

FORM OF RETURN

Manufacturer/Importer: Jt International S.A. ("the Company")
14, Chemin Rieu
CH-1211 Geneva 17
Switzerland

Calendar Year: 2004 12 months to 31 December 2004

Tobacco Product Class: Cigarettes

This Return has been made in respect of all products sold by the Company in the product class in New Zealand. The products listed were either imported by JTI or manufactured under licence in Australia for JTI (by either Philip Morris International, Imperial Tobacco or BAT).

- a) Tobacco Weight by Product Class (including additives and moisture): 6534.1 kg
- b) Weight of Additives in Total by Product Class (excluding water): 455.5 kg
- c) List of additives and quantities not exceeded for each brand and brand variant in this return:
See attached Schedule A.

It is declared that:

- i. All additives used in tobacco in the brands and brand variants in the Calendar Year have been listed in Schedule A.
- ii. No additive has been named for inclusion in Schedule A unless that additive was used in such tobacco products.
- iii. No additive was used in the Company's brands and brand variants in excess of the "Quantity not exceeded" as specified in Schedule A.

- d) Brand information: See attached Schedule B

I, Dr. D. Cooper Rees of Geneva, Switzerland, Vice President of Scientific & Regulatory Affairs for JT International S.A., hereby certify that the information contained in and annexed to this Return is correct for the purposes of the Smoke-free Environments Regulations 1999, subject to the qualifications stated.

This information is provided in confidence and may not be communicated to others.
DATED at Geneva, Switzerland this 28th day of January 2005.

D. Cooper Rees

D. Cooper Rees, Ph.D., DABT

SCHEDULE A

CALENDAR YEAR 2004 – JT INTERNATIONAL S.A.

CIGARETTES

Attached

Ingredients in Cigarette Products
Produced by British American Tobacco, Imperial Tobacco Limited, and JT International
and Sold in New Zealand (2004)

Prefix	Ingredient	Quantity Not Exceeded (%)
	Water	14.8000
	Sugars	3.5349
	Sorbitol	2.3550
	Propylene glycol	2.0059
	Glycerol	1.9870
	Sugars (invert sugar)	1.6319
	Sugars (brown sugar, white sugar, sucrose and/or sucrose syrup)	1.2695
	Menthol and/or l-menthol	1.0931
	Ethyl alcohol (Ethanol)	0.9120
	Cellulose and/or cellulose fiber	0.8903
	Cocoa shells and extract, distillate and butter, and/or powder	0.6460
	Licorice extract, powder and/or fluid	0.6270
	Calcium carbonate	0.4673
	Plum extract	0.2970
	Carob bean extract	0.2642
	Honey	0.1750
	Molasses extract and tincture	0.0879
	Fig extract	0.0500
	Raisin extract and juice	0.0500
	Sugars (corn syrup, glucose syrup)	0.0500
	Tamarind extract	0.0250
trans-	Anethole	0.0100
	Apricot juice concentrate	0.0100
	Apricot oleoresin	0.0100
	Banana extract	0.0100
	Benzyl alcohol	0.0100
	Caramel color	0.0100
	Coffee extract, solid extract, concentrate and/or powder	0.0100
	Ethyl maltol	0.0100
	Fig	0.0100
	Malt extract	0.0100
	Maple syrup	0.0100
	Rum	0.0100
	Sodium benzoate	0.0100
	Vanilla extract, beans and/or pods	0.0100
	Vanillin	0.0100
	Acetoin	0.0010

2-	Acetylpyrazine	0.0010
	Arrack	0.0010
	Balsum Peru oil	0.0010
	Benzaldehyde	0.0010
	Benzoin resin and absolute	0.0010
	Cardamon oleoresin, extract, oil, seed oil, and/or powder	0.0010
	Cassia extract (fistula)	0.0010
	Cinnamon bark oil	0.0010
	Citral	0.0010
	Cognac oil, white and/or green	0.0010
2,5-	Dimethyldihydrofuranolone	0.0010
	Ethyl acetate	0.0010
	Ethyl butyrate	0.0010
	Ethyl vanillin	0.0010
	Fenugreek and/or fenugreek extract and absolute	0.0010
	Guava extract	0.0010
	Glyceryl triacetate	0.0010
cis-3-	Hexen-1-yl acetate	0.0010
	Hexyl acetate	0.0010
	Hexyl alcohol	0.0010
	Isobutyraldehyde	0.0010
	Isopropyl acetate	0.0010
	Labdanum absolute, oleoresin and/or oil	0.0010
	Lovage oil, root oil, and/or extract	0.0010
	Maltol	0.0010
para-	Methoxybenzaldehyde	0.0010
	Methyl cyclopentenolone	0.0010
	Methyl phenylacetate	0.0010
	Mullein flowers	0.0010
gamma-	Octalactone	0.0010
	Palmarosa oil	0.0010
	Phenethyl alcohol	0.0010
	Phenylacetic acid	0.0010
	Piperonal	0.0010
	Rum extract	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Tomato extract	0.0010
4 (2,6,6-	Trimethylcyclohexa-1,3-dienyl)but-2-en-4-one	0.0010
gamma-	Valerolactone	0.0010
	Acetal	0.0001
	Acetanisole	0.0001
	Acetic acid	0.0001
	Acetophenone	0.0001

