



Agricultural Labor Practices (ALP)

STANDARD & GUIDANCE

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INTRODUCTION

JTI is committed to **sustainable tobacco farming**. This commitment is about taking care of people as well as protecting the planet. When it comes to our tobacco leaf supply chain, taking care of people means that all those connected to the production of tobacco leaf should be treated fairly and have their human rights respected throughout the process.

For this reason, **we conduct Supply Chain Due Diligence (SCDD) in regard to our tobacco leaf production, including the respect of human rights, and are expecting our third-party leaf suppliers to do the same.** Conducting SCDD enables us to identify and understand the challenges faced by tobacco growers, their workers, their families, and their communities, so that we can take effective action

(in collaboration with all relevant stakeholders) to prevent, mitigate, and address any actual or potential adverse impacts identified.

JTI's Agricultural Labor Practices (ALP) are an integral part of this approach.

The ALP Standard is based on internationally recognized standards and sets out the minimum human rights standards we expect to be met and maintained on farms.

By requiring directly contracted growers and third-party leaf suppliers to implement and monitor ALP, we are striving to secure a **safe, legal, fair, and respectful long-term future** for everyone involved in tobacco leaf production including growers, workers, and ourselves alike.

DOCUMENT HISTORY

	Date of issue	Effective date	Purpose of change
V1	March 2024	March 2024	Updates to ALP framework
V2	April 2025	April 2025	Design updates

WHAT IS ALP?

JTI's Agricultural Labor Practices (ALP) is a program for promoting safe, legal, fair, and respectful working conditions on farms from which JTI sources tobacco directly or indirectly.

The JTI ALP Standard sets out the human rights standards we expect our business partners to meet and to maintain and is based on the three pillars of:

Ending child labor



Respecting the rights of workers



Driving workplace health & safety



This document also provides guidance on implementing ALP, establishes JTI's expectations for how the minimum standards should be monitored, and outlines how to respond appropriately when non-adherence to the Standard is observed.¹

¹ This version of JTI's ALP supersedes all previous versions: Agricultural Labor Practices 2013, 2014 and 2017 editions.

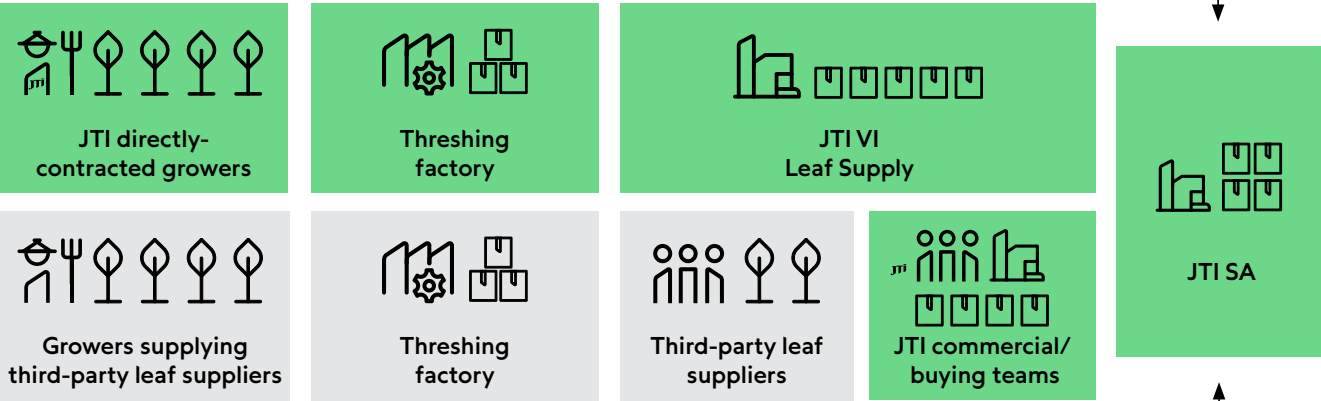


JTI Tobacco Leaf Supply Chain

JTI sources tobacco leaf from third-party leaf suppliers around the world, as well as directly from contracted growers in countries where JTI has a vertically-integrated supply chain.

The ALP Standard applies directly to both of them. It applies indirectly to those growers who are part of JTI’s tobacco leaf supply chain through selling to third-party leaf suppliers.²

JTI vertically-integrated tobacco leaf supply



Third-party tobacco leaf supply

JTI process Third-party supply process

² The way ALP is applied may differ according to the market structure.

ALP STANDARD

Ending child labor

Pillar 1



Hazardous work
by children

Minimum age
& schooling

Respecting the rights of workers

Pillar 2



Remuneration

Forced labor &
human trafficking

Freedom of association

Respectful treatment

Working hours & breaks

Recruitment

Driving workplace health & safety

Pillar 3



Facilities,
accommodation
& wellbeing

Crop
Protection Agent
(CPA) management

Farm safety

First aid

Transport

Green Tobacco
Sickness (GTS)

Child labor is not acceptable.



