ESG Performance Data Book 2023



Building a Smokeless World

Global Reporting Initiative (GRI) Index

For the year ended 31 December 2023

BAT has reported in reference to the GRI Standards for the reporting period 2023. (1 January 2023 to 31 December 2023)

GRI 1 used: GRI 1: Foundation 2021 Applicable GRI Sector Standard(s): None

2023 Combined Annual and Sustainability Report: bat.com/annualreport

+ 2023 ESG Performance Data Book bat.com/sustainbilityreporting

+ 2023 Diversity and Inclusion Report bat.com/sustainabilityreporting

	neral Disclosures (2021)			
The organisation and its reporting practices				
GRI Standard	Requirement	Disclosure location	Direct response, notes and omissions	
2-1	Organisational details	Combined Annual and Sustainability Report 2023 > Front cover		
		Combined Annual and Sustainability Report 2023 > Share Capital and Security Ownership > p.394-397		
		Combined Annual and Sustainability Report 2023 > Our Global Business > p.2-3		
		Combined Annual and Sustainability Report 2023 > Back cover		
		Contact us page on our website www.batcom/contactus		
2-2	Entities included in the organisation's sustainability reporting	Combined Annual and Sustainability Report 2023 > Notes on accounts > p.323-328		
2-3	Reporting period, frequency	GRI Index > Direct Response	Our reporting period spans from	
	and contact point	Combined Annual and Sustainability Report 2023 > Shareholding Administration Services > p.401	1 December 2021 to 30 November 2023. We report on an annual basis.	
		Combined Annual and Sustainability Report 2023 > Back cover		
2-4	Restatements of information	GRI Index > Direct Response	Due to the complexity of consolidating and assuring Scope 3 data from our suppliers and value chain, this is reported one year later. In 2022 we further enhanced our Scope 3 calculation methodology leading to the reporting periods 2020 and 2021 being restated accordingly.	
2-5	External assurance	Combined Annual and Sustainability Report 2023 > Assured ESG Metrics Summary Table > p.119 Combined Annual and Sustainability Report 2023 > ESG Limited Assurance Report > p.120	KPMG have conducted limited external assurance of certain key sustainability metrics in this report in accordance with international standards ISAE (UK) 3000 and ISAE 3410. Their independent limited assurance report for these ESG metrics is available on page 120 of our Combined Annual and Sustainability Report.	
Activities	and workers			
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions	
2-6	Activities, value chain and other business relationships	Combined Annual and Sustainability Report 2023 > Our Global Business > p.2-3		
		Combined Annual and Sustainability Report 2023 > Our Multi-Category Portfolio > p.4-5		
		Combined Annual and Sustainability Report 2023 > Our Business Model > p.18-20		
		Combined Annual and Sustainability Report 2023 > Engaging with Our Stakeholders > p.22-23		
		Combined Annual and Sustainability Report 2023 > Property, Plant and Equipment > p.381		

