



**BRITISH AMERICAN
TOBACCO**
NEW ZEALAND

30 January 2018

Director General of Health
Ministry of Health
PO Box 5013
Wellington 6140

British American Tobacco (New Zealand) Limited
PO Box 2618
Auckland 1140
New Zealand

Telephone: +64 9 357 9430
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www.batnz.com

By EMAIL: tobacco@moh.govt.nz

Attention: Manager Tobacco Control Programme

Dear Ms Chambers,

Please find enclosed the British American Tobacco New Zealand (BATNZ) 2017 Annual Return as required by section 35 of the Smoke-free Environments Act 1990.

The return shows:

- by class of tobacco product, or brand of tobacco product of any class, or variant of a brand of tobacco product of any class, the weight of tobacco and of each additive used in the manufacture of the tobacco products sold by the manufacturer or importer during the previous year; and
- the quantity of each variant of a brand, of tobacco products sold by the manufacturer or importer during the previous year; and
- the recommended price of each brand, and of each variant of a brand, of tobacco product sold by the manufacturer or importer during the previous year; and
- a report of results of all tests that the manufacturer or importer conducted during the previous year for the purposes of section 33 or section 34; and
- the tar, nicotine, and carbon monoxide levels for all cigarette brands and brand variants sold during 2017.

As requested, the Company has only provided these electronically to the Ministry of Health.

Yours sincerely

Alastair Duncan
Head of Legal and External Affairs

FORM OF RETURN

Manufacturer / Importer: British American Tobacco New Zealand
("the Company")

Calendar Year: 12 months to 31 December 2017

Tobacco Product Class: Cigarettes

This Return has been made in respect of all products sold by the Company in this product class in New Zealand.

- a) Tobacco Weight By Product Class (including additives and moisture): 828286 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 7477 kg
- c) List of additives and quantities not exceeded for each brand and brand variant in this return: See attached Schedule A. Schedule A has been complied as set out in the attached copy Legal Firm Certificate.

It is declared based on the copies of Certificates attached to Schedule A that:

- i All additives used in tobacco in the brands and brand variants in the Calendar Year have been listed in Schedule A.
- ii No additive has been named for inclusion in Schedule A unless that additive was used in such tobacco products.
- iii No additive was used in the Company's brands and brand variants in excess of the "Quantity not exceed" as specified in Schedule A.

- d) Brand information: See attached Schedule B.

I, Arif Atlamaz of 74 Dransfield Avenue, Mascot, Sydney as Product Manager hereby certify that the information contained in and annexed to this Return is correct for the purposes of the Smoke-Free Environments Regulations (No.2) 1990, subject to the qualifications stated.

This information is provided in confidence and may not be communicated to others.

DATED at *Sydney* this *22nd* day of *January* 2018

(signature)



FORM OF RETURN

Manufacturer / Importer: British American Tobacco New Zealand
("the Company")

Calendar Year: 12 months to 31 December 2017

Tobacco Product Class: Cigarette Tobacco

This Return has been made in respect of all products sold by the Company in this product class in New Zealand.

- a) Tobacco Weight By Product Class (including additives and moisture): 300051 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 34355 kg
- c) List of additives and quantities not exceeded for each brand and brand variant in this return:
See attached Schedule A. Schedule A has been complied as set out in the attached copy Legal Firm Certificate.

It is declared based on the copies of Certificates attached to Schedule A that:

- i All additives used in tobacco in the brands and brand variants in the Calendar Year have been listed in Schedule A.
- ii No additive has been named for inclusion in Schedule A unless that additive was used in such tobacco products.
- iii No additive was used in the Company's brands and brand variants in excess of the "Quantity not exceed" as specified in Schedule A.

d) Brand information: See attached Schedule B.

I, Arif Atlamaz of 74 Dransfield Avenue, Mascot, Sydney as Product Manager hereby certify that the information contained in and annexed to this Return is correct for the purposes of the Smoke-Free Environments Regulations (No.2) 1990, subject to the qualifications stated.

This information is provided in confidence and may not be communicated to others.