Defining Child Labor

Child labor³ is defined as work that deprives children (under 18 years) of their childhood, their potential, and their dignity, and that may be harmful to their physical or mental development.

It refers to work that may be mentally, physically, socially, or morally harmful to children; and / or work that interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Whether particular forms of work performed by children under 18 years are to be classified as child labor depends on various factors including the child's age, the type and hours of work performed, and the working conditions.

³ Our definition of child labor is interpreted from the internationally agreed definitions provided in [International Labour Organization \(ILO\) Conventions 138 \(minimum age for employment\)](#), and [182 \(eliminating the worst forms of child labor\)](#).

Pillar 1

1.1. Hazardous work by children

1.2 Minimum age & schooling

1.1. Hazardous work by children

Growers shall prevent and protect children (under 18 years) from performing hazardous work on the farm.

Hazardous work includes:

- Working with Crop Protection Agents (CPAs) or any other chemicals.
- Handling green tobacco leaves (which includes harvesting, topping, and de-suckering of tobacco).
- Any other task deemed unsuitable for children (under 18 years), according to JTI's list of hazardous activities or according to local legislation.

Children aged between 16 and 18 years may only engage in some of these tasks potentially related to hazards, if the strict conditions detailed in [JTI's list of hazardous activities](#) if permitted by local legislation; if their health, safety, and morals are fully protected; and if they have received sufficient information, adequate training and supervision on performing such tasks.⁴

⁴ ILO C138, Article 3; ILO R190, Article 4; ILO C184, Article 16.3.





1.2. Minimum age & schooling

Growers shall only employ persons above the age of 15* to work on the farm.⁵

Where local legislation stipulates a higher minimum working age, the law always prevails.

On family farms, children of the household from the age of 13* may do “light work” **that does not involve growing tobacco**, as far as permitted by local legislation.⁶

Growers shall seek to ensure that any work done on the farm by any children (under 18 years) does not interfere with their attendance at school.

Children above the minimum working age may combine work with attendance at school or work full-time if they have completed mandatory schooling.

Children from age 13* engaged in “light work” on the family farm should work fewer than 14 hours per week.⁷

Learning programs

Children involved in vocational learning or training, such as school programs or apprenticeships, can be allowed to work if the tasks relate directly to the learning experiences of the program, and the assignment complies with JTI’s list of hazardous activities, and local legislation.⁸

* In some countries, JTI’s minimum acceptable age for employment is 14 years, provided the conditions of Article 2.4 of ILO Convention 138 have been fulfilled. Where this is the case, the minimum age for light work can be lowered from 13 years to 12 years.

⁵ ILO C138, Article 2.

⁶ ILO C138, Article 71.

⁷ ILO C138, Article 7.

⁸ ILO C138, Article 6.



International standards concerning ability to work

Aged 12* and under	• No work
From the age of 13*	• Can do light work on the family farm for fewer than 14 hours per week. • Not permitted to do any task involved in tobacco growing.
Aged 15* and over	• Can work as hired or family labor excluding doing any hazardous activities, as long as they have reached the legal minimum working age. • Not permitted to handle green tobacco leaves or CPAs.
Aged 16 and over	• Can work as hired or family labor excluding doing some hazardous activities, as long as they have reached the legal minimum working age. • Permitted to do certain hazardous activities (see page 37), provided the conditions in the JTI hazardous activities list are met and local legislation adhered to. • Not permitted to handle green tobacco leaves or CPAs.

* In some countries, JTI's minimum acceptable age for employment is 14 years, provided the conditions of Article 2.4 of ILO Convention 138 have been fulfilled. Where this is the case, the minimum age for light work can be lowered from 13 years to 12 years.

WHAT IS “LIGHT WORK”?

Light work can be any task or chore (connected to the household or the family farm) that is not excessively physically or mentally demanding on the child, commensurate with their age and their size.

For children from the age of 13*, it is acceptable to participate in appropriate light work outside school hours and during school holidays, such as:

- Cleaning and tidying (depending on intensity).
- Assisting in the care of younger siblings.
- Assisting in the preparation and serving of meals.
- Feeding poultry.

These kinds of activities can contribute to children’s development and to the welfare of their families, by providing them with skills and experience for life.

Light work is NOT any of these:

- Tasks involved in growing tobacco.
- Work exceeding 14 hours per week.
- Conditions that hinder the child’s access to education or their ability to actively participate in education.
- Physically or mentally challenging work.
- Work without appropriate equipment for protection.

Any interpretation of “light work” must adhere to all the minimum standards set out in the JTI ALP Standard, and be in accordance with local legislation.

Please note: There is no exhaustive list of appropriate “light work” activities for children from the age of 13*. The appropriateness of tasks will differ depending on the child, the environment, and the social and cultural context, and should be discerned on a case-by-case basis.

