



Universal

# Universal Global Compliance Program

We all have an obligation to report possible violations so the conduct can be considered and Universal can address the situation and take appropriate action.

No one in the Universal family will take any adverse action against anyone for providing truthful information relating to a violation of law or Universal policy. Universal will not tolerate any retaliation against persons asking questions or making good faith reports of possible violations. Anyone who retaliates or attempts to retaliate will be disciplined.

## [ ANONYMOUS HOTLINE ]

### Report a Concern or Ask a Question

By Phone from Nicaragua (toll-free):

#### PHONE:

Dial 1-800-0174 or 1-800-0164 (Spanish Operator). At the prompt, dial 866-292-5224. There is no need to dial a "1" before this number.

#### ONLINE:

[www.ethicspoint.com](http://www.ethicspoint.com)  
[www.universalcorp.com/compliance](http://www.universalcorp.com/compliance)

#### E-MAIL:

[compliance@universalleaf.com](mailto:compliance@universalleaf.com)

### You can also Contact

Your supervisor or manager, a member of the Local, Regional, or Corporate Compliance Committee, the Legal Department, Human Resources, or the Internal Audit Department.

The Compliance Hot Line is available **24 hours a day 7 days a week** and in your **local language**. Phone calls and on-line reports are received by an independent organization: **EthicsPoint**. The goal is to ensure that you can communicate issues and concerns associated with unethical or illegal activities safely and honestly while maintaining your anonymity and confidentiality.

Every report is listened to, followed up on and reported to the Corporate Compliance Committee. We take our Hot Line very seriously and hope you do to. If you see something please report it so that we can work together to stop it.