



# HUMAN RIGHTS AND SUPPLY CHAIN TRANSPARENCY REPORT

For the financial year  
ending March 31, 2025

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, 2024 and March 31, 2025 (fiscal year 2025) to prevent slavery and human trafficking from occurring within the business and supply chain.



# Introduction

Our Company is committed to respecting fundamental human rights. We strive to operate in a manner that upholds the human rights of employees, our partners and the people in the communities where we operate. Slavery, human trafficking and the use of child labor violate a person’s most basic rights. We do not tolerate such abuses, or any other human rights abuses, in our direct operations, indirect operations or our supply chain.

Our understanding of modern slavery is based on the definitions in the UK Modern Slavery Act 2015 and is guided by the United Nations Universal Declaration of Human Rights and the conventions of the International Labor Organization (ILO), particularly related to forced or compulsory labor. We are aware that slavery and human trafficking exist in today’s society, and we recognize the modern slavery risks that all businesses are exposed to, either within their own operations or through the supply chain. Additionally, our understanding of child labor is based on the definitions set by the Agricultural Labor Practices (ALP) program and International Labour Organization (ILO) Conventions 138 (Minimum Age for Admission to Employment) and 182 (Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour).

The ILO estimates there are 112 million child laborers working in agriculture globally. We understand that this practice extends to tobacco production in certain countries where we operate. We do not accept that child labor is a necessary practice and have undertaken strategic initiatives in support of our commitment to eliminate child labor in our supply chain.

The actions outlined in this statement reflect our Company’s global approach to addressing the risks and priorities throughout our operations and supply chain. This statement was approved by the Board of Directors of Pyxus International, Inc. on August 13, 2025.



Pieter Sikkel  
President and CEO

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# BUSINESS & SUPPLY CHAIN

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.

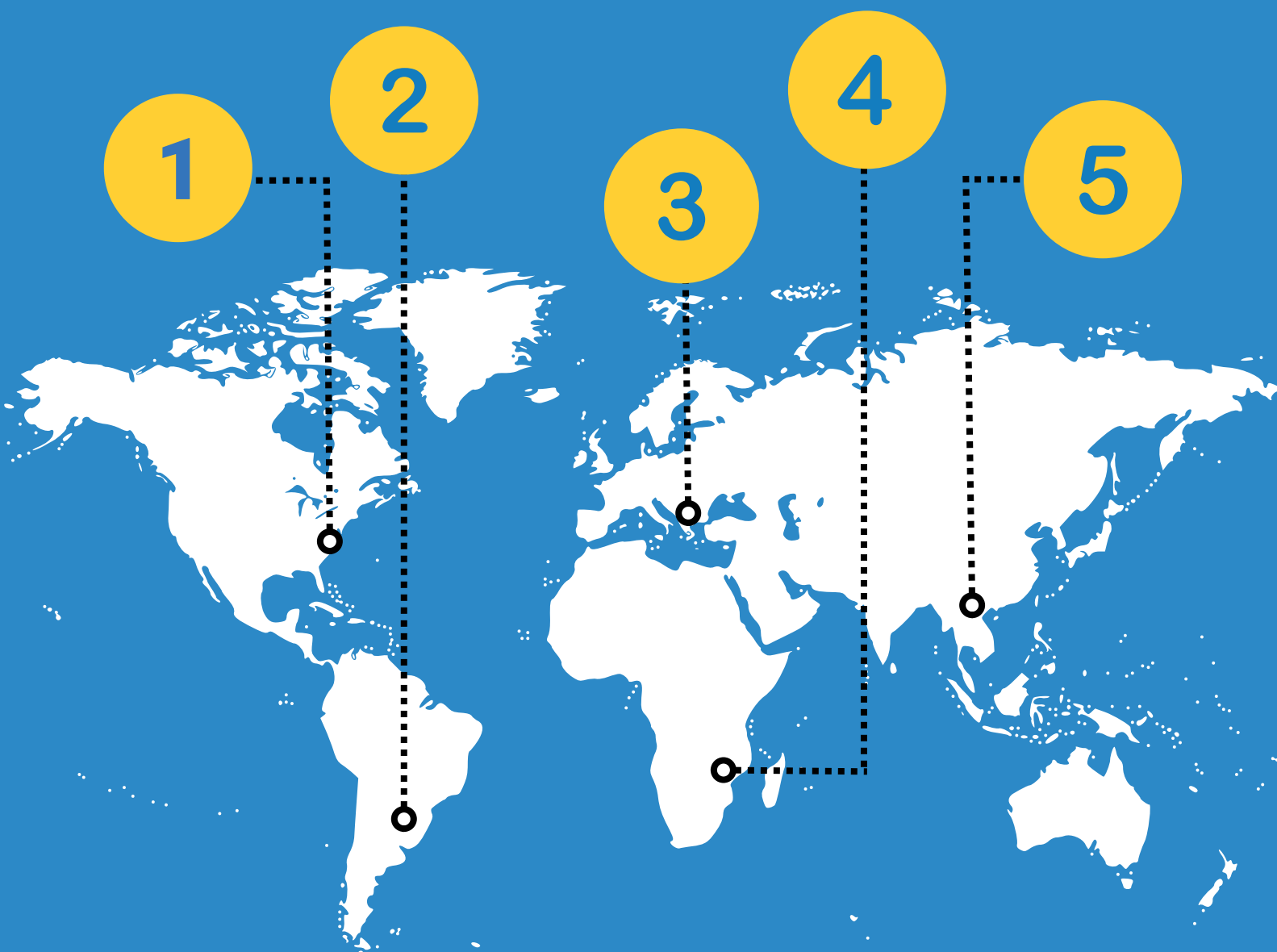
We provide...