* In some countries, JTI’s minimum acceptable age for employment is 14 years, provided the conditions of Article 2.4 of ILO Convention 138 have been fulfilled. Where this is the case, the minimum age for light work can be lowered from 13 years to 12 years.



Growers respect worker's rights and provide for legal, fair, and respectful terms of employment and working conditions.



2.1. Remuneration

Growers shall:

- Remunerate and provide benefits to all workers at least in accordance with applicable local legislation. Wages must always be enough to meet basic needs and provide some discretionary income.
- Take steps to ensure workers' pay and associated benefits are provided as agreed, on time, and without any disciplinary, unfair or illegal withholdings or deductions.
- Keep workers fully informed of the terms & conditions of their employment, including providing copies of contracts, payslips, or maintaining an alternative appropriate written or digital record that is accessible to workers.

WHAT IS REMUNERATION?

Remuneration refers to the total compensation a person receives in exchange for their work – including pay and other (non-financial) benefits.

Pillar 2

2.1. Remuneration

2.2. Forced labor & human trafficking

2.3. Freedom of association

2.4. Respectful treatment

2.5. Working hours & breaks

2.6. Recruitment

2.2. Forced labor & human trafficking

Growers may not tolerate any form of forced or compulsory labor⁹, including bonded, trafficked, or prison labor. All workers conducting farm labor shall have freely consented to do so.

Growers **shall not**:

- Require workers to work against their will.
- Require workers to lodge any monetary 'deposits' or identity papers nor collect recruitment fees.
- Prevent workers from leaving their employment upon reasonable notice.
- Participate in or facilitate the recruitment, transport, harboring, or receipt of people for the purpose of forcing them to work against their will (human trafficking).¹⁰

⁹ Forced labor is defined as any work a person is forced to do against their will, usually under deception and/or the threat of a penalty or punishment. Our definition of forced labor is adapted from the internationally recognized definition in [ILO Convention No. 29 \(1930\)](#), Article 2 "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."

¹⁰ Our definition of human trafficking is adapted from the internationally recognized definition in the [Palermo Protocol \(2000\)](#). For more guidance about observing indicators of human trafficking, see the [JTI Critical Issues Framework Guide](#).

2.3. Freedom of association

Growers shall recognize workers' rights to form work councils, to join trade unions of their own choice and to collectively bargain to advocate for their best interests.

Growers will not interfere with the formation of work councils or trade unions and their organizational activities.

Growers will not discriminate against workers' representatives, undertake to influence them, or hinder them from carrying out their representative functions.





2.4. Respectful treatment

Growers will treat all workers with respect and dignity.

Growers will not subject workers to any physical abuse or discipline, threat of physical abuse, harassment, or other forms of intimidation including a hostile or offensive work environment.

Growers will not seek to exploit, or unfairly or illegally discriminate against any worker. Instead, they will pay particular attention to the rights of workers most vulnerable to discrimination.

WHAT IS FREEDOM OF ASSOCIATION?

Freedom of association and the protection of the right to organize are established in [ILO Convention No. 087 \(1948\)](#).

In the workplace, freedom of association means all employees have the right to join or form a union or other group, to debate, to strike or protest, and to collectively bargain as a group in negotiations with the employer. It also protects the right of employers to form or join equivalent groups or organizations.



2.5. Working hours & breaks

Growers shall:

- Implement working hours that comply with local legislation; providing adequate breaks, rest days and ensuring that leave days are offered and taken.
- Procure workers' free and prior consent to doing any extra working hours (overtime). Extra working hours (overtime) shall be compensated at least in accordance with applicable local legislation.
- Respect total working hours for workers that do not exceed typical farm working hours on a regular basis, and take steps to ensure that extended working days (longer than 8 hours) are only carried out if they do not increase health & safety risks or contribute to workers' fatigue.¹¹

¹¹ ILO code of practice on safety and health in agriculture, 2011, 19.2 Working Hours.

2.6. Recruitment

Growers shall:

- Take steps to ensure that all workers are recruited lawfully and in a responsible and transparent manner that respects their rights throughout the employment relationship – from recruitment through to termination processes.¹² This includes the prohibition of requesting recruitment or onboarding fees from workers.
- Take all reasonable measures to ensure migrant workers are recruited lawfully and transparently, are protected from discrimination, and are not treated less favorably than other workers performing the same or similar work.¹³

¹² Adapted from the [Stronger Together Responsible Recruitment Toolkit](#).

¹³ In accordance with the Dhaka Principles for migration with dignity.

Growers shall apply all reasonable measures to create and maintain a safe, healthy, and injury-free working environment, and to promote the wellbeing of workers.



Growers and workers have a shared responsibility to establish and maintain a safe and healthy working environment, as reflected in ILO Conventions C155 and C184:

- Growers shall meet all occupational health & safety requirements stipulated in local legislation and international covenants.
- Workers shall co-operate with growers, taking all reasonable measures to support the maintenance of a safe, healthy, and injury-free working environment.

