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ACCELERATING TOMORROW'S LEADERS

The quality of our people is key in delivering our purpose of A Better Tomorrow[™]. Launched in 2020. Our ethos is about being bold, fast, empowered, responsible and diverse in order to create a future-fit culture at BAT.

Developed with significant input from our employees, our ethos is the thread that must run through everything we do and; we believe it empowers our people, fosters a vibrant and rewarding workplace and promotes sustainable long-term value.



INVESTING IN LEADERS

The changing external environment means we have to accelerate the pace of our business transformation. We have to focus on driving a high performance work culture by developing the next generation of leaders; valuing the diversity of our employees; encouraging and rewarding entrepreneurial behaviour; and create an engaging culture where individuals and teams can be successful.

We want our people to be ambitious, courageous and resilient. We want them to learn quickly and be responsive to opportunities; and continue to drive and own results.

A NEW CHAPTER IN TALENT

In 2020, we strengthened our high-performance culture by introducing a new talent architecture. A key element of this, LEAP, fosters a culture of active coaching and development.



LEADERSHIP TRAINING

We continued to invest in leadership training for employees across all levels. With revamped content in 2020, our employees spent an average of 40 hours in workshops to upskill their leadership capabilities, and communication through sessions such as *Leading Self, Leading Teams, and Women in Leadership.*

DIGITAL LEARNING

Our Learning & Development (L&D) strategy, emphasizes onthe-job training, followed by direct coaching and classroom sessions.



We successfully transformed our L&D approach, culminating with the launch of two new digital learning platforms comprising:

GRID

"The Grid" is an intuitive, one-stop online platform that houses a myriad of learning content, catering to different development needs. The interactive user experience provides our employees with the option to learn on-demand, with full access to robust content including podcasts, videos and thought leadership articles. Today, the platform has achieved 100 percent sign up rate, and more than 70 percent are active users, and,

edapp.com

BETTER MICROLEARNING

"Ed App" is exclusively for our field force. This innovative offering enables our field force to access learning content on the go, making learning easy and convenient. The app houses learning modules which are carefully created to build commercial functional capabilities.



INVESTING IN LEADERS

GLOBAL GRADUATE PROGRAMME

The Global Graduate Programme seeks out exceptional graduates and puts them through a robust talent and technical development plan for 12 months. At the end of the programme, graduates are hosted for two-weeks in London at the BAT Graduate Academy Camp (the Academy) providing them a valuable opportunity to engage with senior leaders of the organisation and networking opportunities amongst fellow Global Graduates.

This year, the Academy was hosted virtually with graduates accessing a dedicated microsite featuring networking opportunities with peers from other markets, engaging workshops conducted by experienced trainers, and challenging business simulations.

GROWTH ACADEMY PROGRAMME

Introduced in 2018, the Growth Academy Programme has been a staple in accelerating the development of our young field force talent. Over a 12-month period, this programme provides young talent a structured and holistic exposure to all commercial functions. The Growth Academy Programme has been a catalyst in promoting homegrown talent. In 2020, six employees graduated successfully from the programme into managerial roles within the Marketing function.





GROWTH THROUGH DIVERSITY

Diversity is a key element of our ethos at BAT Malaysia. We are committed to fostering a culture of diversity and inclusion where innovation, creativity and different ways of thinking are encouraged. The Company believes in promoting and developing a diverse workforce, as it brings with it a variety of complementary skills, experiences and perspectives, which will enhance our capacity to create value.

At BAT Malaysia we inspire diverse teams of committed and engaged people by:

- 1. Investing in our people
- 2. Attracting the best
- 3. Developing high-performing leaders
- 4. Offering a fulfilling, rewarding and responsible work environment



Won the Life at Work Awards from Talent Corp for Outstanding Practice in Women Workforce Initiative



32% of employees across all management roles are females

33% of employees in senior management are females

50% of the Company's leadership team are female

of employees in the marketing >50% and supply chain departments are female



Launch of "We Care" programme to cater to the diverse needs of individual health and well-being









ATTRACT THE BEST

We take pride in setting a high standard in the people we recruit and value courage, resilience, and passion, which are important attributes when we look for talents.

TALENT SOURCING & RECRUITMENT

In order to attract top talent, we have a comprehensive recruiting process leveraging several talent acquisition channels. By partnering with the recruitment team in our Global Business Services, our recruitment and assessment approach is robust and detailed. This framework has and continues to ensure that we are able to attract and recruit the best talent.