DATED at Sydney this 22nd day of January 2018


(signature)

SCHEDULE B
Calendar Year 2017
Domestic Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2017 \$
DOMESTIC		
CLUB CLASSIC RED 20	113,559,000	22.00
CLUB CLASSIC RED 25	17,779,000	27.00
CLUB ORIGINAL BLUE 20	31,189,000	22.00
CLUB ORIGINAL BLUE 25	1,854,000	27.00
CLUB MENTHOL GREEN 20	22,742,000	22.00
CLUB MENTHOL GREEN 25	1,598,000	27.00
BENSON & HEDGES SUBTLE 20	5,348,000	26.90
BENSON & HEDGES RICH 20	6,658,000	26.90
BENSON & HEDGES RICH 25	4,990,000	33.00
BENSON & HEDGES RICH 2X25 TP	5,491,000	65.00
BENSON & HEDGES CLASSIC 20	40,439,000	26.90
BENSON & HEDGES CLASSIC 25	27,823,000	33.00
BENSON & HEDGES CLASSIC 2X25 TP	3,548,000	65.00
DUNHILL PREMIER 20	10,997,000	26.90
DUNHILL RELEASE CHILLED 20	4,582,000	26.90
DUNHILL DISTINCT 20	33,151,000	26.90
DUNHILL SWITCH 20	18,988,000	26.90
DUNHILL RUM & WINE 20	832,000	26.90
FREEDOM BLACK 20	15,861,000	23.90
FREEDOM BLACK 30	13,562,000	35.50
HOLIDAY BLUE 20	24,531,000	26.00
HOLIDAY BLUE 25	11,793,000	31.00
HOLIDAY BLUE 30	11,301,000	36.90
HOLIDAY GREEN 25	7,485,000	31.00
HOLIDAY GREEN 30	8,448,000	36.90
HOLIDAY BOOST 20	24,501,000	26.00
HOLIDAY RED 20	37,829,000	26.00
HOLIDAY RED 25	15,685,000	31.00
HOLIDAY RED 30	18,187,000	36.90
HOLIDAY RED 2X25 TP	1,966,000	61.00
HOLIDAY RUM & WINE 20	1,103,000	26.00
HOLIDAY SUPERS RED 20	8,722,000	26.00
HOLIDAY SUPERS BLUE 20	3,142,000	26.00
HOLIDAY SUPERS GREEN 20	2,785,000	26.00
LUCKY STRIKE ORIGINAL RED 20 HP	519,000	28.50
PALL MALL MENTHOL BOOST 20	11,678,000	24.50
PALL MALL MENTHOL BOOST 25	4,748,000	29.90
PALL MALL CLICK ON BLUE 20	8,649,000	24.50
PALL MALL CLICK ON BLUE 25	2,577,000	29.90
PALL MALL CLICK ON RED 20	20,717,000	24.50
PALL MALL CLICK ON RED 25	11,069,000	29.90
PALL MALL BASELINE RED 20	56,396,000	23.90
PALL MALL BASELINE RED 25	14,144,000	29.50
PALL MALL BASELINE RED 30	22,339,000	35.00
PALL MALL BASELINE RED 40	26,899,000	46.00
PALL MALL BASELINE BLUE 20	21,159,000	23.90
PALL MALL BASELINE BLUE 25	3,665,000	29.50
PALL MALL BASELINE BLUE 30	7,050,000	35.00
PALL MALL BASELINE BLUE 40	9,202,000	46.00
PALL MALL BASELINE GREEN 20	18,682,000	23.90

