



Date: May 28, 2020

To: Alessia Cerantola, Andrei Ciurcanu (Project Coordinators, OCCRP)

Copy: Sandra Mullin (Senior Vice President, Policy, Advocacy and Communication at Vital Strategies), Anna Gilmore (Director, Tobacco Control Research Group at the University of Bath)

Dear Ms. Cerantola, Mr. Ciurcanu,

As explained in my email dated May 27, 2020, our review process of the series of sponsored articles you have published regarding Philip Morris International and its affiliates is ongoing. We are writing to put you on notice that there are significant factual errors and misleading statements contained throughout the writing and request that you correct these immediately.

As our review process continues, we may ask for additional corrections. However, it is vital that you begin the process of aligning your sponsored content with the facts – many of which you did not provide PMI with an opportunity to respond to prior to publication – as soon as possible. We believe, and hope you do as well, that readers should not be misinformed or misled.

In addition to the factual errors that should be changed, there is a worrisome theme of taking PMI's language and/or actions out of context throughout this and other articles of your report. We request that you adjust your reporting to be truthful and transparent.

In your piece "Pandering to a Pandemic", the following mistakes and false allegations must be rectified:

- 1. You wrote that PMI is "[b]ehind the marketing campaign ... including a singer aged just 19, well below PMI's minimum age for promoters of 25."**

This is false. Your writing references a digital influencer program that was ended in 2019, long before publication of your sponsored content. The individual referenced in this piece, who is above the legal age of purchase for tobacco products, was not engaged, nor compensated, nor given a free device by PM Ukraine to post *IQOS* messaging on social media.

- 2. You wrote that, "As one ad in Romania, published during lockdown, put it: 'Your house doesn't need smoke and ash. Consider that when you think of going out to buy cigarettes.'"**

This is false and misleading. Your translation of the advertisement is both incorrect and incomplete. The exact translation of the ad is: "Your house does not need smoke and ash. Consider this when you think about going to buy cigarettes. Try *IQOS* for free 21 days." This campaign began in April 2019, well before the pandemic was announced.



- 3. You wrote, “The tobacco industry is banned from advertising, promotion and sponsorship under the Framework Convention on Tobacco Control (FCTC), an international treaty laying out rules for governments to curb smoking. But PMI has found other ways of receiving positive attention – by making public donations to charities.”**

The is a scurrilous and unjustified allegation. Firstly, all of PMI’s marketing and communications conform with the laws in countries where PMI operates. Secondly, this unprecedented public health crisis requires the entire global community to come together and help those in need. We are not undertaking any action for publicity; we are doing it because it is the right thing to do and we have resources to help. Protecting people, families, and communities is what matters, and we are saddened that during a global pandemic some would choose to criticize a company for stepping up to provide much-needed support. To be clear: We are very proud of our relief efforts.

- 4. You also wrote, “Anti-tobacco advocates say [PMI’s donations of \$30 million in 62 countries] serve to curry favor from governments that are parties to the FCTC.”**

Again, this is false. We would have gladly provided you with our perspective had you presented us with the question.

- 5. You wrote that, “In Ukraine, PMI has been working hard to ensnare new customers...”**

Again, your verbiage is irresponsible and implies wrongdoing. What we’ve done, and continue to do, is ensure that adult smokers continue to have access to better alternatives than continued smoking. You clearly and irresponsibly sought to imply that, contrary to our stated principles, we sought to recruit non-smokers. This is false, and we ask that you withdraw that allegation immediately.

- 6. You wrote that PMI “has been targeting people under lockdown all over the world.”**

This is another example of irresponsible reporting. PMI markets its smoke-free products to current adult smokers and existing *IQOS* users – our consumers. Since millions of our consumers, and those we hope will make the switch from cigarettes rather than continue smoking, have been in “lockdown,” like the majority of the world, we have adjusted our marketing accordingly to ensure that current adult smokers continue to have access to information about, and access to, products that are a better alternative to continued smoking.

- 7. You wrote, “PMI also said it has donated US\$30 million in 62 countries to fight the pandemic. In some cases, reporters found, PMI has sidestepped rules forbidding**



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tobacco companies from donating to governments by targeting charities in desperate need of funding.”

Please produce evidence to support this baseless allegation or withdraw it immediately.

Please note that we may revert on this particular piece of content if our review uncovers additional errors. Additionally, know that in keeping with PMI's commitment to fostering open and transparent dialogue, we will make all of our correspondence regarding the erroneous information you have published available to the public via our website and through our owned media channels.

Since you requested that we meet your deadlines, we would appreciate the courtesy of your reply on this, as well as the below matters, by 17:00 CET on May 29, 2020.

All of our rights are hereby reserved.

Sincerely,

Dr. Moira Gilchrist

VP Strategic and Scientific Communications
Philip Morris International