Activities	and workers continued		
	Requirement	Disclosure location	Direct answers, notes and omissions
2-7	Employees	Combined Annual and Sustainability Report 2023 > Our Global Business > p.2-3 Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.88-91 ESG Performance Data Book 2023 > Metrics and targets > p.13-14	Direct diswers, notes dia omissions
Governand	ne.	and targets > p.10 14	
	Requirement	Disclosure location	Direct answers, notes and omissions
2-8	Workers who are not employees	GRI Index > Direct Response	In 2023, 5,271 workers were Contractors (independent, self-employed) and 9,929 were third-party on-site workers (e.g. subcontracted service workers, third-party workers).
2-9	Governance structure and composition	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.102-116 Combined Annual and Sustainability Report 2023 > Our Approach to TNFD Disclosures > p. 117-118 Combined Annual and Sustainability Report 2023 > Governance > p.130-169	
2-10	of the highest governance 2023 > Sustainal body Combined Annu	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report	
		2023 > Governance > p.130-169	
2-11	Chair of the highest governance body	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report 2023 > Governance > p.130-169	The Board is collectively responsible to our shareholders for the long-term sustainable success of the Company and for the Group's strategic direction, purpose, values and
2-12	Role of the highest governance body in overseeing the management of impacts	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.102-103 Combined Annual and Sustainability Report 2023 > Governance > p.130-169	governance. The Board provides the leadership necessary for the Group to meet its business objectives within a robust framework of internal controls, and is also responsible for ensuring the Group has an effective executive leadership team in place to execute the Group's strategy. The Board maintains oversight of the Group's operations, performance, governance and
2-13	Delegation of responsibility for managing impacts	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.102-103 Combined Annual and Sustainability Report 2023 > Governance > p.130-169	compliance with regulatory obligations. The Board has three principal Board Committees to which it has delegated certain responsibilities. These Committees are Audit Committee, Nominations Committee and Remuneration Committee.
2-14	Role of the highest governance body in sustainability reporting	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71 Combined Annual and Sustainability Report 2023 > Board engagement with Stakeholders > p.144-148 Combined Annual and Sustainability Report 2023 > Governance > p.130-169	BAT' Audit Committee monitors and reviews the effectiveness of the Group's internal controls, auditing matters, and business risk and compliance systems, and oversees the Group's sustainability reporting.

Governand	ce continued		
	Requirement	Disclosure location	Direct answers, notes and omissions
2-15	Conflicts of interest	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71	
		Combined Annual and Sustainability Report 2023 > Governance > p.130-169	
		Combined Annual and Sustainability Report 2023 > Directors' Commitment and Board Support > p.151	
2-16	Communication of critical concerns	Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	We consider any breaches to our Standards of Business Conduct (SoBC) to be of critica
		Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99	concern.
		Combined Annual and Sustainability Report 2023 > Supplier Engagement > p.100-101	
2-17	Collective knowledge of the highest governance body	Combined Annual and Sustainability Report 2023 > Sustainability Governance > p.70-71	
		Combined Annual and Sustainability Report 2023 > Governance > p.130-169	
2-18	Evaluation of the performance of the highest governance body	Combined Annual and Sustainability Report 2023 > Board Effectiveness > p.151	
2-19	Remuneration policies	Combined Annual and Sustainability Report 2023 > Annual Statement on Remuneration > p.170-192	
Strategy, p	policies and practices		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
2-20	Process to determine remuneration	Combined Annual and Sustainability Report 2023 > Annual Statement on Remuneration > p.170-192	
2-21	Annual total compensation ratio	Combined Annual and Sustainability Report 2023 > Annual Statement on Remuneration > p.183	
2-22	Statement on sustainable development strategy	Combined Annual and Sustainability Report 2023 > Chair's Introduction > p.6-7	
		Combined Annual and Sustainability Report 2023 > Chief Executive' Review > p.8-9	
2-23	Policy commitments	Combined Annual and Sustainability Report 2023 > Sustainability policies, procedures and standards > p.72-73	
2-24	Embedding policy commitments	Combined Annual and Sustainability Report 2023 > Sustainability policies, procedures and standards > p.72-73	
2-25	Processes to remediate negative impacts	Combined Annual and Sustainability Report 2023 > Sustainability policies, procedures and standards > p.72-73	
		Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	
		Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > p.94-95	
2-26	Mechanisms for seeking advice and raising concerns	Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	
		Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99	
		Combined Annual and Sustainability Report 2023 > Supplier Engagement > p.100-101	
		Corporate website: https://www.bat.com/sobc	

