

GUIDEBOOK FOR SUCCESS

THE PMI CODE OF CONDUCT



LETTER FROM OUR CEO

Dear Colleagues,

It is with great pleasure that I share PMI's Guidebook for Success, which updates and replaces our Code of Conduct. The Guidebook describes the fundamental beliefs and attributes that unite and guide us during our collective journey in pursuing PMI's goals.

In turn, those beliefs and attributes reflect our commitment to society, shareholders, business partners, and above all, our colleagues on how we operate as individuals and as a company -- every day and everywhere. We honor this commitment irrespective of the mighty challenges and pressures that we invariably face in our business life because this is the only way to secure a prosperous future. We help each other to stand by our commitments by providing honest feedback and, when the circumstances require, by speaking up to share ideas and raise concerns.

I invite you to read this Guidebook carefully. It will help you navigate through your daily work and to work through the complex situations you may encounter. If you are ever unsure of what to do, take a moment and ask for help. There are plenty of experienced colleagues and subject-matter experts who will be delighted to work with you in resolving the problem.

Trust, collaboration, and integrity form the foundation of business innovation and, ultimately, our success.

Sincerely,



André Calantzopoulos



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THE CORE IDEAS



THE CORE IDEAS

Certain fundamental beliefs about business conduct unite and guide us as PMI employees.

These shared beliefs are at the heart of this Guidebook.

The pages that follow show that we understand how PMI needs to operate to remain competitive – quarterly, yearly, and for decades to come. The principles you'll read reflect both what the external world expects from us as a successful company that operates in the tobacco business, and what we should expect and require from each other as colleagues in pursuit of PMI's goals.

We can take pride in our heritage while creating our company's future. We can build on PMI's remarkable growth while never forgetting that our success comes from doing business with integrity. We can face complex challenges while being confident in our future – so long as we continually renew society's trust in how we operate.

PMI's reputation comes from the sum of our individual actions. With so much at stake, all of us need to pull in the right direction, in the right way. Misconduct by just one of us can overshadow hard work by thousands of us. And that's why the directions in this Guidebook are so important: if we can trust ourselves and our colleagues to follow these directions, we'll preserve PMI's place at the top of the business world; if we lose our way, the consequences are serious for us as individuals and for PMI as a company.

To help you apply these concepts to your daily work, this Guidebook covers topics that come up often and that require great care. Of course, none of us has all the answers, and that's fine – provided we reach out to find the best answers available.

THE CORE IDEAS

**This Guidebook recognizes
the attributes we share as we
conduct business for PMI:**

We question, we speak up, and we innovate. The marketplace is dynamic. Organizations can always improve. We openly acknowledge problems. Being passive is not the solution. Every employee should demonstrate “constructive dissatisfaction” by constantly asking: What are we doing today? Why are we doing it? What innovative solutions can I propose? We say something when we see things that are going wrong or business practices, processes, or products that we can improve. Raising issues or offering solutions makes our commitment to each other meaningful. In turn, the company will listen carefully and act appropriately when employees honor their duty to speak up.

We collaborate. Involving others is not a stumbling-block in the way of action. It is an indispensable step to problem solving. Diversity of thought and opinion produces the best decisions. We manage our business in an inclusive way, and break down individual barriers and barriers to collaboration among departments and functions.

We take accountability and act. We have a sense of urgency in the way that we do business. We do not wait for others to resolve problems. We do not delegate upwards. We lead our teams and take responsibility for the outcomes of their work. We do not content ourselves with not making a mistake. We act decisively when we have the information we need to move forward. More important, however, is that we blend an instinct for speed with thoughtfulness. There is always time to pause before taking a final action and ask whether the action is legal; whether it meets the test of common sense; whether it reflects good judgment; whether it aligns with the PMI way of doing business.

THE CORE IDEAS

When reading this Guidebook, you should also keep in mind these fundamental concepts:

We value the rule of law. We depend on political systems that apply laws fairly; that protect fundamental rights; that honor equality over popularity or political power. The rule of law protects us from arbitrary attacks on our commercial freedoms. When laws and regulations are excessive, we might seek change, but until change happens we comply because our respect for the rule of law is sincere.

