



# Respecting human rights

Our human rights strategy



Our approach and progress



Governance and stakeholder engagement



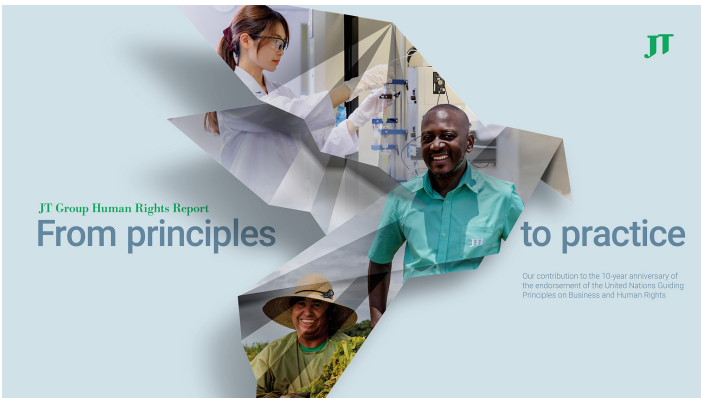
Human Rights Impact Assessments



We operate in parts of the world where human rights are at risk, and are therefore exposed to human rights-related issues, such as forced labor, child labor, bribery, and corruption.

Our sustainability strategy is driven by [three absolute requirements](#) that are at the heart of everything we do. One of these requirements is respecting human rights.

## JT Group Human Rights Report



To coincide with the 10th anniversary of the United Nations Guiding Principles on Business and Human Rights, we are publishing our first standalone Human Rights Report which examines the potential human rights risks arising from our worldwide operations. The report identifies nine salient human rights issues and the steps we are taking to remedy them.

[JT Group Human Rights Report](#)



# Our human rights strategy

We respect human rights across our value chain and recognize the Universal Declaration of Human Rights, the International Bill of Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Our [JT Group Human Rights Policy](#), which was approved by the JT Board of Directors, follows the framework provided by the UN Guiding Principles on Business and Human Rights. This means working to avoid infringing the rights of others and addressing any adverse impacts of our global operations.

Our commitment to human rights is reinforced by our Board of Directors through our Code of Conduct. Our Reporting Concerns Mechanism helps us ensure that we listen to and act on the grievances of those whose human rights might be impacted by our activities. Through this legitimate, fair, and accessible mechanism, we encourage employees and suppliers to speak up on human rights, without fear of retribution, about any concerns they may have.

Our suppliers and growers throughout the world are obliged to respect human rights by adopting and maintaining internationally recognized labor standards regarding child labor, rights of workers, and workplace health and safety. They do this in line with the [JT Group Responsible Procurement Policy, JT Group Supplier Standards, and Agricultural Labor Practices \(ALP\)](#).

Our human rights strategy is based on five pillars:

- 1 Embed
- 2 Identify and Prioritize
- 3 Respond
- 4 Measure
- 5 Report

This circular approach provides a systematic way of conducting ongoing due diligence and is in line with the UN Guiding Principles, the Organisation for Economic Co-operation and Development (OECD) guidelines, and the Food and Agriculture Organization (FAO) guidance on responsible agricultural supply chains.

## Our human rights due diligence

In line with the UN Guiding Principles, we have made human rights due diligence an essential and integrated part of our business. This enables us to identify and assess actual and potential human rights risks, as stated in our JT Group Human Rights Policy.

Embedding human rights due diligence – which is in part informed by our widely applied Human Rights Impact Assessments – is our responsibility. It helps us to prevent adverse impacts on people and ensure the highest standards of behavior are upheld within our business and value chain. As part of this program, we are committed to assessing 100% of our high-risk countries by 2025, in our tobacco business.



The UN Guiding Principles on Business and Human Rights make the pathway clear: companies have a responsibility to respect the rights of those they impact through their business operations and supply chains. That is especially important during a global pandemic. Our commitment to respect human rights and conduct due diligence never wavered during the COVID-19 crisis. As a company, we have embraced our obligation to respect human rights and are committed to

tackling the challenges  
this will bring.

”

Charlie Watson,  
Director, Human Rights, JT  
International

## 2016

### SEPTEMBER 2016

We launch the JT Group Human Rights Policy, formalizing our commitment to respecting human rights.