2-	Acetylpyridine	0.0001
2-	Acetylpyrrole (Methyl 2-pyrrolyl ketone)	0.0001
2-	Acetylthiazole	0.0001
	Alfalfa extract	0.0001
	Ambrox (1,5,5,9- Tetramethyl-13-Oxacyclo (8.3.0.0(4.9)) Tridecane	0.0001
	Amyl alcohol	0.0001
	Angelica root oil	0.0001
	Anise star oil	0.0001
para-	Anisyl acetate	0.0001
para-	Anisyl alcohol	0.0001
para-	Anisyl formate	0.0001
	Apple extract (Apple essence concentrate)	0.0001
	Ascorbic acid	0.0001
	Beeswax absolute	0.0001
	Benzoic acid	0.0001
	Benzyl acetate	0.0001
	Benzyl cinnamate	0.0001
	Benzyl formate	0.0001
	Benzyl phenylacetate	0.0001
	Bois de rose oil	0.0001
1-	Butanol	0.0001
	Butyl acetate	0.0001
	Butyl hexanoate	0.0001
	Butyl phenylacetate	0.0001
	Butylated hydroxytoluene	0.0001
	Butyric acid	0.0001
	Carbon dioxide	0.0001
d-	Carvone	0.0001
l-	Carvone	0.0001
	Cassia bark oil	0.0001
	Castoreum extract and/or absolute	0.0001
	Chamomile oil	0.0001
	Cinnamaldehyde	0.0001
	Cinnamic acid	0.0001
	Citric acid	0.0001
	Citronellal	0.0001
dl-	Citronellol	0.0001
	Clary sage extract and/or oil	0.0001
	Coriander seed oil	0.0001
beta-	Damascone	0.0001
	Davana oil	0.0001
2-trans,4- trans-	Decadienal	0.0001
delta-	Decalactone	0.0001

gamma-	Decalactone	0.0001
	Decanal	0.0001
	Decanoic acid	0.0001
	Diacetyl (2, 3- Butanedione)	0.0001
3,4-	Dihydrocoumarin	0.0001
2,5-	Dimethylpyrazine	0.0001
para-	Dimethoxybenzene	0.0001
3,4-	Dimethyl-1,2-cyclopentanedione	0.0001
3,7-	Dimethyl-6-octenoic acid	0.0001
delta-	Dodecalactone	0.0001
gamma-	Dodecalactone	0.0001
	Ethyl benzoate	0.0001
	Ethyl cinnamate	0.0001
	Ethyl decanoate	0.0001
	Ethyl formate	0.0001
	Ethyl hexanoate	0.0001
	Ethyl isovalerate	0.0001
	Ethyl lactate	0.0001
	Ethyl laurate	0.0001
	Ethyl levulinate	0.0001
	Ethyl octadecanoate	0.0001
	Ethyl octanoate	0.0001
	Ethyl oleate	0.0001
	Ethyl palmitate	0.0001
	Ethyl phenylacetate	0.0001
	Ethyl propionate	0.0001
3-	Ethyl-2-methylpyrazine	0.0001
2-	Ethyl-3,(5 or 6)dimethylpyrazine	0.0001
2-	Ethyl-3,5-dimethylpyrazine	0.0001
5-	Ethyl-3-hydroxy-4-methyl-2(5H)-Furanone	0.0001
4-	Ethylguaiacol	0.0001
	Eugenol	0.0001
	Fennel and sweet oil	0.0001
d-	Fructose	0.0001
	Furfuryl alcohol	0.0001
	Geraniol	0.0001
	Geranyl acetate	0.0001
	Geranyl phenylacetate	0.0001
	Grape juice concentrate	0.0001
	Guaiac wood oil	0.0001
	Guaiacol	0.0001
gamma-	Heptalactone	0.0001
	Heptanal	0.0001
gamma-	Hexalactone	0.0001
	Hexanal	0.0001