Continued

	General Disclosures (2021) co		
	y, policies and practices cont	tinued	
GRI Standa	ard Requirement	Disclosure location	Direct answers, notes and omissions
2-27	Compliance with laws and regulations	ESG Performance Data Book 2023 > Metrics and Targets > p.15	
		Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99	
		Combined Annual and Sustainability Report 2023 > Assured ESG Metrics Summary Table > p.119	
		Combined Annual and Sustainability Report 2023 > Financial Statements > p.194-328	
		Combined Annual and Sustainability Report 2023 >Sustainable Future > Marketing and Communications > p.96-97	
2-28	Membership associations	Corporate website: Stakeholder engagement	
	'	https://www.bat.com/group/sites/ UK_9D9KCY.nsf/vwPagesWebLive/ DO933J8K	
	Material Topics (2021)		
Stakeho	older engagement	<u>_</u>	
GRI Standa	ard Requirement	Disclosure location	Direct answers, notes and omissions
2-29	Approach to stakeholder engagement	Combined Annual and Sustainability Report 2023 > Engaging with our Stakeholders > p.22-23	
2-30	Collective bargaining agreements	GRI Index > Direct Response	In 2023, 33.6% of Group company employee were covered by an independent trade unior or collective bargaining agreement.
3-1	Process to determine material topics	Combined Annual and Sustainability Report 2023 > Double Materiality Assessment > p. 74-77	
3-2	List of material topics	Combined Annual and Sustainability Report 2023 > Double Materiality Assessment > p.74-77	Harm Reduction; Climate Change; Circular Economy; Biodiversity; Water; Employees, Diversity and Culture; Human Rights; Farme Livelihoods and Communities; Marketing an Communications; Ethics and Integrity, Supplier Engagement.
Harm R	eduction		
GRI Standa	ard Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Harm Reduction > p.78-79	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
Climate	e Change		
GRI Standa	ard Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Climate Change > p. 80-81	
		Combined Annual and Sustainability Report > Sustainability Policies > p.72-73	
GRI 302	2: Energy (2016)		
302-1	Energy consumption within the organisation	Combined Annual and Sustainability Report 2023 > Climate Change > p.80-81	– Energy use in direct operations (Direct energy): 2,182 GWh
		Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.115-116	Renewable energy use: 832 GWhNon-renewable energy use: 1,350 GWh
		Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	- Renewable energy as % of direct energy use: 38%
		E00 D (D) D) 00000 E	

ESG Performance Data Book 2023 > Targets

and Metrics > p.4

	aterial Topics (2021) Change continued		
	d Requirement	Disclosure location	Direct answers, notes and omissions
	Energy (2016) continued		
302-3	Energy intensity	ESG Performance Data Book 2023 > Targets and Metrics > p.4	Energy intensity in GWh per million of £ of revenue): 0.080
		Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.116	Energy intensity in GWh per million of EUR of revenue: 0.070
302-4	Reduction of energy consumption	Combined Annual and Sustainability Report 2023 > TCFD Reporting> p.116	Energy consumption from activities for which the Group is responsible (in million kWh): 2023: 1,292; 2022: 1,435; 2021: 1,508.
			Energy consumption resulting from the purchase of energy by the Group for its own use (in million kWh): 2023: 890; 2022: 909; 2021: 972.
GRI 305:	Emissions (2016)		
305-1	Direct (Scope 1) GHG emissions	Combined Annual and Sustainability Report 2023 > Climate Change > p.80-81	Scope 1 emissions (thousand tonnes CO ₂ e): 267
		Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.114-116	
		Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	
		ESG Performance Data Book 2023 > Targets and Metrics > p.3	
305-2	Energy indirect (Scope 2) GHG emissions	Combined Annual and Sustainability Report 2023 > Climate Change > p.80-81	Scope 2 emissions (thousand tonnes CO ₂ e) Market-based: 95
		Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.114-116	Scope 2 emissions (thousand tonnes CO ₂ e) Location-based: 342
		Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	
		ESG Performance Data Book 2023 > Targets and Metrics > p.3	
305-3	Other indirect (Scope 3) GHG emissions	Combined Annual and Sustainability Report 2023 > Climate Change > p.80-81	Total Scope 3 emissions (thousand tonnes CO ₂ e)- Latest available data 2022: 6,045
		Combined Annual and Sustainability Report 2023 > TCFD Reporting > p.114-116	Total Scope 3 CO ₂ e Reportable Emissions (thousand tonnes CO2e)- Latest available
		Combined Annual and Sustainability Report 2023 >ESG 2023 Assured Metrics > p.119	data 2022: 4,611 Total Scope 3 net biogenic emissions
		ESG Performance Data Book 2023 > Targets and Metrics > p.3-4	including biogenic removals (thousand tonnes CO ₂ e)- Latest available data 2022: 1,433
305-4	GHG emissions intensity	Combined Annual and Sustainability Report 2023 > Climate Change > p.80-81	Scope 1 and 2 $\rm CO_2e$ emissions intensity ratio (tonnes per £m revenue): 13.3
		Combined Annual and Sustainability Report 2023 >TCFD Reporting > p.114-116	Scope 1 and 2 $\rm CO_2e$ emissions intensity ratio (tonnes per EUR m revenue): 11.5
		Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	
		ESG Performance Data Book 2023 > Targets and Metrics > p.3	
305-5	Reduction of GHG emissions	Combined Annual and Sustainability Report 2023 > Climate Change > p.52	In 2023, we reduced our Scope 1 and 2 GHG emissions by 13.9% vs 2022 (-33.1% vs 2020
		Combined Annual and Sustainability Report 2023 >TCFD Reporting > p.114-116	baseline). In 2022, our total Scope 3 GHG emissions
		Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	decreased by 6.9% vs 2021 (-12.5% vs 2020 baseline).
		ESG Performance Data Book 2023 > Targets and Metrics > p.3	

