

Philip Morris Products S.A.	Confidential
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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	March 1, 2021 to February 28, 2022

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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

The creation of Marketing Materials begins with PM USA asking a creative agency partner, described in Table 1, for a creative output. Depending on the context, we may request a (b) (4)

For example, if the intended audience (adult smokers 21+), intended message (features and benefits of IQOS®), and intended channel (email) (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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Table 1: List of Entities Involved in the Creation and Dissemination of Marketing Materials During this Reporting Period

Entity Involved	Role	Contractual Description
(b) (4)	Creation of advertising: website, social media, direct mail, point of sale material, email, print advertisements, paid digital media, and equity photoshoots Dissemination of advertising: direct mail and email	(b) (4)
(b) (4)	Dissemination of advertising: digital media and print media buy/flight plans	(b) (4)
(b) (4)	Dissemination of advertising: digital media buy/flight plans	(b) (4)
(b) (4)	Dissemination of advertising or materials related to Customer Care (i.e., coupons provided to resolve a service issue), digital development, and e-commerce product fulfilment	(b) (4)
(b) (4)	Dissemination of advertising: website	(b) (4)
(b) (4)	Creation of advertising: Company-owned retail locations material, face-to-face interaction materials, and event materials Dissemination of advertising: Company-owned retail locations material, face-to-face interaction collateral, and event materials	(b) (4)
(b) (4)	Creation of advertising: third-party retail	(b) (4)

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PM USA did not contract with bloggers, social media influencers, or any other type of advertiser not included in the above summary during the Reporting Period. In addition, we did not use Paid Affiliates during the Reporting Period. Due to the ongoing COVID-19 pandemic, PM USA hosted no in-person events during the Reporting Period.

1.2. Dissemination of Materials

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

approval through the internal compliance review process, we disseminate Marketing Materials according to the type of channels in which they are intended to be used. Table 2 below shows types of Marketing Materials, the channels in which they are disseminated, the entity that disseminates them, and to whom they are disseminated.

Table 2: List of Entities Involved in Marketing Materials Dissemination during the Reporting Period, Organized by Type of Marketing Material

Material	Channel	Disseminated By	Disseminated To
Retail Point of Sale Advertising	Company-owned Retail	(b) (4)	IQOS-Owned Retail
Retail Point of Sale Advertising	Third-Party Retail	(b) (4)	AGDC ² to place in Third-Party Retail
Company-owned Websites Advertising	Company-owned Websites	(b) (4)	Age-verified 21+ tobacco consumers on the Adult Tobacco Consumer Database (ATCD)
Direct Mail Advertising	Direct Mail	(b) (4)	Age-verified 21+ tobacco consumers on the ATCD
Email Advertising	Email	(b) (4)	Age-verified 21+ tobacco consumers on the ATCD
Product Labeling	Labeling	Company-owned and Third-Party Retail	Age-verified 21+ tobacco consumers

² AGDC, or Altria Group Distribution Company, provides sales, distribution, logistics, and merchandising support to Altria Group's operating companies and affiliates. In some instances, this may include AGDC contracting third-party installers, such as (b) (4) to provide merchandising support on behalf of Altria's operating companies and affiliates. PM USA does not have a direct relationship with these third-party installers, and they conduct similar dissemination activities as AGDC.

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Material	Channel	Disseminated By	Disseminated To
Print Advertising	Print Media	(b) (4)	Publishers of publications meeting policy-driven readership standards (i.e., 85/15)
Digital Paid Advertising	Digital Paid Media	(b) (4)	Age-verified 21+ tobacco consumers via cookie tracking and matching to publicly available records
Social Media Posts (unpaid)	Social Media Branded Page	(b) (4)	Age-verified 21+ tobacco consumers who follow <i>IQOS</i> social media platforms directly
Materials Used in Face-to-Face Interactions	Events, third-party retail, etc.	(b) (4)	Age verified 21+ tobacco consumers who identify as current tobacco users
Materials Used in (b) (4) Interactions	(b) (4)	(b) (4)	(b) (4) and age-verified 21+ tobacco consumers invited by paid affiliates to interactions

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