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Modern Slavery Statement

This Statement discusses the activities of JUUL Labs, Inc. and its consolidated subsidiaries (collectively, "JUUL Labs") during 2018 to address forced labour, human trafficking and slavery (collectively, "modern slavery") in our business and supply chains. We have published this Statement pursuant to both the California Transparency in Supply Chains Act and the UK Modern Slavery Act.

This Statement describes the compliance activities and planned enhancements of JUUL Labs taken as a whole since we maintain the same modern slavery compliance policies and procedures across our business. However, not all of the entities in our consolidated group are subject to the California Transparency in Supply Chains Act and the UK Modern Slavery Act.

Business Overview

JUUL Labs is a manufacturer of electronic nicotine delivery systems. JUUL Labs' goal is to provide an alternative to cigarettes in order to end combustible smoking. JUUL Labs' products are targeted at adult cigarette smokers in the United States, Canada, Israel and Europe.

JUUL Labs' primary facilities are located in California, the United Kingdom and Singapore. Our workforce consists almost entirely of engineers and office support personnel. Given the nature of JUUL Labs' workforce, we believe that the risk of modern slavery in our business is negligible.

Primary Vendor Relationships

Consistent with JUUL Labs' commitment to quality, we have a limited number of primary vendors, and our relationships with these vendors are stable and ongoing. JUUL Labs' hardware products are manufactured on its behalf by a small number of large, well-known global contract manufacturers, primarily in their factories in eastern China. The liquid in our refillable pods is manufactured in the United States by well-known, established manufacturers. We also have specified some of the tier-2 suppliers used by our contract manufacturers. We believe that the strength of our primary vendor relationships helps mitigate the risk of modern slavery in our supply chains.

Furthermore, we strive to conduct business with vendors who adhere to ethical business practices. Our vendor contracts and standard form purchase order terms and conditions include provisions that require our contract manufacturers and other vendors to comply with all applicable laws. This includes laws that prohibit modern slavery. Our contracts with our designated tier-2 suppliers also require them to comply with the law. Compliance with contractual requirements is taken into account in our procurement decisions.



Grievance Mechanism and Ethics Hotline

JUUL Labs maintains an Ethics Hotline through which employees, vendor personnel and other third parties may anonymously report violations. To make a report to the Ethics Hotline, visit www.JUULlabs.ethicspoint.com or call 1-844-681-1090.

Future Steps to Mitigate Modern Slavery Risk

As a young and rapidly growing company, JUUL Labs continues to enhance its policies and procedures relating to modern slavery. We are in the process of implementing a new Supplier Code of Conduct, which explicitly addresses modern slavery and other labour practices. We also are making other enhancements to our social compliance program to mitigate modern slavery risk in our supply chains. Among other things, during 2019, JUUL Labs intends to enhance its training for both internal personnel and vendors. We also are enhancing our vendor due diligence. Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Board of Directors of JUUL Labs UK Holdco Ltd. and signed by a director of that entity.

A handwritten signature in black ink, appearing to read "Dan Thomson", written over a horizontal line.

Dan Thomson,
Director, JUUL Labs UK Holdco Ltd.