



HUMAN RIGHTS AND SUPPLY CHAIN TRANSPARENCY REPORT

For the financial year ending March 31, 2026

This statement is published in accordance with the UK Modern Slavery Act 2015 and the Swiss Code of Obligations (Art 964I) and Due Diligence and Transparency Ordinance (Art 16) and the steps taken to eliminate child labor from the supply chain. It outlines the actions that Pyxus International, Inc., and its subsidiaries (together, "Pyxus" or the "Company") implemented between April 1, 2025 and March 31, 2026 (fiscal year 2026) to prevent slavery and human trafficking from occurring within the business and supply chain.

Introduction

Our Company is committed to respecting fundamental human rights and conducting business in a responsible and ethical manner across our operations and supply chain. We strive to foster a working environment that respects the rights and dignity of our employees, business partners and the communities where we operate. Slavery, human trafficking and child labor are serious violations of human rights and we do not tolerate such abuses, or any other human rights violations throughout our supply chain.

Our approach to addressing modern slavery is informed by the UK Modern Slavery Act 2015 and guided by the principles set forth in the United Nations Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO), particularly those concerning forced or compulsory labor. We recognize that modern slavery and human trafficking are global risks that can affect companies across varying industries, and remain committed to identifying and addressing these risks throughout our supply chain.

Our understanding of child labor is based on the standards established by our Agricultural Labor Practices (ALP) program and International Labour Organization (ILO) Convention 138 regarding minimum age for employment, and Convention 182 regarding the prohibition and elimination of the worst forms of child labor.

The ILO estimates that nearly 138 million children globally are impacted by child labor, with agriculture accounting for approximately 61 percent of all cases. We recognize that child labor can occur in tobacco production in certain countries where we operate. We reject the belief that child labor is an unavoidable practice and continue to advance strategic initiatives designed to identify, prevent and eliminate child labor within our supply chain.

The actions outlined in this statement reflect our Company's global approach to assessing, addressing and mitigating human rights risks throughout our supply chain. This statement was approved by the Board of Directors of Pyxus International, Inc. on August 12, 2026.



Pieter Sikkel
President and CEO



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BUSINESS & SUPPLY CHAIN

Our Business

Pyxus is a global agricultural company that delivers value-added products and services to customers in more than 80 countries. As a trusted provider of responsibly sourced, independently verified, sustainable and traceable products and ingredients, we believe everything we do is to transform people's lives so that together we can grow a better world. As of March 31, 2026, Pyxus employed approximately 3,300 full-time employees, of which approximately 83.3 percent were employed outside of the United States.

Through our operating subsidiaries, we process products in Company owned and third-party facilities around the world, including in Argentina, Brazil, China, India, Indonesia, Jordan, Malawi, North Macedonia, Tanzania, Thailand, Turkey, the United States and Zimbabwe. Our business is rooted in the leaf tobacco sector, where we purchase, process, pack, store and ship tobacco to manufacturers of consumer products worldwide. In addition to our leaf business, we also have investments in e-liquid and product flavoring; next generation product solutions; seed research, development and sales; and the production and processing of crops complementary to tobacco.

POLICIES, PROCEDURES & STANDARDS

Pyxus seeks to mitigate modern slavery risks through clear policies, procedures and standards that guide our business conduct, employee behavior and expectations of our business partners. These include the Company's:

- **Code of Business Conduct**
- **Agricultural Labor Practices Program**
- **Anti-Child Labor Policy**
- **Human Rights Policy**
- **Third-Party Services Provider Compliance Program**
- **Sustainability Policy**
- **Policy on Sustainable Agriculture**

Code of Business Conduct

Our Company's Code of Business Conduct is our guide to ethical and lawful conduct. It defines the Company's expectations for legal and ethical behavior on the part of every employee — an obligation that is a condition of employment. The Code of Business Conduct is available in 18 languages, representing the primary languages spoken across our global employee base, and explicitly states our commitment to eliminating human rights abuses, including forced and child labor, within our operations and supply chain. These expectations are echoed in our Human Rights Policy. In fiscal year 2026, our Company's eligible compliance program participants worldwide completed training on the Code of Business Conduct. In addition, all new, full-time employees were required to read the Code of Business Conduct when hired.

Agricultural Labor Practices Program

Our Company's ALP program sets clear human rights standards that all participants in our agricultural supply chain are expected to follow. These standards are based on the ILO Declaration on Fundamental Principles and Rights at Work and other relevant ILO conventions. National and local legislation supersedes the standards if it is more restrictive than ILO guidance. The standards must be interpreted and implemented in line with local laws and applicable ILO conventions. Included within this program is a standard to address forced labor, which states that all farm labor must be voluntary.

