

FORM OF RETURN

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

Calendar Year: 12 months to 31 December 2009

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): 1187366 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 6386 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 compiled as set out in the attached copy Legal Firm Certificate.

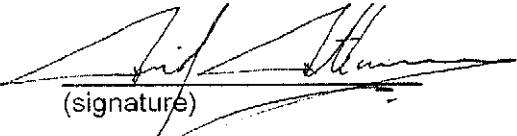
It is declared based on the copies of Certificates attached to Schedule A that:

- 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 Developer 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 *11th* day of *January* 2010


(signature)

FORM OF RETURN

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

Calendar Year: 12 months to 31 December 2009

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): 632118 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 92382 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 compiled as set out in the attached copy Legal Firm Certificate.

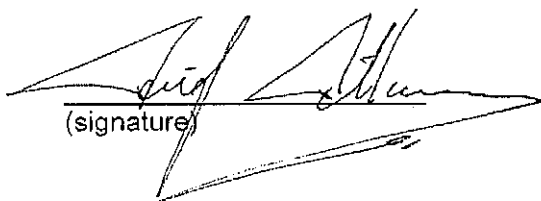
It is declared based on the copies of Certificates attached to Schedule A that:

- 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 Attamaz of 74 Dransfield Avenue, Mascot, Sydney as Product Developer 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 *11th* day of *January* 2010


(signature)

FORM OF RETURN

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

Calendar Year: 12 months to 31 December 2009

Tobacco Product Class: Cigars

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): 12 kg
- b) Weight Of Additives In Total By Product Class (excluding water): 0 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 compiled as set out in the attached copy Legal Firm Certificate.

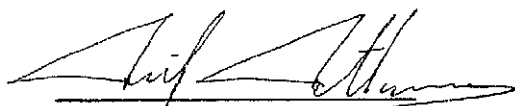
It is declared based on the copies of Certificates attached to Schedule A that:

- 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 Developer 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 *11th* day of *January* 2010


(signature)

**SCHEDULE B
Calendar Year 2009
Cigarettes**

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2010
		\$
BENSON & HEDGES SUBTLE 20	11,681,800	11.70
BENSON & HEDGES SUBTLE 20 LEP	1,040,800	Delisted
BENSON & HEDGES RICH 20	17,674,100	11.70
BENSON & HEDGES RICH 20 LEP	1,641,700	Delisted
BENSON & HEDGES RICH 25	20,510,000	14.30
BENSON & HEDGES RICH 25 LEP	2,047,700	Delisted
BENSON & HEDGES RICH 2X20 TP	964,500	23.00
BENSON & HEDGES RICH 20 LEP TIN	214,400	Delisted
BENSON & HEDGES CLASSIC 20	83,423,400	11.70
BENSON & HEDGES CLASSIC 20 LEP	7,357,200	Delisted
BENSON & HEDGES CLASSIC 25	88,540,800	14.30
BENSON & HEDGES CLASSIC 25 LEP	8,594,500	Delisted
BENSON & HEDGES CLASSIC 2X20 TP	2,864,600	23.00
BENSON & HEDGES CLASSIC 20 SP LEP TIN	868,500	Delisted
DUNHILL PREMIER 20	22,671,700	11.80
DUNHILL PREMIER 25	22,771,300	14.50
DUNHILL PREMIER 25 LEP	1,015,700	Delisted
DUNHILL PREMIER 20 LEP TIN	260,400	Delisted
DUNHILL PREMIER 20 LEP	1,609,700	Delisted
DUNHILL CHILLED 20	2,109,800	11.80
DUNHILL DISTINCT 20	34,279,800	11.80
DUNHILL DISTINCT 25	22,312,400	14.50
DUNHILL DISTINCT 25 LEP	1,097,800	Delisted
DUNHILL DISTINCT 20 LEP TIN	326,800	Delisted
DUNHILL DISTINCT 20 LEP	1,701,000	Delisted
DUNHILL REFINED 20	3,155,900	11.80
DUNHILL REFINED 20 LEP	328,700	Delisted
FREEDOM BLUE 20	1,163,000	9.50
FREEDOM BLUE 25	785,500	12.00
FREEDOM BLUE 30	2,006,300	14.00
FREEDOM GREEN 20	2,810,700	9.50
FREEDOM GREEN 25	1,586,600	12.00
FREEDOM GREEN 30	4,466,000	14.00
FREEDOM ORANGE 30	14,292,200	14.00
FREEDOM ORANGE 20	7,411,600	9.50
FREEDOM ORANGE 25	3,001,900	12.00
FREEDOM FILTER (BLACK) 20 LEP	11,684,600	9.30
FREEDOM FILTER (BLACK) 30 LEP	1,326,300	13.90
HOLIDAY BLUE 30	22,985,300	15.40
HOLIDAY BLUE 30 LEP	3,604,100	Delisted
HOLIDAY BLUE 20	28,824,000	10.30
HOLIDAY BLUE 20 LEP	3,818,700	Delisted
HOLIDAY BLUE 25	26,199,700	13.00
HOLIDAY BLUE 2X20 TP	1,723,100	20.00
HOLIDAY BLUE 2X25 TP	5,009,700	25.50
HOLIDAY GREEN 2X20 TP	2,296,800	20.00
HOLIDAY GREEN 2X25 TP	4,709,000	25.50
HOLIDAY DARK GREEN 25	1,418,000	13.00
HOLIDAY DARK GREEN 30	2,648,300	15.40
HOLIDAY GREEN 20	34,715,000	10.30
HOLIDAY GREEN 20 LEP	4,497,100	Delisted
HOLIDAY GREEN 25	27,106,700	13.00
HOLIDAY GREEN 30	27,054,500	15.40
HOLIDAY GREEN 30 LEP	4,163,000	Delisted
HOLIDAY RED 20	126,861,600	10.30
HOLIDAY RED 20 LEP	15,576,900	Delisted
HOLIDAY RED 25	82,109,600	13.00