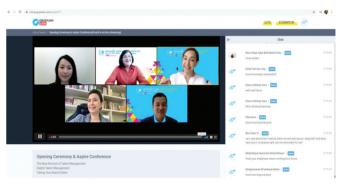
VIRTUAL CAREER FAIR

To successfully deliver on our talent brand agenda and attract exceptional young Malaysian talent, BAT Malaysia participated in virtual career fairs like Aspire Virtual Graduan Career Fair. By owning virtual booths, leading talks with industry leaders and offering opportunities for prospective talents to have one-onone with our HR team, we managed to secure candidates for the Global Graduate Programme, ensuring a strong pipeline for future leadership positions.

DIGITAL TALENT BRANDING

Research and insights have guided how and where we drive our recruitment strategy. In 2020, market research was initiated with 1,200 Malaysian students across Malaysia and the UK to better understand their jobs searching behaviour. From the results, key data-driven decisions on messaging, platforms, and content delivery have helped to shape our approach.

With digital channels as the primary driver, we received a higher number of applications this year compared to last year, as well as stronger online engagement from potential candidates.





WORKFORCE ENGAGEMENT

Becoming a winning organisation would not be possible if not for the people who are our biggest assets. We have invested heavily into digitalising our engagement initiatives, ensuring that we can continue to recognise and celebrate our people, to drive an engaged and energized organisation.

DIGITALISING HOW WE ENGAGE

With work from home in effect for most of 2020, we launched The Culture Collective (TCC), an integrated multi-channel communications platform that allows our employees to keep updated with the business, stay engaged and communicate with each other amidst the pandemic. Through the TCC, we organised virtual townhalls, and leveraged social media to create private groups where employees across BAT Malaysia could stay in touch and connected with each other.



HEALTH AND WELLBEING

Health and mental wellbeing became increasingly important as our people go through constant change. Keeping in line with our strategy to digitalise our organisation, we introduced a digital application for all employees as part of our new wellness programme, "We Care". The application provides our employees access to a wide range of health-related services, including psychologists, dieticians, and fitness coaches. Employees are able to consult and seek advice from the various health professionals and use the resources to embark on their journey to living a healthier lifestyle.









RECOGNISING AND REWARDING

ETHOS AWARDS & A BETTER TOMORROW[™] AWARDS

In 2020, we rebranded our recognition framework into the Ethos Awards. This award aims to reward our employees who have gone the extra mile to deliver exceptional results and displayed leadership behaviors in line with our ethos - bold, fast, responsible, diverse, and empowered. More than 390 Ethos Awards were awarded to employees through 2020 celebrating and recognizing great examples of leadership, teamwork and individual displays of Ethos behaviours.

In 2020, we also revealed the inaugural "A Better Tomorrow[™] awards, which aims to recognise outstanding performance results throughout the year. In total, 17 teams were nominated for successfully delivering initiatives resulting high business impact and contribution to the business, or outstanding display of leadership and perseverance.

LONG SERVICE AWARDS

Our long service awards recognises and celebrates our loyal employees, where their perseverance and contribution has served as a great example for the organisation.

In 2020, we celebrated our Long Service Awards with 25 recipients through a virtual event that was shared companywide, showcasing some of their most memorable moments with BAT.

Specially curated care packages were sent to recipients' homes as a token of appreciation for their years of service. 12 employees celebrated their 10 years service with the Company, 3 employees were recognised for over 20 years service, and 5 employees were recognised for 30 years of long service. We also celebrated five retirees who retired after many years with the company, two whom had been with us for 40 years.

CONCLUSION

As our business evolves, so too does our employee value proposition. Today we are attracting a different and wider range of people and skillsets than we did before, injecting exciting new capabilities into the business.

We believe that by focusing on fostering a culture of Diversity and Inclusivity and by a continued commitment to develop local talent into leaders fit for the future BAT Malaysia will be a highly energised organisation ready to deliver our purpose of A Better TomorrowTM.