### NOVEMBER 2016

In Japan, we launch a human rights e-learning program with a 92% completion rate. (\*C)

### DECEMBER 2016

We carry out a Human Rights Impact Assessment at our headquarters and Group companies in Japan. (\*C)

## 2017

### OCTOBER 2017

Our international tobacco business launches a human rights e-learning program in 25 languages with a 68% completion rate.

### SEPTEMBER 2017

An external gap analysis concluded that we have a robust set of policies and procedures to address human rights risks in our international tobacco business.

### FEBRUARY 2017

The first annual meeting of the Human Rights External Advisory Board takes place. (\*E)

## 2018

### FEBRUARY 2018

The annual meeting of the Human Rights External Advisory Board takes place.

### APRIL 2018

We enhance our Reporting Concerns Mechanism for migrant workers in Japan.

### SEPTEMBER 2018

We carry out Human Rights Impact Assessments in Mexico and the

### NOVEMBER 2018

We carry out Human Rights Impact Assessments in Myanmar and

(\*E)

(\*C)

Dominican Republic.

Malaysia.

**MARCH 2018**

We carry out a Human Rights Impact Assessment in Tanzania.

**JUNE 2018**

In our international tobacco business, 75% of our employees complete a human rights e-learning module.

**OCTOBER 2018**

We establish internal guidelines for the hiring and labor management of migrant workers in Japan. (\*C)

**MAY 2019**

We carry out Human Rights Impact Assessments in China and Thailand in our processed food business. We hold a human rights workshop with our tobacco leaf merchants in Zimbabwe.

**JANUARY 2019**

We run a cross-functional workshop to identify our salient human rights issues. (\*E)

**2019**

**FEBRUARY 2019**

The annual meeting of the Human Rights External Advisory Board takes place. (\*E)

**JUNE 2019**

We carry out Human Rights Impact Assessments in Ethiopia (entire value chain) and Malawi (tobacco leaf supply chain).

**JULY 2019**

We carry out a post-acquisition Human Rights and Environment, Health and Safety assessment in Bangladesh.

**SEPTEMBER 2019**

We carry out Human Rights Impact Assessments in Kazakhstan and Kyrgyzstan (entire value chain).

**AUGUST 2019**

We relaunch our human rights e-learning module in our international tobacco business. We publish our human rights correspondence with Human Rights Watch, the UN Human Rights Council, and UK newspaper, The Guardian, on our website.

**2020**

**MARCH 2020**

We introduce the self-assessment questionnaire in Lebanon.

**NOVEMBER 2019**

We carry out a Human Rights Impact Assessment in India (tobacco leaf supply chain), in partnership with our leaf merchants and other companies.

**OCTOBER 2019**

We carry out a Human Rights Impact Assessment in Egypt (entire value chain).

**DECEMBER 2019**

We introduce the self-assessment questionnaire in Colombia and Morocco as pilot countries.



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## Our approach

## Embed

### Approach

We are working hard to embed human rights thinking in our Company culture, and to improve employees' understanding of the human rights implications of business decisions. To do this, we provide regular training and continuously share information about human rights and the JT Group Human Rights Policy.

### Our progress

In the digital world, where attention spans are short and content easily disregarded, we have taken a different approach to e-learning. In 2020, we laid the groundwork to launch a digital human rights e-learning campaign which focuses on behavioral change. The objective is to increase awareness and understanding of human rights risks and to empower our employees to do the right thing with regards to ethical behaviors. The campaign will be launched in 2021 ahead of the tenth anniversary



of the UN Guiding Principles. It will offer employees bite-sized training modules via a new human rights e-learning platform.

Employees in our Japanese operations have completed an online human rights e-learning module, which was offered in Japanese, English, and Chinese with a completion rate of 92% (\*C). The scope of the training included our subsidiary companies in China and Thailand (processed food business) and the U.S. (pharmaceutical business). In addition, we provide reader-friendly printed communication materials to over 25,000 employees (\*C). The goal is to enhance our employees' awareness and understanding of human rights.

## Identify and prioritize

### Our approach

There are a variety of ways in which we identify and understand human rights impacts. Our approach and methodology is tailored to match exactly what we are assessing. Thanks to this flexibility, and our unwavering commitment to protecting human rights, we continued to conduct human rights due diligence throughout the pandemic. For the highest risk human rights countries within our prioritization matrix, we conduct Human Rights Impact Assessments, while for the lower ranked high-risk countries, we conduct self-assessment questionnaires.