3.1. Facilities, accommodation, and wellbeing

Growers shall provide workers with access to clean drinking and washing water close to their workplace.

Accommodation and/or food, where provided by the grower, shall at a minimum include:

- Access to potable water.
- Safe and hygienic sanitation facilities.
- Safe and hygienic living quarters.
- Privacy for individuals and/or households (especially protecting vulnerable persons such as women and children).

Pillar 3

3.1. Facilities, accommodation & wellbeing

3.2. Crop Protection Agent (CPA) management

3.3. Farm safety

3.4. First aid

3.5. Transport

3.6. Green Tobacco Sickness (GTS)



3.2. Crop Protection Agent (CPA) management

Growers shall:

- Follow the prescribed security, safeguarding, storage, handling, preparation, application, and safe disposal instructions provided by the manufacturer of the Crop Protection Agent (CPA).
- Follow the procedures explained to them by Agronomy Technicians,¹⁴ which are based on good agricultural practices that have been optimized for local conditions.
- Ensure adequate personal protective clothing and equipment are provided to prevent and mitigate accidents, or other adverse health effects from working with CPAs.
- Inform their workers of the correct way to work with CPAs, and the associated risks.

Growers shall not allow pregnant women, nursing mothers, children under 18 years, or other vulnerable people to handle or apply CPAs.

¹⁴ “Agronomy Technician” is the title used by JTI to refer to the technical experts who work with growers throughout the crop cycle, providing technical support / extension services in relation to Good Agricultural Practices (GAP), Minimum Agronomic Standards (MAS), Agricultural Labor Practices (ALP), Supply Chain Due Diligence (SCDD), and other topics. People in this role may alternatively be known as Leaf Technicians, Field Technicians, Extension Officers, or other similar titles. Throughout the JTI ALP Standard & Guidance, any reference to “Agronomy Technician” may be understood to refer to Agronomy Technicians and all others who visit growers/tobacco fields on behalf of JTI or a third-party supplier company.

3.3. Farm safety

Growers shall:

- Take adequate steps to prevent accidents and injury to health occurring in the course of work, by minimizing, so far as reasonably practicable, the causes of hazards inherent in the working environment.
- Maintaining all machinery, tools and equipment used for agricultural activities in safe working order, and storing them correctly.
- Ensuring, where necessary, that adequate personal protective equipment are provided to prevent and mitigate accidents or other adverse effects on health and safety.
- Providing occupational health and safety training to workers on a regular basis.

This includes:

- Regularly checking the farm environment for safety hazards, communicating them to workers, and taking all reasonable steps to eliminate them.

Hazardous work by adults (over 18 years)

Growers and/or other (adult) workers on the farm shall only undertake hazardous activity, as determined and allowed in JTI's hazardous activities list or in local legislation, if:

- It is permitted by all applicable laws including local legislation and by international standards.
- They have received adequate training on performing such tasks.
- They are appropriately protected.



3.4. First aid

Growers shall provide workers on the farm with access to first aid, and access to professional healthcare where needed.

3.5. Transport

Transport, where provided by the grower, shall be safe and free of charge.

3.6. Green Tobacco Sickness (GTS)

Growers shall:

- Apply all reasonable measures and practices to prevent Green Tobacco Sickness (GTS), in accordance with recommendations from Agronomy Technician.
- Ensure that adequate personal protective clothing and equipment are provided and used to prevent and mitigate adverse health effects from exposure to green tobacco.
- Ensure they and other workers understand the risks associated with GTS, and the appropriate practices to prevent it.



WHAT IS GREEN TOBACCO SICKNESS (GTS)?

GTS is a form of occupational nicotine poisoning, which may affect tobacco growers or workers, especially during harvesting. It is caused by the acute transfer of nicotine from the surface of green tobacco leaves to skin through rainwater, dew or sweat.

GTS is a non-life-threatening condition, characterized largely by nausea, vomiting, headache, muscle weakness, and dizziness.

GTS prevention and mitigation actions may include:

- Wearing appropriate personal protective equipment (PPE) such as water-resistant clothing, nicotine-resistant gloves, plastic aprons, rain-suits, and socks with boots.
- Avoiding wet working conditions or getting clothing wet.
- Changing into dry clothing, if clothing gets damp or wet.
- Taking regular hydration breaks (ensure the provision of water, and rests taken in the shade)
- Washing exposed skin areas thoroughly with soap and water.
- Limiting work with green tobacco leaves to during cooler periods of the day.

