



**Universal**

**UNIVERSAL LEAF TOBACCO COMPANY, INC.**

**It is the policy of Universal that Universal and its affiliates, and their respective officers, directors, employees and agent will not knowingly supply tobacco to any entity or individual engaged in the manufacture, distribution or sale of counterfeit tobacco products. Anyone who violates this policy, or knowingly authorizes, allows or condones anyone's violation of this policy, shall be subject to severe disciplinary action.**

There has been increased public and industry attention to the illegal manufacture, distribution, and sale of counterfeit consumer tobacco products, particularly cigarettes. "Counterfeit tobacco products" are tobacco products that are sold bearing another person's or company's trademark or design in order to deceive customers about the quality or origin of the product.

Various civil and criminal laws make it illegal to knowingly aid or participate in the manufacture or supply of counterfeit products. While, as a leaf dealer, Universal does not sell consumer tobacco products, we are hurt by the counterfeiting of those products because our business is focused on service to companies whose established tobacco product brands are the primary target of the counterfeit trade.

In support of our anti-counterfeiting policy, Universal has instituted a process designed to verify that our customers are not engaged in the counterfeit trade and that our agents are not knowingly supporting counterfeit trade. Universal will also conduct periodic compliance reviews, which will include auditing the customer/agent verification process, and will monitor any specific developments in the area of counterfeiting that are brought to our attention through the media, governmental contacts, and through our employees and customers. All of our customers and agents now and in the future will be informed of the terms of our policy and will be encouraged to bring new developments in the area of counterfeiting to our attention.

Universal is dedicated to having an effective anti-counterfeiting policy. Everyone in the Universal family must consider how this policy may apply to any specific transaction, activity, or conduct in which they are engaged. Any questions or concerns related to this policy should be directed to Universal's Legal Department, and the Legal Department should be notified of any violations of this policy.