SCHEDULE B
Calendar Year 2017
Domestic Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2017 \$
DOMESTIC		
PALL MALL BASELINE GREEN 25	3,199,000	29.50
PALL MALL BASELINE GREEN 30	7,536,000	35.00
PALL MALL BASELINE GREEN 40	8,973,000	46.00
PALL MALL BASELINE EXTRA KINGS RED 20	50,860,000	24.50
PALL MALL BASELINE EXTRA KINGS BLUE 20	12,514,000	24.50
PALL MALL BASELINE EXTRA KINGS GREEN 20	14,700,000	24.50
ROTHMANS KING SIZE 20	8,700,000	27.50
ROTHMANS KING SIZE 25	9,430,000	34.00
ROTHMANS RED 20	65,057,000	22.50
ROTHMANS BLUE 20	77,135,000	22.50
ROTHMANS BLUE 25	1,922,000	28.00
ROTHMANS GREEN 20	12,778,000	22.50
ROTHMANS GREEN 25	553,000	28.00
ROTHMANS RED 25	7,110,000	28.00
ROTHMANS RED 30	14,297,000	33.50
WINFIELD BLUE 20	8,795,000	26.30
WINFIELD BLUE 25	16,572,000	32.50
WINFIELD RED 20	10,728,000	26.30
WINFIELD RED 25	23,969,000	32.50
WINFIELD SELECT 20	6,991,000	26.30
WINFIELD GREEN 25	3,305,000	32.50
WINFIELD GOLD 25	5,347,000	32.50

SCHEDULE B
Calendar Year 2017
Duty Free Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2017
DUTY FREE		\$
BENSON & HEDGES CLASSIC 20	89,000	18.00
BENSON & HEDGES CLASSIC 25	180,000	22.00
BENSON & HEDGES CLASSIC 2X25 TP	456,000	44.00
BENSON & HEDGES RICH 25	52,000	22.00
BENSON & HEDGES RICH 2X25 TP	121,000	44.00
CLUB CLASSIC RED 25	11,000	17.50
DUNHILL PREMIER 20	125,000	18.00
DUNHILL DISTINCT 20	234,000	18.00
HOLIDAY RED 25	257,000	20.50
HOLIDAY BLUE 25	256,000	20.50
HOLIDAY GREEN 25	203,000	20.50
PALL MALL CLICK ON RED 25	152,000	20.00
PALL MALL CLICK ON BLUE 25	76,000	20.00
PALL MALL MENTHOL BOOST 25	274,000	20.00
PALL MALL BASELINE RED 25	208,000	19.50
PALL MALL BASELINE BLUE 25	108,000	19.50
WINFIELD RED 25	251,000	21.50
WINFIELD BLUE 25	330,000	21.50
WINFIELD GOLD 25	128,000	21.50

SCHEDULE B
Calendar Year 2017
Cigarette Tobacco

Brand & Brand Variant Including Pack Size	Quantity Released for Sale Kg	Recommended Retail Price per Pack, Jan 2017 \$
DOMESTIC		
CAPSTAN REGULAR 30GM	435	48.50
CAPSTAN RUM 30GM	8,420	48.50
CAPSTAN CAPNC 50GM	5,772	76.50
CAPSTAN CAPNC 30GM	24,408	48.50
CLUB RED 30GM	12,335	48.50
PARK DRIVE FINE CUT REGULAR 50GM	14,613	85.00
PARK DRIVE FINE CUT REGULAR 30GM	29,111	52.90
PARK DRIVE FINE CUT BLUE 50GM	4,046	85.00
PARK DRIVE FINE CUT BLUE 30GM	15,805	52.90
PARK DRIVE FINE CUT MENTHOL 30GM	6,731	52.90
PORT ROYAL ORIGINAL 50GM	24,793	85.00
PORT ROYAL ORIGINAL 30GM	48,625	52.90
PORT ROYAL KEN BOURBON 50GM	543	85.00
PORT ROYAL KEN BOURBON 30GM	3,272	52.90
PORT ROYAL BLACK LABEL 30GM	2,648	52.90
HOLIDAY RED 30GM	14,855	51.50
HOLIDAY RED 50GM	4,597	83.50
HOLIDAY GREEN 30GM	13,517	51.50
HOLIDAY GREEN 50GM	2,275	83.50
HOLIDAY BLUE 30GM	983	51.50
HOLIDAY RUM FLAVOURED 30GM	870	48.50
ROTHMANS RED 30GM	5,299	45.00
WINFIELD RED 30GM	23,365	49.90
WINFIELD RED 50GM	9,132	79.90
WINFIELD RUM FLAVOURED 30 GM	17,551	49.50
WINFIELD RUM FLAVOURED 50 GM	4,300	77.00
DUTY FREE		
CAPSTAN CAPNC 50GM	8	50.00
HOLIDAY RED 50GM	91	55.50
HOLIDAY GREEN 50GM	74	55.50
WINFIELD RED 50GM	91	53.50
PARK DRIVE FINE CUT REGULAR 50GM	322	56.50
PARK DRIVE FINE CUT BLUE 50GM	231	56.50
PORT ROYAL ORIGINAL 50GM	933	56.50