We accept that society demands that we act responsibly. Many people have strong views about tobacco and tobacco companies. We don't expect everyone to agree with everything we do, but we need to be sensitive to the environment in which we operate. Our decisions should take account of the reality and the perception of our conduct. We should understand that it's often in our best interest, especially over the longer term, to hold ourselves to a higher standard than our competitors or companies in other industries.

We understand that trust and honesty are critical. No organization can retain the ability to function without trust and honesty. At the most basic level, it would be impossible to make sound decisions unless we can depend on receiving accurate information from colleagues. And, to state the obvious, a company that tries to compete through dishonesty and deception won't survive. It comes down to credibility; to whether people inside and outside the company can and should believe us; to whether we are consistent in word and action.

We think long term. We don't settle for episodic, short-term success; the goal is sustainable growth. We anticipate potential opportunities and problems. Cutting corners to produce temporary results merely creates the illusion of success and, instead of profitable returns, invariably yields losses. Sustainable growth is more than financial performance; it's equally about people. A focus on consumers, dedication to diversity and inclusion, and strong partnerships — they all invoke a long-term perspective.

Finally, along with asking questions goes listening. If you supervise others, you have a special responsibility to listen to the views and concerns of your team members (and to ensure they understand this Guidebook). Whether you have two or 2,000 people reporting to you, never forget that effective leadership requires engaged listening.

WORKPLACE INTEGRITY



WORKPLACE INTEGRITY

What We Do

We maintain a work environment that is inclusive, safe, and professional.

All of us should have an equal chance to contribute and succeed based on the merits of our work. Everyone benefits when this happens.

Discrimination, harassment, and unsafe working conditions are unfair; they are the opposite of how we do business.

How We Do It

We make all employment-related decisions based on merit. Do not limit people's opportunity to contribute or advance based on age, childcare responsibilities, disability, ethnicity, gender, gender expression, sexual orientation, religion, pregnancy, or other protected personal characteristics.

Harassment has no place here. Treat others with respect. Do not tolerate offensive, demeaning, or abusive conduct. Verbal abuse, bullying, unwanted sexual advances, intimidation, and offensive behavior are examples of inappropriate conduct. Violence and threats of violence are, of course, also unacceptable.

Make safety the priority. Protect yourself and those around you from injury by following all company and government health and safety rules. Advise your management about all injuries and near misses. It is unsafe and impermissible to work while impaired or intoxicated by legal or illegal substances, including alcohol or prescription medications and drugs. Do not bring weapons to work or carry them while doing company business unless you have received specific authorization to do so under the company's practices.

What We Need to Remember

Stop and listen. Behavior can be disrespectful and exclusionary even if it's not intentional. People sometimes unknowingly offend others and embarrass the company because they simply do not take the time to listen or to understand how others might feel or react. For example, if you find yourself thinking — and acting like — you are the smartest person in the room and that others do not have good ideas, you may be demonstrating a lack of respect for and understanding of the people around you. You can offend them and completely miss insightful ideas.

People should feel free to express themselves at work. Our business benefits from a wide range of approaches and opinions. We foster a diverse and inclusive environment where all employees feel comfortable. We all have different needs and styles, and we should make fair accommodations to adjust for these differences.

Our standards apply in non-office settings. Remote work locations, off-site meetings, business trips, and team social events are all work-related settings. For example, the rules against harassment apply to conduct that occurs at an off-site retirement party. In all situations, you should consider how your behavior could affect your colleagues and the company's reputation.

Employee representation. We respect the right of employees to join, or not to join, trade unions and representative organizations of their own choice.

MARKETING & SALES



MARKETING & SALES

What We Do

We market and sell our products responsibly, and only to adult smokers.

Our brands are among the most valuable in the world. We put our creativity and innovation into developing and maintaining brand value. At the same time, we know that tobacco products create health risks to consumers.

