



Sustainability & Supply Chain Integrity Policy

Universal Leaf Tobacco Company, Incorporated, (“ULT”) is firmly committed to the sustainability and integrity of all aspects of our tobacco supply chain in all areas in which we operate. The foundation of our Sustainability & Supply Chain Integrity Policy consists of our strict compliance with applicable laws and Universal’s comprehensive Code of Conduct and other compliance policies, and our commitment to organizational objectives in seven main focus areas:

- **Good Agricultural Practices-** We shall develop, promote and use sound leaf production techniques and strategies which meet our customers’ needs, promote farmer profitability and support environmental sustainability, biodiversity and resource conservation.
- **Good Manufacturing Practices-** We shall develop, promote and use industry best practices and sound technologies to optimize production in our processing facilities in meeting customer requirements, creating a safe working environment, improving energy efficiency and supporting environmental sustainability.
- **Environmental Protection-** We shall comply with all environmental laws and regulations, monitor our industrial activities, analyze supply chain activities and cooperate with our supply chain partners to formulate and implement strategies to reduce the environmental impact of the tobacco supply chain, promote energy efficiency, support biodiversity and conserve forestry and other natural resources.
- **Health and Safety-** We shall comply with all health and safety laws and regulations, create and maintain a safe working environment and encourage our supply chain partners to do the same in the interest of employees, contractors, farmers, farm workers and other supply chain stakeholders.
- **Tobacco Security, Integrity and Traceability-** We shall implement programs and strategies aimed at enhancing the security of tobacco supply and promoting tobacco quality throughout the supply chain for the purpose of the long-term supply of compliant tobaccos.
- **Fair Labor Practices-** We shall create opportunities for a qualified and diverse workforce at all levels of our organization, and to respect workers’ freedom of association and other labor rights as defined by applicable laws, help eliminate child labor and forced labor throughout the supply chain, and encourage tobacco farmers and communities to recognize and address labor issues.
- **Social Responsibility-** We shall operate in a fair and responsible manner, strive to be a beneficial and constructive supply chain partner to our stakeholders, and address key aspects and concerns of the tobacco industry and the farming and industrial communities in which we operate.

Our business directly and indirectly supports the communities and regions in which we operate by providing local tobacco farmers efficient access to the global tobacco market, offering our employees a fair and safe working environment, and promoting sustainability in our communities and our farmers' communities. We are firmly committed to supporting our customers, our farmers, our employees, our communities and our business partners in the tobacco supply chain through ethical business practices and targeted programs and investments aligned with our organizational objectives.

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 Sustainability & Supply Chain Integrity Policy. This policy will be regularly reviewed by the ULT Board and amended as needed.