

FORM OF RETURN

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

Calendar Year: 12 months to 31 December 2019

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): 676774 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 6610 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.

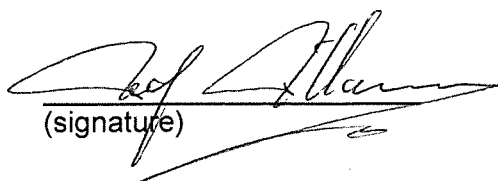
It is declared based on the copies of Certificates attached to Schedule A that:

- 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 *14th* day of *January* 2020


(signature)

FORM OF RETURN

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

Calendar Year: 12 months to 31 December 2019

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): 297254 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 39998 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 *14th* day of *January* 2020


(signature)

SCHEDULE B
Calendar Year 2019
Domestic Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2020 \$
DOMESTIC		
CLUB CLASSIC RED 20	82,264,000	30.90
CLUB CLASSIC RED 25	46,321,000	37.90
CLUB ORIGINAL BLUE 20	31,989,000	30.90
CLUB ORIGINAL BLUE 25	16,260,000	37.90
CLUB GREEN 20	18,838,000	30.90
CLUB GREEN 25	12,995,000	37.90
BENSON & HEDGES SUBTLE 20	3,875,000	35.50
BENSON & HEDGES RICH 20	7,504,000	35.50
BENSON & HEDGES CLASSIC 20	28,662,000	35.50
BENSON & HEDGES CLASSIC 25	23,288,000	43.90
BENSON & HEDGES SPECIAL RED 20	883,000	35.50
DUNHILL PREMIER 20	8,087,000	35.50
DUNHILL MENTHOL RELEASE 20	4,354,000	35.50
DUNHILL DISTINCT 20	15,756,000	35.50
DUNHILL SWITCH 20	19,295,000	35.50
FREEDOM BLACK 20	2,991,000	33.50
HOLIDAY BLUE 20	15,453,000	33.50
HOLIDAY BLUE 25	14,230,000	41.50
HOLIDAY GREEN 25	9,974,000	41.50
HOLIDAY BOOST 20	19,363,000	33.50
HOLIDAY RED 20	24,101,000	33.50
HOLIDAY RED 25	21,689,000	41.50
PALL MALL MENTHOL BOOST 20	12,740,000	35.00
PALL MALL CLICK ON BLUE 20	4,778,000	35.00
PALL MALL CLICK ON RED 20	8,993,000	35.00
PALL MALL CLICK ON RED 25	6,682,000	42.90
PALL MALL BASELINE RED 20	23,380,000	33.50
PALL MALL BASELINE RED 25	19,105,000	41.50
PALL MALL BASELINE RED 40	1,175,000	Delisted
PALL MALL BASELINE BLUE 20	10,093,000	33.50
PALL MALL BASELINE BLUE 25	6,102,000	41.50
PALL MALL BASELINE BLUE 40	562,000	Delisted
PALL MALL BASELINE GREEN 20	8,499,000	33.50
PALL MALL BASELINE GREEN 25	5,858,000	41.50
PALL MALL BASELINE GREEN 40	395,000	Delisted
PALL MALL BASELINE FC RED 20	30,548,000	33.50
PALL MALL BASELINE FC BLUE 20	9,357,000	33.50
PALL MALL BASELINE FC GREEN 20	6,948,000	33.50
ROTHMANS KING SIZE 20	3,721,000	36.50
ROTHMANS KING SIZE 25	4,942,000	44.90
ROTHMANS RED 20	33,968,000	28.50
ROTHMANS BLUE 20	33,150,000	28.50
ROTHMANS BLUE 25	6,656,000	36.50
ROTHMANS GREEN 20	1,721,000	28.50
ROTHMANS GREEN 25	481,000	36.50
ROTHMANS RED 25	13,294,000	36.50
ROTHMANS MENTHOL ROYAL 20	2,535,000	25.50
WINFIELD BLUE 20	4,403,000	35.00
WINFIELD BLUE 25	10,239,000	43.90
WINFIELD RED 20	6,037,000	35.00
WINFIELD RED 25	16,587,000	43.90
WINFIELD SELECT RED 20	234,528,000	29.90
WINFIELD SELECT BLUE 20	46,942,000	29.90
WINFIELD SELECT MENTHOL 20	27,679,000	29.90
WINFIELD GOLD 25	3,454,000	43.90