	conomy	Diselecture legation	Direct analysis action and action
GRI Standard	Requirement of	Disclosure location Combined Annual and Sustainability Report	Direct answers, notes and omissions
3-3	Management of material topics	2023 > Circular Economy > p.82-83	
	'	Combined Annual and Sustainability Report	
		2023 > Sustainability Policies > p.72-73	
GRI 306: \	Waste (2020)		
306-1	Waste generation and significant waste-related	Combined Annual and Sustainability Report 2023 > Circular Economy > p.82-83	
	impacts	ESG Performance Data Book 2023 > Targets and Metrics > p.5	
306-2	Management of significant waste-related impacts	Combined Annual and Sustainability Report 2023 > Circular Economy > p.82-83	
		ESG Performance Data Book 2023 > Targets and Metrics > p.5	
		Combined Annual and Sustainability Report 2023 >Sustainability Policies > p.72-73	
306-3	Waste generated	Combined Annual and Sustainability Report 2023 > Circular Economy > p.82-83	– Total waste generated 114.9 thousand tonnes
		ESG Performance Data Book 2023 > Targets	– Waste recycled 100.7 thousand tonnes
		and Metrics > p.5	– Waste disposal 14.3 thousand tonnes
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
306-5	Waste directed to disposal	ESG Performance Data Book 2023 > Targets and Metrics > p.5	We currently only disclose against a sub- requirements of this standard:
			 Hazardous waste generated 1.59 thousar tonnes
			 Waste to energy / incineration with energy recovery 10.9 thousand tonnes
			 Waste incinerated without energy recover 1.36 thousand tonnes
			- Waste to landfill 2.06 thousand tonnes
Water			
	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Water > p.86-87	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
		Combined Annual and Sustainability Report 2023 > Our Approach to TNFD Disclosures > p.117-118	
GRI 303: \	Water and Effluents (2018)		
303-1	Interactions with water as a shared resource	Combined Annual and Sustainability Report 2023 > Water > p.86-87	
		ESG Performance Data Book 2023 > Targets and Metrics > p.6-7	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
303-2	Management of water discharge related impacts	Combined Annual and Sustainability Report 2023 > Water > p.86-87	
		ESG Performance Data Book 2023 > Targets and Metrics > p.6-7	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
	Water withdrawal	Combined Annual and Sustainability Report	Total water withdrawn for direct operation
303-3	774.6. 77.1.4.4.74	2023 > Water > p.86-87	(mn m ³⁾ in 2023: 3.16

