Fracture of any bone but not the fingers, thumbs and toes;
- Loss of vision, temporary or permanent;
- Dislocation of any joint except the joints of the fingers, thumbs and toes; and
- Major burn.

Sustainability Performance

# COMMUNITIES continued

SUPPLIER COMMUNITIES					
Targets/ambitions	Metric	Progress tracking			Assured
		2024	2023	2022	
100% by 2025 of product materials and higher-risk indirect suppliers to have undergone at least one independent labour audit within a three-year cycle	Number of independent labour audits conducted on non-tobacco suppliers since 2022	540	384	263	N
	% of product materials and higher-risk indirect suppliers that have undergone at least one independent labour audit within a three-year cycle	91	59	37	Y

## Suppliers engagement

### Number of independent labour audits conducted of product materials and higher-risk indirect suppliers

**KPI definition:** Includes all suppliers of product materials – other than tobacco leaf – used in Group products. Such materials include filters, paper, adhesives, e-liquids, New Category devices, batteries and electronic components.

Higher-risk indirect suppliers are our machinery and point of sale materials suppliers.

Both product and high risk indirect suppliers go through a risk assessment using the following human rights indices independently published by Verisk Maplecroft: Corruption, Occupational Health and Safety, Modern Slavery, Migrant Workers, Freedom of Association and Collective Bargaining, Discrimination in the Workplace, Decent Working Time, Decent Wages, and Child Labour.

**Methodology:** Supplier labour audits include all audits and self-assessments with verification conducted by an independent third party against their workplace conditions assessment criteria, which is aligned to international standards, including International Labour Organisation (ILO) Conventions.

The reports are sent to the supplier and then to the relevant Procurement team, who reviews the results and applies BAT’s ranking of the audit. The supplier is then responsible for making any necessary changes to address the issues identified within the recommended time frame.

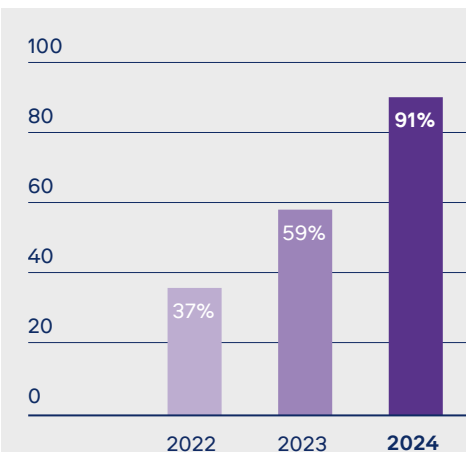
**Data governance:** Relevant updates on the audit programmes progress are provided to the Supply Chain Due Diligence (SCDD) Committee, which is a senior cross functional forum.

When a supplier does not implement the necessary changes to address the issues identified then an escalation is made to the SCDD Committee for consideration on proposed next steps (e.g. extension on time-frame or supplier removal).

### % of product materials and higher-risk suppliers to have undergone at least one independent labour audit within a three-year cycle

**Methodology:** See Reporting Criteria for Number of independent labour audits conducted of product materials and high-risk indirect service suppliers.

### % of product materials and higher-risk indirect suppliers that have undergone at least one independent labour audit within a three-year cycle



#### Summary of progress towards our target

Since 2022, 540 in-scope suppliers in 59 countries have undergone at least one labour audit:

- Tier 1 product materials suppliers: 388;
- Lower-tier product materials suppliers: 48; and
- Indirect suppliers: 104.

In 2024, 321 independent labour audits were carried out. 156 were first time audits and 165 were re-audits of existing suppliers due to previous audit performance.

Sustainability Performance

# Creating a culture of integrity

Creating a culture of integrity		Progress tracking			Assured
Targets/ambitions	Metric	2024	2023	2022	
<b>Aiming for 100% adherence to our Standards of Business Conduct (SoBC), including the Respect in the Workplace and Human Rights Policies</b>	% of employees who completed annual SoBC training and compliance sign-off	100	100	100	N
	Number of alleged SoBC breaches	512	427	292	N
	Number of established SoBC breaches	164	123	84	Y
	Number of reports of alleged SoBC breaches relating to Respect in the Workplace and Human Rights	230	216	117	N
	Number of established SoBC breaches relating to Respect in the Workplace and Human Rights	71	69	33	Y
	Number of disciplinary actions taken as a result of established SoBC breaches that resulted in people leaving BAT	81	79	58	Y
	% of Group companies assessed for human rights risks	100	100	100	N

## Creating a culture of integrity

### Number of alleged SoBC breaches

**KPI definition:** This includes all reports of alleged SoBC breaches. A breach refers to any issue that would be considered to compromise any of the rules and principles set out in the SoBC, including unethical behaviour. Not all contacts made via our Speak Up channels (i.e. SoBC Portal or independent hotline) involve alleged SoBC breaches. Some contacts relate to questions or complaints on other matters, such as product complaints or HR grievances. Therefore, this data relates to all SoBC contacts that were identified to be alleged SoBC breaches, which were subsequently investigated. Consistent with our reporting approach, cases are not included in the above if they were not resolved at the end of the previous reporting period.

### Number of alleged SoBC breaches that are established as breaches

**KPI definition:** Of the alleged SoBC breaches that were investigated (see above for reports of alleged SoBC breaches relating to all policies),

this data relates to those that were established as substantiated breaches upon investigation.

### Reports of alleged SoBC breaches relating to Respect in the Workplace and Human Rights and established breaches

**KPI definition:** All reports of alleged SoBC breaches, made via our Speak Up channels and SoBC portal against the Respect in the Workplace or Human Rights policies.

Not all contacts made via our Speak Up channels and SoBC portal involve alleged SoBC breaches; some contacts relate to questions regarding the SoBC or other matters. Therefore, this data relates to all SoBC contacts that were assessed as alleged SoBC breaches, which were subsequently established as breaches, following an investigation.

### Number of disciplinary actions taken as a result of SoBC allegations that resulted in people leaving BAT

**KPI definition:** Following investigations of alleged breaches of the SoBC, disciplinary sanctions are determined. These vary from warning letters to additional training to employment termination.

## Integrity Network

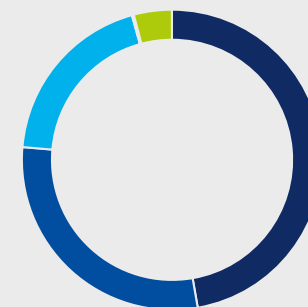
**Definition:** The Integrity Network was formed in 2021 and has more than 100 members, comprising Legal and Corporate and Regulatory Affairs employees responsible for implementing the compliance programme for markets and central functions.

## Business Integrity Panel

**Definition:** The Group BIP is comprised of the Group Designated Officers (GDOs) and invited guests (as required). Four senior Group executives act as GDOs:

- the Associate General Counsel, Business Conduct and Compliance
- the Company Secretary of British American Tobacco p.l.c.
- the Group Head of Internal Audit
- the Group Head of Reward

## Breakdown of reports of alleged SoBC breaches in 2024



Policy areas	Breakdown (%)
Social and Environment (Workplace and human rights)	47
Corporate Assets and Financial Integrity	29
Personal and Business Integrity	19
Others not relating to a specific policy area	0
National and International Trade	4
External stakeholders (Lobbying and public contributions)	0

Data does not add up to 100% due to rounding up