TAN SRI DATO' SERI (DR.) ASEH BIN HAJI CHE MAT

PSM, SPSK, SSAP, SPTJ, SPDK, DPCM, DSAP, DIMP, KMN, AMN



Age	Gender	Nationality
69	Male	Malaysian

Independent Non-Executive Director (Chairman)

Date Appointed to the Board:

1 January 2017

Qualifications:

- Degree in Economics from University of Malaya, Malaysia
- Masters in Public Administration from University of Southern California, United States
- Certificate in International Financial Administration, United States
- PhD (Honorary) in International Relations from Limkokwing University of Creative Technology, Cyberjaya, Malaysia
- PhD (Honorary) in Management from Infrastructure University Kuala Lumpur, Malaysia

Membership of Board Committee:

• Nomination and Remuneration Committee (Chairman)

Number of Board Meetings Attended in the Financial Year:

• 4/4

Present Directorship(s):

- **Listed Entity**
- Nil

Other Public Company:

• Nil

- Tan Sri Dato' Seri (Dr.) Aseh is active in community service. He is the Trustee and Chairman of Football Association of Malaysia Vetting, Monitoring and Integrity Committee, Chairman of Yayasan Pesara Kerajaan and President of Tiara Golf & Country Club, Melaka. He is also the Chairman of Infrastructure University Kuala Lumpur. He was also active in the Administrative and Diplomatic Service and was its longest serving President. Besides that, he was the Chairman of the University Council of Limkokwing University of Creative Technology (2008-2017), Social Security Organisation (2017-2018), Stemlife Berhad (2008-2013) and MWE Holdings Berhad (2008-2018). He was also a board member of Lion Diversified Holdings Berhad (2007-2019).
- Tan Sri Dato' Seri (Dr.) Aseh joined the Ministry of Finance, Malaysia in March 1974 and held various positions as Assistant Secretary, Secretary and Principal Assistant Secretary of the Education Services Commission in Kuala Lumpur, Sarawak and Sabah during his eight years with the Commission.
- Since 1984, he served in the Ministry of Home Affairs, Malaysia in various positions including Principal Assistant Secretary of the Security and Police Affairs Division; Undersecretary of the Security and Preventive Division, and Management Division; and Deputy Director General and Director General of the Department of Immigration, Malaysia.
- In February 2001, Tan Sri Dato' Seri (Dr.) Aseh was appointed Secretary General of the Ministry of Home Affairs, Malaysia, a post he held until his retirement on 22 October 2007.
- Post retirement from the civil service, he held the position of Chairman of Pos Malaysia from July 2008 to 2011 and President of Putrajaya Corporation from August 2012 to July 2015. In September 2015, Tan Sri Dato' Seri (Dr.) Aseh was appointed Non-Executive Chairman of Fujitsu (Malaysia) Sdn. Bhd.

JONATHAN REED



Age	Gender	Nationality
50	Male	British

Non-Independent Executive Director/Managing Director

Date Appointed to the Board:

20 February 2020

Qualification:

• Bachelor of Science in Biochemistry from North East Surrey University, United Kingdom

Membership of Board Committee:

• Nil

Number of Board Meetings Attended in the Financial Year: • 4/4

Present Directorship(s):

- **Listed Entity**
- Nil

Other Public Company:

• British American Tobacco Malaysia Foundation

- Prior to his appointment, Jonathan was the Marketing Director of British American Tobacco Middle East South Asia since 2017. He was responsible for the sales and marketing efforts across seventeen (17) countries, where he focused on building a strong portfolio, route to market and activation capabilities across the Area on both the combustible portfolio of brands and the launch of the Groups New Category products, as well as simplifying ways of working to deliver performance, efficiency and effectiveness.
- He has more than twenty (20) years of international experience in British American Tobacco p.l.c. Group, spanning across multiple markets in Europe, Middle East, Asia and Australasia. Prior to his time in Dubai, he served in the Australasia market in 2016 and was responsible for driving the business turnaround in the South Pacific markets.
- He was the Head of Brands in Bentoel Indonesia (2010-2016) and Marketing Director North Europe in British American Tobacco Denmark (2008-2012).
- Jonathan started his career in British American Tobacco UK in 1997 and held many marketing positions across all disciplines.





