

## Independent Assurance Statement

### To: the Stakeholders of British American Tobacco Representation Brussels

#### Introduction

Bureau Veritas UK has been engaged to provide external assurance to British American Tobacco Representation Brussels over reported progress against the commitments made to stakeholders stated in the EU Social Report published in 2007, and appearing on the British American Tobacco EU Social Reporting website. The preparation of the reported information, setting out the progress made in respect of the 49 commitments is the sole responsibility of British American Tobacco Representation Brussels.

#### Scope of work and methodology

- ▶ The scope for the assurance was determined following discussions with British American Tobacco Representation Brussels and included:
  1. review of activities undertaken by British American Tobacco over the period since the end of the previous reporting cycle (01 January 2007 – 01 December 2009), as reported on the Commitments Fulfilment section of the British American Tobacco EU Social Reporting website (<http://www.batresponsibility.eu>);
  2. responses and certain performance related information included on the above stated website.
  
- ▶ As part of the review, Bureau Veritas undertook the following activities:
  - interviews with key personnel at British American Tobacco Representation Brussels offices and of British American Tobacco Western Europe Region in London;
  - comprehensive review of information and data with regard to performance and progress, including investigation of source data, where available, relating to the fulfilment of commitments.

To provide continuity with the original assurance over the 2007 British American Tobacco EU Social Report, which evaluated the commitments for balance and alignment with stakeholder expectations, our assurance has been informed by the AA1000 Assurance Standard principles of completeness, materiality and responsiveness. The assurance has taken into account the appropriateness of the actions reported by British American Tobacco Representation Brussels since the 2007 reporting in order to fulfil the stated commitments.

The overall aim of this exercise was to provide a reasonable level of assurance over information directly related to progress against the commitments, as reported on the stated website.

#### Findings

Based on the above, it is our opinion that:

- the information included in the Commitments Fulfilment section of the stated website is accurate, reliable and objective, and is presented in a clear and understandable manner;
- the information is being reported in a timely manner in relation to the rate of progress made against the commitments;
- each of the achievable commitments has been addressed with appropriate actions and allocation of resources and/or funding;
- commitments that have not been achievable due to changing stakeholder perspectives or insufficient progress made by parties outside of the company's influence are being addressed through appropriate alternative measures;

- whilst new stakeholder issues and concerns may have been identified since the original consultation in 2006/2007, British American Tobacco Representation Brussels has responded only to those commitments set out in the 2007 Report and appearing on the British American Tobacco EU Social Reporting website;
- the information from the British American Tobacco Group companies across the European Union has been collated and reported in good faith, has been subject to adequate internal controls and is considered to be free from significant error or misstatement;
- during the course of our assurance nothing came to our attention to indicate that there was any material error, omission or misstatement in the information that was subject to review.

### **Areas of good practice**

Areas where British American Tobacco Representation Brussels has demonstrated good practice include:

- commitment to addressing the key areas of stakeholder concern (anti-illicit trade, public place smoking and harm reduction) through continued efforts to engage and share information with external stakeholders;
- this includes, as part of a long-term engagement programme, consultation with individuals and industry networks, as well as a planned stakeholder dialogue session in 2010 to provide continuity with the 2006-7 social reporting cycle.

### **Considerations and limitations**

Excluded from the scope of our work is information relating to:

- activities outside the defined assurance period;
- company position statements including any expression of opinion, belief, aspiration, expectation, aim or future intention provided by British American Tobacco Representation Brussels;
- information within or hyperlinked from any British American Tobacco website beyond the Commitments Fulfilment section accessible at <http://www.batresponsibility.eu/comfulfilment.html>.

This independent Assurance Statement should not be relied upon to detect all errors, omissions or misstatements, nor can it guarantee the quality of accounting and reporting processes. We believe the scope of assurance provides a reasonable basis for our conclusions.

### **Statement of independence, impartiality and competence**

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 180 years history in providing independent assurance services, and an annual turnover in 2008 of €2.55 billion.

Our assurance team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes in accordance with best practice. The assurance team does not have any involvement with British American Tobacco Representation Brussels or with the British American Tobacco plc other than third party assurance and we believe there to be no conflict between the scope of work herein and any other services provided by Bureau Veritas to the British American Tobacco group.

Bureau Veritas has implemented a Code of Ethics across its business which ensures that all our staff maintains high ethical standards in their day to day business activities.

**Bureau Veritas UK Limited**

**London, December 2009**