Accordingly, we engage only in responsible sales and marketing activities. If we are irresponsible, we will not have a long-term future.

How We Do It

We market and sell to adult smokers. Adults are capable of making an informed decision to smoke. Our products and marketing and sales activities are not meant for minors or non-smokers. We have a responsibility as a leading tobacco company to do our part in preventing youth smoking.

We warn consumers about the health effects of our products. All advertising and packaging for consumers must have health warnings, even if the law does not require these warnings.

Marketing must be honest and accurate. Information or claims about our products in our marketing and sales materials must be fact-based.

We respect the law. Marketing and sales regulations are often complex and require guidance to interpret. You should speak up if you are aware of any activities that might be at odds with laws or company policies.

What We Need to Remember

All marketing must go through an approval process.

Because we must meet a very high standard, our approval process combines trust and respect for individual judgment and creativity, with appropriate review. When reviewing proposed marketing, we involve people from different roles who have different experiences.

We are also judged on the activities of third parties.

Marketing and sales activities often involve third parties, such as agencies and hostesses. Their actions reflect on our company as much as our own. If you work with third parties in any marketing and sales activities, inform them about our principles and be alert for anything that appears to compromise our values or to bend the rules.

We are developing new products. A top priority for PMI is to develop and market products that have the potential to reduce the risks of contracting smoking-related diseases. Based on their nature and method of distribution, these products may be subject to different rules governing consumer research and marketing and sales. You should be familiar with these rules before engaging in any marketing and sales activities for reduced-risk products.

COMPETITION



COMPETITION

What We Do

We thrive in a fair, competitive marketplace.

We compete vigorously based on product quality, consumer insights, innovation, price, and other means that competition laws encourage. We know that a competitive market is good for business and our consumers.

How We Do It

We act independently of our competitors.

Don't even think of discussing or agreeing about price or any other competitively sensitive topic with competitors. If your job requires you to interact with a competitor, get advice from the Law Department about how to do so properly. Avoid conversations involving pricing, brand launches, trade programs, or other competitively sensitive topics.

We do not act with business partners to exclude rivals or harm competition.

Arrangements with customers and vendors may be an issue if they exclude rivals or make it more costly for rivals to compete, or if they harm competition among distributors, retailers, or vendors. Where we have significant market share, we need to be particularly sensitive when interacting with the trade and supply chain.

What We Need to Remember

Getting it right means asking for help. Competition rules are complex and can be counterintuitive. The Law Department and affiliate management understand what is appropriate for your market and can offer guidance. Before taking action, ask yourself whether your decision could appear to be in cooperation with competitors, or designed to exclude or make it more costly for rivals to compete. If so, you need to consult your management and your colleagues in the Law Department.

Any interaction with competitors may create legal issues.

Often your best approach is to avoid unnecessary contact with competitors, especially if your job or the circumstances might create even the impression that pricing, trade terms and programs or other competitive topics are discussed. If someone starts talking about such topics, end the conversation. Make it clear to those around you that you are not willing to participate in any anti-competitive agreements. Then, immediately contact the Law Department.

The way we compete is as important as the results. Some ways to increase volume and profits are simply not how we do business. Similarly, collecting information about our competitors' activities is not necessarily the right thing to do. The type of information and how we collect it are often subject to legal limitations. Work with your local lawyers to learn – and follow – the applicable local rules.

ANTI-BRIBERY & CORRUPTION



ANTI-BRIBERY & CORRUPTION

What We Do

We do not bribe anyone, anywhere, for any reason.

Bribery undermines the rule of law and debilitates the well-being of society. We recognize that our refusal to participate in corrupt activities may make doing business more difficult in some markets, but bribery is simply unacceptable at PMI.

We are consistent and firm in this position; otherwise, we would put our integrity and reputation at risk. And we have proven time and time again that we can ultimately achieve our business objectives without such unacceptable short cuts.

