



Conflict Minerals Policy Statement 2016

RJR Technologies, Inc. ("RJR") is committed to responsible sourcing and to compliance with the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, 2010 (the "Dodd-Frank Act" or simply "the Act").

The U.S. Congress enacted Section 1502 of the Act, in part, due to concerns that the exploitation and trade of conflict minerals by armed groups was helping to finance armed conflict in the DRC and adjoining countries, which was contributing to a humanitarian crisis in the region. Conflict minerals are defined as Tin, Tungsten, Tantalum and Gold.

RJR is not subject to the reporting and due diligence requirements of the Act and the Rules as RJR is not an SEC issuer. That being said, RJR does utilize minerals covered by the Act and does believe in the responsible sourcing of such minerals.

To take measures to ensure responsible sourcing, RJR uses the Conflict Free Sourcing Initiative ("CFSI") to validate mineral sources and has adopted the standardized Conflict Free Reporting Template developed by the CFSI, which facilitates the transfer of information throughout our supply chain regarding mineral country of origin and the smelters and refiners being utilized.

Because RJR does not source directly from mines or smelters, we request all relevant suppliers to submit conflict minerals data, including smelter information, using the standardized Conflict Free Reporting Template and continually engages with our supply chain in an attempt to ensure conflict minerals data is accurate and complete. We also request that relevant suppliers ensure all smelters in their supply chain engage with the CFSI or other relevant bodies.

Through these efforts, RJR attempts to ensure the smelters in its supply chain become CFSI Certified Conflict Free.

Sincerely,

A handwritten signature in blue ink that reads 'Raymond Bregante'. The signature is fluid and cursive, with a long horizontal stroke at the end. There are several small blue dots scattered around the signature, particularly to the left and below it.

Raymond Bregante
Executive Chairman