

Philip Morris Products S.A.	Confidential
2021 Annual Report for PM0000424-PM0000426, PM0000479 and PM0000634	Page 1 of 5
Annex 15: Creation and Dissemination of the Products' Labeling and Advertising	Version 1.0

Annex 15: Creation and Dissemination of the Products' Labeling and Advertising

Product	Marlboro Amber <i>HeatSticks</i> Marlboro Green Menthol <i>HeatSticks</i> Marlboro Blue Menthol <i>HeatSticks</i> <i>IQOS</i> System Holder and Charger <i>IQOS</i> 3 System Holder and Charger
FDA STN	PM0000424-PM0000426, PM0000479 and PM0000634
Reporting Period	PM0000424-PM0000426 and PM0000479: March 1, 2020 to February 28, 2021 PM0000634: December 7, 2020 to February 28, 2021

TABLE OF CONTENTS

1. CREATION AND DISSEMINATION OF MATERIALS	2
1.1. Creation of Materials	2
1.2. Dissemination of Materials	2

LIST OF TABLES

Table 1: List of Entities Involved in the Creation of Materials During this Reporting Period.....	3
Table 2: List of Entities Involved in Marketing Materials Dissemination during the Reporting Period.....	4

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Philip Morris Products S.A.	Confidential
2021 Annual Report for PM0000424-PM0000426, PM0000479 and PM0000634	Page 2 of 5
Annex 15: Creation and Dissemination of the Products' Labeling and Advertising	Version 1.0

The Marketing Orders¹ require submission of an Annual Report with a summary of how the marketing of the tobacco products continues to be appropriate for the protection of public health, including “A summary of the creation and dissemination of the products’ labeling, advertising, marketing, and/or promotional materials – whether conducted by you, on your behalf, or at your direction – including a list of all entities involved and a description of their involvement, including a description of contractual agreements with such entities.” This Annex provides such summary of the creation and dissemination processes, as well as a list of the entities involved and a description of their involvement.

1. CREATION AND DISSEMINATION OF MATERIALS

In general, PM USA’s process to create and disseminate all its consumer facing labeling, advertising, marketing, and/or promotional materials, (“Marketing Materials”) is designed to clarify the intended message and intended audience, while ensuring compliance with internal policy and external regulations and laws.

1.1. Creation of Materials

(b) (4)

1.2. Dissemination of Materials

Marketing Materials are not disseminated until (b) (4)

(b) (4)

¹ This Annex is responsive to the April 30, 2019 Marketing Order for PM0000424-PM0000426 and PM0000479, and the December 7, 2020 Marketing Granted Order for PM0000634. We refer to both orders collectively here as the “Marketing Orders”.

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Philip Morris Products S.A.	Confidential
2021 Annual Report for PM0000424-PM0000426, PM0000479 and PM0000634	Page 3 of 5
Annex 15: Creation and Dissemination of the Products' Labeling and Advertising	Version 1.0

(b) (4)

Table 1: List of Entities Involved in the Creation of Materials During this Reporting Period

Entity Involved	Role	Contractual Description
(b) (4)	Creation of advertising: direct mail, point of sale material, email, print advertisements, and equity photoshoots	(b) (4)
	Dissemination of advertising: direct mail and email	
	Dissemination of advertising: digital media and print media buy/flight plans	
	Dissemination of advertising: digital media buy/flight plans	
	Creation of advertising: website, email, social media, paid digital, and equity photoshoots	
	Dissemination of advertising: email	
	Dissemination of advertising or materials related to Customer Care	
	(b) (4)	
	Dissemination of advertising: website	

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Philip Morris Products S.A.	Confidential
2021 Annual Report for PM0000424-PM0000426, PM0000479 and PM0000634	Page 4 of 5
Annex 15: Creation and Dissemination of the Products' Labeling and Advertising	Version 1.0

Entity Involved	Role	Contractual Description
(b) (4)	Creation of advertising: Owned retail locations material, face to face interaction materials, and event materials	(b) (4)
	Dissemination of advertising: Owned retail locations material, face to face interaction collateral, and event materials	
	Creation of advertising: third-party retail	

PM USA did not contract with bloggers, social media influencers, or any other type of advertising not included in the above summary during the reporting period. In addition, (b) (4) (b) (4) Due to the ongoing COVID19 pandemic, PM USA hosted no in-person events during the reporting period.

Table 2: List of Entities Involved in Marketing Materials Dissemination during the Reporting Period

Material	Channel	Disseminated By	Disseminated To
Retail Point of Sale Advertising	Owned Retail	(b) (4)	IQOS® Owned Retail
Retail Point of Sale Advertising	Third-Party Retail		AGDC ² to place in Third Party Retail
Owned Websites Advertising	Owned Websites		Age verified consumers on the Adult Tobacco Consumer Database (ATCD)

(b) (4)

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Philip Morris Products S.A.	Confidential
2021 Annual Report for PM0000424-PM0000426, PM0000479 and PM0000634	Page 5 of 5
Annex 15: Creation and Dissemination of the Products' Labeling and Advertising	Version 1.0

Material	Channel	Disseminated By	Disseminated To
Direct Mail Advertising	Direct Mail	(b) (4)	Age verified consumers on the ATCD
Email Advertising	Email		Age verified consumers on the ATCD
Product Labeling	Labeling		Age verified consumers
Print Advertising	Print Media		Publishers of publications meeting policy-driven readership standards (i.e. 85/15)
Digital Paid Advertising	Digital Paid Media		Age-verified consumers (b) (4) (b) (4)
Social Media Posts (unpaid)	Social Media Branded Page		Age-verified consumers who follow IQOS® social media platforms directly
Materials Used in Face-to-Face Interactions	Events, third-party retail, etc.		Age-verified adult consumers who identify as current tobacco users
Materials Used in (b) (4) Interactions	(b) (4)		(b) (4) and age verified 21+ smokers invited by (b) (4) (b) (4) to events

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