SECTION 172(1) STATEMENT

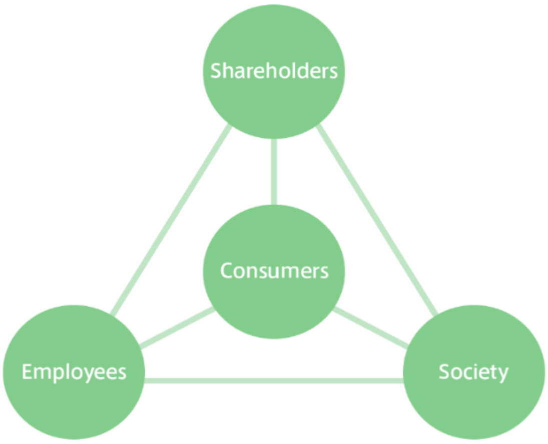
1 January - 31 December
2024

Introduction

This statement sets out how the Directors have had regard to the matters set out in section 172(1) of the Companies Act 2006 (the "**Act**") when performing their duties and how this influenced their discussions and decision-making throughout the year ended 31 December 2024. The Directors' primary responsibility is to act in the way they consider, in good faith, will be most likely to promote the success of the Company for its shareholder, whilst having regard to various factors and the interests of other stakeholders.

The Company's stakeholders

The stakeholder model (4S) used by the Company requires it to fulfil its responsibilities towards consumers, shareholders, employees and the wider society. The Directors firmly believe that the pursuit of the 4S model and the allocation of business investments which offer additional value to consumers will deliver long-term sustainable growth.



In addition to these four key stakeholders, the Directors have identified the following additional stakeholders and factors which they consider to be relevant when complying with section 172(1) of the Act: customers, suppliers and other business partners; government and political stakeholders; maintaining high business and ethical standards, and the long-term sustainability of the Company.

Engagement with stakeholders

The Company aims to participate in regular, meaningful and balanced engagement with all of its stakeholders. This engagement enables the Company to foster business relationships and understand the views of our stakeholders, which in turn informs the decisions made by the Board. For further information see the *Directors' Report*.

Effect on the Company's decisions and strategies during the financial year

The Directors have had regard to the various factors and the interests of the stakeholders mentioned above whilst performing their duties.

Key strategic decisions

Launch of JTI 360 Website

In April, the Company launched the *JTI 360* website, which is an online category partner for independent and symbol customers, providing key information to customers including updates on our product and brands, legislation, the retail landscape and best-practice advice.

Launch of new products

As part of the continued efforts to grow and diversify the business and compete effectively in the market, the Company launched the new Nordic Spirit Intense Flavour Range which includes four new flavours, Mayfair Gold roll-your-own tobacco 30g, Sterling roll-your-own tobacco 40g, Sterling Dual Double Capsule Leaf Wrapped 20s, as well as EVO Cobalt and two EVO limited-edition products, Amarillo and Ruby Option.

Factor	Outcome
a) **Likely long-term consequence of any decision**	The Board annually produces the 3-year local Annual and Strategic Plan (2025-2027), which is derived from and aligns with the global JTI plan and monitors its implementation and progress against key performance indicators. In approving the plan, the Directors also considered various factors such as competitor behaviour, the performance of the industry, as well as the evolving economic, political and market conditions.

b) Interest of the Company's employees	The Directors understand the importance of its employees to the long-term success of the business and are proud that the Company holds all 3 *Investors In People* accreditations; Platinum standard in both *People* and *Wellbeing* and Gold in the *Apprentices* accreditation. We were recognised by the Top Employers' Institute for the 13th year in a row, awarded Gold in Mind's Workplace Wellbeing Index, and achieved the Global Equality Standard. The Company has developed and maintains a range of well-established employee engagement channels to ensure that the Directors understand the views of the Company's employees. Throughout the year the Company provided various updates to employees. For further information see the *Directors' Report*.
c) The need to foster the Company's business relationships with suppliers, customers and others	The Board regularly reviews how the Company maintains positive relationships with all of its stakeholders, including suppliers, customers and others. During the year, the Company provided performance updates to its key accounts. The Company also launched the *JTI 360* website, which is an online category partner for independent and symbol customers, providing key information to customers including updates on our product and brands, legislation, the retail landscape and best-practice advice. Managing our supply chain responsibly is a priority. The Board believes this is beneficial not only for our sustainable growth, but also for our stakeholders and wider society. Our approach to sustainability is built in part around environmental, community investment and human rights priorities – all of which inform the standards we hold our suppliers to. For further information, see the *Directors' Report*. Government and political stakeholders impact the Company by setting the regulations which shape our operating environment. The Company engaged with them formally in order to explain to them the Company's business and priorities, as well as issues such as the trade in illegal tobacco products.
d) Impact of the Company's operations on the community and environment	JTI is committed to minimizing the social and environmental impact of our value chain, products and services. We are focused on protecting the environment, minimizing the use of natural resources, and respecting people, communities, and biodiversity. The Directors take very seriously the responsibility of ensuring the Company is a good corporate citizen. The Company continues to run the *Don't Be Complicit In Illicit* campaign to tackle illicit trade and supports the *No ID, No Sale!* programme, which provides retailers with materials to help them comply with legislation on preventing underage sales. The Company along with other members of the Tobacco Manufacturers' Association, continues to contribute to a programme of activities to prevent and reduce cigarette litter in public places across the UK (see paragraph on page 3 of the Company's financial statements headed "*Litter*"). As part of its long-established Community Investment programme, the Company continued to work with leading charities and cultural institutions to help make communities more inclusive, improve access to resources and protect the environment. The Company allows employees to take up to 50 volunteering hours per annum. In 2024, 72% of employees volunteered their time and contributed 2991 hours to a range of charities throughout the UK across the year. The Company held a UK-wide donation drive, *The Big Give*, where employees collected and donated over 6,000 items to 15 charities across the UK, including food, clothing, toiletries and other essentials.
e) Desirability of maintaining a reputation for high standards of	The Directors have committed to maintaining consistently high business and ethical standards, and there are various global and local policies in place to ensure this. These policies include the *JTI Code of Conduct, JTI Global Procurement Procedure, JTI Know Your Business Partner Policy, JTI Preventing Financial Crime Procedure, JTI Sanctions and Export Controls Policy, JTI Competition Law Policy, JTI Global Data Breach Policy, JT Group Human Rights Policy,* and *Employee Disclosures and Declarations Policy*. These policies are regularly

	business conduct	reviewed and updated to ensure they continue to meet the high expectations the Directors have for the business.
f)	**Act fairly between members**	The Board has not had to consider the need to act fairly between members of the Company as the Company only has one shareholder.

This statement forms part of the Strategic Report of the Company for the financial year ended 31 December 2024 and has been approved by the Board of Directors on 9 May 2025