Age	Gender	Nationality
74	Female	Malaysian

Senior Independent Non-Executive Director

Date Appointed to the Board:

1 March 2012

Qualification:

• Bachelor of Economics from University of Malaya, Malaysia

Membership of Board Committees:

- Nomination and Remuneration Committee
- Risk Management Committee
- Audit Committee

Number of Board Meetings Attended in the Financial Year: • 4/4

Present Directorship(s): **Listed Entities**

- Berjaya Food Berhad
- Boustead Holdings Berhad

Other Public Company:

• Pernec Corporation Berhad

Working Experience:

- Datuk Zainun began her career with Malaysian Investment Development Authority ("MIDA"), an agency under the Ministry of International Trade and Industry in relation to the promotion and coordination of industrial development in the country where she worked for thirty-five (35) years.
- Throughout her service, Datuk Zainun held various key positions in MIDA and in some of the country's strategic councils, notably her pivotal role as the National Project Director in the formulation of the first Malaysian Industrial Master Plan. She was the Deputy Director-General of MIDA for eleven (11) years and Director-General for nine (9) years before her retirement in September 2004.
- Whilst in MIDA, she also sat on various committees or authorities at national level, including being a member of the Industrial Coordination Act Advisory Council, Defence Industry Council and National Committee on Business Competitiveness Council, Malaysia Incorporated and the National Project for Majlis Penyelarasan Perindustrian before retiring in September 2004.

Note:

• Datuk Zainun resigned as Senior Independent Non-Executive Director of the Company on 28 February 2021, upon completion of her nine (9) years tenure as Independent Non-Executive Director.

DATO' CHAN CHOON NGAI

DSNS



Age	Gender	Nationality
65	Male	Malaysian

Senior Independent Non-Executive Director

Date Appointed to the Board:

1 February 2011

Qualification:

 Degree in Mechanical Engineering from University of Birmingham, United Kingdom

Membership of Board Committees:

- Nomination and Remuneration Committee
- Risk Management Committee
- Audit Committee

Number of Board Meetings Attended in the Financial Year: • 4/4

Present Directorship(s):

Listed Entity

• Nil

Other Public Company:

• Nil

- Dato' Chan was appointed to the Board of BAT Malaysia since 1 February 2011 after his retirement on 31 December 2010 as Operations Director of the Company. He was re-designated as Non-Independent Non-Executive Director of BAT Malaysia on 1 January 2013 following the expiry of his contract of service on 31 December 2012. Subsequently, he was re-designated as Independent Non-Executive Director of BAT Malaysia on 23 May 2016. He was re-designated as Senior Independent Non-Executive Director on 28 February 2021.
- He was appointed as the Operations Director of BAT Malaysia in July 2000 and his portfolio expanded to include Business Development Services effective 15 November 2010.
- Dato' Chan joined Rothmans of Pall Mall (Malaysia) Berhad ("Rothmans Malaysia") in 1979, as a Production Management Trainee and held various positions in the Production Division, including Production Executive Make and Pack (1980-1982), Personal Assistant to Rothmans International World Production Director, Rothmans International United Kingdom (1982- 1984), Acting Factory Manager Rothmans Malaysia (1984-1986), Factory Manager Rothmans Malaysia (1984-1986), Factory Manager Rothmans Malaysia (1994- 1995). Dato' Chan was then appointed as Production Director of the then Rothmans Malaysia in October 1995. He was the Director of Tien Wah Press Holdings Berhad from May 1997 to June 2003.

ERIC OOI LIP AUN



Age	Gender	Nationality
63	Male	Malaysian

Independent Non-Executive Director

Date Appointed to the Board:

1 March 2019

Qualifications:

- Member of the Malaysian Institute of Accountants
- Member of the Malaysian Institute of Certified Public Accountants

Membership of Board Committees:

- Risk Management Committee (Chairman)
- Audit Committee (Chairman)

Number of Board Meetings Attended in the Financial Year: • 4/4

Present Directorship(s): Listed Entity

• Genting Berhad

Other Public Company:

• Nil

- Eric was a partner of PricewaterhouseCoopers ("PwC"), Malaysia until his retirement in June 2015 after thirty eight (38) years of service. He joined the firm of Price Waterhouse (PW) (now known as PricewaterhouseCoopers) in 1977, qualified as a Certified Public Accountant in 1981 and was admitted to the partnership of PwC in Malaysia in 1991.
- In 2012, Eric assumed the responsibility to lead the middle market practices of the Asia Pacific cluster of PwC firms, focused on working with entrepreneurs and high net worth individuals and families.
- From 2002 to 2008, Eric was the Assurance leader for PwC's regional grouping in Asia, and he was a member of PwC's Global Assurance leadership team.
- In 1996, he assumed management and leadership positions for different parts of PW/PwC within Malaysia, across Asia and globally. He was PW Malaysia's leader for Audit and Business Advisory Services, and continued in the role following the merger between PW and Coopers & Lybrand to form PwC in 1998, a position he held through 2008.