Each of the minimum standards are aligned with internationally recognized norms and regulations; on child labor, working conditions and health and safety management in agriculture, including (but not limited to):

- International Labour Organization (ILO) C138 – Minimum Age Convention, 1973
- ILO R146 – Minimum Age Recommendation, 1973
- ILO C182 – Worst Forms of Child Labour Convention, 1999
- ILO R190 – Worst Forms of Child Labour Recommendation, 1999
- ILO C087 – Freedom of Association and Protection of the Right to Organise, 1948
- ILO C029 – Forced Labour Convention, 1930
- ILO C105 – Abolition of Forced Labour Convention, 1957
- ILO P029 – Protocol of 2014 to the Forced Labour Convention, 1930
- ILO C155 – Occupational Safety and Health Convention, 1981
- ILO C184 – Safety and Health in Agriculture Convention, 2001
- ILO code of practice on safety and health in agriculture, 2011
- Dhaka Principles for Migration with Dignity, 2012
- ILO-IOE: Child Labour Guidance Tool for Business; How to do business with respect for children's right to be free from child labour, 2015
- ILO: Combating forced labour: A handbook for employers and business, 2015
- ILO: General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs, 2019
- United Nations Convention Against Transnational Organized Crime; Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol), 2000

The minimum standards set out in the ALP Standard do not supersede any stricter requirements set by local legislation. Therefore, if the ALP Standard differs from local legislation, whichever provides the higher level of protection applies.



THE JTI APPROACH TO ALP

ALP is one of the main tools allowing us to identify potential labor challenges or human rights issues in the tobacco leaf supply chain on an ongoing basis.

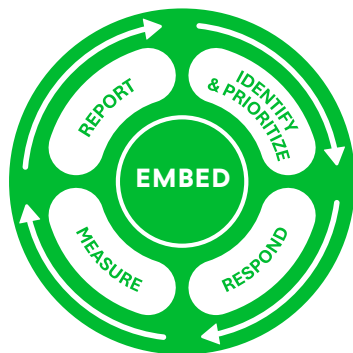


SUPPORTING SUPPLY CHAIN DUE DILIGENCE

ALP forms an integral part of the comprehensive Supply Chain Due Diligence (SCDD) we undertake to ensure compliance with our human rights and environmental due diligence obligations along the tobacco leaf supply chain.

JTI's SCDD is an ongoing risk-management system embedded in our policies and governance structures, following a four-step cycle:

- **Identify & prioritize** the actual and potential adverse impacts in the tobacco leaf supply chain.
- **Respond** to the most urgent (prioritized) issues by preventing and mitigating actual and potential adverse impacts.
- **Measure** our progress over time.¹⁵
- **Report** on impacts identified, and measures taken to address them.



This cycle enables regular evaluation, learning and continuous improvement.

We encourage the third-party leaf suppliers with whom we collaborate to implement a similar approach to SCDD.

The data gathered (by JTI and by third-party leaf suppliers) when monitoring ALP helps to identify & prioritize labor challenges and human rights issues that need to be addressed.

¹⁵ We aim to measure our progress and evaluate the success of initiatives by monitoring KPIs at the levels of output, outcome and impact.

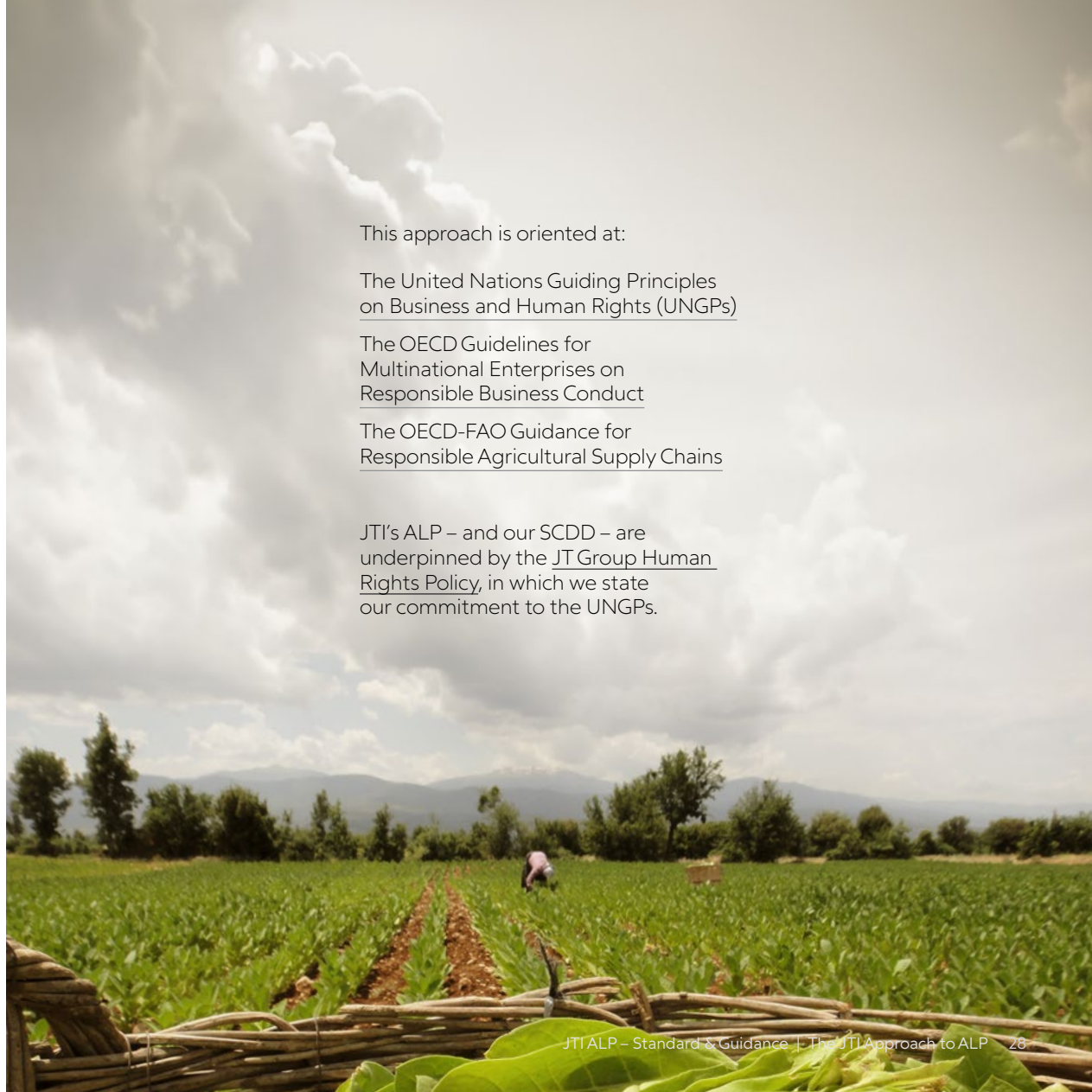
This approach is oriented at:

The United Nations Guiding Principles on Business and Human Rights ([UNGPs](#))

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

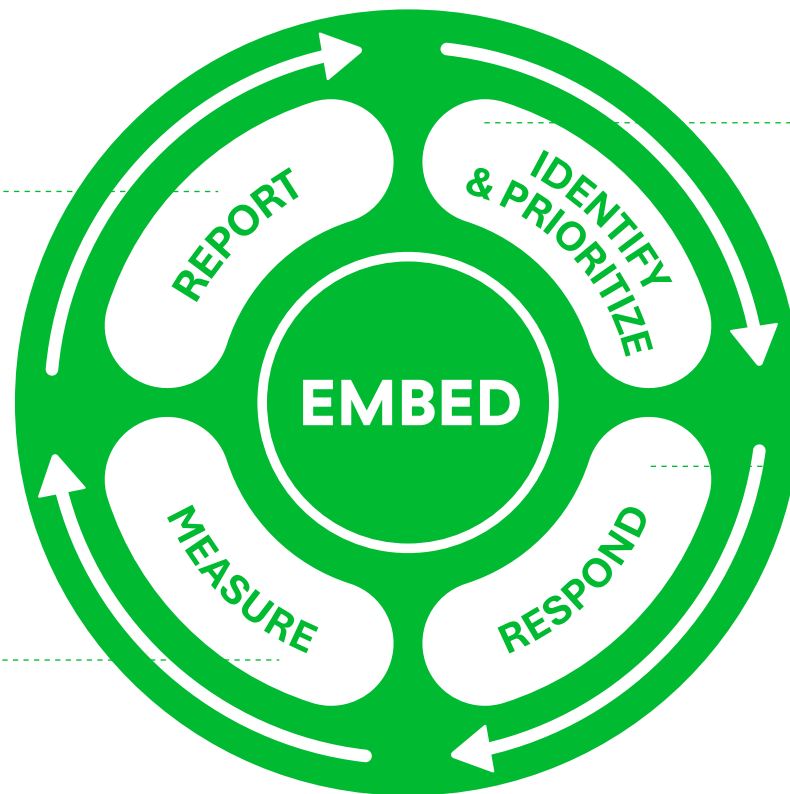
The OECD-FAO Guidance for Responsible Agricultural Supply Chains

JTI's ALP – and our SCDD – are underpinned by the [JT Group Human Rights Policy](#), in which we state our commitment to the UNGPs.



ALP data enables us to measure progress and report on our SCDD.

Over time, the data gathered periodically through the monitoring of ALP can inform the measurement of KPIs that track our progress in addressing prioritized issues. These KPIs, in turn, inform how we report internally and externally on our SCDD.



ALP is used for identifying and prioritizing issues.

ALP, as a core component of our SCDD, is one of the main tools allowing us to identify human rights and environment-related issues in the supply chain on an ongoing basis.

ALP data provides a consistent and direct insight into the issues faced by growers, workers and their communities.

ALP also contributes to how we respond to issues.

