



British American Tobacco's

Vapour Products Marketing Principles

At British American Tobacco we believe in upholding high standards in relation to the marketing of all our products. Our Vapour Products Marketing Principles provide a responsible and consistent approach to all of our marketing activities for this important category.

There is a growing demand for reduced risk alternatives to conventional tobacco products and our view is that these products have the potential to play an important role in tobacco harm reduction. While we believe our Vapour Products are significantly less risky than conventional tobacco products, we recognise that they should only be marketed responsibly.

Consequently, we want to ensure that all of our marketing activities related to Vapour Products are carried out in accordance with the Marketing Principles set out in this document.

These Marketing Principles contain four core principles which we think are essential to ensure the responsible marketing of our Vapour Products. The rationale for each principle is set out and supported by further detail about how the principle should be applied in our marketing communications and activities.

These Marketing Principles apply to the marketing of all British American Tobacco Vapour Products anywhere in the world and must be considered when planning all of our marketing activities. As they do not offer particular requirements for every activity, an element of judgement must be exercised in the application of the Marketing Principles to the activity concerned.

These Marketing Principles are our minimum standard and will be applied even when they are stricter than local laws. However, if local laws or other local marketing codes are stricter than or override our Marketing Principles, then we will abide by those laws or marketing codes. We will monitor and audit our performance against these Marketing Principles, and report our findings, as required, in accordance with British American Tobacco's governance framework.

These Marketing Principles shall not apply to any Vapour Products that are licensed by any medicines authority nor any tobacco heated products (THPs). Licensed products will be subject to the regulatory requirements applicable to the marketing of those licensed products whilst THPs will, for the time being, be governed by British American Tobacco's International Marketing Principles for combustible tobacco products.

We expect all British American Tobacco companies and anyone working on our behalf to adopt these Marketing Principles and to seek to apply them in good faith at all times.

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Our four core principles are

- 1 We will target our Vapour Product marketing at adults.
- 2 We will market our Vapour Products to smokers and consumers of vapour and nicotine products.
- 3 We will be clear and factual about our Vapour Products and their potential risks.
- 4 We will not promote combustible tobacco products through our Vapour Product marketing.

1. We will target our Vapour Product marketing at adults.

We believe that youth should not use any nicotine products. All of our advertising and promotional activities will be directed at adults, both in terms of its likely general appeal and by virtue of its media placement. In particular, we will take care to ensure that:

- 1.1 Our advertising and promotional activities will not be of particular appeal to youth or reflect or be associated with youth culture. Our advertising and promotional activities will not feature or portray real or fictitious characters that are likely to appeal particularly to youth.
- 1.2 We will apply the protocols set out in Appendix 1.
- 1.3 Any person using a Vapour Product or playing a significant role in our advertising must neither be, nor seem to be, under 25.
- 1.4 Promotional gifts, activities and events will be designed to appeal to adults.
- 1.5 Branded sponsorship of events will be limited to those events: (i) which are directed at an adult audience; and (ii) whose audience is predominantly adult.
- 1.6 Sampling must only be directed at adult users of tobacco, vapour or nicotine products.
- 1.7 All advertising and packaging for our Vapour Products will make it clear that they are intended for adults.



2. We will market our Vapour Products to smokers and consumers of vapour and nicotine products.

We believe that there is a potentially significant public health benefit if smokers switch to our Vapour Products. In particular, we will take care to ensure that:

- 2.1 The content and purpose of our advertising and promotional activities does not seek to encourage people who are not currently smokers or users of vapour or nicotine products to use our Vapour Products.