GRI 3: Mat	terial Topics (2021) continu	red	
Water cor	ntinued		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
GRI 303: V	Vater and Effluents (2018) o	continued	2
303-4	Water discharge	Combined Annual and Sustainability Report 2023 > Water > p.86-87	Total water discharged (mn m³) in 2023: 1.53
		ESG Performance Data Book 2023 > Targets and Metrics > p.6	
303-5	Water consumption	Combined Annual and Sustainability Report 2023 > Water > p.86-87	Total water consumption (mn m³) in 2023: 1.63
		ESG Performance Data Book 2023 > Targets and Metrics > p.6	
Biodiversit	ty and Ecosystems		
	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Biodiversity and Ecosystems > p.84-85	
		ESG Performance Data Book 2023 > Targets and Metrics > p.7	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
GRI 304: B	Riodiversity (2016)		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Combined Annual and Sustainability Report 2023 > Our Approach to TNFD Disclosures > p.117 ESG Performance Data Book 2023 > Targets and Metrics > p.7	In 2023 we extended this Geospatial risk assessment to cover BAT Group's owned Manufacturing facilities. This identified high priority sites if they scored "high" in any of the following risk categories: Species Threat Abatement and Restoration (STAR) Risk Score, Proximity to Internationally Recognised Area's (IRA), or Species Risk Score. The 22 operational sites identified (accounting
			for 30% of our global operations mapped area) are located across Chile, Croatia, Fiji, Honduras, Poland, Samoa, Singapore, Solomon Islands, Sri Lanka, Sudan, Trinidad and Tobago, Türkiye, Venezuela and Zambia.
304-2	Significant impacts of activities, products and services on biodiversity	Combined Annual and Sustainability Report 2023 > Biodiversity and Ecosystems > p.84-85	
		Combined Annual and Sustainability Report 2023 > Our Approach to TNFD Disclosures > p.117-118	
		ESG Performance Data Book 2023 > Targets and Metrics > p.7	
Human Ri	ghts		
	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
GRI 408: C	Child Labour (2016)		
408-1	Operations and suppliers at significant risk for incidents	Combined Annual and Sustainability Report 2023 > ESG 2023 Assured Metrics > p.119	In 2023, 359 incidents (2022: 942) of child labour were reported on 0.15% (2022: 0.38%)
	of child labour	Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	of farms in our Thrive Supply Chain. 100% of incidents were reported as resolved during the season.
		ESG Performance Data Book 2023 > Targets and Metrics > p.9-10	

GRI 3: Ma	terial Topics (2021) continu	ued	
Human Ri	ghts continued		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
GRI 413: L	ocal Communities (2016)		
413-1	Operations with local community engagement, impact assessments, and development programs	Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities p.94-95 ESG Performance Data Book 2023 > Targets	
413-2	Operations with significant actual and potential negative impacts on local communities	and Metrics > p.8-9 Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities p.94-95 ESG Performance Data Book 2023 > Targets and Metrics > p.8-9	Local communities are potentially at higher risk of being impacted by the effects of issues like exploitation, child and forced labour, which impact both individuals and communities. We implement human rights due diligence and community resilience programmes to reduce these risks.
Supplier E	ngagement		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
GRI 308: S	Supplier Environmental Ass	essment (2016)	
308-1	New suppliers that were screened using environmental criteria	GRI Index > Direct Response	3,154 new suppliers were screened using environmental criteria in 2023.
GRI 414: S	upplier Social Assessment	(2016)	
414-1	New suppliers that were screened using social criteria	Combined Annual and Sustainability Report 2023 > Supplier Engagement > p.100-101	We do not report in the format prescribed by this Index, however, all New Category Tier 1 suppliers are audited on a annual basis. In 2023, 623 social assessments of suppliers in 55 countries were conducted through our external audit partners, Intertek and EcoVadis. Out of the 623 assessments, 167 were re-audits from previous years and 186 were new audits.
414-2	Negative social impacts in the supply chain and actions taken	Combined Annual and Sustainability Report 2023 > Supplier Engagement > p.100-101	
Farmer Liv	velihoods and Communities	S	
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > 94-95 Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
GRI 203: Ir	ndirect Economic Impacts		
203-1	Infrastructure investments and services supported	Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > p.94-95 ESG Performance Data Book 2023 > Targets	
203-2	Significant indirect economic impacts	and Metrics > p.8-9 Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > p.94-95 ESG Performance Data Book 2023 > Targets and Metrics > p.8-9	
GRI 413: L	ocal Communities (2016)		
413-1	Operations with local community engagement, impact assessments, and development programs	Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > p.94-95 ESG Performance Data Book 2023 > Targets and Metrics > p.8-9	