How We Do It

Never offer or give a bribe or allow others to bribe on our behalf. We need to be extremely careful when we offer anything of value — including money, gifts, favors or entertainment — that might be seen as an attempt to influence a person's professional actions or decisions. Use good judgment and, whenever in doubt, work with the Law Department to understand what you can and cannot do.

Don't make facilitating payments — even if allowed under local law. Facilitating payments are nominal payments or small gifts to government officials in exchange for speeding up a routine process or service. If you perceive a need or feel pressure to make such a payment, do not do it. Instead, talk to the Law Department about how best to deal with the situation.

Document everything of value given to government officials. You should always report gifts and entertainment you provide to government officials. This will fulfill the legal requirements for accurate books and records, and help avoid any misimpressions.

What We Need to Remember

Before offering or giving anything of value to a government official, understand both PMI's and your local requirements.

Conduct that might be appropriate in one market might be illegal or otherwise unacceptable in another. For example, offering a meal to an official is illegal in some countries, but legitimate and customary in other countries.

What if a bribe or facilitating payment seems like the only option?

If you believe a bribe is necessary or someone pressures you to bribe, then you must speak up. The company will involve the right people to find the right way forward. We can often solve problems by contacting higher levels of government or business associations. We will forgo business opportunities or revise objectives in situations where we cannot solve the immediate problem.

The definition of a government official might surprise you. You need to be particularly cautious when dealing with government officials. This is because laws have very specific requirements related to interactions with government officials. Government officials include national and local government employees and political candidates. The definition might also include employees of government-owned businesses, such as journalists working for a state-run newspaper or even the manager of a state-owned petrol station.

Third parties need to follow our rules. Any third party interacting with government officials on our behalf must follow the same rules we do and refrain from paying bribes (directly or through go-betweens).

COMPANY INFORMATION



COMPANY INFORMATION

What We Do

We protect the business value of our information and ideas.

The information and ideas we use at work come from our hard work and creativity. How we use and share this information can either enhance or destroy its value.

To retain its precious value, we need to follow specific ways to document, protect, process, and secure our proprietary information and ideas. Safeguarding this information helps protect and grow our business.

How We Do It

Protect confidential information. We lose competitive advantage if others know what we are thinking or doing. We may develop innovative marketing and sales strategies, but our efforts can lose value if competitors learn of our plans in advance. Do not share commercially sensitive information without authorization. Examples of commercially sensitive information include specifications for new products and technologies, marketing and corporate affairs strategies, research data, budgets, and other financial information.

Respect privacy and safeguard personally identifying information. We collect and use information about individuals inside and outside of the company for human resources, marketing, and other legitimate purposes. This is a normal part of doing business, but there are rules for collecting, using, sharing, storing, transferring, and disposing of personal data in order to protect privacy. Don't provide personal data to anyone who doesn't have proper authorization to view it because of a clear business need for the information.

Do not engage in or facilitate insider trading. In order to protect the investing public, securities laws make it illegal for those with "material inside information" to buy or sell securities (stocks, bonds, options, and so on). "Material inside information" means information that is not available to the public and that a reasonable investor would likely consider important in deciding whether to purchase or sell a security. Do not use inside information to buy or sell securities. Further, do not give someone else (your spouse, co-worker, friend, broker, and so on) a "tip" regarding material inside information.

Consult with our investor relations office before giving non-public financial or business information to a member of the investment community. Insider trading abuses the trust PMI places in you, is illegal, and is unfair to other investors.

Preserve our intellectual property rights. There are many ways a good idea can lose its value if it isn't protected. Work with the Law Department to understand how copyrights, patents, trademarks, and other forms of intellectual property rights protect the value of our ideas and work product.

Respect the confidentiality and intellectual property rights of others. Don't steal other people's secrets or their property, intellectual or otherwise. This applies to big things like another company's secret process and to small things such as a copyrighted image found on the Internet.

Be careful with unsolicited ideas. If someone from outside the company comes to you with an unsolicited idea, immediately contact the Law Department before using or sharing the idea. Doing this will reduce the risk of a third party claiming credit for an idea we already have or alleging that we stole an idea.