In line with the UN Guiding Principles, our Human Rights Impact Assessments and self-assessment questionnaires focus on the greatest risk to people, both within our own Company and through business relationships with our suppliers, from farm to store. Both tools allow us to address the identified risks of rights-holders, meet our stakeholder expectations on respecting human rights, and mitigate the overall risks to people and the business.

### Our progress

As part of our commitment to assess 100% of high-risk countries by 2025 in our tobacco business, we have completed ten Human Rights Impact Assessments across our entire value chain in the last two years: Bangladesh, Dominican Republic, Egypt, Ethiopia, Kazakhstan, Kyrgyzstan, Malaysia, Mexico, Myanmar, and Tanzania. This demonstrates our approach to prioritizing, which involves considering where our greatest risks to people lie. It also shows our willingness to go into countries with histories of human rights allegations and assess the on-the-ground reality.

In 2019, we also conducted Human Rights Impact Assessments in our tobacco leaf supply chain in various markets, including Ethiopia and India. These assessments provide a more comprehensive

understanding of the human rights impacts within one specific part of our value chain – our tobacco supply chain and tobacco growing business – and the challenges that tobacco growers face in their communities.

In 2019, we introduced a self-assessment questionnaire to evaluate the human rights profile of more countries, to increase the scope and impact of our human rights due diligence. Following the same methodology as our Human Rights Impact Assessments, this smartly designed survey targets our lower ranked high-risk countries that have not been prioritized for a full assessment in the short term.

Piloted in Morocco and Colombia, the questionnaire is designed to identify human rights risks to people, so that we can act on that information and meet our responsibility to respect human rights. Effectively assessing human rights impact requires building the know-how of the colleagues involved in the assessment.

In 2020, with our ability to conduct in-person Human Rights Impact Assessments disrupted by the pandemic, we had to adapt. One of the ways we have done this is by expanding the human rights self-assessment questionnaires. After the successful roll-out of the self-assessment questionnaire in Morocco and Colombia, we launched this tool in a further 10 countries in 2020: Brazil, Guatemala, Indonesia, Lebanon, Russia, South Africa, Thailand, Tunisia, Vietnam, and the United Arab Emirates. Each self-assessment questionnaire is reviewed by a third party, who assess the findings and any supporting documentation.

To further increase our human rights due diligence work, we integrated human rights into existing risk identification tools such as our internal audit procedure. We adapted the methodology to include a greater focus on risks to people, rather than simply risks to the business, and trained our internal auditors accordingly. This means that our internal audit procedure is now able to identify and understand risks to people on top of standard audit methodology.

The findings of the internal audit are then shared with our human rights team, helping build a wider picture of potential risks to people and allowing for more targeted and effective human rights assessments.

Outside of our international tobacco business, we started conducting due diligence in our processed food business in China and Thailand in 2019, with the support of KPMG AZSA Sustainability. This followed the Human Rights Impact Assessment of three of our business operations – our Japanese domestic tobacco business, pharmaceutical business, and processed food business – in 2016 and 2018, supported by Ernst & Young. In those three business operations in Japan, we identified the risks unique to migrant workers as key. Read more about [how we addressed the risks concerning this group](#).

To identify the most important current and potential risks, we have also applied a smart mix of self-assessment questionnaires and on-site Human Rights Impact Assessments since 2016. The



questionnaires cover a broad spectrum of human rights issues and aim to identify the greatest potential risks in our operations. Topics include child labor, forced labor, occupational health and safety, working conditions, social security, discrimination, and grievances, and there is also a special focus on vulnerable groups such as migrant workers. The questionnaires are followed by on-site assessments where needed.

In 2019, based on the results of the questionnaires, three out of seven of our subsidiary companies in China and Thailand were identified as potentially high-risk. We therefore decided to carry out on-site assessments in these three companies to examine the risk in more detail. As a result, we identified occupational health and safety, working conditions, and social security as risks, and we put robust action plans in place to address these. The plans were agreed between the top management of these companies, our human rights team, and KPMG Azusa Sustainability. The necessary improvements have either already been confirmed, or progress is still being monitored.