GRI 3: Mat	erial Topics (2021) continu	ed	
Farmer Liv	velihoods continued		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
413-2	Operations with significant actual and potential negative impacts on local communities	Combined Annual and Sustainability Report 2023 > Farmer Livelihoods and Communities > p.94-95 ESG Performance Data Book 2023 > Targets and Metrics > p.8-9	Local communities are potentially at higher risk of being impacted by the effects of issues like exploitation, child and forced labour, which impact both individuals and communities. We implement human rights due diligence and community resilience programmes to reduce these risks.
Ethics and	Integrity		
	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Ethics and Integrity > 98-99 Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
GRI 205: A	nti-corruption (2016)		
205-2	Communication and training about anti- corruption policies and procedures	Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99 ESG Performance Data Book 2023 > Targets and Metrics > p.15	In 2023, 100% of employees completed our annual SoBC training and compliance sign-off.
GRI 205: A	nti-corruption (2016)		
GRI 415: Pt	Confirmed incidents of corruption and actions taken ublic Policy (2016) Political contributions	Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99 Combined Annual and Sustainability Report 2023 > Financial Statements > Notes on Accounts > p.227 ESG Performance Data Book 2023 > Targets and Metrics > p.15 Combined Annual and Sustainability Report 2023 > Ethics and Integrity > p.98-99 Combined Annual and Sustainability Report 2023 > Audit Committee > p.169	In 2023, 427 of all the 707 SoBC contacts were assessed as alleged SoBC breaches and reported to the Audit Committee. No wrongdoing was found in 135 cases Investigation ongoing at year-end for 169 cases; and 123 cases were established as breaches and appropriate action taken. In 2023, the established SoBC breaches resulted in 79 people leaving BAT and 53 written warnings. The Group does not make contributions to UK political organisations or incur UK politic expenditure. The total amount of political contributions made to non-UK political parties in 2023 was £6,044,775 (2022: £4,576,059) as follows:
	and Communications Requirement Management of	Disclosure location Combined Annual and Sustainability Report	Reynolds American Companies reported political contributions totalling £6,044,775 (US\$7,519,700) for the full year 2023. No other political contributions were reported. Direct answers, notes and omissions
GDI //17. NA	material topics	2023 > Marketing and Communications > p.96-97 Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	
	arketing and Labelling (201		
417-2	Incidents of non- compliance concerning product and service information and labelling	Combined Annual and Sustainability Report 2023 > Marketing and Communications > p.96-97 ESG Performance Data Book 2023 > Targets and Metrics > p.15	