SCHEDULE B
Calendar Year 2009
Cigarettes

Brand & Brand Variant Including Pack Size	Quantity Released for Sale	Recommended Retail Price per Pack, Jan 2010
		\$
HOLIDAY RED 2X20 TP	7,394,500	20.00
HOLIDAY RED 30	93,190,500	15.40
HOLIDAY RED 30 LEP	14,401,400	Delisted
HOLIDAY RED 2X25 TP	13,776,800	25.50
HOLIDAY GOLD 20	2,932,800	10.30
HOLIDAY GOLD 25	4,124,700	13.00
HOLIDAY GOLD 30	3,554,800	15.40
DUNHILL ESSENCE RUBY 20	3,430,600	12.00
DUNHILL ESSENCE GOLD 20	2,608,100	12.00
DUNHILL FINE CUT NAVY 20	2,104,800	12.00
DUNHILL FINE CUT WHITE 20	3,773,600	12.00
DUNHILL KOREAN WHITE 20	1,831,600	11.80
KENT FUTURA 20	978,700	11.90
KENT INFINA 20	1,189,300	11.90
KENT NEO 20	465,900	11.90
LUCKY STRIKE ORIGINAL RED 20 HP	2,403,700	11.70
LUCKY STRIKE ORIGINAL RED 20 SP	884,000	11.70
LUCKY STRIKE ORIGINAL SILVER 20 HP	1,115,700	11.70
LUCKY STRIKE ORIGINAL SILVER 20 SP	318,000	11.70
PALL MALL BLUE 20	27,874,400	10.00
PALL MALL BLUE 26	14,104,100	12.80
PALL MALL BLUE 2X20 TP	860,900	19.80
PALL MALL BLUE 2X26 TP	3,710,400	25.00
PALL MALL BLUE 30	3,157,900	14.80
PALL MALL RED 20	95,091,900	10.00
PALL MALL RED 20 LEP	34,145,600	Delisted
PALL MALL RED 26	71,652,400	12.80
PALL MALL RED 2X20 TP	3,430,400	19.80
PALL MALL RED 2X26 TP	12,997,100	25.00
PALL MALL RED 30	19,899,300	14.80
PALL MALL GREEN 20	28,511,900	10.00
PALL MALL GREEN 26	17,149,400	12.80
PALL MALL GREEN 2X20 TP	20,000	19.80
PALL MALL GREEN 2X26 TP	3,627,400	25.00
PALL MALL GREEN 30	4,198,100	14.80
PALL MALL AMBER 20	1,046,100	10.00
ROTHMANS KING SIZE 20	51,443,600	12.00
ROTHMANS KING SIZE 25	54,568,100	14.90
STATE EXPRESS 555 SPHERE 20	1,754,600	12.00
STATE EXPRESS 555 SPHERE BLUE 20	811,000	12.00
WINFIELD BLUE 20	12,334,300	11.40
WINFIELD BLUE 25	34,775,300	14.00
WINFIELD BLUE 2X25 TP	3,079,700	27.50
WINFIELD RED 20	33,652,400	11.40
WINFIELD RED 25	86,890,500	14.00
WINFIELD RED 2X25 TP	9,533,300	27.50
WINFIELD GREEN 20	3,989,700	11.40
WINFIELD GREEN 25	13,083,100	14.00
WINFIELD GREEN 2X25 TP	1,203,400	27.50
WINFIELD GOLD 20	4,063,100	11.40
WINFIELD GOLD 25	15,379,800	14.00
CAMEO 20	2,763,400	12.00
PACIFIC NO 1 30	149,900	16.60
SPORTSMAN KING SIZE 25	1,714,400	14.20
TOPAZ 20	626,600	12.00

