Juul Labs is an independent manufacturer of reusable and rechargeable e-cigarettes. Our mission is to transition adult smokers away from combustible cigarettes, eliminate their use, and combat underage usage of our products. We do not want any non-nicotine users, especially those who are underage, to try our products.

The UK is a global leader in tobacco control and recognises the potential role of e-cigarettes in tobacco harm reduction. Juul Labs strongly supports the Government's Smokefree 2030 goal, and our products are available to local authorities through the Government's Swap to Stop scheme. We support the Tobacco and Vapes Bill, which we believe will help address youth usage, strengthen consumer safety and confidence and provide greater enforcement powers to clamp down on irresponsible actors.

Juul Labs is committed to playing our part in ensuring compliant vapes are available to adult smokers while underage use is prevented and unsafe products are kept off the market. Our mobile app is part of our commitment - it is designed to address the challenges smokers face when trying to quit cigarettes while combating underage use. It offers insights that helps users understand when and how they use their JUUL devices, and how their usage changes over time so they can make informed decisions about how they use our products. Our technology also provides the ability to lock the device (and for it to automatically lock itself when not in the possession of the owner).

We are committed to security and data privacy:

- Juul Labs has no access to adult smokers' usage data or location;

- JUUL App data is secured and encrypted both in transit and at rest;

- Other data collected for product debugging and improvement (such as crash reports) are de-identified, and;

- JUUL App data is never used for marketing or sold to third parties.

We currently offer a degraded web application for iOS users, but this only has a limited feature set, with less reliable Bluetooth connection. We are currently unable to provide:

- the ability to locate a lost device;

- automatically lock a device, and;

- provide battery and pod e-liquid level notifications.

Notably for the Government's ambition to combat underage use, the poorer functionality of the web application is an impediment to the potential deployment of our age-locking technology in the UK.

The useability of the web application has a material impact on use and retention rates. Although around three quarters of JUUL2 device purchasers own iOS phones, compared to just a quarter with Android phones, the native Android app has had more than twice as many lifetime users as our web app. Web app users are much less likely to continue using the app: 47% of Android users who download the JUUL app go on to use it regularly after the first 3-4 weeks, compared to just 13% for web app users.

We support the CMA's proposed intervention to require Apple to open up iOS to allow users to access other app stores on their devices. We would also welcome a move to require Apple to

allow users to directly download apps from websites, as users can currently do on MacOS. These are simple solutions to current issues facing a wide range of app developers and brings Apple in line with its competitors.

We believe the Digital Markets Unit should aim to learn from experiences in the EU with the implementation of the Digital Markets Act. The regulation has been in place for almost a year, and while some improvements have been made to the mobile app ecosystem, including the arrival of third-party app stores that have opened up the iOS ecosystem, the ability to directly download apps from certain websites is still not available despite being required under the new law.

Ultimately, we would like the iOS App Store to become more open and enable adult smokers to access our app for download so that they can leverage usage insights for their quitting journey, and retain confidence in its age verification and device locking technology.