



Group Tobacco Policy

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REVISION HISTORY

Date of change	Changed section	Changed by
8/18/06	Section 3, § 3	Bo Aulin

1 SCOPE

This Group Tobacco Policy is applicable to all divisions and business units within the Swedish Match Group.

2 DISTRIBUTION, CONFIRMATION AND IMPLEMENTATION OF THIS POLICY

This policy is to be distributed to the following groups of persons and must be confirmed in accordance with the matrix below.

Confirmation required for Group Tobacco Policy	Received	Read	Implemented
GMT	X	X	X
Division VP	X	X	X
Head of Legal Unit	X	X	

- By confirming that the Group Policy Document has been RECEIVED, the recipient confirms to know that the Policy exists.
- By confirming that the Group Policy Document has been READ, the recipient acknowledges having read and understood the contents of the Policy.
- Confirming that the Group Policy Document has been IMPLEMENTED means that the recipient
 - has informed all other persons within his/her respective unit that may be affected by the policy of the contents of the Policy,
 - has documented evidence of informing the other persons within his/her respective unit of the Policy (ex. Meeting Minutes with Participant List and Agenda, Return-receipt on an e-mail), and
 - ensures that the principles of the Policy are followed within his/her respective unit.

3 GROUP TOBACCO POLICY

The tobacco policy of Swedish Match reflects a global commitment to provide the highest quality tobacco products to adult consumers while recognizing the societal demands and expectations placed on a worldwide marketer of tobacco products.

- We believe that no one under the age of 18 should be sold tobacco.
- We will market and promote tobacco products only to adult consumers.
- We believe that adult consumers have the right to enjoy tobacco products with the common knowledge of the health risks associated with certain tobacco products.
- We will direct our marketing efforts to maintain and expand the use of Swedish Match products among adult consumers who use tobacco and not to adults who have chosen not to use tobacco products or have quit.
- We will continue to provide our adult consumers with the highest quality tobacco products, produced to meet the wide variety of adult consumer preferences.
- We are committed to preventing the underage sale and use of tobacco products in markets where Swedish Match is present or will be present. Swedish Match believes that responsible tobacco retail education and information are the most effective means of preventing the underage sale of tobacco. Swedish Match will strive to continue to provide global support and leadership to our retail partners in any efforts they make to demonstrate their endorsement of the "Under 18 No Tobacco policy".
- We are prepared to continue partnering with retailers, distributors and public officials throughout the world to prevent underage use of tobacco while protecting the rights of adult consumers to make an informed decision about whether they chose or not chose to use tobacco.

Swedish Match does normally not sell its products directly to consumers and thus cannot always control to whom the products are sold. In markets where products legally cannot be sold to anyone under 18 this is not a problem. In other markets it

can be difficult to enforce our policy. This is particularly so in markets where the legislator has chosen another age limit. For practical reasons, we have chosen to follow such legal age limit regardless of whether it is higher (of course) or lower than 18. It is important, though, that different stakeholders, including the legislator, in markets where a lower age limit exists are made aware of our 18 No Tobacco policy and our preference for it as a legal age limit.

All personnel will adhere to this corporate Tobacco Policy which, if at all legally permitted, allows sampling to only adult consumers and prohibit marketing advertising, promotions of tobacco products directed to anyone under the age of 18.