## Respond

### Our approach



Human Rights Impact Assessments and self-assessment questionnaires are a means to an end, not an end in themselves. It's vital that we act on the information generated by the assessments in order to meet our responsibility to respect human rights.

We develop action plans, with input from the local business, employees and communities, to address issues identified through Human Rights Impact Assessments and self-assessment questionnaires. These plans enable us to drive improvements and integrate human rights into our existing management processes in a consistent way. The plans have defined responsibilities, clear timelines for implementation, and key performance indicators to monitor progress.

## Our progress

We develop human rights action plans for each country that has undertaken an assessment, each with an agreed timeline. A total of 32 Human Rights Champions were appointed within these countries, as part of a network. The responsibility of this network is to ensure that action plans are managed and implemented by each country, and respect for human rights is firmly established in the business.

The Human Rights Champions are selected by the local management, typically from departments where human rights risks are relevant. The Champions manage the implementation of the action plans locally, on top of their usual roles. Our head office provides the Champions with training materials on the UN Guiding Principles on Business and Human Rights, as well as support with specific points within the action plans.

In 2019, we carried out a review of our high-risk countries, including a more detailed analysis on which countries have the greatest risk to people. Previously, we identified our high-risk countries using publicly available geopolitical data on human rights. We decided to improve this process by integrating additional criteria regarding our international tobacco business' operations and impact into our overall matrix.

The criteria included the number and type of our international tobacco business' operations in each country, historical data from our operational grievance mechanism or Agricultural Labor Practices program, the health and safety performance of our international tobacco business' operations in each country, and our salient issues. This improvement to the process ensures we have a much more accurate picture of our potential risks in each country, and that we are able to prioritize our actions where they are needed most.

## Our progress in Asia including Japan

Since 2018, we have established action plans for 21 key sites in Japan<sup>\*C</sup>, covering the head offices of subsidiary companies in our Japanese operations. We have also agreed action plans for seven of our subsidiary companies in the processed food business in China and Thailand, as high-risk countries outside of Japan.

In addition to local efforts, our Japanese headquarters has improved our corporate guidelines to address the potential risks relating to migrant workers, identified as the most vulnerable group through our Human Rights Impact Assessments. The number of migrant workers in Japan has increased rapidly in the past few years accelerated by the revised immigration law. Consequently, there was a need for common, Group-wide guidelines regarding the hiring and labor management of migrant workers, aligned with the international norm, the UN Guiding Principles.

We now offer our external Reporting Concerns Mechanism in five languages – Japanese, English, Chinese, Vietnamese, and Nepali – to give migrant workers easier access to reporting channels.

In addition, we launched a new scheme, in which central management regularly checks the employment status of migrant workers across our entire Japanese operations. By making sure we have the most up-to-date information, we can better protect this vulnerable group and address any potential and actual risks.

## Identifying our salient issues

To strengthen the focus of our policies and programs on human rights areas that matter most, it is crucial to have an understanding of our respective salient human rights issues.

### What is a salient issue?

According to the UN Guiding Principles Reporting Framework, “a company’s salient human rights issues are those human rights that stand out because they are at risk of the most severe negative impact through the company’s activities or business relationships.”

The concept of salience focuses on the risk to people, not to the business, and impacts are prioritized according to their severity and likelihood. The risks that are viewed as most salient are likely to converge as a risk to the business.

To identify the salient human rights issues in our value chain, in 2019 we conducted an assessment with the support of auditing firm Mazars. This exercise included a review of relevant internal policies and procedures, and a workshop with internal stakeholders.

A total of 16 human rights issues important to our international tobacco business were presented and discussed. The idea was to understand which specific activities associated with our business may put human rights at risk, so that we can proactively identify those issues to prioritize. Forced & Bonded Labor, Child Labor, and Living Wage were among the seven human rights issues identified as salient.

To ensure that our ongoing human rights program and due diligence processes already target these salient issues, we have integrated them into our Human Rights Impact Assessment methodology and self-assessment questionnaires. These issues are now also included in our methodology for identifying high-risk countries, which helps us to prioritize our due diligence process based on where our greatest potential impacts lie.

In 2020, with the support of external experts, we undertook a new project to identify salient human rights issues for the JT Group. Once finalized, these salient human rights issues will be disclosed and reflected in our human rights reporting, as per the UN Guiding Principles Reporting Framework.