Retain records required by the law and the company. All affiliates have a retention schedule that states which documents you must keep and for how long. These schedules ensure that the business has the information it needs to operate and that we meet regulatory requirements. From time to time, you might receive a Legal Hold Notice that requires you to keep certain documents because of, for example, a lawsuit or a government investigation. If you receive a Legal Hold Notice, you must follow its directions and retain all the documents it describes.

PMI 1-C – Managing Company Information

PMI 3-C – Personal Data Protection

PMI 6-C – Intellectual Property Rights

PMI 18-C – Using Computer Technology

PMI 18-CG2 – Social Media Guidelines

COMPANY STATEMENTS & RECORDS



COMPANY STATEMENTS & RECORDS

What We Do

We communicate openly and honestly.

Our company's statements influence whether the public perceives us favorably or unfavorably.

The public's trust in our honesty is important to the long-term sustainability of our business. To maintain this trust, all of our public communications must be truthful, appropriate, and not misleading.

We honor the same practices in our internal communications and records.

How We Do It

Our financial statements are accurate and understandable.

Investors should be able to make decisions based on what we say. Our financial statements and other financial information we share with regulators and the public must give an understandable and complete picture of our business.

We maintain accurate books and records. Having accurate books and records is not limited to our financial statements. Reporting of any business information by employees and the company must be accurate, complete, and timely.

We do not make scientific claims without robust evidence.

We are developing products that may have the potential to reduce the risks of smoking. To address this complex challenge, our scientists, who have expertise across a wide range of disciplines, are developing and assessing prototype products. We have a strong quality framework for conducting this research, including pre-clinical trials, clinical studies, behavioral studies, and post-launch surveillance. We back up our scientific claims by sharing our data and being open to scientific peer review.

We disclose our support. We are transparent about our role in developing materials that seek to influence policy decisions of interest to the company. This includes the results of work we have funded on the health implications of our products, as well as when third parties present data or views on our behalf, which we have financed, in order to inform policy decisions. This attribution requirement does not apply when independent third parties, including governments and organizations, act on their own behalf, even if PMI provides assistance such as reference materials or data.