The standards used to measure this include:

- Workers do not work under bond, debt or threat and must receive wages directly from the employer.
- Workers are free to leave their employment at any time with reasonable notice.
- Workers are not required to make financial deposits with employers.
- Wages or income from crops and work done are not withheld beyond the legal and agreed payment conditions.
- Growers do not retain the original identity documents of any worker.
- The grower does not employ prison or compulsory labor.

Human Rights & Anti-Child Labor Policies

The ALP program is supported by our Human Rights and Anti-Child Labor policies. Our Human Rights Policy outlines our commitment to respecting human rights, as defined by the International Bill of Human Rights and the ILO's Declaration of Fundamental Principles and Rights at Work. The International Bill of Human Rights 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 and the United Nations Global Compact. We take meaningful steps to prevent the use of forced, bonded or indentured labor, involuntary prison labor, slavery, human trafficking, and child labor in our workplaces and throughout our supply chain.

We are committed to continuously improving our ability to identify and eliminate child labor in our supply chain, both at the local and global levels. To achieve this, we employ the following measures:

- Policies and trainings
- Identification of adverse impacts
Cease/prevent impacts
- Track implementation and results
- Communicate how impacts are addressed
- Remediation



Third-Party Services Provider Compliance Program

We maintain a compliance program for third-party service providers that prohibits the use of any illegal, unethical or improper methods of conducting business, which would reasonably include human rights abuses. This program also prohibits any payments from the Company to be used for illegal, unethical or improper purposes. To minimize the risks associated with using third-party service providers, we require that all new, high-risk service providers undergo a pre-engagement compliance review. We recognize that when a vendor is conducting business on our behalf, their actions reflect on our business. The goal of our program is to proactively identify and mitigate any compliance risks associated with the use of service providers.

HUMAN RIGHTS DUE DILIGENCE

Through our risk-based due diligence procedures, we seek to identify, prioritize, respond, and measure actual and potential human rights impacts in the agricultural supply chain. Our due diligence process includes stakeholder engagement and identification of potential extreme breaches related to modern slavery, human rights and child labor. Employees are trained to identify activities that may cause or contribute to actual or potential negative human rights impacts. They are trained to recognize situations where we are directly linked to such impacts in the supply chain. Our procedures also involve preventing and mitigating these adverse impacts and are supported by grievance mechanisms for stakeholders to report any actual or potential negative impact on human rights.

Grower Training & Monitoring

While we recognize the risk of modern slavery, we believe the greatest risk is within our agricultural supply chain. To mitigate this risk, subsidiaries directly involved with agronomic production have strong grower education, training and monitoring programs, which include both announced and unannounced farm visits.

In addition, we include language in our contracts with growers that stipulates they must abide by our standards, programs and policies regarding human rights and forced labor or the regulations set by the country in which they reside, whichever is more stringent. Although contract language varies by country, growers who sign the contracts are agreeing that they will comply with the slavery and human trafficking laws of the country or countries in which they do business, along with our standards, programs and policies. Growers must also indicate that they understand there are commercial consequences for failure to abide by such laws, standards, programs and policies.

Our field teams are trained to teach contracted growers about the ALP program. In addition to providing education through group training, they seek to visit contracted farms multiple times per season to provide growers guidance on how to address labor issues on their farms.

During these visits, we monitor for compliance with the ALP measurable standards, including forced and child labor. Subsidiaries directly involved with agronomic production are also required to document how contracted growers source their labor, including whether a labor broker is involved and whether any persons under the age of 18 are employed.



Grower Training & Monitoring

In addition to these regular visits, local field teams and management often conduct unannounced farm visits. The number and schedule of visits annually vary by origin. To monitor for potential forced or child labor on farms, our field teams routinely follow the steps below, but not necessarily in this order:



Visual Observation



Grower Interview(s)



Worker Interview(s)



Written Documentation Review

Assessing & Managing Risk

We employ a multi-pronged approach to address human rights and child labor risks in our agricultural supply chain, to drive change and implement long-lasting solutions that help secure the sustainability of agricultural communities.

During our farm monitoring visits, we collect data on the farm and from the grower to assess each farm's risk level. These risk assessments help us prioritize the training and monitoring of higher risk growers. If it is determined that there is a violation of the ALP program and/or applicable regulations, the field technician will record the violation in SENTRI®, our proprietary track-and-trace platform. SENTRI® has the capability to capture data points throughout the supply chain, including ALP-related violations such as child labor.

