

Human Rights Policy

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PURPOSE

It is the purpose of this Policy to define Pyxus's commitment to respect Human Rights as defined by the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work. The International Bill of Human Rights collectively includes the two Covenants: the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights. We also commit to the United Nations Guiding Principles on Business and Human Rights.

I. OUR COMMITMENT

A. Respect for Human Rights

We emphasize treating individuals with dignity and respect inside our organization and throughout our supply chain. Where we don't have managerial control, we actively seek to promote compliance with this Policy. We commit to continuously review and update policies and procedures to proactively identify, address and respond to unfavorable Human Rights impacts with which we are possibly included. We are dedicated to complying with pertinent laws and implement controls wherever we operate. Where national law and international Human Rights standards differ, we follow the higher standard.

B. Valuing Diversity

We value the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, gender identity, HIV status, marital status, or any other status protected by the laws or regulations in the locations where we operate.

Regardless of personal characteristics or status, Pyxus does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to Pyxus employees, but also throughout our supply chain.

C. **Freedom of Association and Collective Bargaining**

We respect our employees' right to associate or not associate with third-party organizations, join, form or not join a labor union, seek representation, bargain or not bargain collectively in accordance with local laws, without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representative.

D. **Freely Chosen Employment**

We are committed to ensuring all work is voluntary. We take meaningful steps to prevent the use of forced, bonded or indentured labor, involuntary prison labor, slavery or human trafficking in our workplaces and throughout our supply chain.

E. **Child Labor**

Inside our organization, child labor will not be used under any circumstances. All employees must meet the minimum age requirement set by local laws. We intend to continue improving identification of and elimination of child labor in our supply chain as detailed in our Child Labor Policy.

F. **Minimum Wage, Hours and Benefits**

We are committed to compensating our employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours for our employees shall be limited to what is permitted by local laws.

G. **Workplace Health and Safety**

We are committed to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks and will engage with employees to improve health and safety in our workplaces.

II. OUR STANDARDS AND EXPECTATIONS

A. Respect for Human Rights is fundamental to the success of Pyxus, our subsidiaries and the communities where we operate. Employees are united by values that demonstrate our insistence on achieving the right results, the right way:

1. Have the Courage to Lead
2. Communicate Openly and Transparently
3. Commit To and Support Each Other
4. Promote and Protect Quality Outcomes
5. Honor Our Past While We Proudly Pursue Our Future

B. Pyxus's commitment to human rights embodies and reflects these values as they influence everything we do and serve as the guiding principles that drive our Company every day. Where appropriate, we engage in dialogue with stakeholders on Human Rights issues related to our business and the communities where we operate.

III. PROCESS FOR IMPLEMENTATION

- A. Pyxus and its subsidiaries are expected to follow the spirit and intent of our guiding principles to ensure respect for Human Rights. These principles are an integral part of other related policies, including the Code of Business Conduct.
- B. We regularly review and update the progress on our efforts, and publicly communicate the results. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it to their Human Resources Department or the Compliance Helpline where we will review the concern and conduct an appropriate investigation. Concerns can be reported through Pyxus's Compliance Helpline anonymously, if desired.
- C. A copy of this policy will be provided internally and externally. It will be communicated to our employees, shareholders, contractors, and suppliers.