SCHEDULE B
Calendar Year 2009
Cigarette Tobacco

Brand & Brand Variant Including Pack Size	Quantity Released for Sale Kg	Recommended Retail Price per Pack, Jan 2010 \$
PARK DRIVE FINE CUT REGULAR 50GM	65,776	34.00
PARK DRIVE FINE CUT REGULAR 30GM	85,089	20.80
PARK DRIVE FINE CUT REGULAR 35GM LEP	5,014	Delisted
PARK DRIVE FINE CUT REGULAR 30GM TIN	536	Delisted
PARK DRIVE FINE CUT BLUE 50GM	19,940	34.00
PARK DRIVE FINE CUT BLUE 30GM	29,904	20.80
PARK DRIVE FINE CUT MENTHOL 50GM	7,660	34.00
PARK DRIVE FINE CUT MENTHOL 30GM	13,939	20.80
PORT ROYAL ORIGINAL 50GM	110,922	34.60
PORT ROYAL ORIGINAL 30GM TIN	1,207	Delisted
PORT ROYAL ORIGINAL 30GM	154,227	21.30
PORT ROYAL ORIGINAL 30GM LEP	3,465	Delisted
PORT ROYAL KEN BOURBON 50GM	7,522	34.60
PORT ROYAL KEN BOURBON 30GM	10,139	21.30
PORT ROYAL BLACK LABEL 30GM	5,800	22.30
THREE CASTLES 50GM	729	34.60
HOLIDAY RED 30GM	39,348	20.00
HOLIDAY RED 40GM	2,422	26.00
HOLIDAY RED 50GM	22,661	32.80
HOLIDAY GREEN 30GM	15,582	20.00
HOLIDAY GREEN 40GM	481	26.00
HOLIDAY GREEN 50GM	6,121	32.80
HOLIDAY BLUE 30GM	1,084	20.00
WINFIELD RED 30GM	13,979	19.60
WINFIELD RED 50GM	7,259	31.90
WINFIELD RUM FLAVOURED 30 GM	892	19.60
WINFIELD RUM FLAVOURED 50 GM	421	31.90

SCHEDULE B
Calendar Year 2009
Cigars

Brand & Brand Variant Including Pack Size	Quantity Released for Sale Sticks	Recommended Retail Price per Pack, Dec 2009 \$
DUNHILL SIGNATURE TORPEDO 3	111	36.00
DUNHILL SIGNATURE ROBUSTO 4	176	29.00
DUNHILL SIGNATURE PETIT CORONA 5	360	20.00
DUNHILL SIGNATURE CHURCHILL 3	168	40.00
DUNHILL SIGNATURE CORONA 5	275	25.00
DUNHILL SIGNATURE CHURCHILL 25	25	Delisted

BRITISH AMERICAN
TOBACCO
AUSTRALASIA

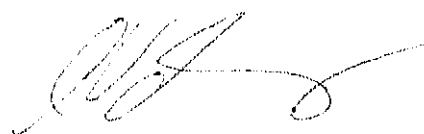
SMOKE-FREE ENVIRONMENT REGULATIONS ACT 1999

Schedule 6

Manufacturer or Importer: British American Tobacco New Zealand
Laboratory: Sydney
Calendar Year: 2009
Product: Cigarettes

I, Con Valmas (Laboratory Manager) of Sydney hereby certify that the attached report correctly records the results of all tests carried out at the Virginia Park Laboratory, Sydney on behalf of British American Tobacco New Zealand Limited during the year 2009 for the purposes of Section 33 of the Smoke-free Environment Act 1990.