**SMOKE FREE ENVIRONMENTAL REGULATION 2007
SCHEDULE 6**

FORMS OF REPORT OF TESTS CONDUCTED BY MANUFACTURE OR IMPORTER

MANUFACTURE / IMPORTER :

British American Tobacco New Zealand

LABORATORY:

British American Tobacco - Singapore Factory Analytical Services Laboratory
(Rotary Smoke Analysis Machine)

CALENDER YEAR :

Jan - Dec 2017

PRODUCT :

CIGARETTES

SKAND VARIANTS

	TAR	NICOTINE	CO
BENSON & HEDGES CLASSIC	14	1.4	16
BENSON & HEDGES RICH	11	1.2	12
BENSON & HEDGES SUBTLE	7	0.8	7
CLUB BLUE	11	1.0	13
CLUB GREEN	11	0.8	13
CLUB RED	14	1.3	15
DUNHILL DISTINCT BLUE	8	0.9	11
DUNHILL SWITCH	11	1.2	11
DUNHILL PREMIER RED	11	1.2	14
DUNHILL RUM & WINE	9	1.1	11
DUNHILL CONVERT RELEASE	14	1.1	14
FREEDOM BLACK	14	1.4	15
HOLIDAY BLUE	11	1.0	12
HOLIDAY GREEN	12	0.9	13
HOLIDAY RED	14	1.3	15
HOILDAY BLUE EXTRA KING	11	1.3	12
HOILDAY GREEN EXTRA KING	13	1.1	15
HOILDAY RED EXTRA KING	14	1.4	16
HOILDAY RUM & WINE	14	1.4	16
LUCKY STRIKE ORIGINAL RED	13	1.0	14
PALL MALL BASELINE BLUE	9	1.0	10
PALL MALL BASELINE GREEN	13	1.0	15
PALL MALL BASELINE RED	13	1.3	15
PALL MALL BASELINE RED EXTRA KING	14	1.4	16
PALL MALL BASELINE GREEN EXTRA KING	14	1.4	16
PALL MALL BASELINE BLUE EXTRA KING	12	1.2	13
PALL MALL CLICK ON RED	14	1.3	13
PALL MALL CLICK ON BLUE	11	1.0	9
PALL MALL MENTHOL BOOST	14	0.9	11
ROTHMANS BLUE	11	1.1	11
ROTHMANS FILTER	14	1.1	14
ROTHMANS GREEN	11	1.0	12
ROTHMANS RED	12	1.2	13
WINFIELD BLUE	11	1.0	12
WINFIELD GOLD	7	0.7	7
WINFIELD GREEN	14	1.0	14
WINFIELD RED	14	1.3	15
WINFIELD SELECT	14	1.3	15

	MEAN*CI	MEAN*CI	MEAN*CI
CI (Confidence Interval)= 95 Percent of confidence intervals	0.7	0.1	0.8

Denotes - product no longer in production at British American Tobacco Manufacturing Singapore.

Note: The testing was performed by British American Tobacco Singapore, however this report is being prepared by British American Tobacco Manufacturing Singapore on behalf of British American Tobacco Australasia

I, (Joseph LAU), of 15 Senoko Loop, Singapore, certify that the report correctly records the results of all tests carried out at the laboratory at Singapore on behalf of British American Tobacco New Zealand during the year 2017 for the purposes of section 33 of the Smoke-free Environments Act 1990.

