



# Overview of engagement principles

## Our framework

Our Guidebook for Success (Code of Conduct) and several Principles & Practices set out detailed standards for engaging with governments and public organizations or third parties generally, doing external communications or public statements, making contributions or providing financial support to certain projects, giving gifts or providing entertainment to third parties, and recording and reporting such expenses.

This document does not replace those standards, but it describes their basic tenets and summarizes their spirit. It also provides a means for PMI to tell the public what is important to PMI when interacting with governments and public organizations, and allows PMI to invite feedback on these fundamental tenets.

## Key points to remember

- Communication and respectful exchange of informed, substantiated, and reasoned ideas is the best way to achieve regulatory and fiscal frameworks beneficial to the societies they apply to.
- We think it is our responsibility to share our knowledge and expertise with governments, authorities and public organizations.
- The merit of PMI's ideas, the rigor and validity of its scientific conclusions, the verifiability of its facts and the integrity of its employees should be the only means through which PMI advances its positions and communicates them to governments, public organizations and opinion leaders.
- Corruption, bribery, influence-trafficking, misleading information, secrecy about issues that are material to a decision, and dishonesty in general are not acceptable forms of doing business at PMI.

## What we do

- PMI's research and development activities follow rigorous scientific standards. When it comes to our Reduced-Risk Products, PMI makes its findings public and invites external review.
- PMI scientists are committed to those rigorous standards.
- PMI only communicates to governments and public organizations product information that has been substantiated by such rigorous scientific methods.
- The positions PMI publicly advocates for, and the arguments supporting such positions, are consistent with PMI's internal positions and do not overlook any information that PMI may internally have that might be material to PMI's audience.
- PMI's positions on regulation of its products, taxation, harm-reduction, employment, safety, and a vast array of important topics result from self-critical, respectful internal debate that considers not only business objectives but also, among other things, PMI's legal obligations, societal expectations, human rights, long-term environmental effects, and consumers' rights to full and accurate information.
- We believe that regulation and taxation of tobacco and nicotine products should be consistent with their different risk profiles. We make our views known through our website, the media, and communications to governments such as through public consultations and other available platforms.
- We do not bribe or try to inappropriately influence other people's objectivity.
- We have strict standards governing how we provide gifts and entertainment to government officials, members of public institutions and private individuals. We comply with those standards.
- We have strict rules concerning what contributions are appropriate, what due diligence is required before making them, what disclosures are in order and, when needed, how to maintain the independence of those that receive such contributions. The same applies to our membership in external organizations. We comply with these rules.
- We require third parties interacting with governments, public institutions or other audiences on our behalf to refrain from engaging in bribery or in other forms of inappropriate influence. We make our internal standards known to them and monitor their compliance therewith.
- We require third parties interacting with others on our behalf and communicating about PMI's position on topics such as harm-reduction, product regulation, taxation and others, to disclose their relationship with, and any financial support they receive from, us so that their audience has access to the information material for them to make a decision or adopt a view.
- We keep accurate and complete financial records of all expenses incurred in interacting with government officials, public organizations and any other third party.
- We communicate honestly and respectfully, internally and externally.



- We market and sell our products according to the following principles:
  - We do not market or sell to minors, non-smokers or non-users of nicotine products.
  - Consumption of combustible tobacco products is harmful to health.
  - Non-combustible products are not risk-free.
  - People concerned about the risks associated with any of our products, should quit.
- Any positions or messages communicated or advocated for with governments or public organizations are consistent with, and respectful of, these principles.
- We comply with reasonable, legal governmental requirements to provide information to authorities.
- We communicate institutionally and do not allow the use of personal email accounts, or other means that might be misleading, for company communications or the transmittal of PMI information.
- We do not seek to gain access to, nor discuss with governments or other third parties, confidential information of others, including our competitors. We comply with anti-trust regulations.
- Our Compliance help-line and Department are available to anyone working at PMI wanting to report suspected violations of our Guidebook for Success or Principles & Practices. Reports can be made anonymously. PMI respects and protects the identity of those that raise concerns. PMI does not tolerate retaliation of any kind against good-faith reporting.