Dated at Sydney this 14th Day of January, 2010



Con Valmas
Laboratory Manager
Analytical Services Laboratory

BRITISH AMERICAN
TOBACCO
AUSTRALASIA

SMOKE FREE ENVIRONMENTAL REGULATION 1999
SCHEDULE 6

FORMS OF REPORT OF TESTS CONDUCTED BY MANUFACTURE OR IMPORTER

MANUFACTURE / IMPORTER :

British American Tobacco New Zealand

CALENDER YEAR :

2009

PRODUCT :

CIGARETTES

<u>BRAND VARIANTS</u>	<u>TAR</u>	<u>NICOTINE</u>	<u>CO</u>
BENSON & HEDGES CLASSIC	11	0.9	11
BENSON & HEDGES RICH	9	0.8	9
BENSON & HEDGES SUBTLE	5	0.5	5
CAMEO	10	0.9	11
DUNHILL CHILLED	9	0.6	11
DUNHILL DISTINCT	8	0.7	9
DUNHILL ESSENCE GOLD	6	0.7	3
DUNHILL ESSENCE RUBY	9	0.9	5
DUNHILL FINE CUT NAVY	7	0.7	7
DUNHILL FINE CUT WHITE	4	0.4	4
DUNHILL PREMIER	10	0.8	11
DUNHILL REFINED	6	0.6	5
DUNHILL WHITE	7	0.6	7
FREEDOM BLUE	9	0.8	9
FREEDOM FILTER	11	0.9	12
FREEDOM GREEN	9	0.6	9
FREEDOM ORANGE	11	0.9	11
HOLIDAY BLUE	9	0.8	8
HOLIDAY DARK GREEN	11	0.8	14
HOLIDAY GOLD	6	0.5	5
HOLIDAY GREEN	9	0.6	9
HOLIDAY RED	11	0.9	11
KENT FUTURA	8	0.7	9
KENT INFINA	1	0.1	1
KENT NEO	5	0.4	5
LUCKY STRIKE ORIGINAL RED	11	0.9	11
LUCKY STRIKE ORIGINAL SILVER	6	0.5	6
PACIFIC NO 1	11	0.9	11
PALL MALL AMBER	4	0.4	5
PALL MALL BLUE	8	0.8	8
PALL MALL GREEN	11	0.7	12
PALL MALL RED	11	1.0	13
ROTHMANS KING SIZE	11	0.9	11
SPORTSMAN	11	0.9	11
STATE EXPRESS GOLD	11	1.0	11
STATE EXPRESS GOLD PEARL	8	0.7	9
TOPAZ	11	0.9	11
WINFIELD BLUE	9	0.8	9
WINFIELD GOLD	5	0.5	5
WINFIELD GREEN	11	0.7	13
WINFIELD RED	12	1.0	12
	MEAN*C1	MEAN*C1	MEAN*C1
C1= 95 Percent of confidence intervals	0.17	0.02	0.29



Con Valmas
Laboratory Manager
Analytical Services Laboratory

ADDITIVES LIST

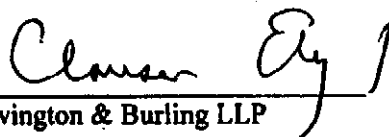
CIGARETTE TOBACCO

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

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 New Zealand
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 27th day of January, 2010.



for Covington & Burling LLP

January 27, 2010

CIGARETTE TOBACCO

Ingredients in Cigarette Tobacco produced by British American Tobacco and Imperial Tobacco and sold in New Zealand in 2009

