

## Plxsur's Responsible Marketing Principles

Through our mission to invest responsibly in the future of tobacco harm reduction our Responsible Marketing Principles ensure that all our portfolio companies market vaping products responsibly.

The products that our portfolio companies manufacture, distribute, and sell direct to adult smokers and nicotine consumers as an alternative to combustible cigarettes underpinning our responsible marketing principles that reflect our stance that under age should never have access to vaping products.

We are committed to applying our Responsible Marketing Principles across our entire portfolio, upholding the same high standards in every market we operate.

In Europe we conduct rigorous regulatory and compliance audits across our portfolio to ensure that as a minimum we comply with Article 20 of the European Tobacco Product Directive that relates to marketing restrictions for e-cigs. We also apply the same standards as, or the local equivalent in the Rest of World markets, when we conduct due diligence on companies in the vaping space we are looking to acquire.

Our portfolio companies conduct all marketing in accordance with our Responsible Marketing Principles. These principles include:

- Vaping products contain nicotine and are intended only for adult smokers
- Vaping products are not appropriate or intended for those under age
- Vaping products are not marketed to be used as smoking cessation products
- Vaping products should not be marketed as providing a therapeutic value, as being safe or healthy for consumers, or as products which do not produce second hand health effects
- Vaping products should not be marketed or sold using modified risk descriptors or claims, unless authorised as such
- We do not feature images or situations intended for an underage audience
- Plxsur Group retailers' campaigns depict appropriately-aged individuals
- Plxsur Group retailers' campaigns do not use cartoons, caricatures, or other designs aimed at attracting those under age
- Plxsur Group retailers ensure responsible placement of vaping products to limit exposure to those under age
- Plxsur Group supports and complies with all regulations in the markets in which we operate designed to prevent sales to those under age – this includes stringent third-party age verification for online sales
- Plxsur Group retailers do not engage in social media promotions or advertising
- Plxsur Group retailers do not promote its products through public broadcast, print, and digital product advertising