SCHEDULE B
Calendar Year 2019
Duty Free Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2020
DUTY FREE		\$
BENSON & HEDGES CLASSIC 20	35,000	23.50
BENSON & HEDGES CLASSIC 25	522,000	28.90
BENSON & HEDGES RICH 25	45,000	28.90
DUNHILL PREMIER 20	66,000	23.50
DUNHILL DISTINCT 20	172,000	23.50
HOLIDAY RED 25	223,000	26.90
HOLIDAY BLUE 25	199,000	26.90
HOLIDAY GREEN 25	206,000	26.90
PALL MALL CLICK ON RED 25	65,000	27.90
PALL MALL BASELINE RED 25	169,000	26.90
PALL MALL BASELINE BLUE 25	98,000	26.90
WINFIELD RED 25	303,000	28.90
WINFIELD BLUE 25	322,000	28.90
WINFIELD GOLD 25	108,000	28.90

SCHEDULE B
Calendar Year 2019
Cigarette Tobacco

Brand & Brand Variant Including Pack Size	Quantity Released for Sale Kg	Recommended Retail Price per Pack, Jan 2019 \$
DOMESTIC		
CAPSTAN REGULAR 30GM	973	65.90
CAPSTAN RUM 30GM	5,300	65.90
CAPSTAN CAPNC 50GM	5,342	105.00
CAPSTAN CAPNC 30GM	15,854	65.90
CLUB RED 30GM	6,600	66.90
PARK DRIVE FINE CUT REGULAR 50GM	11,883	109.90
PARK DRIVE FINE CUT REGULAR 30GM	24,113	69.90
PARK DRIVE FINE CUT BLUE 50GM	3,089	109.90
PARK DRIVE FINE CUT BLUE 30GM	14,224	69.90
PARK DRIVE FINE CUT MENTHOL 30GM	6,359	69.90
PORT ROYAL ORIGINAL 50GM	22,219	109.90
PORT ROYAL ORIGINAL 30GM	46,636	69.90
PORT ROYAL KEN BOURBON 30GM	3,015	69.90
PORT ROYAL BLACK LABEL 30GM	1,012	69.90
HOLIDAY RED 30GM	12,499	68.90
HOLIDAY RED 50GM	3,348	109.90
HOLIDAY GREEN 30GM	13,249	68.90
HOLIDAY RUM FLAVOURED 30GM	23,579	59.90
ROTHMANS RED 30GM	41,847	59.90
WINFIELD RED 30GM	17,759	68.90
WINFIELD RED 50GM	6,220	109.90
WINFIELD RUM FLAVOURED 30 GM	10,720	66.90
		Recommended Retail Price per Pack, Jan 2019 \$
DUTY FREE		
HOLIDAY RED 50GM	73	71.00
WINFIELD RED 50GM	110	70.50
PARK DRIVE FINE CUT REGULAR 50GM	264	71.50
PARK DRIVE FINE CUT BLUE 50GM	158	71.50
PORT ROYAL ORIGINAL 50GM	809	71.50



**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 2019

PRODUCT :

CIGARETTES :