	Hexanoic acid	0.0001
4 (para-	Hydroxyphenol)-2-butanone	0.0001
	Indole	0.0001
alpha-	Ionone	0.0001
beta-	Ionone	0.0001
gamma-	Ionone	0.0001
alpha-	Irone	0.0001
	Isoamyl acetate	0.0001
	Isoamyl alcohol	0.0001
	Isoamyl butyrate	0.0001
	Isoamyl formate	0.0001
	Isoamyl phenylacetate	0.0001
	Isoamyl propionate	0.0001
	Isovaleric acid	0.0001
cis-	Jasmone	0.0001
	Lauric aldehyde	0.0001
	Lemon oil and/or extract	0.0001
	Linalool	0.0001
	Linalool oxide	0.0001
	Linalyl acetate	0.0001
	Mace powder, extract and/or oil	0.0001
2-	Methoxy-4-methylphenol	0.0001
1-	Methoxy-4-propenylbenzene	0.0001
2-	Methoxy-4-vinylphenol	0.0001
	Methyl anthranilate	0.0001
3-	Methyl butyraldehyde	0.0001
	Methyl furfuryl disulphide	0.0001
	Methyl sulphide	0.0001
4-	Methylacetophenone	0.0001
2-	Methylbutyric acid	0.0001
5-	Methylfurfural	0.0001
	Myristic acid	0.0001
	Myrrh oil, absolute	0.0001
2,4-	Nonadienal	0.0001
gamma-	Nonalactone	0.0001
	Nutmeg and/or oil	0.0001
	Oak bark extract	0.0001
delta-	Octalactone	0.0001
	Octanoic acid	0.0001
	Orange oil, bitter	0.0001
	Palmitic acid	0.0001
2,3-	Pentanedione	0.0001
	Petitgrain oil and/or absolute	0.0001
	Phenethyl acetate	0.0001
	Phenethyl octanoate	0.0001

	Phenethyl phenylacetate	0.0001
	Phenylacetaldehyde	0.0001
	Potassium sorbate	0.0001
	Propenyl guaethol	0.0001
	Propionic acid	0.0001
	Pyroligneous acid extract	0.0001
	Rum ether	0.0001
	Salicylaldehyde	0.0001
	Sodium citrate	0.0001
	Styrax extract	0.0001
	Tea extract	0.0001
5,6,7,8-	Tetrahydroquinoxaline	0.0001
	Thyme oil, white and/or red	0.0001
para-	Tolualdehyde	0.0001
2-	Tridecanone	0.0001
	Triethyl citrate	0.0001
3,7,11-	Trimethyl-1,6,10-dodecatrien-3-ol (Nerolidol)	0.0001
2,6,6-	Trimethylcyclohex-2-ene-1,4-dione (4-Keto isophorone)	0.0001
2,3,5-	Trimethylpyrazine	0.0001
gamma-	Undecalactone	0.0001
d,l-	Valine	0.0001
	Isopentane	N/A
	Nitrogen	N/A

ADDITIVES LIST

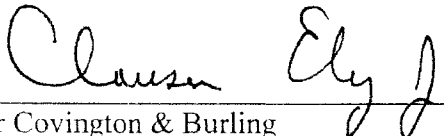
CIGARETTES

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2004**

The Law Firm of Covington & Burling hereby certifies as follows:

1. The attached list of cigarette additives has been compiled from cigarette additive lists supplied by the Participating Companies.
2. The Participating Companies for the cigarette additives list are:
 - a. British American Tobacco (Investments) Limited
 - b. Imperial Tobacco New Zealand
 - c. JT International S.A.
3. All of the cigarette additives listed by any Participating Company are shown on the attached list.
4. A copy of the certificate which accompanied the cigarette additives list of each Participating Company is annexed to the attached cigarette additives list.
5. In the attached cigarette additives list, the "Quantity Not Exceeded" is the highest "Quantity Not Exceeded" shown by any Participating Company in its cigarette additives list.

DATED this 25th day of January, 2005.



for Covington & Burling

ADDITIVES LIST

CIGARETTES

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2004**

I, Dr. D. Cooper Rees, Vice President of Scientific & Regulatory Affairs at JT International S.A., 14 Chemin Rieu, CH-1211 Geneva 17, Switzerland (the "Company"), hereby certify in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 28th day of January, 2005.

D. Cooper Rees

D. Cooper Rees, Ph.D., DABT

ADDITIVES LIST

Cigarettes

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2004**

I, Deborah Dillon of British American Tobacco (Investments) Limited (the "Company") hereby certifies in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this

17th

day of

December

2004

Deborah M. Dillon


**ADDITIVES LIST
CIGARETTES**

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2004**

I, Keith Milsom, Product Stewardship, Ingredients Declaration Manager, on behalf of Imperial Tobacco New Zealand (the "Company") hereby certify in respect of the Company's attached product class list of additives that:

- a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

DATED this 26th day of JANUARY 2005



Signature