- Responsibly sourced
- Independently verified
- Sustainable
- And traceable

...products & ingredients

Learn more at [pyxus.com](https://pyxus.com)

As of March 31, 2025, Pyxus employed approximately 3,100 full-time employees in 26 countries, spanning across five continents.



Through our operating subsidiaries, we process products in Company-owned and third-party facilities around the world, including in Brazil, China, India, Indonesia, Jordan, Malawi, North Macedonia, Tanzania, Thailand, Turkey, United States and Zimbabwe. We work with growers to produce sustainable leaf tobacco, groundnuts, maize and more. While these growers' farms vary in size and complexity, the majority are smallholder family farms of one hectare or less.



# 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 Policies



## 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 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.

## Agricultural Labor Practices Program

Pyxus' Agricultural Labor Practices program sets clear human rights standards that all participants in our agricultural supply chain are expected to follow. These standards are based on labor standards of 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 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 training
- Identification of adverse impacts
- Cease/prevent impacts
- Track implementation and results
- Communicate how impacts are addressed
- Remediation



## Third-Party Services Provider Compliance Policies

We maintain compliance policies for third-party service providers that prohibit the use of any illegal, unethical or improper methods of conducting business, which would reasonably include human rights abuses. These policies also prohibit any payments from the Company 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. Additionally, our procedures 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 in our operations and supply chain, 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.

While we do not require a certification from our suppliers regarding compliance with human trafficking laws, 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 the specifics of this 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 agronomists and field technicians are trained to teach contracted growers about the ALP program. In addition to providing education through group trainings, 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 are required to document how contracted growers source their labor, including whether or not a labor broker is involved and whether any persons under the age of 18 are employed.

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

1. Visual Observation
2. Grower Interview(s)
3. Worker Interview(s)
4. 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 policy 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 industry 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 labor. Utilizing the data collected within SENTRI®, our agronomists and field technicians can 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 or other industry organizations to address larger, systemic issues in the agricultural sector.





A photograph of three men in blue uniforms working in a field. The man on the left is wearing a camouflage cap and white gloves, leaning over a plant. The man on the right is wearing a grey cap and is also leaning over a plant. A third man is partially visible in the background. The background is a blurred field of green plants.

# MODERN SLAVERY PREVENTION TRAINING

In fiscal year 2025, 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.

## Staff Training

All staff responsible for training and monitoring our contracted growers for ALP compliance, including the forced labor principle and measurable standards, participate in annual trainings to provide clarity and current information about human rights. These trainings 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, when necessary.

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## Grower ALP Trainings

In fiscal year 2025, 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 on-farm individual and group trainings and workshops.

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# 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. They team develops action plans to create or revise grower and farmworker trainings, as applicable, 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 an important aspect of our ALP program. For example, our tobacco leaf subsidiary, Alliance One International, LLC (AOI), participates in the Sustainable Tobacco Production (STP) program, which assesses and monitors AOI's performance in meeting industry-wide standards for tobacco.

This program evaluates whether the proper systems, governance and processes are in place to meet environmental, crop and human rights standards. STP is aligned to international standards, including those of the ILO and the UN Sustainable Development Goals, and features a stronger focus on impact, risk and continuous improvement.

In recent years, STP updated its scope to focus on eight sustainability themes in the agricultural supply chain, which includes human and labor rights as well as livelihoods. During fiscal year 2025, our operations in Argentina, Tanzania, Turkey and Zambia took part in STP assessments.