Joseph LAU
Quality Improvement Analyst
Analytical Services Laboratory

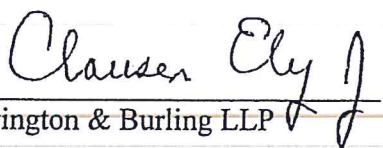
**ADDITIVES LIST
CIGARETTES**

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

The Law Firm of Covington & Burling LLP hereby certifies as follows:

1. The attached list of cigarettes additives has been compiled from cigarettes additive lists supplied by the Participating Companies.
2. The Participating Companies for the cigarettes additives list are:
 - a. British American Tobacco
 - b. Imperial Tobacco
 - c. JT International
3. All of the cigarettes additives listed by any Participating Company are shown on the attached list.
4. A copy of the certificate which accompanied the cigarettes additives list of each Participating Company is annexed to the attached cigarettes additives list.
5. In the attached cigarettes additives list, the "Quantity Not Exceeded" is the highest "Quantity Not Exceeded" shown by any Participating Company in its cigarettes additives list.

DATED this 18Th day of January, 2018.


for Covington & Burling LLP

CIGARETTES

Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JT International, and sold in New Zealand in 2017

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	12.8000
	Sugars/Sugar, Invert	3.6854
	Glycerol	2.0304
	Propylene Glycol	1.7717
L-	Menthol	0.9228
	Carob Bean Extract, Powder, Oleoresin	0.8183
	Calcium Carbonate	0.5678
	Cocoa Extract, Mass, Shells, Powder	0.5538
	Licorice Extract, Root Extract, Powder, Fluid	0.3591
	Cellulose	0.3549
	Plum Extract, Juice, Concentrate/Prune Extract	0.2078
	Acetic Acid	0.0250
	Apricot Extract	0.0250
	Ethyl Acetate	0.0250
	Ethyl Butyrate	0.0250
	Fenugreek Extract, Oil, Oleoresin	0.0250
	Molasses, Molasses Extract, Essence	0.0250
	Piperonal	0.0250
	Guava Extract	0.0100
	Phenyl Carbinol	0.0100
	Raisin Extract, Juice, Concentrate	0.0100
	Vanillin	0.0100
	Balsam Peru Oil, Resinoid, Oleoresin	0.0010
	Benzoin Gum Sumatra/Benzoin Resinoid and/or Resin Extract	0.0010
	Benzyl Carbinol	0.0010

	Caramel and/or Caramel Color	0.0010
	Citral	0.0010
	Coffee Extract	0.0010
	Coriander Seed Oil and/or Extract	0.0010
Delta-	Decalactone	0.0010
	Ethyl Hexanoate	0.0010
	Ethyl Maltol	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Trans-2-Butenoate	0.0010
	Ethyl Vanillin	0.0010
	Eucalyptol	0.0010
2-	Heptanone	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Isovalerate	0.0010
	Isobutyric Acid	0.0010
	Maltol	0.0010
Para-	Methoxy Benzaldehyde	0.0010
	Methylcyclopentenolone	0.0010
	Methyl Salicylate	0.0010
	Nutmeg Oil	0.0010
	Phenethyl Phenylacetate	0.0010
	Spearmint Oil	0.0010
	Sugar Cane Extract	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Vanilla Extract and/or Oleoresin	0.0010
	Vanilla Oleoresin	0.0010
	Acetanisole	0.0001
2-	Acetylpyrazine	0.0001
	Amyl Butyrate	0.0001

Trans-	Anethole	0.0001
	Benzaldehyde	0.0001
	Benzyl Benzoate	0.0001
	Beta-Ionone	0.0001
	Butyric Acid	0.0001
	Cardamom Seed Oil	0.0001
	Cassia Bark Oil	0.0001
	Celery, Celery Seed Extract and/or Oil	0.0001
	Citric Acid	0.0001
	Clary Sage Oil	0.0001
	Davana Oil	0.0001
Gamma-	Decalactone	0.0001
	Decanoic Acid	0.0001
4,5-	Dimethyl-3-Hydroxy-2,5-Dihydrofuranone	0.0001
3,7-	Dimethyl-6-Octenoic Acid	0.0001
2,5-	Dimethylpyrazine	0.0001
	Ethyl 10-Undecenoate	0.0001
	Ethyl 2-Methylbutyrate	0.0001
5-	Ethyl-3-Hydroxy-4-Methyl-2(5H)-Furanone	0.0001
	Ethyl Isovalerate	0.0001
	Ethyl Lactate	0.0001
	Ethyl Oenanthate	0.0001
	Ethyl Palmitate	0.0001
	Ethyl Propionate	0.0001
	Fig Extract	0.0001
	Gentian Root Extract	0.0001
	Geraniol	0.0001
	Ginger Oil	0.0001
	Guaiacol	0.0001