When the ALP Standard is not being met, we expect appropriate and timely action to prevent the identified risk or mitigate the impact.

Further, analysis of ALP data can help to understand root causes and to make strategic SCDD decisions about systemic responses – e.g., where to focus resources, initiatives or social programs; and to continually improve our SCDD.



IMPLEMENTING ALP

Meeting and maintaining the ALP Standard involves a continuous focus on training, observing, recording, taking action, and analyzing and disclosing ALP data, to inform wider SCDD.

We expect ALP to be implemented according to this guidance.



Train

- Regular training should be provided to growers to enable them to meet and maintain good labor practices and ALP standards.
- Regular training should also be provided for Agronomy Technicians in order to equip them with the knowledge and skills necessary to monitor and advise growers appropriately on meeting and maintaining ALP standards.



Observe

- Adherence to the ALP minimum standards at farm level should be monitored continuously through observation by Agronomy Technicians and/or others who visit farms.



Record

- Where suspected or confirmed non-adherence to the ALP Standard is observed, each instance should be formally recorded to allow appropriate and tailored follow-up, and to contribute to the collation of aggregated data about the issues facing growers and workers.
- Records of observations should be sufficiently detailed to aid clear understanding of the issue, its causes and contributing factors.
- It is important that all non-adherences to the Standard are recorded, regardless of their severity. Records should indicate if the non-adherence is a regular ALP observation, a Prompt Action Issue or an Extreme Breach.



Act

- When a suspected or confirmed non-adherence to the ALP Standard is encountered, the observation(s) should be discussed with the grower (unless it is not safe to do so) and, where appropriate, with the affected workers to understand why the standard is not being met and how they can be supported to meet it.
- In more serious cases, the JTI Critical Issues Framework should be used to guide the appropriate immediate and longer-term response, remediation plan and closure of the case.
- Agronomy Technicians should support and advise growers to help them learn and continuously improve their ALP over time.



Analyze

- All observations should be recorded in a database maintained and monitored by management.
- Aggregate data should be regularly analyzed to inform SCDD; to aid understanding of the root causes of human rights issues, to identify trends or patterns in the issues that arise (e.g., concentration of an issue in a certain region), and to inform decisions on prioritizing and implementing appropriate actions and tailored investments.



Disclose

- JTI periodically gathers ALP data, from third-party leaf suppliers and from our vertically-integrated origins, to inform SCDD reporting and (internal and external) communication. Up-to-date ALP data (including records of Critical Issues) should be disclosed when requested.
- ALP data may also be disclosed elsewhere, in accordance with other reporting requirements and in adherence to applicable data protection laws.

JTI CRITICAL ISSUES FRAMEWORK

A Critical Issue is defined by JTI as any incident or circumstance that presents an immediate threat to life, liberty, or limb.



Critical Issues are the most serious violations of the ALP Standard.

Growers and workers on tobacco farms can face difficult and complex challenges which, on occasion, may give rise to a Critical Issue.

There are two categories of Critical Issue:

- **Prompt Action Issues** arise where there is an immediate or prolonged risk to life or limb of an individual or group, **due to ignorance or malpractice by them or by others.**
- **Extreme Breaches** arise where there is a severe risk to life, limb or liberty **due to purposeful actions or exploitation by other(s).**

This means that Agronomy Technicians (and others who visit farms) should be prepared for when they may observe an incident or circumstance on a farm that presents an immediate threat to the life, liberty or limb of the grower, the workers, themselves or others.

The JTI Critical Issues Framework sets out guidance for how to manage and respond to these moments.

Avoidance of (further) harm should always be the primary consideration.

JTI suppliers are expected to have **dedicated response procedures** in place for responding to Prompt Action Issues and to Extreme Breaches, incorporating the three core principles of the JTI approach:

- Protecting the victim(s) and others, including the person who reports the observation.
- Managing remediation with a clear escalation route and timeline.
- Providing access to specialist support.

Additionally, due to their complex and highly-regulated nature, some Critical Issues (including hazardous work, and forced labor & human trafficking) should be monitored and addressed in line with our detailed guidance.



JTI Critical Issues Framework

A Critical Issue is any incident or circumstance that presents an immediate threat to life, liberty, or limb.



Prompt Action Issues

Arise wherever there is **an immediate or prolonged risk to life or limb** of an individual or group, **due to ignorance or malpractice by them or by others.**



Immediate action should be taken to ensure the person(s) at risk are made safe without delay.



Extreme breaches

Arise wherever there is **a severe risk to life, liberty, or limb due to purposeful actions or exploitation by other(s).**



No immediate action should be taken, due to the sensitivity and potential risk of retaliation. Follow-up requires caution, management support, and specialist expertise.

JTI suppliers are expected to determine which issues they consider Prompt Action Issues, and which they consider Extreme Breaches, and to have dedicated response procedures in place for both.