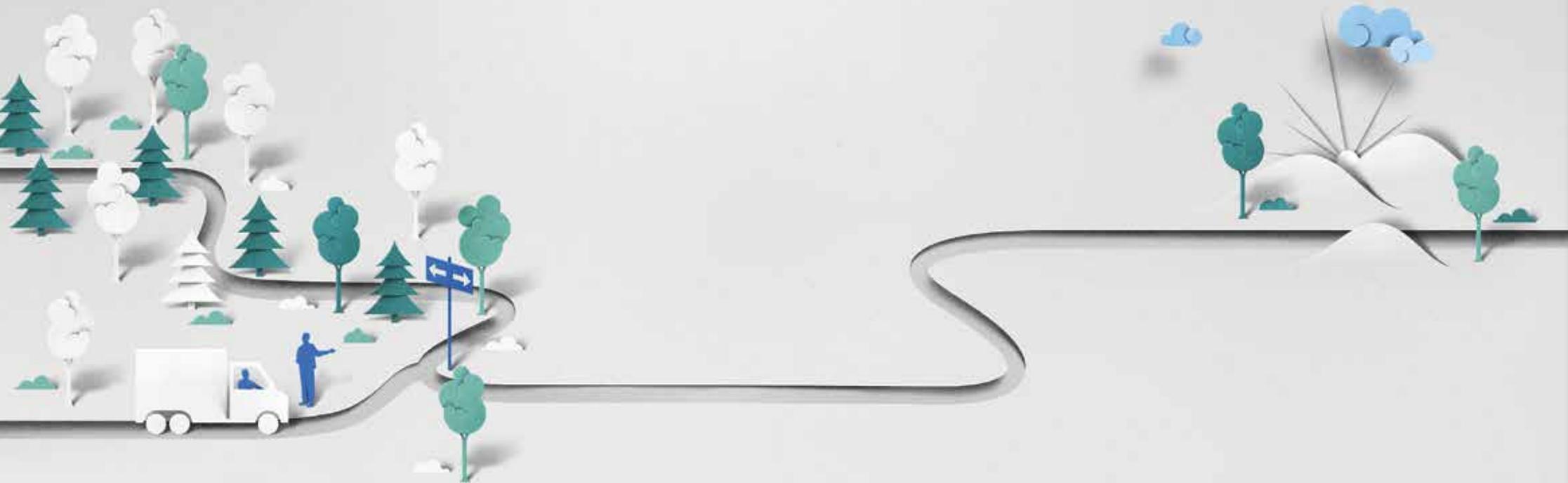
What We Need to Remember

The same principles apply to how we

communicate internally. Be honest, accurate, and complete in your daily communications. Take the time to be understandable. Do not confuse facts with opinion. Should you need to hypothesize about a topic, make it clear that that is what you are doing. Unless it's your job, do not make legal assessments or offer legal opinions in what you write.

Social media is not private. It's natural to use social media to talk about what is on your mind. Understand, however, that what you say via social media is a public communication. Even if you do not mean to, it might be taken as a company statement, rather than your individual views, and disclose confidential company information. This could mislead the public and violate investment and confidentiality laws. Follow the company's guidelines for using social media.

FISCAL & TRADE



FISCAL & TRADE

What We Do

We help prevent illegal sales of our products and misuse of our company resources.

A large number of smokers worldwide prefer our brands above all others. This is clearly a very good thing, but it increases the incentives for criminals to trade in our products as contraband in violation of customs or tax laws or to use our company for money laundering. PMI's standards are clear: We will not condone, facilitate, or support contraband or money laundering. We work with governments to stop illegal sales of our products. Our credibility in this area depends on our being alert to any activities or practices that might compromise our standards.

How We Do It

We have business practices designed to prevent criminal exploitation. Money laundering is the process by which individuals or entities try to conceal the source of illicit funds or otherwise make the source of their illicit funds look legitimate. PMI complies with anti-money laundering laws by using procedures to avoid receiving cash or cash equivalents that are the proceeds of crime. To prevent contraband, our affiliates monitor customer sales volumes and take action if they suspect illegal diversion of our products.

We screen potential new customers, vendors, and third-party manufacturers. We only do business with those who share our standards of compliance and integrity. The Internal Controls Department has processes to identify potential problems with business partners. We double check to be sure we don't do business with countries, regimes, organizations, or individuals that are subject to trade sanctions with which we must comply. This screening must happen before entering into a new business relationship.

We comply with anti-boycott restrictions. Under U.S. law, PMI is required to report to the U.S. Government, and not to cooperate with, any request concerning foreign boycotts contrary to U.S. Government policy. Employees may not take any action, furnish any information, or make any declaration that could be viewed as participation in an illegal foreign boycott. Current information on prohibited international boycotts is available from the Law Department.

What We Need to Remember

Know Your Customer and other fiscal and trade standards help you do your work faster and keep all of us out of trouble. Company practices for checking on customers and other third parties may seem cumbersome and take time, but they help our business operate more efficiently and lawfully. The U.S. and other countries impose restrictions on dealings with a number of countries and thousands of individuals, and the list changes every day. Our systems help us avoid violations and collect the information we would need to respond to a government request.

PMI 9-C – Know Your Vendors

PMI 10-C – Know Your Customers and Third Party Manufacturers

PMI 11-C – Acceptable Forms of Payment

PMI 15-C – Taxation

CONFLICTS OF INTEREST & GIFTS & ENTERTAINMENT



CONFLICTS OF INTEREST & GIFTS & ENTERTAINMENT

What We Do

We make fair and objective decisions.

Conflicts of interest occur when personal, social, financial, or political activities overlap with an employee's work responsibilities. Most conflicts of interest involve personal relationships, such as having a close relative who works for a company seeking to do business with PMI. Our work decisions should always be based on what is best for PMI, not for us personally. Having a conflict is not necessarily a problem. Our conflict of interest requirements promote fair decision making by requiring disclosure, review, and potential mitigation of conflicts that may affect our professional objectivity. Likewise, our rules on gifts and entertainment prohibit receiving or offering anything that might influence professional judgment. This means that we can rely on each other to make good decisions, and builds our reputation for doing business honestly.