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## Governance and stakeholder engagement

Given the breadth of the JT Group's operations around the world, it was critical to establish an appropriate governance structure. We believe it is important to embed respect for human rights throughout our entire organizational structure. This is driven by our dedicated human rights team, which is responsible for raising awareness and improving engagement internally. JT Group's top management is committed to respecting human rights. The senior management of all JT Group businesses attend a regular forum, our Business Ethics Committee\*E, to discuss key agendas for sustainability, including human rights.

To secure an effective due diligence system, it is critical to link impact assessments to effective governance structures that ensure accountability for acting on the findings. For this reason, the establishment of a Human Rights Champions Network was central to our governance structure in 2018. This network comprises employees from the countries in which we have conducted Human Rights Impact Assessments, and facilitates the sharing of guidance and best practice on human rights by those closest to the issues on the ground.

To advance the rights of our stakeholders, it is important that we listen to the advice, concerns, and criticisms of people outside the JT Group. Therefore, we have continued to take counsel from our Human Rights External Advisory Board.

To further strengthen our external engagement, we have partnered with Business for Social Responsibility (BSR) and (until 2019) KPMG Azusa Sustainability. These organizations provide technical support with our ongoing human rights due diligence approach and overall human rights strategy.

**Human rights external advisory board\*E**

Our Human Rights External Advisory Board plays a vital role in providing us with a broad external perspective in the human rights area. Made up of international experts on business and human rights, the Board advises us on all issues that the members consider relevant for the implementation of our human rights strategy. The panel of experts guides us with their expertise and challenges us where they believe we need to improve, helping to strengthen our efforts to deliver on our human rights commitments.

Board members include:

- Paul Bowden (Professor of Law, The Nottingham Law School)
- Donna L. Westerman (Sustainable Purchasing Leadership Council)
- Rona Starr (Association for Professional Social Compliance Auditors)
- Jonathan Drimmer (Paul Hastings)
- Richard Karmel (Mazars)

## Protecting and respecting employee rights during the pandemic

The Advisory Board was very positive about our response to COVID-19. The Board has provided feedback and recommendations to our response to the pandemic from a human rights standpoint, which we will reflect upon in the next phase of implementation.

To ensure our response followed human rights best practice, we are completing the 'United Nations Development Program Human Rights Due Diligence and COVID-19: Rapid Self-Assessment for Business'. This provides a structure for our response and ensures that we make rights-respecting decisions across the business.

From the start of the pandemic, we made decisions that helped protect and respect our employees' rights.

### Guidelines for vulnerable employees

In June 2020, we created guidelines for vulnerable employees providing comprehensive guidance on how to protect our personnel. We also ensured that staff from third-party contractors (hygiene,

catering, security, etc.) would receive salaries in full, even if they were requested not to come to our premises or their shifts were reduced.

## Inclusive decision-making

In our international tobacco business, we involved relevant stakeholders in critical decision-making processes. This included debating and deliberating on return-to-work scenarios, ensuring we considered everything from our employees' point of view. Returning to the office is currently voluntary, with a survey held every two weeks to gauge feedback from employees working at the headquarters of our international tobacco business. Based on their knowledge of the changes and adaptations made in their workspace, employees have the freedom to decide whether it is safe for them to return to work.

## Strict health and safety measures

For many of our employees and contractors, working-from-home is not an option, because they work in factories, sales distribution, and other field-based jobs. To ensure they can work safely, we put in place stringent measures, using a risk-based approach that puts people first.

## Clear communication

Finally, we provided scientifically accurate information – using clear, easy-to-understand language – to staff on a regular basis. This included the multiple steps taken to protect employees, as well as data relating to those impacted by COVID-19 both globally and locally.

Read more about how we have responded to the pandemic from the perspective of [Community Investment](#), [Health & Safety](#) and [Supply Chain](#).

## Measure

We are committed to continually measuring the effectiveness of, and improving where possible, our approach to respecting human rights.

Since we started our Human Rights Impact Assessments in 2016, we have been measuring the effectiveness of our Action Plans. Each Action Plan we develop includes an individual set of key performance indicators to measure the effectiveness of our improvements over time. For our


Human Rights Champions, we track the implementation of each action item and report on a quarterly basis to the human rights team. All human rights action plans are discussed on a quarterly basis with selected Management to measure progress.

