



## **Fair Labor Practices Policy**

Universal Leaf Tobacco Company, Incorporated, (“ULT”) and its affiliated operations are committed to complying with all applicable local, state, and national laws related to our employees and their rights, and to providing a safe and fair working environment for all our employees, in all countries in which we operate. Furthermore, Universal does not employ child or forced labor in any of our operations. Within the confines of the local, state, and national laws of our operating companies, and in the spirit of national and international labor conventions and treaties, Universal employees shall have the freedom of association and the ability to individually or collectively communicate grievances and negotiate compensation without the fear of retribution.

Universal is also committed to encouraging adherence to the same principles on the tobacco farms where Universal companies contract the supply of tobacco. Universal will endeavor to communicate and monitor that applicable laws are observed; that children are protected from labor exploitation; that there is no forced labor; that farm workers are paid fairly, treated fairly and provided a safe working environment; and that freedom of association is respected.

Universal supports the activities of the Elimination of Child Labour in Tobacco Growing Foundation and will continue activities to eliminate child labor and to protect workers’ rights.

Our worldwide team of tobacco professionals shall develop local policies and programs, commit organizational resources and educate our workforce to adhere to applicable laws, Universal’s Code of Conduct and other compliance policies, and this Fair Labor Practices Policy. This policy will be regularly reviewed by the ULT Board and amended as needed.