	Hexanoic Acid	0.0001
	Hexyl Acetate	0.0001
Alpha-	Irone	0.0001
	Isoamyl Phenylacetate	0.0001
	Isovaleric Acid	0.0001
	Jasmine Absolute	0.0001
	Labdanum Extract, Oil, Oleoresin	0.0001
	Linalyl Acetate	0.0001
	Lovage Extract and/or Oil	0.0001
	Mace Oil	0.0001
	Methyl 2-Pyrrolyl Ketone	0.0001
4-	Methylacetophenone	0.0001
Gamma-	Nonalactone	0.0001
	Orange Oil, Distilled	0.0001
	Palmitic Acid	0.0001
	Peppermint Oil	0.0001
	Phenylacetic Acid	0.0001
	Propenylguaethol	0.0001
	Propyl Acetate	0.0001
	Rose Extract and/or Oil	0.0001
	Tea Extract and/or Powder	0.0001
	Tomato Extract	0.0001
2-	Tridecanone	0.0001
4-	(2,6,6-Trimethylcyclohex-1-Enyl)But-2-En-4-One (Beta-Damascone)	0.0001
4-	(2,6,6-Trimethylcyclohexa-1,3-Dienyl)But-2-En-4-One (Beta-Damascenone)	0.0001
2,3,5-	Trimethylpyrazine	0.0001
Gamma-	Undecalactone	0.0001
	Valerian Root Oil	0.0001

	Veratraldehyde	0.0001
	Vetiver Oil	0.0001
	Carbon Dioxide	0.0000
	Nitrogen	0.0000
	Ethyl Alcohol	0.0000

ADDITIVES LIST

[Cigarettes]

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

I, Dominic Turner, Regional Product Manager-Aspac, Global R&D, BAT Aspac Service Centre Sdn Bhd hereby certifies in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 15 day of DECEMBER, 2017.



Dominic Turner

**ADDITIVES LIST
CIGARETTES**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

I, Phil Doherty, Product Science, Regulatory Reporting Manager, on behalf of Imperial Tobacco New Zealand (the "Company") hereby certify in respect of the Company's attached product class list of additives that:

- a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 4th day of January 2018

Signature

A handwritten signature in black ink, appearing to be 'P. Doherty', written over a horizontal line. The signature is stylized with a large loop at the bottom.



ADDITIVES LIST

CIGARETTES

PARTICIPATING COMPANY CERTIFICATE IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017

I, Jochen Gorges, SRA Reporting & Systems Vice President at JT International Germany GmbH, Diedenhofener Str. 30, D-54294 Trier, Germany (the "Company"), hereby certify in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

Dated at Trier, Germany this 03rd day of January 2018

Jochen Gorges
SRA Reporting & Systems
Vice President

**ADDITIVES LIST
CIGARETTE TOBACCO**

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

The Law Firm of Covington & Burling LLP hereby certifies as follows:

1. The attached list of cigarette tobacco additives has been compiled from cigarette tobacco additive lists supplied by the Participating Companies.
2. The Participating Companies for the cigarette tobacco additives list are:
 - a. British American Tobacco
 - b. Imperial Tobacco
 - c. Scandinavian Tobacco Group
3. All of the cigarette tobacco additives listed by any Participating Company are shown on the attached list.
4. A copy of the certificate which accompanied the cigarette tobacco additives list of each Participating Company is annexed to the attached cigarette tobacco additives list.
5. In the attached cigarette tobacco additives list, the "Quantity Not Exceeded" is the highest "Quantity Not Exceeded" shown by any Participating Company in its cigarette tobacco additives list.