	terial Topics (2021) continu		
Marketing	and Communications con	tinued	
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
GRI 417: M	larketing and Labelling (201	6) continued	
417-3	Incidents of non- compliance concerning marketing communications	Combined Annual and Sustainability Report 2023 > Marketing and Communications > p.96-97 ESG Performance Data Book 2023 > Targets and Metrics > p.15	In 2023, we identified 3 incidents of non-compliance with marketing regulations resulting in a fine or penalty and 0 incidents of non-compliance with regulations resulting in a regulatory warning. Any allegations of non-compliance are managed and escalated by the relevant market. Regional Heads of Legal who report any relevant findings to the Regional Audit Committee and remediation actions are implemented, as appropriate.
Employees	s, Diversity and Culture		
GRI Standard	Requirement	Disclosure location	Direct answers, notes and omissions
3-3	Management of material topics	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.88-92 Combined Annual and Sustainability Report	
0.01.11.1		2023 > Sustainability Policies > p.72-73	
	mployment (2016)		
401-1	New employee hires and employee turnover	ESG Performance Data Book 2023 > Targets and Metrics > p.14	– Voluntary turnover for all employees Group-wide in 2023: 4,048 (8.1%)
			 Since 2019, the total number of hires bringing new capabilities is more than 3,800, and of these 45% are female
401-3	Parental leave	https://www.bat.com/group/sites/ UK_CRHJSY.nsf/vwPagesWebLive/ DOBDRS72	Our Parents@BAT platform provides our employees with accessible assistance, particularly when welcoming new members to the family. This initiative allows all new mothers and adoptive parents to take a minimum of 16 weeks' fully paid maternity leave, regardless of location, going beyond many local requirements. See website for more information.
GRI 404: T	raining and Education (201	6)	
404-1	Average hours of training per year per employee	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.88-89	We do not report in the format prescribed by this Index, however we disclose some highlights of our leadership and functional capabilities programmes:
			 An average of 36 hours of learning over the year for each of our c.14,000 managers; and
			 An average of £301 investment in learning per employee.
404-2	Programs for upgrading employee skills and transition assistance programs leave	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.88-89	
GRI 405: D	Piversity and Equal Opportu	ınity (2016)	
405-1	Diversity of governance bodies and employees	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.88-89	
		Combined Annual and Sustainability Report 2023 > Board of Directors > p.132-135	
		Combined Annual and Sustainability Report 2023 > Management Board > p.136-137	
405-2	Ratio of basic salary and remuneration of women to men	BAT Diversity and Inclusion Report (Gender and Ethnicity Reporting) 2023 > p.12-14	

	terial Topics (2021) continu		
Employees	s, Diversity and Culture (Co	ntinued)	
	Requirement	Disclosure location	Direct answers, notes and omissions
GRI 403: C	Occupational Health and Saf	fety (2018)	
403-1	Occupational health and safety management system	https://www.bat.com/principles 'Health and Safety Policy Statement'	As well as focusing on identifying hazards, assessing risks to people's health at work,
		Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	and introducing appropriate controls, we also have global programmes that protect and promote the health and wellbeing of
		Combined Annual and Sustainability Report 2023 > Sustainability Policies > p.72-73	employees, their families, and local communities.
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-2	Hazard identification, risk assessment, and incident investigation	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-3	Occupational health	Combined Annual and Sustainability Report	Services include:
	services	2023 > Employees, Diversity and Culture > p.90-91	 Medical services, health screening and insurance;
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	 Mental health support and counselling services;
			– Healthy lifestyle and fitness schemes; and
			 Family-friendly policies and initiatives, such as flexible working and support for childcare.
403-4	Worker participation, consultation, and communication on occupational health and safety	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-5	Worker training on occupational health and safety	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-6	Promotion of worker health	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	
		Combined Annual and Sustainability Report 2023 > Human Rights > p.92-93	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	
403-8	Workers covered by an occupational health and safety management system		We currently do not report against this metric in the format prescribed by this Index However, we track health and safety performance across all our sites. Our EHS
		ESG Performance Data Book 2023 > Targets and Metrics > p.12	Management System provides guidance and procedures on implementing our Health and Safety (H&S) commitments effectively.

GRI 3: Material Topics (2021) continued				
Employe	es, Diversity and Culture (Continued)		
GRI Standa	rd Requirement	Disclosure location	Direct answers, notes and omissions	
GRI 403:	Occupational Health and	Safety (2018) continued		
403-9	Work-related injuries	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	Number of work-related accidents resulting in injury to employees and contractors in 2023: 99	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12		
403-10	Work-related ill health	Combined Annual and Sustainability Report 2023 > Employees, Diversity and Culture > p.90-91	Occupational illness cases in 2023: 0	
		ESG Performance Data Book 2023 > Targets and Metrics > p.12		

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