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	25.0000
	Propylene glycol	5.2669
	Glycerol	4.4200
	Invert sugar	3.8439
	Cellulose (Cellulose fibre)	1.8456
	Rum (Cane sugar extract, Jamaican, and white)	0.8050
	Ethanol	0.7865
	Acetic acid	0.7600
l-	Menthol	0.4910
	Calcium carbonate	0.4614
	Potassium sorbate	0.3500
	Sodium benzoate	0.2557
	Vanillin	0.2042
	Lactic acid	0.1846
	Carob bean extract	0.1593
	Guar gum	0.1217
	Cocoa, cocoa products, and cocoa extract	0.0726
	Methyl cyclopentenolone	0.0600
	Spearmint oil	0.0600
	Coffee extract	0.0597
	Apricot extract	0.0250
	Ethyl acetate	0.0250
	Ethyl butyrate	0.0250
	Honey	0.0250
	Piperonal	0.0250
	Acetoin	0.0100
	Benzaldehyde	0.0100
	Benzoin gum sumatra	0.0100
	Benzoin resinoid sumatra	0.0100
	Benzyl alcohol (Phenylcarbinol)	0.0100
n-	Butyric acid	0.0100
l-	Carvone	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
	Isobutanol	0.0100
	Isovaleric acid	0.0100
	Maltol	0.0100
gamma-	Nonalactone	0.0100
	Peppermint oil	0.0100
	Plum juice/concentrate	0.0100

	Raisin extract and/or concentrate	0.0100
para-	Tolyl aldehyde	0.0100
	Valerian root oil	0.0100
	Vanilla oleoresin	0.0100
	Acetophenone	0.0010
	Acetyl pyrazine	0.0010
n-	Amyl butyrate	0.0010
	Balsam oil, peru	0.0010
	Citral	0.0010
	Davana oil	0.0010
delta-	Decalactone	0.0010
	Diacetyl	0.0010
para-	Dimethoxybenzene	0.0010
gamma-	Dodecalactone	0.0010
	Ethyl hexanoate	0.0010
	Ethyl lactate	0.0010
	Ethyl trans-2-butenoate	0.0010
	Ethyl-2-methyl butyrate	0.0010
	Guaiacol	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
para-	Methoxybenzaldehyde	0.0010
para-	Methyl anisole	0.0010
alpha-	Methyl benzyl acetate	0.0010
3-	Methyl butyraldehyde	0.0010
2-	Methyl butyric acid	0.0010
	Methyl salicylate	0.0010
4-	Methylacetophenone	0.0010
	Nutmeg oil	0.0010
gamma-	Octalactone	0.0010
2,3-	Pentanedione	0.0010
	Phenyl acetaldehyde	0.0010
3-	Phenyl-2-propen-1-ol	0.0010
	Propionic acid	0.0010
gamma-	Undecalactone	0.0010
	Vanilla extract	0.0010
	Veratraldehyde	0.0010
	Glucose	0.0001
	Salicylaldehyde	0.0001
gamma-	Valerolactone	0.0001

ADDITIVES LIST
Cigarette Tobacco

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Deborah Dillon of British American Tobacco, (the "Company") hereby certifies in respect of the Company's attached product class list of additives that:

- (g) 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.
- (h) 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.
- (i) 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 22nd day of December, 2009.

Deborah M. Dillon

Deborah M. Dillon
Scientific & Regulatory Affairs Manager

**ADDITIVES LIST
CIGARETTE TOBACCO**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Keith Milsom, Stewardship and Submissions, Submissions and Systems 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 19TH day of JANUARY 2010



Signature

ADDITIVES LIST

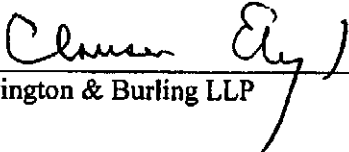
CIGARS

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

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

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

DATED this 27th day of January, 2010.



for Covington & Burling LLP

January 27, 2010

CIGARS

Ingredients in Cigars produced by British American Tobacco and Imperial Tobacco and sold in New Zealand in 2009