DATED this 12TH day of January, 2018.

Clara Ely
for Covington & Burling LLP

CIGARETTE TOBACCO

**Ingredients in Cigarette Tobacco produced by British American Tobacco,
Imperial Tobacco, and Scandinavian Tobacco Group, and sold in
New Zealand in 2017**

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	25.0000
	Propylene Glycol	5.0089
	Glycerol	3.9667
	Sugar, Invert	3.2008
	Cellulose Fibre	1.7358
L-	Menthol	1.7000
	Ethanol	1.1626
	Rum	0.8000
	Acetic Acid	0.7898
	Rum, White	0.3519
	Sodium Benzoate	0.3374
	Potassium Sorbate	0.3010
	Vanillin	0.2353
	Cocoa Powder	0.2277
	Licorice Extract, Powder	0.2277
	Lactic Acid	0.1736
	Guar Gum	0.1447
	Carob Bean Extract	0.1339
	Spearmint Oil	0.0670
	Cocoa and Cocoa Products	0.0500
	Cocoa Extract	0.0500
	Apricot Extract	0.0250
	Benzoic acid	0.0250
	Ethyl Acetate	0.0250

	Ethyl Butyrate	0.0250
	Phenylcarbinol	0.0250
	Piperonal	0.0250
	Rum Jamaica	0.0250
	Vanilla Extract	0.0250
	Acetoin	0.0100
	Benzaldehyde	0.0100
	Benzoin Gum Sumatra	0.0100
	Benzyl Alcohol	0.0100
	Benzyl Benzoate	0.0100
N-	Butyric Acid	0.0100
	Cane Sugar Extract	0.0100
L-	Carvone	0.0100
	Coffee Extract	0.0100
	Ethyl Maltol	0.0100
	Ethyl Propionate	0.0100
	Ethyl Vanillin	0.0100
	Fig Juice Concentrate and/or Extract	0.0100
	Geraniol	0.0100
	Glucose Syrup	0.0100
	Isobutanol	0.0100
	Isovaleric Acid	0.0100
	Lovage Extract	0.0100
	Maltol	0.0100
Para-	Methoxy Benzaldehyde	0.0100
	Methyl Cyclopentenolone	0.0100
	Methyl Ethyl Ketone	0.0100
Gamma-	Nonalactone	0.0100
	Peppermint Oil	0.0100

	Propyl Formate	0.0100
	Raisin Extract and/or Concentrate	0.0100
Para-	Tolyl Aldehyde	0.0100
	Valerian Root Oil	0.0100
N-	Amyl Butyrate	0.0010
	Balsam Oil, Peru	0.0010
	Citral	0.0010
Delta-	Decalactone	0.0010
	Dextrose	0.0010
Gamma-	Dodecalactone	0.0010
	Ethyl Hexanoate	0.0010
	Ethyl Lactate	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Trans-2-Butenoate	0.0010
	Ethyl-2-Methyl Butyrate	0.0010
	Fenugreek Extract	0.0010
Gamma-	Heptalactone	0.0010
2-	Heptanone	0.0010
Gamma-	Hexalactone	0.0010
	Hexyl Acetate	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Phenylacetate	0.0010
	Isobutyl Phenylacetate	0.0010
	Isobutyraldehyde	0.0010
	Isobutyric Acid	0.0010
	Linalool	0.0010
Alpha-	Methyl Benzyl Acetate	0.0010
3-	Methyl Butyraldehyde	0.0010
2-	Methyl Butyric Acid	0.0010

