



## Non-Retaliation Policy

Pyxus International, Inc. requires all directors, officers employees, and agents (collectively, “Personnel”) to report suspected violations of the law or Code of Business Conduct (“CBC”) to Management, the Chief Compliance Officer, or the Compliance Helpline reporting system.

It is a violation of the CBC for any Personnel to retaliate against or take other adverse actions against those who report a violation of the CBC in good faith. “Good faith” does not mean that you need to be right – but it does mean that you should be telling the truth as you understand it

It is also against Company policy for any personnel to retaliate against or take other adverse actions against those who cooperate with any internal or government investigation as described in the CBC.

Retaliation can take many forms, including denial of promotion, refusal to hire, denial of job benefits, demotion, suspension, threats, reprimands, negative evaluations, harassment, or other adverse treatment. Those who retaliate against others in violation of the Pyxus Non-Retaliation Policy will be subject to disciplinary action up to and including dismissal. Please promptly report violations of this Policy.

Corporate Compliance Department

+ 919 379 4118

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