DATUK CHRISTINE LEE OI KUAN



Age	Gender	Nationality
62	Female	Malaysian

Non-Independent Non-Executive Director

Date Appointed to the Board:

1 March 2012

Qualification:

• Degree in Law from University of Malaya, Malaysia

Membership of Board Committee:

• Nil

Number of Board Meetings Attended in the Financial Year:

• 4/4

Present Directorship(s):

Listed Entity

• Nil

Other Public Company:

• Nil

- Datuk Christine was the Legal and External Affairs Director of BAT Malaysia from September 2006 until her retirement in 31 December 2018. Datuk Christine was responsible for corporate and regulatory affairs and legal matters of BAT Malaysia. She was re-designated as Non-Independent Non-Executive Director of BAT Malaysia on 1 January 2019 after her retirement.
- Datuk Christine started out as the Head of Legal and Company Secretary at BAT Malaysia in 2001. She was appointed to the Top Team, now known as the Leadership Team of BAT Malaysia in 2006.
- Prior to joining BAT Malaysia, Datuk Christine was the Head of Legal and Company Secretary of two public listed companies, Hong Leong Industries Berhad and Malaysian Pacific Industries Berhad.
- She was with the Attorney General's Chambers of Malaysia from 1983, serving in the Prosecution and Advisory and International Law Divisions.

IGNACIO BALLESTER



Age	Gender	Nationality
47	Male	Italian

Non-Independent Executive Director/Finance Director

Date Appointed to the Board:

9 December 2019

Qualifications:

- Degree in Business Administration from School of Economics, University of Buenos Aires, Argentina
- Masters in Business Administration from IDEA (Instituto para el Desarrollo Empresarial de la Argentina), Graduate School of Business, Argentina
- General Management Programme from INSEAD The Business School for the World, Fontainebleau, France

Membership of Board Committee:

• Risk Management Committee

Number of Board Meetings Attended in the Financial Year: • 4/4

Present Directorship(s):

- **Listed Entity**
- Nil
- Other Public Company:

• Nil

- From 2015 to 2019, Ignacio was the Area Finance Director, Chief Financial Officer ("CFO") and Chief Information Officer for British American Tobacco South America Cluster where he lead the Finance and Information Technology Departments for a group of seven companies/ countries (Argentina, Chile, Peru, Paraguay, Uruguay, Bolivia, and Ecuador). During this time, Ignacio was also the President of the Board for British American Tobacco Chile.
- Prior to his current role, Ignacio was the Managing Director for BAT Aspac Service Centre, the Regional Shared Services Unit for Asia Pacific Region based in Kuala Lumpur from 2012 to 2015.
- He also served as Finance Director for B.A.T. (U.K. and Export) Limited and Regional Finance Manager for BAT East Europe, Africa and Middle East, based in London from 2008 to 2011.
- He was the Area CFO and Head of IT for BAT Southern African Markets (based in Stellenboch, South Africa) from 2007 to 2008.
- He was the CFO and Head of IT for BAT Mozambique (Maputo, Mozambique) from 2005 to 2007.
- Ignacio started his career in British American Tobacco Argentina as a management trainee under the Finance Management Trainee Programme from 1996 to 1998. After completing his management trainee programme in 1998, he held various finance positions with assignments in Argentina and Western Europe until 2005.

PROFILE OF LEADERSHIP TEAM

JONATHAN REED

Managing Director

Date Appointed to the Leadership Team:

1 April 2020

Age	Gender	Nationality
50	Male	British

For details of Jonathan's profile, please refer to page 65 of this Annual Report.

NICHOLAS KEITH BOOTH ("NICK") Legal and External Affairs Director

Date Appointed to the Leadership Team:

7 October 2020

Age	Gender	Nationality
40	Male	New Zealand

Qualification:

• Bachelor of Arts majoring in Politics, University of Otago, New Zealand

Directorship in Public Companies and Listed Issuers:

• Nil

Working Experience:

- Nick was appointed the Regulatory Affairs Director of BAT Malaysia on 7 October 2020 and subsequently the Legal and External Affairs Director on 1 March 2021.
- Prior to his current role, he was the Head of Corporate and Government Affairs of British American Tobacco Australia.
- Nick joined British American Tobacco Australia in 2004 and has served in various roles in the Legal and External Affairs within the BAT Group in Australia, New Zealand and London.