Forced labor & human trafficking indicators

Forced labor & human trafficking are some of the most serious Extreme Breaches of ALP.

JTI suppliers are expected to understand the **variety of indicators (or “clues”)** that **signify potential forced labor or human trafficking**, and to monitor them in a way that highlights **where two or more indicators combine** to point to a situation of potential forced labor and/or human trafficking.



JTI hazardous activities list

Hazardous work is any activity undertaken in the workplace which, by its nature, presents a **heightened risk of causing injury or illness to workers.**

The JTI Hazardous Activities List sets out the conditions and the heightened health & safety protocols under which hazardous activities may be undertaken. Carrying out hazardous work without the appropriate protocols in place may be a Prompt Action Issue or an Extreme Breach.



All other incidents or circumstances considered a Critical Issue should be monitored and addressed in accordance with the JTI Critical Issues Framework and the dedicated response procedures.

Hazardous work

Hazardous work is any activity undertaken in the workplace which, by its nature, presents a heightened risk of causing injury or illness to workers.

All hazardous work should be undertaken only under certain conditions and with heightened health & safety protocols in place.

Task	Under 16	16-18	18+
	Can a person under 16 years old ever be assigned this task?	Can a person 16 to 18 years old ever be assigned this task?	Can a person 18+ years old ever be assigned this task?
		Yes, if: - it is permitted by local legislation; - their health, safety and morals are fully protected; - they have received adequate training on performing such tasks; and - they are appropriately protected and supervised.	Yes, if: - it is permitted by local legislation; - they have received adequate training on performing such tasks, and; - they are appropriately protected.
Working in poorly lit environments.	Never.	Never.	Never.
Handling toxic, caustic and acid chemicals.			Yes. (Additional conditions not listed as they may differ from country to country)
Handling green tobacco leaves and harvesting, topping and suckering of tobacco.			
Lifting and handling heavy loads.		Load is not greater than 10% of body mass. A heavy load is defined as more than 10% of their body mass.	
Frequently working long hours.		Working hours are not greater than 8 hours per day and not greater than 36 hours per week and do not interfere with their wellbeing or, where applicable, their mandatory schooling.	
Working at unprotected heights.		If height is not greater than four feet (1.2 meters), and more with fall protection.	
Driving or operating motorized farm machinery/vehicles.		No additional conditions (except holding a relevant driving license or similar legal authorization).	
Operating sharp or powered farm tools.		No additional conditions.	
Prolonged exposure to intense hot weather, humidity and direct sunshine.		No additional conditions. Prolonged exposure is defined as that which causes physical distress.	
Exposure to excessive noise, vibration or dust.		No additional conditions. Excessive noise, vibration or dust are defined as those with potential to cause ill health conditions.	

Table 1. JTI's hazardous activities list

PARTNERING WITH TOBACCO GROWERS AND THIRD- PARTY LEAF SUPPLIERS

ALP with directly contracted growers

We support directly-contracted growers to implement the ALP Standard through training, monitoring, and constructive dialogue – all the way from the seed to the sale.

Our Agronomy Technicians make regular visits to every farm from which we directly source our tobacco, to provide technical advice on sustainable crop management, productivity, and good labor practices. These teams observe the implementation of ALP while on the farms and record any instances of non-compliance in our official database. In cases of non-compliance, we evaluate appropriate measures in collaboration with the grower. We endeavor to ensure that ongoing adverse impacts are brought to an end and that future adverse impacts are prevented. We discuss with the grower where further support might be needed and decide which measures could help them to meet our expectations.

Our Agronomy Technicians endeavor to partner with growers to overcome any obstacles or challenges they face so they can meet our standards.

The prevention of harm to workers, growers or others is always the primary consideration when making and recording an observation.

Our expectations of our contracted growers

ALP also forms an integral part of our agreement with contracted growers.

We expect growers to understand and implement the ALP Standard, and to work with us to continuously improve performance. We commit to provide adequate support, if needed.

Growers are expected to understand that the people who work for them should do so under legal, safe, fair, and respectful conditions, and be able to exercise their rights in accordance with local legislation and with the ALP Standard.

When a grower does not meet all the ALP Standard, we engage with them to understand why and we support them to do so. However, if a grower does not show a commitment to ALP, or continually disregards agreed improvement measures, we may decide to terminate an existing contract or to refrain from renewing their contract. Before any such decision is taken, we review all facts on a case-by-case basis.





ALP with third-party leaf suppliers

An ALP clause is included in the supply agreements we sign with third-party leaf suppliers.

We ask that all third-party suppliers from whom we purchase tobacco leaf implement JTI's ALP, or a similar program that meets the same minimum standards, and to regularly report their compliance to us.

To support them to meet our standards, we provide training and communications materials about our ALP Standard and how we expect it to be monitored and maintained; and we collaborate with them to introduce or to continuously improve their own ALP programs.

