## of the Reynolds American Leadership Team Policy for the Oversight of Efforts to Support Human Rights

Reynolds American Inc. and each of its operating companies support universally recognized human rights within their spheres of influence. To ensure that these efforts to promote human rights are effective and appropriate, this policy is adopted.

- 1. The Statement on Efforts to Support Human Rights shall be reviewed annually by the Committee.
- 2. No less frequently than annually, the Committee shall review:
  - a. human rights risks relevant to the operations of RAI and its operating companies;
  - b. the process or processes by which those risks are identified;
  - c. efforts to address such risks;
  - d. the appropriateness of existing governance mechanisms; and
  - e. this policy.
- 3. The Vice President, Corporate Sustainability of RAI Services Company is responsible for coordinating and scheduling the reviews required under this policy.



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