There are various ways to measure the effectiveness of our responses in our leaf supply chain. One of them is the number of issues which we observe during subsequent crop cycles. Read more on [our approach](#).

## Report

Our understanding of our obligations under the UN Guiding Principles is to 'know and show' that we are aware of the potential human rights related risks to which we may be connected, and that we are taking appropriate steps to manage those that occur. The UN Guiding Principles encourage corporate transparency to the benefit of a broad set of stakeholders. We are committed to this level of transparency and disclosure.

Read more on our individual [assessments and action plans](#).

In 2019, we published [our human rights correspondence](#)  with Human Rights Watch, the UN Human Rights Council, and The Guardian on our website.

## Programs

To address our human rights issues, markets put in place their own customized corrective measures through human rights action plans. We also have global programs that can be applied by the local markets to ensure a consistent approach across the Group. Read more:

[Code of Conduct](#)

[JT Group health and safety](#)

[Agricultural Labor Practices](#)

[Our ARISE \(Achieving Reduction of Child Labor in Support of Education\) program](#)

[Community Investment](#)

[Diversity and inclusion](#)

## JT UK Modern Slavery Act

JTI UK, the JT Group's U.K. subsidiary, has been publishing a Modern Slavery Act Statement since 2017.

[JTI UK Modern Slavery Statement \(JTI UK Website\)](#) 



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## Human Rights Impact Assessments and Self-assessment Questionnaires

Our Human Rights Impact Assessments focus on impacts to people within our main operations and value streams. Key activities during an impact assessment include visiting and observing farming, processing, manufacturing, and sales and distribution operations. During the assessments, we conduct a series of interviews with employees and workers, as well as representatives of suppliers, clients, and partners.

At the end of the assessment, we report on the findings and discuss recommendations for improvement with local management. Our head office then works closely with the local team to address any issues raised and improve the situation.

## Adapting our approach to ensure continuity

Our commitment to conducting human rights due diligence as part of our Human Rights Policy never wavered during the pandemic. To ensure continuity and protect everyone involved, we tailored our approach and used different tools where necessary.

Unable to conduct on-site assessments due to the pandemic, we quickly introduced remote Human Rights Impact Assessments and expanded the roll-out of our human rights self-assessment questionnaires. These consist of around 100 questions based on our human rights due diligence methodology. Focusing on procedures and processes, the questionnaires help us to assess the effectiveness of our work on the ground and identify any 'blind spots'.

As the year progressed, we added specific COVID-19 risk-related questions. These covered subjects such as personal protective equipment, working from home, and procedures for returning to the office.

Rightsholder involvement and consultation is a fundamental component of effective due diligence, so we plan to include this element in our self-assessment questionnaire in 2021.

## Human Rights Impact Assessments: key findings

The following list of key findings includes one human rights risk identified in each of our assessments, to demonstrate the wide range of issues our stakeholders may face.

## Read more about key findings and how we are addressing them by selecting a country

### Asia, Americas

Bangladesh (2019)

Colombia (2020)

Dominican Republic (2018)

China (2019)

India (2019)

Japan (2016/2017)

Kazakhstan &

Kyrgyzstan (2019)

Malaysia (2018)

Mexico (2018)

Myanmar (2018)

Vietnam (2020)

Thailand (2019)

### Africa, Middle

#### East

Egypt (2019)

Ethiopia (2019)

Lebanon (2020)

Malawi (2019)

Morocco (2020)

South-Africa (2020)

Tanzania (2018)

Tunisia (2020)

Zimbabwe (2019)

### Europe

Switzerland (2017)



## Case study

# Using leverage with our leaf merchants

The UN Guiding Principles recommend the following:

*UN Guiding Principle 13 (b):*

*The responsibility to respect human rights requires that business enterprises seek to prevent or mitigate adverse impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.*

*UN Guiding Principle 19 (b) (ii):*

*In order to prevent and mitigate adverse human rights impacts, business enterprises should integrate the findings from their impact assessments (...) and take appropriate action. Appropriate action will vary according to (...) the extent of its leverage in addressing the adverse impact.*

With this in mind, we have been receiving Agricultural Labor Practices reports from major suppliers since 2016. Through these, we recognized Crop Protection Agent management challenges in Zimbabwe. We have been looking for solutions beyond providing Personal Protective Equipment, which led us to initiate a Highly Hazardous Pesticide response.

