

A PMTA must contain a description of the applicant's plans for labeling, advertising, marketing, promotion, and other consumer-directed activities regarding the new tobacco product developed by the time of filing. Such marketing plans must contain descriptions of actions that would be taken by the applicant, on behalf of the applicant, or at the applicant's direction for at least the first year the product would be marketed after receiving an order. If an applicant does not intend to use any advertising, marketing, promotion, or other communication activities directed at consumers, or has not developed marketing plans by the time of submission, the PMTA must contain a statement to that effect. As part of the description of the marketing plan, the PMTA must specify items such as the intended target audience(s), media and distribution channels, particular tactics, total dollar amount(s) of media buys and marketing and promotional activities (where applicable), and timing for the activities, including, but not limited to, information describing:

Labeling:

All ZYN product labeling carries the following warning at 30% of the two primary panels: WARNING: This product contains nicotine. Nicotine is an addictive chemical.

Advertising, marketing, promotion and other consumer directed activities:

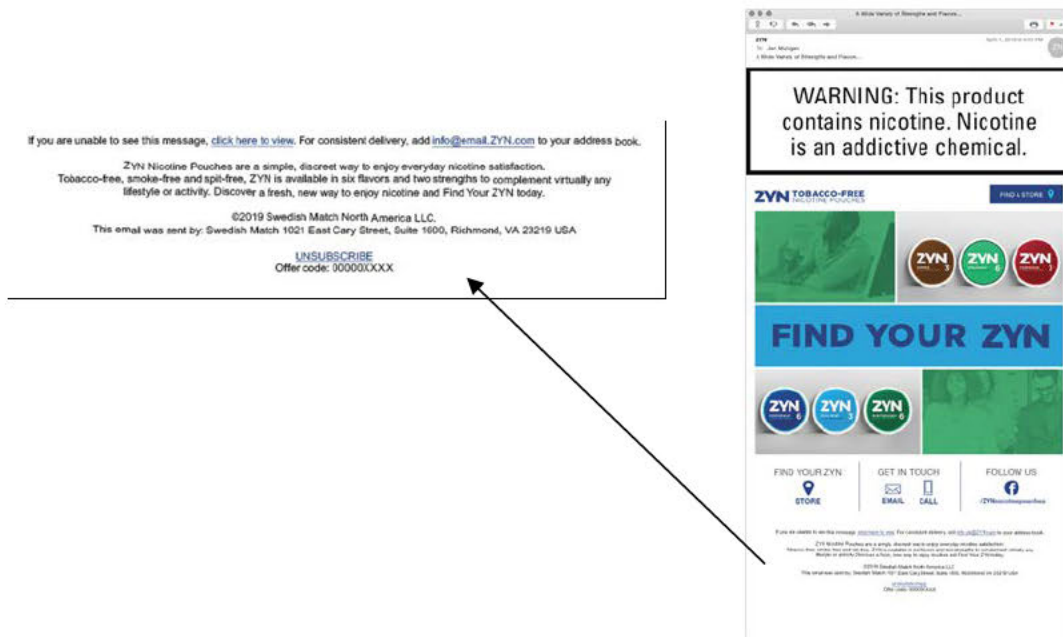
In Store Communication: At retail locations where ZYN is sold, branded fixtures may be used to display product in a non-self-serve location. Additional signage may also be used to communicate the product is available for sale at that location and to display pricing. (b) (4)



Website: The ZYN.com website is an age-gated site where consumers can get information about the product and locate retailers that sell the product.



Customer Relationship Marketing (CRM): ZYN communicates with age verified consumers that have signed up to receive brand communications through email. ZYN sends an average of 2 emails a month to this audience. Each email sent has an unsubscribe feature should the consumer choose to opt out. (b) (4) ZYN does not employ any direct mail via postal service or other delivery methods to consumers' homes and has no plans to do so in the immediate future.



(i) The use of competent and reliable data sources, tools, technologies, and methodologies to establish, maintain, and monitor highly targeted marketing plans and media buys

ZYN employs technology to ensure its messaging reaches only the intended audience of adult 21+ tobacco or nicotine users.

