

# Group Principles on Communication

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<b>Recipients:</b>	Operating Unit management teams
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## 1 Introduction

This document establishes general rules and principles for Swedish Match's communication with employees and external stakeholders.

## 2 Group Principles on Communication

- Information from Swedish Match shall be correct, relevant, clear, timely and proactive.
- Swedish Match shall at all times comply with relevant rules and regulations related to communication and information.
- The Group's corporate language is English. Consequently, internal communication that affects the group as a whole must be available in English. Local information may be given in the local language.
- There shall be only one Swedish Match corporate website: [www.swedishmatch.com](http://www.swedishmatch.com).
- Only designated spokespersons are permitted to issue statements on behalf of the Swedish Match Group or any of its subsidiaries.
- Employees who are not designated spokespersons shall exercise caution when making public statements or comments (for example in social media) if such comments can be construed as being related to the Group or its business and shall state clearly that such statements and comments are personal and does not reflect the view or opinions of the Group or its management.
- Prior approval from the Chief Executive Office ("CEO") is required for any communication which can reasonably be expected to have an effect on the share price.

## 3 Responsibility at Group level

- The **CEO** shall keep the Board of Directors informed of any information which can reasonably be expected to affect the share price of the Swedish Match stock or which could materially affect the reputation of the Group.
- The **CEO** is the principal spokesperson on group-wide matters including but not limited to the Group's vision, business strategies, market assessments and similar.
- The **CFO** is the principal spokesperson for matters relating to the financials of the Group.
- The **SVP Regulatory Affairs & Group Communications** is the primary contact for internal and external communications other than as specifically delegated to other spokespersons in the Group. The **SVP Regulatory Affairs & Group Communications** is also responsible for:
  - Issuing communication manuals to designated spokes persons,
  - The Group's intranet site,
  - The Group's internal communication (except such internal communication which has been delegated to Operating Unit Heads)
  - Development and maintenance of the Group's Corporate Identity and graphical appearance
- The **Senior Vice President Investor Relations and Sustainability (SVP IR)** is
  - The primary contact person for investors, analysts and business media
  - Responsible for the Group's corporate website,
  - The primary spokesperson for issues related to sustainability.
- The **CEO, CFO, the SVP IR and the SVP Regulatory Affairs & Group Communications** may designate spokespersons at Group level and in the Operating Units for certain types of information or for specific media contacts.

## **4 Responsibility at Operating Unit level**

### **4.1 Operating Unit Presidents**

- Are entitled to make statements concerning current operations within their area of responsibility (provided that such statements do not include any information which could reasonably be expected to affect share price) and to delegate authority to make such statements to their direct reports.
- Shall ensure that all media contacts to employees within their respective Operating Unit are reported to and co-ordinated with the SVP Regulatory Affairs & Group Communications.
- Shall ensure that all requests for information to employees within their respective Operating Unit from financial community stakeholders are reported to and co-ordinated with the SVP IR.
- Shall without delay keep the CEO informed of all information which could reasonably be expected to affect the share price or which could have an impact on the reputation of the Group.
- Shall ensure that the SVP Regulatory Affairs & Group Communications is made aware of information and activities in their respective Operating Units which could generate positive or negative media interest or which is suitable for publication on the Group's intranet site.