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	14.0000
	Propylene glycol	1.8416
	Ethyl vanillin	1.6670
	Vanillin	1.0222
	Propionic acid	0.8157
	Cellulose fibre	0.7872
	Benzyl alcohol	0.7406
	Sodium hydroxide	0.5000
	Guar gum	0.4151
	Diatomaceous earth	0.3991
	Methylhydroxyethyl cellulose	0.3158
	Piperonal	0.2181
	Triethylene glycol	0.0914
	Sodium saccharin	0.0721
	Melamine resin	0.0699
	Sodium carboxymethylcellulose	0.0691
	Titanium dioxide	0.0625
	Caramel colour	0.0500
	Ethyl cellulose	0.0500
	Fenugreek extract	0.0500
	Ethanol	0.0250
	Ethyl hydroxyethyl cellulose	0.0250
	Phosphoric acid	0.0250
	Potassium sorbate	0.0250
	Tamarind seed powder	0.0250
	Benzaldehyde	0.0100
	Ethyl propionate	0.0100
	FD&C Yellow # 5	0.0100
	FD&C Yellow # 6	0.0100
	Iron oxide	0.0100
gamma-	Nonalactone	0.0010
	Pipsissewa leaf extract	0.0010
	Acetoin	0.0001
	Butyric acid	0.0001
	Diacetyl	0.0001
	Ethyl butyrate	0.0001
	Maltol	0.0001
	Octanoic acid	0.0001
	Veratraldehyde	0.0001

**ADDITIVES LIST
CIGARS**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Keith Milsom, Stewardship and Submissions, Submissions and Systems Manager, on behalf of Altadis U.S.A. Inc., an Imperial Tobacco Group company (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 19TH day of JANUARY 2010



Signature

ADDITIVES LIST

Cigars

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Deborah Dillon of British American Tobacco, (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 22nd day of December, 2009.

Deborah M. Dillon
Deborah M. Dillon
Scientific & Regulatory Affairs Manager

ADDITIVES LIST


CIGARETTES

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

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

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

DATED this 27th day of January, 2010.


for Covington & Burling LLP

January 27, 2010

CIGARETTES

Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JT International and sold in New Zealand in 2009

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	12.8000
	Sugars (invert, white, brown, corn syrup, sucrose and/or sucrose syrup)	3.8255
	Propylene glycol	2.7284
	Glycerol	2.0999
	Licorice (Licorice Extract, Root Extract, Powder Extract)	1.2817
	Cellulose (Cellulose fibre)	0.8002
	Cocoa powder	0.7552
	Cocoa (extract, shell extract, distillate, and powder)	0.6184
	Honey	0.5980
I-	Menthol	0.5730
	Guar gum	0.3896
	Calcium carbonate	0.3460
	Carob bean extract (Carob, absolute, oleoresin, gum, powder)	0.2711
	Cocoa nibs	0.2170
	Plum juice and/or extract	0.2109
	Ethanol	0.1376
	Fig juice concentrate and/or extract	0.0500
	Molasses (extract, distillate, essence, tincture)	0.0500
	Raisin extract and/or concentrate	0.0500
	Sorbitol	0.0500
	Fenugreek extract, absolute, oleoresin, resin	0.0250
	Benzoin resinoid sumatra	0.0100
	Benzyl Alcohol	0.0100
	Coffee, coffee extract, oleoresin	0.0100
	Ethyl acetate	0.0100
	Ethyl butyrate	0.0100
	Ethyl maltol	0.0100
	Guava extract	0.0100
	Isoamyl acetate	0.0100
	Rum and/or rum extract	0.0100
	Tamarind extract	0.0100
	Vanillin	0.0100
	Acetoin	0.0010
	Balsam peru oil and/or resinoid	0.0010
	Benzaldehyde	0.0010
	Buchu leaf oil	0.0010
	Caramel	0.0010