BRAND VARIANTS

	<u>TAR</u>	<u>NICOTINE</u>	<u>CO</u>
BENSON & HEDGES CLASSIC	14	1.3	15
BENSON & HEDGES RICH	11	1.1	10
BENSON & HEDGES SUBTLE	6	0.7	7
CLUB BLUE	12	1.1	14
CLUB RED	14	1.3	15
CLUB GREEN	11	0.8	14
HOLIDAY BLUE	11	1.1	12
HOLIDAY GREEN	12	1.1	13
HOLIDAY RED	14	1.3	15
HOLIDAY BOOST	12	1.1	11
DUNHILL DISTINCT	9	1.0	10
DUNHILL PREMIER RED	12	1.2	13
DUNHILL SWITCH	11	1.1	11
DUNHILL MENTHOL RELEASE	13	1.1	11
FREEDOM BLACK	13	1.4	15
PALL MALL BASELINE BLUE	9	0.9	10
PALL MALL BASELINE GREEN	14	0.9	13
PALL MALL BASELINE RED	13	1.3	14
PALL MALL CLICK ON BLUE	9	1.0	9
PALL MALL CLICK ON RED	12	1.1	13
PALL MALL MENTHOL BOOST	14	0.9	13
* PALL MALL BASELINE FC BLUE	12	1.1	13
* PALL MALL BASELINE FC RED	13	1.1	15
* PALL MALL BASELINE FC GREEN	14	1.0	15
ROTHMANS BLUE	12	1.1	12
ROTHMANS FILTER	14	1.0	14
ROTHMANS RED	13	1.2	14
ROTHMANS GREEN	11	0.9	12
WINFIELD RED	14	1.3	16
WINFIELD SELECT RED	14	1.3	15
WINFIELD BLUE	11	1.0	13
WINFIELD SELECT BLUE	12	1.2	13
WINFIELD SELECT MENTHOL	10	0.8	12

CI (Confidence Interval)= 95 Percent of confidence intervals

MEAN*C1	MEAN*C1	MEAN*C1
0.67	0.06	0.73

* Denotes - product manufactured at British American Tobacco *Korea Indonesia dit*

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, (Tay Boon Kain), 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 2019 for the purposes of section 33 of the Smoke-free Environments Act 1990.

Tay Boon Kain

Quality Improvement Manager

Analytical Services Laboratory

CIGARETTES

**Ingredients in Cigarettes produced by British American Tobacco, JTI,
and Imperial Tobacco, and sold in New Zealand in 2019**

Prefix	Component Name	QNE
	Water	12.8000
	Sugars	3.6973
	Sugar, Invert	2.8593
	Glycerol	2.7319
	Propylene Glycol	1.7708
L-	Menthol	1.3000
	Licorice Extract, Fluid	1.2558
	Menthol	0.9464
	Calcium Carbonate	0.8276
	Cellulose	0.5173
	Cocoa Powder	0.5117
	Cocoa Extract, Mass, Shells, Powder	0.4993
	Licorice Extract, Root Extract, Powder	0.3569
	Carob Bean Extract, Powder, Oleoresin	0.2593
	Plum Extract, Juice, Concentrate	0.2156
	Carob Bean Extract	0.0511
	Fenugreek Extract, Oil, Oleoresin	0.0250
	Molasses, Molasses Extract, Essence	0.0250
	Apricot Extract	0.0100
	Balsam Oil, Peru	0.0100
	Cocoa Extract	0.0100
	Corn Syrup, High Fructose	0.0100
	Ethyl Butyrate	0.0100
	Fenugreek Extract	0.0100
	Fig Extract	0.0100

	Guava Extract	0.0100
	Maltol	0.0100
Para-	Methoxy Benzaldehyde	0.0100
	Phenyl Carbinol	0.0100
	Piperonal	0.0100
	Poly-Dimethyl Siloxane Emulsion	0.0100
	Prune Extract	0.0100
	Raisin Extract, Juice, Concentrate	0.0100
	Vanillin	0.0100
	2,3,5,6-Tetramethylpyrazine	0.0010
	Balsam Peru Oil, Resinoid, Oleoresin	0.0010
	Benzoin Gum Sumatra	0.0010
	Benzyl Carbinol	0.0010
	Caramel	0.0010
	Caramel And/Or Caramel Color	0.0010
	Coffee Extract	0.0010
	Coriander Seed Oil	0.0010
	Delta-Decalactone	0.0010
	Ethyl Maltol	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Vanillin	0.0010
	Eucalyptol	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Isovalerate	0.0010
	Isovaleric Acid	0.0010
	Methyl Salicylate	0.0010
	Methylcyclopentenolone	0.0010
	Nutmeg Oil	0.0010
	Phenethyl Phenylacetate	0.0010

