

Global Standard

Youth Access Prevention Toolkit for Social Media

Definitions

Company or BAT - JSC JV “UZBAT A.O.”

Own Social Pages – social pages for which BAT controls setup, login, content posted and community management.

Authors and Talents – individuals who have built a reputation for their knowledge and expertise on a specific topic. BAT may work with authors and talent (in line with applicable regulations, platform policies and internal guidelines) to post on its behalf.

Community Management – the management of BAT and its brands’ relationships with their consumers whilst on social media. The act of community management can usually be defined by response to messages, comments or otherwise as well as incorporate outbound messaging to communities and groups.

User Generated Content (UGC) - any content created by people, rather than brands. For the purposes of this document, this content will refer to users creating content on social media that directly or indirectly refer to BAT’s New Category Products even though the posts may not specifically tag BAT or its brands.

Third Parties – organisations and individuals that are not part of the BAT Group, but which may manage BAT’s Social Media pages on New Categories products, including:

- 1) Retail – retail outlets selling BAT products that own Social Media channels not controlled by a BAT entity.
- 2) Agencies – marketing agencies who may create content, post content, run campaigns and competitions and conduct other activities BAT or its brands.
- 3) Partners - businesses or individuals who BAT partners with for the management of its brands’ social accounts.
- 4) Affiliates – any other organisations who manage BAT brands’ social media.
- 5) Intermediaries - Individuals or businesses that BAT contracts with for sale of its New Categories products, who may contract with an additional party to manage BAT’s Social Media on New Categories, where BAT does not have a direct contractual relationship with the party (e.g. wholesalers or distributors).

Products - This Toolkit only applies to BAT’s New Categories products (including, but not limited to tobacco heating products and vapor).

Introduction

This Toolkit only applies to social activity around BAT's New Categories Products on social media platforms including YouTube, Facebook, Instagram & Twitter. Additional social platforms should be reviewed with local LEX on a case-by-case basis to ensure appropriate YAP procedures are in place.

Agency Non-Compliance

BAT maintains a strict zero tolerance policy on non-compliance with this YAP Toolkit.

Overarching Social YAP Principles

All parties involved and managing any social activity are required to comply with the Overarching Social YAP Principles stated below:

Own Social Pages

- Ensure all applicable age gating capabilities are utilised and applied across social media pages carrying marketing communications about our New Categories brands or Products.
- Social media bio pages and all content posted on our social pages must include “20+ only” (or other applicable minimum age, e.g. for Vuse it must be “21+ only”) throughout.
- Content and captions should not include or refer to any themes or hashtags that have youth appeal.

Authors and Talents

- Ensure that all Authors and Talent appearing in our communications are confirmed to be over the age of 25 and that at least 85% of their followers are over the highest legal minimum age in any market where 15% or more of their followers are located.
- Ensure that any media company or Partners have at least 85% of their followers over the highest legal minimum age in any market where 15% or more of their followers are located.

Community Management

Ensure that our social media accounts only communicate directly with adults via:

- Direct verification (i.e. asking the user directly to confirm their age) OR
- Self-declaration of age by a user so that they can see content restricted to adults.

- In either case, a reasonable amount of care must still be applied (i.e. check the user's profile picture) for additional evidence to suggest that the user is an adult before BAT communicates with them.

User Generated Content

Before we allow UGC to appear on our social feeds, we must make sure that:

- It only includes people aged over 25; and
- It does not have youth appeal.

We must ensure that we get consent from the individuals to use said UGC and follow local privacy and data laws.

Whenever the business is made aware of UGC that appears to have been produced by an underage person, BAT shall make reasonable efforts to report content to the platform owner.

Community Management principals and driving responsibility

These guidelines apply to our participation on social media platforms.

- In direct messages and comments, we do not engage in conversation with users unless they are above the legal age limit.