	Cassia extract (fistula)	0.0010
3,7-	Clary sage oil	0.0010
	Coriander extract and/or oil	0.0010
beta-	Damascenone	0.0010
delta-	Decalactone	0.0010
	Ethyl isovalerate	0.0010
	Ethyl phenylacetate	0.0010
	Ethyl vanillin	0.0010
	Glucose	0.0010
gamma-	Hexalactone	0.0010
	Isoamyl isovalerate	0.0010
	Isopropyl acetate	0.0010
	Isovaleric acid	0.0010
2,3,5,6-	Mace oil	0.0010
	Maltol	0.0010
	Methyl cyclopentenolone	0.0010
2-	Methyl pyrazine	0.0010
gamma-	Nonalactone	0.0010
	Nutmeg powder and/or oil	0.0010
	Orange oil, distilled (sweet, terpeneless)	0.0010
	Phenethyl alcohol	0.0010
	Piperonal	0.0010
	Sodium citrate	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Valerian root extract	0.0010
	Vanilla, vanilla beans, extract, oleoresin	0.0010
	Acetic acid	0.0001
2-	Acetylpyrazine	0.0001
	Ambroxide	0.0001
trans-	Anethole	0.0001
	Angelica root oil	0.0001
	Anise star oil	0.0001
	Apricot extract	0.0001
	Benzyl benzoate	0.0001
	Benzyl cinnamate	0.0001
n-	Butyric acid	0.0001
	Cardamom seed oil	0.0001
	Cassia Bark Oil	0.0001
delta-	Celery seed extract and/or oil	0.0001
	Cognac oil, green	0.0001
beta-	Damascone	0.0001
gamma-	Davana oil	0.0001
gamma-	Decalactone	0.0001
	Diacetyl	0.0001
2,5-	Dimethyl pyrazine	0.0001
3,7-	Dimethyl-6-octenoic acid	0.0001
	Ethyl heptanoate	0.0001
	Ethyl hexanoate	0.0001

	Ethyl octadecanoate	0.0001
	Ethyl palmitate	0.0001
	Ethyl propionate	0.0001
2-	Ethyl-3, [5 or 6]-dimethyl pyrazine	0.0001
5-	Ethyl-3-hydroxy-4-methyl-2-(5h)-furanone	0.0001
	Gentian extract and/or root extract	0.0001
	Geraniol	0.0001
	Grape juice concentrate	0.0001
	Guaiacol	0.0001
	Heptanoic acid	0.0001
	Hexanoic acid	0.0001
para-	Hydroxyphenyl)-2-butanone(4-	0.0001
beta-	Ionone	0.0001
	Isoamyl phenylacetate	0.0001
	Isobutanol	0.0001
	Isobutyric acid	0.0001
	Jasmine absolute and/or extract	0.0001
	Labdanum extract, absolute, oil, resinoid	0.0001
	Linalyl acetate	0.0001
2,3,5-	Menthyl isovalerate	0.0001
para-	Methoxybenzaldehyde	0.0001
3-	Methyl butyraldehyde	0.0001
	Methyl-2-pyrrolyl ketone	0.0001
4-	Methylacetophenone	0.0001
2-	Methylbutyric acid	0.0001
gamma-	Octalactone	0.0001
	Oilbanum oil	0.0001
	Orange oil (sweet)	0.0001
	Phenethyl isobutyrate	0.0001
	Phenethyl isovalerate	0.0001
	Phenethyl phenylacetate	0.0001
	Phenylacetic acid	0.0001
	Propenyl guaethol	0.0001
	Rose absolute and/or oil	0.0001
	Tea extract, distillate, and/or resinoid	0.0001
2-	Tridecanone	0.0001
2,3,5-	Trimethyl pyrazine	0.0001
gamma-	Undecalactone	0.0001
	Ylang ylang oil	0.0001
	Carbon dioxide	0.0000
	Isopentane	0.0000
	Nitrogen	0.0000

ADDITIVES LIST

Cigarettes

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Deborah Dillon of British American Tobacco, (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 22nd day of December, 2009.

Deborah M. Dillon
Deborah M. Dillon
Scientific & Regulatory Affairs Manager

**ADDITIVES LIST
CIGARETTES**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Keith Milsom, Stewardship and Submissions, Submissions and Systems 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 19TH day of JANUARY 2010



Signature

ADDITIVES LIST

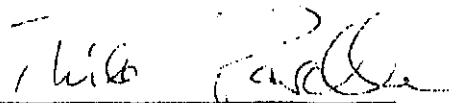
CIGARETTES

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Thilo Paschke, Vice President of Scientific & Regulatory Affairs at JT International S.A., 1, Rue de la Gabelle, Morgins, CH-1211 Geneva 26, Switzerland (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, 2010.


Thilo Paschke, Ph.D.