Website: For a consumer to gain access to the ZYN.com website, their identity and age must be verified by a 3rd party vendor. Upon visiting the website, the consumer is directed to a registration page to gather information from the visitor. This information is securely used by the 3rd party vendor (b) (4) to match the provided information with a known identity by using known addresses, names and birthdate. If the identity is not verified or is below the age of 21, access to the website is denied.

Digital Marketing: ZYN uses a trusted global media agency to serve advertisements to only adult 21+ tobacco or nicotine users. The media agency has integrated all ZYN advertising efforts with a partner (b) (4) to provide independent 3rd party traffic auditing and blocking services. (b) (4)

(b) (4). This secondary layer of filtering is specifically blocking ads from being served, even to targeted 21+ tobacco or nicotine audiences, while the user is on any website that would not be considered brand-safe.

Social Media: ZYN uses Facebook's age verification tool to only grant access to the ZYN Facebook page to consumers who are registered as adult 21+.

Customer Relationship Marketing (CRM): For a consumer to receive CRM communication from ZYN, they must have registered on the ZYN.com website and have their age identified as being an adult 21+ by the methods mentioned under website. In addition, the consumer must opt in to receive marketing communication from the brand.

Consumer Engagement: For a consumer to gain access to a ZYN activation, (b) (4)

(ii) The target adult audiences by age-range(s) (including young adult audiences ages 18 to 24), and other demographic or psychographic characteristics

The target adult audience of ZYN is a consumer who currently uses a tobacco or nicotine product who is over the age of 21.

Consumer research indicates the nicotine pouch consumer is similar but not identical to the moist snuff consumer. Both have very similar profiles in terms of marital status, household income and family make up. However, differences of the two consumer groups include nicotine pouches having a higher incidence of females, a higher income level and a slightly lower median age than moist snuff consumers. Also of note,

there was a correlation between consumer and quitting behavior. – this despite the fact that the product is not marketed as such. The more times a tobacco consumer has tried to quit in the past, the more interest they had in the product. Finally, it was also determined that nicotine pouches have minimal appeal to consumers that currently do not use tobacco or nicotine products.

In addition to formal consumer research, the company has received an overwhelming number of unsolicited product reviews and testimonials. These testimonials largely praise the product for helping the consumer become tobacco free and, in some cases, allowing them to quit nicotine altogether (again, ZYN is not marketed as a help quitting product). With the consumer's consent, these stories are occasionally shared through age verified marketing platforms with other consumers.

(iii) The insights into the target audience the applicant is using to inform its marketing plans, including its strategic approach, key messages and themes, creative direction, and potential marketing tactics or channels

The main insight that drives marketing communication is that adult tobacco consumers who enjoy the nicotine experience desire to make a switch to become tobacco free. This results in key messaging that ZYN is tobacco free. Examples of messaging at retail where ZYN is sold:



(iv) Any means by which youth-access or youth-exposure to the products' labeling, advertising, marketing, and promotion would be limited

ZYN limits exposure to youth by only conducting marketing efforts in age-verified mediums and by adhering to any and all regulations for warnings at the local, state and federal levels. In fact, ZYN included warnings on all labeling, point-of-sales materials and all marketing materials before it was mandated by the FDA. In addition, ZYN meets a self-imposed marketing code of conduct for all of the company's products and takes following steps to limit exposure to youth:

(b) (4)

(v) The use of owned, earned, shared, or paid media to advertise or promote the products

If granted a PMTA, Swedish Match would plan to proactively communicate the designation and would respond accordingly to media outlets that would want to engage in articles, interviews, etc. that would be published in a public forum.

In the event of any false or incorrect statements or stories being produced by the media, Swedish Match would make reasonable efforts with the responsible source to correct any errors. (b) (4)

(vi) The use of partners, sponsors, influencers, bloggers, or brand ambassadors to advertise or promote the products

(b) (4)

(vii) The use of consumer engagements, including events at which the products will be demonstrated or sampled

(b) (4)

(b) (4)

(viii) The use of earned media, public-relations, or other communications outreach to promote the products

See answer to section (v) above.