3. We will be clear and factual about our Vapour Products and their potential risks.

We believe our Vapour Products can play an important role in reducing the harm from tobacco products, by providing a viable alternative to adult smokers that is less risky than conventional tobacco products. We will not, expressly or implicitly, say anything about the nature of our products unless supported by robust scientific evidence. In particular, we will take care to ensure that:

- 3.1 Any claims in our advertising and promotional activities relating to the performance or functional attributes of any of our Vapour Products must be verified by robust scientific, technical or consumer research, as appropriate.
- 3.2 Nothing in our advertising and promotional activities will suggest that sporting or athletic success, popularity or social success, professional success or sexual appeal is enhanced by using Vapour Products.
- 3.3 Where our Vapour Products contain nicotine all advertising will make it clear that they contain nicotine.
- 3.4 All relevant packaging of our Vapour Products will carry clearly visible and appropriate health warnings.



4. We will not promote combustible tobacco products through our Vapour Product marketing.

Our Vapour Products are designed as alternatives to combustible tobacco products and our advertising of, and promotional activities related to, them will not promote the use of such tobacco products. In particular, we will take care to ensure that:

- 4.1 Our advertising and promotional activities contain nothing to encourage or promote the use of combustible tobacco products or that shows the use of a combustible tobacco product in a positive light.
- 4.2 Our advertising and promotional activities contain nothing which promotes any design, imagery or logo style which is associated with a combustible tobacco brand.
- 4.3 Our advertising and promotional activities do not seek to encourage tobacco smoking.



Appendix 1 — Protocols for ensuring our advertising is directed at adults

Out of home advertising

- No advertising shall be placed within 100 metres of the perimeter of a school.

TV advertising

- No advertising will be placed in, or adjacent to, programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18 (at least 75% of the audience must be aged 18 or over).

Video on demand advertising

- No pre-roll or mid-roll advertising will take place in programmes commissioned for, principally directed at, or likely to appeal particularly to, audiences under the age of 18 (at least 75% of the audience must be aged 18 or over).
- No advertising will be placed on games consoles.

Print advertising

- No advertising will be placed in any publication unless at least 75% of the readers of such publication are aged 18 or over.

- No advertising will be placed on the packaging or outside cover of any print publication intended for general distribution.

Digital display advertising (mobile and desktop)

- No advertising will be placed on any site which is principally directed at, or likely to appeal particularly to, audiences below the age of 18 (at least 75% of the audience must be aged 18 or over)

Cinema advertising

- No advertising will take place adjacent to films principally directed at, or likely to appeal particularly to, audiences below the age of 18 (at least 75% of the audience must be aged 18 or over).

Sponsorship

- No event or activity will be sponsored where such event or activity is directed at, or likely to appeal particularly to, audiences below the age of 18 (at least 75% of the audience must be aged 18 or over).



Appendix 2 — Definitions

adult	A person who is at least 18 years old or, if higher, the minimum age for the lawful sale, purchase, possession or consumption of Vapour Products.
advertising	Any consumer communication, promotional activity or use of branding which aims to encourage consumers to purchase one of our products.
branding	Any identifier of a British American Tobacco product, including any trade mark, logo or brand icon.
out of home advertising	Advertising sites such as billboards, bus shelters, transport stops or stations, telephone booths, street signs or similar, which are not located at, or do not form part of, a trade or retail outlet where Vapour Products are sold.
promotional activity	Any activity, including any promotional event, organised by or on behalf of a British American Tobacco company with the objective of promoting any of British American Tobacco's products to consumers.
promotional event	Any event organised with the objective of promoting any of British American Tobacco's products to consumers.
tobacco product	Any product which incorporates tobacco, including manufactured cigarettes, cigars, cigarillos, pipe tobacco, fine cut tobacco, shisha, pre-formed tobacco rolls, and smokeless tobacco.
Vapour Product	(a) a device such as an electronic cigarette (or e-cigarette) which is intended to enable the inhalation of a vapour; and (b) a liquid, which may or may not contain nicotine, which is intended to be vaporised by a device within part (a) of this definition (and any item containing such a liquid). No tobacco product or any product licensed by any medical authority shall be considered a Vapour Product for the purposes of the Vapour Product Marketing Principles.
youth	Anyone under the age of 18 years, or, if higher, the minimum age for the lawful sale, purchase, possession or consumption of Vapour Products.