Field technicians will communicate with the grower and worker(s) to obtain additional information about the relationship. If an ALP-related violation is identified and logged, the field technician will remind the grower about their contractual obligations and develop an action plan to resolve the situation. On a follow up visit, the field technician will evaluate and determine whether the individual(s) is still at risk.



If the situation has been resolved, the case will be closed. If not, the field technician will elevate the case to their superior to determine the next steps.

While our primary goal is to drive continuous ALP improvement, if a grower does not demonstrate a willingness to address and permanently resolve the identified issue, we reserve the right to terminate or not renew a contract. In addition to our internal risk assessments, we also participate in third-party assessments to incorporate broader stakeholder feedback.

Grower Collaboration

Through our farm monitoring process, we focus on identifying the root cause of potential human rights abuse, including child and forced labor. Utilizing the data collected within SENTRI®, our field teams actively work to identify trends within select geographical areas or types of farms.



Any observed human rights violation is often a symptom of a larger, more hidden cause. While we work to immediately address the symptom by reducing the risk of physical or psychological harm to an individual, we also attempt to work with the grower to identify the root cause and address that issue.

In many instances, this work involves partnering with community, government or other industry organizations to address larger, systemic issues in the agricultural sector.

MODERN SLAVERY PREVENTION TRAINING

MODERN SLAVERY PREVENTION TRAINING



Staff Trainings

All staff responsible for training and monitoring our contracted growers for ALP compliance, including the forced labor principle and measurable standards, participate in annual training to provide clarity and current information about human rights. These training sessions provide practical guidance on addressing human rights violations within the supply chain. Following the training, eligible participants are tested for comprehension of the material covered, and remedial training is provided to individuals, where necessary.



Grower ALP Trainings

In fiscal year 2026, our contracted growers were trained on the forced labor ALP principle and measurable standards to promote program compliance. The type of training and education provided is tailored to meet the needs and risks of the growers' location and generally includes a combination of group trainings and workshops and individual education on the farm.

MEASURING EFFECTIVENESS

In our key sourcing origins, our subsidiaries have employees dedicated to ALP program implementation. These teams regularly review agricultural labor incident reports that are generated during our on-farm visits. The team develops action plans to create or revise grower and farmworker trainings, as necessary, and decides if a contract needs to be reduced or terminated based on grower compliance with the ALP program.

External Monitoring & Risk Assessments

We are committed to fair labor practices within our supply chain. Independent, third-party monitoring is critical to the identification and evaluation of potential risks for human trafficking and slavery as well as a critical aspect of effective due diligence. For example, our tobacco leaf subsidiary, Alliance One International, LLC (AOI), participates in the industry's Sustainable Tobacco Production (STP) program, which is designed to enhance agricultural supply chain due diligence and drive a positive impact on social and environmental issues.

STP includes eight themes, including human and labor rights and farmer livelihoods, and aligns with internationally recognized frameworks, such as the United Nations Sustainable Development Goals, UN Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD), and the Food and Agriculture Organization (FAO) of the UN. The Company's leaf operations participate in STP's annual desktop self-assessments which requires us to report to STP. Through this process, we report on our commitment to due diligence, adopted procedures to support that commitment and quantitative measures to show impact. Self-assessment results are then substantiated by the STP Secretariat and are used in combination with generic risk screenings to help inform where in-depth assessments (IDA) should take place.

An IDA is an important tool to identify and prioritize challenges on the ground, paving the way for impactful results. It is performed by a third party with subject matter expertise. During fiscal year 2026, our operations in Brazil, Malawi and Indonesia took part in STP assessments.

In addition, third-party human rights assessments are conducted regularly at the origin level to assess the effectiveness of the ALP program, reduce the number and severity of labor rights violations on contracted farms and improve the overall experience of farmworkers on contracted farms. We have not used third-party verification to monitor risks in our non-agricultural supply chain and are unable to verify whether subcontractors used by our flavoring & next generation product(s) businesses use labor brokers.

Stakeholder Engagement

We understand the importance of capturing the voice of rights holders, and are committed to engaging with our stakeholders, particularly those who have been affected or may have been affected by human rights violations. We regularly interact with a wide range of external stakeholders to discuss our approach and specific concerns, both at a global level and locally within the countries where we operate.



As part of our external engagement strategy, we participate in several industry groups, including those focused specifically on human rights. Organizations that our Company is involved with to drive sustainable development and industry collaboration include, but are not limited to, the International Tobacco Growers Association and the Eliminating Child Labour in Tobacco Growing Foundation (ECLT). Since fiscal year 2024, one of our employees has served as the president of the ECLT Foundation's board of directors.

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