How We Do It

Disclose potential conflicts of interest. Your private life is private. The company respects this but needs to know if there are situations where your private interests might overlap with your professional responsibilities. You must disclose your potential conflicts of interest to the Compliance Department, even if you think that you can manage the issue without assistance. Most people overestimate their own ability to make objective decisions when faced with competing personal interests. The best way to test your objectivity is to involve others, who can usually find ways to mitigate the conflict.

Do not offer gifts or entertainment to compromise the professional judgment of others. Providing gifts and entertainment is a legitimate way of building business relationships and showing esteem. But gifts and entertainment should not be used to influence the objectivity of the people with whom we do business. The specifics are in our gift rules. Always use your good judgment and avoid anything that is lavish or not customary or that will embarrass your colleagues or the company. Do not participate in any entertainment that is unsavory or sexually oriented. You generally need approval to provide gifts totaling more than US\$250 during a calendar year; affiliates may set lower thresholds.

Do not accept gifts or entertainment that can influence your professional objectivity. Do not accept anything that violates the company's gift rules or would embarrass your colleagues or the company. You need approval to accept gifts or entertainment of more than US\$250 during a calendar year; affiliates may set lower thresholds.

What We Need to Remember

The process for disclosing conflicts of interest is simple, confidential, and fair. The company provides simple tools for employees to disclose conflicts of interest. In fact, most potential conflicts receive clearance, with appropriate conditions for those involved. Only people with the need to know will review your conflict of interest disclosure.

Who is a close relative? A "close relative" is a husband or a wife, parents and stepparents; children and stepchildren; brothers and sisters; stepbrothers and stepsisters; nephews and nieces; aunts and uncles; grandparents; grandchildren; and in-laws. The "close relative" rules also cover domestic partners (whether or not officially recognized under local law) and the person with whom you are in a close personal relationship. Contact the Compliance Department for guidance if you are not sure if a person is a "close relative."

Disclose a Conflict of Interest

Use our online form (conflictofinterest.pconnect.biz) or contact Compliance directly. Unless you think it is a matter that needs to remain private, inform your supervisor.

SUPPLY CHAIN RESPONSIBILITY



SUPPLY CHAIN RESPONSIBILITY

What We Do

We are committed to long-term growth.

Achieving long-term growth depends on the sustainability of our internal and external supply chains. We are reducing the environmental impact of our activities and promoting the sustainability of the natural resources on which we depend.

We are sensitive to and work to address concerns regarding child and forced labor. These actions improve our business results and improve the lives of people in the communities where we operate.

How We Do It

We continue to reduce our carbon footprint.

We have annual, five year, and twenty year targets to reduce the carbon footprint of our supply chain. Our initiatives cover sustainability in agricultural production, including deforestation, energy and water consumption, recycling, and CO2 emissions. We disclose our progress annually.

We are working to eliminate child, forced and other labor abuses in our supply chain.

We do not condone child or forced labor and do not employ children in our company. We engage with farmers on good agricultural practices to improve the sustainability of their crops. We expect farmers to implement the requirements of our Agricultural Labor Practices Code. Our charitable giving program helps create opportunities for rural communities.

What We Need to Remember

We work with suppliers who share our commitment to compliance and integrity. Whom we choose to work with in our supply chain and how our partners and suppliers operate affects our reputation and our business. If you are selecting a new supplier or reevaluating a current one, make sure they understand our principles and be alert to anything that could compromise our standards.

LEARN MORE

PMI Agricultural Labor Practices Code

PMI 8-C – Environment, Health, Safety and Security

PMI 12-C – Charitable Contributions

SPEAKING UP

What We Do

When something can be improved or is wrong, we take action.

If you see something going wrong, you must speak up. When you speak up, the company will listen and act. Equally important is speaking up to improve things.