In May 2018, we received a letter from the United Nations Office of the High Commissioner for Human Rights that highlighted several alleged human rights violations such as child labor, health and safety, and a variety of labor rights abuses in tobacco growing in Zimbabwe.


Although we have no operations in Zimbabwe and only purchase tobacco leaf through leaf merchants (third-party suppliers), we were still connected through our business relationship. The purchasing entity of our international tobacco business used its commercial leverage with the suppliers to reduce the risk of harm occurring. The local entity of our international tobacco business worked alongside some of our biggest leaf merchants – Alliance One International, Inc. (AOI), Premium Tobacco International DMCC (Premium), and Universal Leaf Tobacco Company, Inc., CONTRAF-NICOTEX-TOBACCO GmbH – to encourage suppliers to adopt and implement the UN Guiding Principles on Business and Human Rights. Where necessary, we also recommended changes to their business practices, not just in Zimbabwe but globally.

All of our suppliers engaged positively and made the following commitments:

- Eliminate the use of the most hazardous pesticides to human health – Highly Hazardous Pesticides Criteria 1 – by the end of 2021
- Develop a human rights policy approved at the most senior level of their organization and make it publicly available
- Develop an industry-wide grievance mechanism
- Focus efforts on six key issues identified as having the potential to cause the most severe harm and that are most likely to occur: exposure of workers to hazardous substances, land rights, child labor, gender discrimination, freedom of association, and environmental impacts

We also engaged in open dialogue with the Zimbabwe Ministry of Labor, the Tobacco Industry and Marketing Board, the Tobacco Research Board, and the National Employment Council for Agriculture and Tobacco.

We will monitor the commitments our suppliers have made and continue to work with them to ensure the best possible outcome for those impacted.

Read our [full correspondence](#)  with the United Nations Office of the High Commissioner for Human Rights.

## Case study

# Eliminating Highly Hazardous Pesticides Criteria 1 in our supply chain

To protect people and the environment, our objective is to phase out the use of Highly Hazardous Pesticides (HHPs) Criteria 1 from our leaf supply chain by the end of 2021.

HHPs Criteria 1 are pesticide formulations that meet the criteria of hazard classes 1a and 1b of the World Health Organization Recommended Classification of Pesticides by Hazard.

Our suppliers have committed to an assessment by country to identify any HHPs Criteria 1 which are still registered, recommended, or used in tobacco production. They will also identify available alternatives, prioritizing Bio Crop Protection Agents. There will be a special focus on eliminating HHPs Criteria 1 Pyrethroids insecticides as part of our 2021 commitment.

## External recognition

We were categorized as a 'leader' by the Global Child Forum in their latest study, conducted in collaboration with the Boston Consulting Group. This benchmark report analyses just under 700 of the world's largest companies and how they are safeguarding children's rights as part of their business value chain.

We are proud that the study recognizes the concrete actions we have taken to embed respect for children's rights in our supply chain, notably through our flagship child labor elimination program ARISE.

## Going forward

Our work to promote and respect human rights will evolve and adapt to the changing economic and political context of the countries where we operate. Our approach to human rights due diligence is

ongoing, as the risks to human rights may change over time. We will continue to act where actions are necessary and focus on our human rights priority areas.

In our international tobacco business for 2021, we will continue to prioritize countries based on a set of risk-based criteria in order to assess our most high-risk countries first. Going forward, we are committed to assessing actual and potential human rights risks in at least six countries each year and will continue to embed respect for human rights within the business.

In our Japanese operations, we will carry on monitoring the progress of our Human Rights Impact Assessment action plans and provide the necessary support to ensure that they are implemented. Given the increase in migrant workers since Japan's immigration policy was revised in April 2019 we made minor changes to the Group-wide guidelines for migrant workers, in line with Japan's revised immigration law. Unfortunately, due to COVID-related travel restrictions, we had to postpone the follow-up of the Human Rights Impact Assessments we conducted in 2017 in our processed food business, focusing on migrant workers. However, we conducted self-assessment questionnaires in the subsidiaries of our processed food business which relate to labor management, targeting not only migrant workers but all employees.

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### About our reporting

Our referenced guidelines(GRI), notes on data (BoR), and scope of our data (\*A-E).

[Read more >](#)

## You might also like...

Human  
resources

JT Group health  
and safety

Investing in  
people

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