	Phenylcarbinol	0.0010
	Spearmint Oil	0.0010
	Vanilla Extract	0.0010
	Vanilla Extract And/Or Oleoresin	0.0010
	2,3,5-Trimethylpyrazine	0.0001
	2,5-Dimethylpyrazine	0.0001
	2-Acetylpyrazine	0.0001
	2-Tridecanone	0.0001
	3,7-Dimethyl-6-Octenoic Acid	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
	4,5-Dimethyl-3-Hydroxy-2,5-Dihydrofuranone	0.0001
	4-Methylacetophenone	0.0001
	5-Ethyl-3-Hydroxy-4-Methyl-2(5H)-Furanone	0.0001
	Acetanisole	0.0001
	Amyl Butyrate	0.0001
	Benzaldehyde	0.0001
	Benzoin Resinoid And/Or Resin Extract	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
	Coriander Extract And/Or Oil	0.0001
	Davana Oil	0.0001

Delta-	Decalactone	0.0001
	Decanoic Acid	0.0001
	Ethyl 10-Undecenoate	0.0001
	Ethyl 2-Methylbutyrate	0.0001
	Ethyl Acetate	0.0001
	Ethyl Hexanoate	0.0001
	Ethyl Isovalerate	0.0001
	Ethyl Lactate	0.0001
	Ethyl Oenanthate	0.0001
	Ethyl Palmitate	0.0001
	Ethyl Propionate	0.0001
	Gamma-Decalactone	0.0001
	Gamma-Nonalactone	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
	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
	Methyl Cyclopentenolone	0.0001
	Orange Oil, Sweet, Terpeneless	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
	Sugar Cane Extract	0.0001
	Tea Extract And/Or Powder	0.0001
	Tomato Extract	0.0001
	Trans-Anethole	0.0001
Gamma-	Undecalactone	0.0001
	Veratraldehyde	0.0001
	Vetiver Oil	0.0001
	Carbon Dioxide	0.0000
	Nitrogen	0.0000
	Ethyl Alcohol	-

**ADDITIVES LIST
CIGARETTES**

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

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 9th day of January, 2020.

Clausen Ely
for Covington & Burling LLP

ADDITIVES LIST

[Cigarettes]

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

I, Fiona Ng Jia Hui, Regional Product Manager APME, 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 17th day of DECEMBER, 2019.



Fiona Ng Jia Hui

Exhibit #1

ADDITIVES LIST
Cigarette

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

Keira Edwards, Global Submissions Senior Manager on behalf of Imperial Tobacco New Zealand (the "Company") 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 16th day of December, 2019.

KE Edwards
Keira Edwards



ADDITIVES LIST

CIGARETTES

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

I, Jochen Gorges, SRA Reporting & Systems Principal Director of 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 07th day of January 2020

J. G.

*Jochen Gorges
SRA Reporting & Systems
Principal Director*

CIGARETTE TOBACCO

**Ingredients in Cigarette Tobacco produced by British American Tobacco,
Imperial Tobacco, and Scandinavian Tobacco Group, and sold in New
Zealand in 2019**

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	20.0000
	Propylene Glycol	4.9903
	Glycerol	4.1124
	Invert Sugar	3.4000
	Sugar, Invert	2.7000
	Cellulose Fibre	1.6902
L-	Menthol	1.3000
	Ethanol	0.8000
	Spearmint Oil	0.5670
	Menthol	0.4589
	Potassium Sorbate	0.3833
	Rum, White	0.2853
	Acetic Acid	0.2809
	Sodium Benzoate	0.2800
	Cocoa Powder	0.2392
	Licorice Extract, Powder	0.2392
	Vanillin	0.1848
	Lactic Acid	0.1740
	Guar Gum	0.1409
	Carob Bean Extract	0.1229
	Cocoa And Cocoa Products	0.0690
	Apricot Extract	0.0250
	Benzoic Acid	0.0250