When you speak up in good faith, PMI will support you fully.

How We Do It

Share your ideas and experience on how to improve things. If a requirement or process makes it more difficult for you to work effectively or appears too complicated for the purpose, then say something. Rules and processes should make sense and help you do your job. You should also say something if you perceive that actions have not been taken to protect the company from a potential business, legal, or regulatory risk.

Ask questions when things aren't clear.

PMI provides all of us, at every level of the organization, with access to colleagues who can answer questions, solve problems, and provide advice. If you are unsure what to do, ask—you will get help.

Stop things that go wrong. Mistakes happen. When they do, it's part of your job to help correct them. If something does not seem right, or it appears that this Guidebook, a Principle & Practice, or the law is being compromised, you have an obligation to speak up. Ignoring a potential compliance issue can enable a relatively small problem to grow into a large problem, causing real harm to your fellow employees and the company.

What We Need to Remember

We investigate reports of suspected misconduct. The Compliance Department has trained employees in several functions to investigate your concerns. PMI Investigation Standards govern all compliance investigations, and we run a post-investigation quality assurance program to ensure that the process remains fair, unbiased, and respectful.

Ask if you are not sure. If you are worried about what will happen when you speak up, talk with your local management or the Compliance Department. They can address your concerns and answer any questions you might have about the process.

How to Speak Up

There are many ways to speak up. Reach out to:

- Your supervisor or head of department
- Human Resources
- The Law Department
- The Compliance Department:
 - PMI.Compliance@pmi.com
 - Regional Compliance Director
 - Cluster Head for your affiliate

A third-party operated Compliance Helpline is also available 24 hours a day, seven days a week, in all languages spoken at PMI.

Contact the Helpline online (compliance.pconnect.biz) or by telephone. Local dial-in numbers are listed on your intranet. Collect calls are accepted (+1 303-623-0588).

You can use the Helpline anonymously, unless you are calling from one of the few countries where local laws restrict such practices. If you are not sure about anonymity restrictions in your location, ask the Helpline or consult the Law Department.

SUPERVISOR'S RESPONSIBILITIES



SUPERVISOR'S RESPONSIBILITIES

The culture of our organization influences our actions.

Many factors create corporate culture. For example, the way we work together as teams, the fairness of the organization, perceptions of corporate policies, competitive pressure, and even rumors all contribute, for better or for worse, to our corporate culture. Those whom the company trusts to supervise others have a special responsibility for shaping our corporate culture and the work environment of their teams.

All supervisors should ensure that their teams:

Know and understand this Guidebook and the PMI Principles & Practices relevant to their job.

Understand that this Guidebook and the PMI Principles & Practices are applied fairly and consistently.

Feel free to speak up about compliance issues and expect the company to listen to their concerns.

See that we do business with integrity.

Preserving the right culture is much harder than just telling employees to follow the rules. Above all, it takes authentic leadership. Set an example by showing what it means to act with integrity. Earn the trust of your team by talking about the topics in this Guidebook. Listen and act on what they say. Remember that team members' silence may not mean that they don't have anything to say.

If someone speaks up about suspected misconduct, remember that they are honoring their duty as an employee and should be treated with respect. Immediately contact Compliance with any such matters so the company can objectively address the concern.

Trust needs to go both ways. If you think your supervisor should do more to build our culture of compliance and integrity, then tell your supervisor or others at the company.

APPLICABILITY, WAIVERS & EXCEPTIONS

This Guidebook contains mandatory provisions that apply to all PMI employees, officers, and directors and to anyone doing business on our behalf. Violations of this Guidebook or Compliance Principles & Practices may result in discipline, including termination.

In exceptional circumstances, the company's Chief Compliance Officer may grant a waiver of a provision of this Guidebook. Waivers of any provisions for executive officers of the company must also be confirmed by the Board of Directors.

This Guidebook applies to Philip Morris International Inc. and its direct and indirect subsidiaries, collectively referred to as Philip Morris International, PMI, or the company.



