



DATA ETHICS POLICY

Introduction

At STG we want to conduct our business to the highest standards. We are committed to honest and ethical behaviour and want to be regarded as trustworthy and transparent by those we engage with, be it commercial partners, employees, civil society, or regulators.

This Data Ethics Policy ("the Policy") sets out STG's data ethical principles and describes our approach to Data Use covering all data types.

In this Policy the term "Data Use" means any type of activity where data or information is collected, analysed, stored, modified, shared, or otherwise processed including all forms and use of advanced technology, artificial intelligence ("AI"), and machine learning.

In STG we acknowledge the importance of an ethical approach to Data Use, and we are committed to apply, review and develop our data ethical principles on an ongoing basis.

The Policy applies to all companies in STG and to all employees in the STG companies.

Our Data processing

In STG we process various types of data, both personal data, including HR data, and customer data, consumer data, supplier data, market data, sales data, technical data, statistical data, test data, production data etc.

We use customer and consumer data, including website behaviour data and transactional data, to target and improve our retail website content and to create a more personalized and smooth experience for our online customers.

Our Data Ethics principles

1.

We protect and process personal data about individuals carefully and in accordance with applicable laws and regulations, and only keep such data as long as necessary.

We only process personal data, when we have a specific purpose for this, and we strive to ensure that our Data Use of personal data generally benefits the persons concerned.



2.

Advanced technology, including AI, machine learning and algorithms, applied in STG may not harm individuals or society.

3.

We believe that Data Use should be unbiased and when personal data is included, a focus should be kept on the individuals behind the data.

4.

We aim to ensure that our decisions are based on data of good quality, for instance by applying diligence in assessing the reliability of the data source and by taking into consideration that the data used is relevant and sufficient for the purpose. To the extent we purchase data, we only purchase such data from sources that we have good reasons to trust.

5.

We aim to always uphold appropriate security measures, including through reliable IT applications and IT providers, to ensure the protection of data.

Governance

The Executive Board of Scandinavian Tobacco Group A/S is responsible for ensuring that processes and procedures are established to ensure compliance with this Policy. A Data Ethics Committee will assess and decide on data ethical issues in STG and regularly report to the Executive Board on such issues.

This Data Ethics Policy will be supplemented by practical guidelines and training of employees on data ethical topics.

Employees who have questions or are in doubt about the Policy or have questions on data ethics should consult their manager, the Data Ethics Committee, or a member of the Executive Board.

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