	Ethyl Acetate	0.0250
	Ethyl Butyrate	0.0250
	Piperonal	0.0250
	Rum Jamaica	0.0250
	Acetoin	0.0100
	Benzaldehyde	0.0100
	Benzoin Gum Sumatra	0.0100
	Benzyl Alcohol	0.0100
N-	Butyric Acid	0.0100
	Cocoa Extract	0.0100
	Coffee Extract	0.0100
	Ethyl Maltol	0.0100
	Ethyl Propionate	0.0100
	Ethyl Vanillin	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
	Molasses, Sugar Cane	0.0100
Gamma-	Nonalactone	0.0100
	Peppermint Oil	0.0100
	Phenylcarbinol	0.0100
	Propyl Formate	0.0100
	Rum	0.0100

	Rum White	0.0100
	Valerian Root Oil	0.0100
N-	Amyl Butyrate	0.0010
	Balsam Oil, Peru	0.0010
	Cane Sugar Extract	0.0010
	Citral	0.0010
Delta-	Decalactone	0.0010
Gamma-	Dodecalactone	0.0010
	Ethyl Hexanoate	0.0010
	Ethyl Lactate	0.0010
	Ethyl Palmitate	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Trans-2-Butenoate	0.0010
	Ethyl-2-Methyl Butyrate	0.0010
Gamma-	Heptalactone	0.0010
2-	Heptanone	0.0010
Gamma-	Hexalactone	0.0010
	Hexyl Acetate	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Butyrate	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
Para-	Tolyl Aldehyde	0.0010
	Vanilla Extract	0.0010
	Vanilla Oleoresin	0.0010
	Veratraldehyde	0.0010
	Whisky	0.0010
	Wine	0.0010
	Ylang Ylang Oil	0.0010
	Acetophenone	0.0001
2-	Acetylpyrazine	0.0001
	Acetylthiazole	0.0001
	Ambrox	0.0001
	Benzyl Carbinol	0.0001
	Benzyl Cinnamate	0.0001
	Butyric Acid	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-	Dimethyldihydrofuranolone	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
para-	Methoxybenzaldehyde	0.0001
4-	Methyl Acetophenone	0.0001
Para-	Methyl Anisole	0.0001
3-	Methyl Cycloentane-1,2-Dione	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) Osb)	0.0001
	Pepper Oil, Black	0.0001
	Phenyl Acetaldehyde	0.0001

3-	Phenyl-2-Propen-1-Ol	0.0001
	Phenylacetic Acid	0.0001
5-	Propenyl Guaethol	0.0001
	Propionic Acid	0.0001
	Salicylaldehyde	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
2,3,5-	Trimethylpyrazine	0.0001
Gamma-	Undecalactone	0.0001
	Valeric Acid	0.0001
Gamma-	Valerolactone	0.0001
	Nitrogen	0.0000

**ADDITIVES LIST
CIGARETTE TOBACCO**

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

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 7th day of January, 2020.

Clausen Ely
for Covington & Burling LLP

ADDITIVES LIST
[Cigarette Tobacco]

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

I, Fiona Ng Jia Hui, Regional Product Manager APME, Global R&D, BAT
Aspac Service Centre Sdn Bhd hereby certifies in respect of the Company's attached product
class list of additives that:

- (d) 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.
- (e) 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.
- (f) 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 17th day of DECEMBER, 2019.



Fiona Ng Jia Hui

Exhibit #1

ADDITIVES LIST
Cigarette Tobacco

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

Keira Edwards, Global Submissions Senior Manager on behalf of Imperial Tobacco New Zealand (the "Company") hereby certifies in respect of the Company's attached product class list of additives that:

- (d) 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.
- (e) 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.
- (f) 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 16th day of December, 2019.

KE Edwards
Keira Edwards



ADDITIVES LIST

CIGARETTE TOBACCO

PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR 1 JANUARY TO 31 DECEMBER 2019.

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' list for that product class.

January 3, 2020.

A handwritten signature in dark ink, consisting of a series of loops and strokes, positioned below the date.