	Nutmeg Oil	0.0010
	Plum Juice/Concentrate	0.0010
	Propionic Acid	0.0010
	Salicylaldehyde	0.0010
	Vanilla Oleoresin	0.0010
	Veratraldehyde	0.0010
	Whisky	0.0010
	Wine	0.0010
	Acetophenone	0.0001
	Acetyl Pyrazine	0.0001
	Acetylthiazole	0.0001
	Ambrox	0.0001
	Benzyl Carbinol	0.0001
	Benzyl cinnamate	0.0001
	Caramel	0.0001
	Cardamom Seed Oil	0.0001
Beta-	Caryophyllene	0.0001
	Cinnamaldehyde	0.0001
	Cinnamon Bark Oil	0.0001
	Cinnamyl Propionate	0.0001
	Coriander Oil	0.0001
Beta-	Damascenone	0.0001
Beta-	Damascone	0.0001
	Davana Oil	0.0001
Gamma-	Decalactone	0.0001
2,3-	Diethylpyrazine	0.0001
Para-	Dimethoxybenzene	0.0001
2,6-	Dimethoxyphenol	0.0001
3,4-	Dimethyl-1,2-Cyclopentadione	0.0001

3-(5- or 6-)-	Dimethyl-2-Ethylpyrazine	0.0001
2,5-	Dimethylpyrazine	0.0001
	Ethyl Acetoacetate	0.0001
	Ethyl Decanoate	0.0001
	Ethyl Heptanoate	0.0001
	Ethyl Laurate	0.0001
	Ethyl Octanoate	0.0001
2-	Ethyl-3,(5 or 6)-Dimethylpyrazine	0.0001
	Guaiacol	0.0001
Cis-3-	Hexen-1-ol	0.0001
Cis-3-	Hexen-1-yl Acetate	0.0001
4-	Hydroxy-2,5-Dimethyl-3(2H)-Furanone	0.0001
4-	Hydroxy-3-Pentenoic Acid Lactone	0.0001
Beta-	Ionone	0.0001
	Lemon Oil	0.0001
d-	Limonene	0.0001
2-	Methoxy-4-Methylphenol	0.0001
2-	Methoxy-4-Vinylphenol	0.0001
4-	Methyl Acetophenone	0.0001
Para-	Methyl Anisole	0.0001
	Methyl Salicylate	0.0001
6-	Methyl-5-Hepten-2-One	0.0001
4-	Nonanolide	0.0001
Gamma-	Octalactone	0.0001
	Orange Oil, Cold Pressed, Sweet (Citrus Sinensis (L))	0.0001
	Pepper Oil, Black	0.0001
	Phenyl Acetaldehyde	0.0001
	Phenylacetic Acid	0.0001
3-	Phenyl-2-Propen-1-ol	0.0001

	Storax	0.0001
	Styrax Oil	0.0001
5,6,7,8-	Tetrahydroquinoxaline	0.0001
2,3,5,6-	Tetramethylpyrazine	0.0001
	Tolu Balsam Extract	0.0001
	Tolu Balsam Gum	0.0001
Para-	Tolyl Acetate	0.0001
	Triacetin	0.0001
2,3,5-	Trimethyl Pyrazine	0.0001
	Trimethylcyclohexenedione	0.0001
Gamma-	Undecalactone	0.0001
	Valeric Acid	0.0001
Gamma-	Valerolactone	0.0001
	Nitrogen	0.0000

ADDITIVES LIST
[Cigarette Tobacco]

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

I, Dominic Turner, Regional Product Manager-Aspac, Global R&D BAT Aspac Service Centre Sdn Bhd hereby certifies in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 15 day of DECEMBER, 2017.



Dominic Turner

**ADDITIVES LIST
CIGARETTE TOBACCO**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2017**

I, Phil Doherty, Product Science, Regulatory Reporting Manager, on behalf of Imperial Tobacco New Zealand (the "Company") hereby certify in respect of the Company's attached product class list of additives that:

- a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 4th day of January 2018

Signature



SCANDINAVIAN TOBACCO GROUP
EERSEL

ADDITIVES LIST

CIGARETTE TOBACCO

PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR 1 JANUARY TO 31 DECEMBER 2017.

I, **Vincent Crepy, Executive Vice President** of Scandinavian Tobacco Group hereby certifies in respect of the Company's attached product class list of additives that:

- (a) all additives which have been or will be used in the tobacco in the Company's brand in the product class for sale in New Zealand have been listed;
- (b) the Company has not included in the list any additive, which has not or will not be used in its brand in the product class for sale in New Zealand;
- (c) no additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

January 4, 2018.