Since 2014, external human rights assessments have been conducted regularly by various organizations in our origins 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 for risks in our non-agricultural supply chain and are unable to verify whether subcontractors used by our e-liquids businesses use labor brokers.

## Stakeholder Engagement

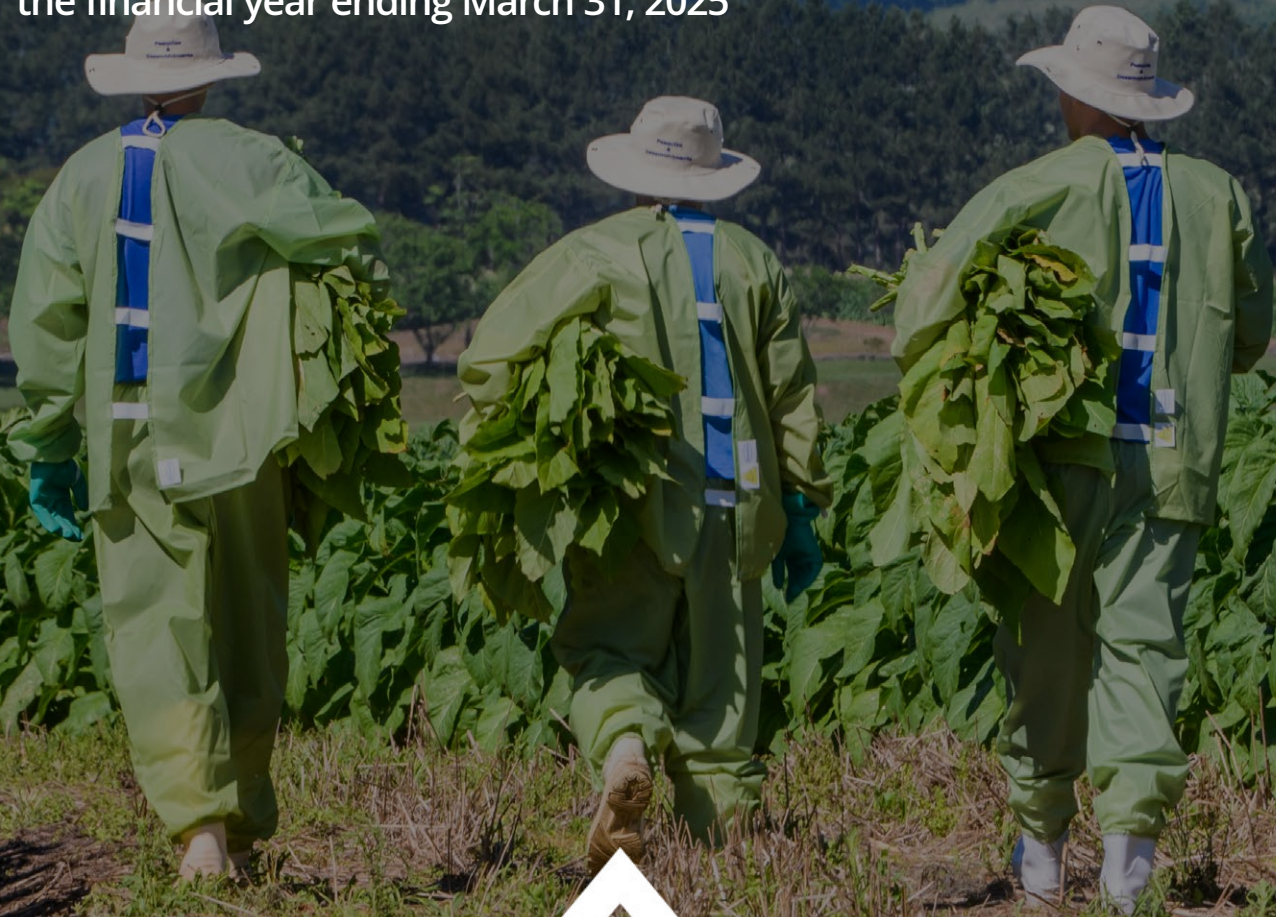
We understand the importance of capturing the voice of rights holders, and are committed to engaging with our stakeholders, particularly those who have been affected or may have been affected by human rights violations. We regularly interact with a wide range of external stakeholders to discuss our approach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

We also partner with numerous stakeholder groups to drive a more substantial and effective impact. This is especially true in the areas related to human rights. For example, we partner with the Eliminating Child Labour in Tobacco Growing Foundation (ECLT), and since fiscal year 2024, one of our employees has served as the president of the foundation's board of directors.



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