IGNACIO BALLESTER Finance Director

Date Appointed to the Leadership Team:

9 December 2019

Age	Gender	Nationality
47	Male	Italian

For details of Ignacio's profile, please refer to page 70 of this Annual Report.

PROFILE OF LEADERSHIP TEAM

GENEVIEVE HIEW

Brands and Strategic, Planning & Insights Director

Date Appointed to the Leadership Team:

1 January 2020

Age	Gender	Nationality
36	Female	Malaysian

Qualification:

• Degree in Chemical Engineering from the University of Nottingham, Malaysia

Directorship in Public Companies and Listed Issuers:

• Nil

Working Experience:

- Genevieve was appointed the Brands and Strategic, Planning & Insights Director of BAT Malaysia on 1 January 2020.
- Prior to her current role, she was the Divisional Sales Manager for the entire Java Island and East Nusa Tenggara under the Bentoel Group based in Indonesia.
- Genevieve joined BAT Malaysia in 2008 as a Management Trainee. She has held various roles in the Marketing function within the Malaysian and Indonesian regions.

FELICIA TEH SOOK-CHING

Human Resources Director

Date Appointed to the Leadership Team:

15 July 2019

Age	Gender	Nationality
43	Female	Malaysian

Qualifications:

- Masters in Business Administration, University of Nottingham, United Kingdom
- Bachelor of Commerce, University of Western Australia, Australia

Directorship in Public Companies and Listed Issuers:

• Nil

- Felicia was appointed the Human Resources ("HR") Director of BAT Malaysia on 15 July 2019.
- Prior to her current role, she was the Regional HR Director South East Asia for Carlsberg where she oversaw the HR agenda for Singapore, Myanmar and Laos, in addition to leading the people and the organisation's strategy in Malaysia.
- Before her move to BAT Malaysia, Felicia had successfully led many initiatives to enhance employee engagement, culture and productivity enabling strong business results. She is also passionate about people development.

PROFILE OF LEADERSHIP TEAM

C K REMEENA PRABHAKARAN

Operations Director

Date Appointed to the Leadership Team:

1 March 2018

Age	Gender	Nationality
57	Female	Malaysian

Qualification:

• Bachelor of Science in Mathematics, Microbiology and Genetics from University of Malaya, Malaysia

Directorship in Public Companies and Listed Issuers:

• Nil

Working Experience:

- Remeena was appointed the Operations Director of BAT Malaysia on 1 March 2018.
- Prior to her current role, she was the Head of British American Tobacco's Asia Pacific Supply Service Centre from July 2014 to February 2018.
- Remeena joined British American Tobacco in 2012 as the Asia Pacific Middle East Head of Category and Sourcing Manager within the Procurement function. In 2013, she was promoted as the Regional Head of Procurement.
- She was with Philip Morris International from 1997 to 2012 with her last role being the Director of Supply Chain South Cluster.

BRYCE MATTHEW GREEN

Trade Marketing and Distribution Director

Date Appointed to the Leadership Team:

6 November 2020

Age	Gender	Nationality
36	Male	Australian

Qualifications:

- Business Management, Edith Cowan University, Australia
- Hospitality Management, Edith Cowan University, Australia

Directorship in Public Companies and Listed Issuers:

• Nil

Working Experience:

- Bryce was appointed as the Trade Marketing and Distribution Director on 6 November 2020.
- Prior to his current role, Bryce was the Marketing Director China, a Joint Venture between BAT and CNTC as well as working on various projects across Asia Pacific.
- Bryce then spent a number of years working across the South Pacific markets as the Head of Marketing Papua New Guinea and Fiji before promoted as the South Pacific Area Marketing Manager.
- Bryce joined BAT Australia in 2009 as a Trade Marketing Representative. He has held various roles in the Marketing function in Australia.

Additional Information:

None of the Directors or the Leadership Team have:

- any family relationships with any other Director and/or major shareholder of BAT Malaysia.
- any conflict of interest with BAT Malaysia.
- any convictions for offences within the past five years and have not been imposed any public sanction or penalty by the relevant regulatory bodies during the financial year 2020.