

# Our Code of Conduct

Doing what's right. It's who we are.





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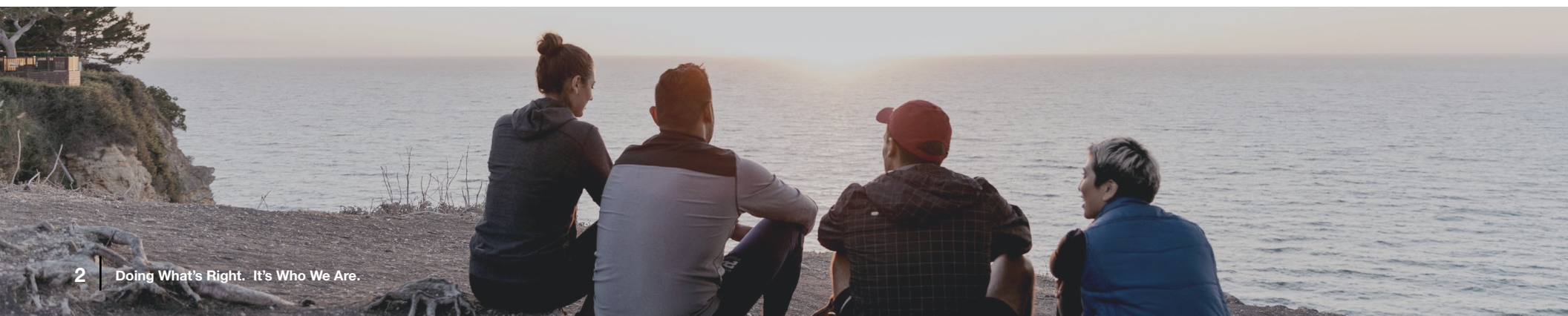
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## Doing What's Right. It's Who We Are.

### Dear Herbalife Nutrition Employee:

At Herbalife Nutrition, our first – and most important – value is “We Always Do What’s Right.” It’s not just what we do, it’s who we are.

As Chairman and Chief Executive Officer, I have promised to lead the Company with honor and the highest level of integrity and to strive to uphold the ethics and integrity of our employees and distributors. Maintaining this reputation is one of our most important jobs.

Our Code of Conduct is not simply a set of rules, it’s what we believe in. It requires us all to conduct our business in a way that is consistent with our Values and in accordance with applicable laws. It also requires that we be responsive to the concerns of the communities in which we operate and exercise the highest degree of honesty and integrity in our dealings with others.

Our Code is intended to help each of us understand our responsibilities and make the right choices. It is also meant to stimulate awareness of ethical issues that we may encounter in our daily business activities. Doing the right thing begins with basic honesty and integrity. More than ever, it also depends on our good judgment and sensitivity to the way others see us and how they may interpret our actions.

Each of us is responsible for the reputation of Herbalife Nutrition, and that reputation is built on trust. Always doing what’s right and maintaining honesty and integrity in all our business decisions means our distributors and their customers can trust us, our business partners can trust us, the public can trust us and we can all trust each other. And that’s what makes ours such a special company where we can all be proud to work.



John Agwunobi  
*Chairman and Chief Executive Officer*





# Our Principles

At Herbalife Nutrition, our Principles shape our culture. They unite us and inspire us to be our best each day.

## Our Why

### Making the World a Better Place

The purpose and unique value of our Company, our Distributors and our Employees, is to help people be healthier and happier through personalized nutrition and a proven business opportunity so that around the globe, every tomorrow is continually better.

## Our How

### Through Purpose-driven Distributors Who Are Our Difference

Beyond products that deliver on their promises, our customers receive irreplaceable Knowledge, Encouragement, Respect, Supportive Coaching, Care, Community and amazing Opportunity. This is what our Distributors truly distribute. We are driven by their needs and energized by their passion.

## Our What

### To Create Inspiring Results for a Better Life

With effective products that taste great, Distributors who provide guidance along the journey, the support of an entire company full of enthusiastic Employees and an encouraging community, we can give people around the world a simpler path to a healthier, happier life.

## Our Values

### We Always Do What's Right

When we look in the mirror we see integrity, honesty, humility and trust. We reflect the belief that ethical is never optional. And we honor and respect each other, our Distributors, our customers, and most importantly, ourselves.

### We Work Together

We learn, we teach. We follow, we lead. We help one moment and accept help the next. We never stop collaborating, which makes us unstoppable. We have fun. We keep things simple. We celebrate the individual and the team in each of us.

### We Build It Better

We're always looking up. Because that's where the opportunity is. To learn. To grow. To innovate. To excel and exceed. To be an agent of change in our communities. To turn an entrepreneurial spirit into daily inspiration as we make our customers' lives – and ours – healthier and happier.



## Our Code

One thing you can say about our Company: we know nutrition – the benefits it brings, the science behind it and how to apply it to help people reach their goals. We believe building a better world starts with us and the way we do business. Our Code of Conduct guides us in our daily work. It forms an ethical framework that brings us together – no matter our jobs or where we work – and motivates us to work with a shared sense of integrity and pride.

### What does the Code do?

The Code is here to help each of us do our jobs ethically and uphold the law. Think of it as a how-to guide to your job and our Company. It tells you what's expected of you and helps you follow the laws and regulations that apply to your job and live our Principles. This Code proposes a set of minimum standards. Where a local law sets higher standards than those set out in this Code, the local law takes precedence. Also, Herbalife Nutrition business units may set stricter standards, as long as these standards do not conflict with our Code of Conduct.

The Code can't answer every question you could have about laws or ethics, but it is a good place to look for answers. It can help you through many challenging situations, and when the answers aren't clear, the Code also leads you to resources, policies and people who can help.



### What's in the Code for me?

- Summaries of ethical topics you need to know about
- Tips to do what's right
- Decision-making tools
- Examples of situations that could happen
- Links to our policies for more information
- Resources you can reach out to for help



# Our Code

## Who is the Code for?

All Herbalife Nutrition employees are required to comply with our Code and policies and to act in accordance with all applicable laws. Moreover, non-employees that have a business relationship with Herbalife Nutrition must comply with our Code's paramount principles of honesty, integrity and ethical decision-making.



## What if someone violates the Code?

When someone does something unethical, or violates Herbalife Nutrition's Principles, policies or the law – or even ignores misconduct, it violates our Code. This reflects poorly on us all – as individuals and as a Company.

Because we take our Code seriously, we also take misconduct seriously. Any employee found to have engaged in conduct that violates our Code could face disciplinary action, up to and including termination of employment. If misconduct also violates a law, it could result in criminal prosecution, fines or jail time.



## Our Responsibilities

Through our everyday actions, we shape our Company's future. Begin by understanding what's expected of you.

### Every employee has the responsibility to:

**Reflect our Principles.** When you look in the mirror, make sure you see someone who embraces our Principles and lives our Values each day. You'll inspire others to do the same.

**Know the Code, the law and our policies.** Like every business, many laws and regulations apply to us. Know how they apply to you and ask the Legal Department if you don't know. Read the Code and our policies to learn how they apply to you and ask the Ethics and Compliance Office if anything is unclear.

**Raise your voice.** You live our Values when you speak up for them. [Voice your concerns](#) about any behavior that doesn't reflect who we are or any acts that could violate our Code, policies or the law. Failure to report known violations of the Code, policies or the law is in and of itself a violation of the Code. In addition, anyone who encourages or permits another person to violate the Code is subject to disciplinary actions, up to and including termination.

### Managers have even more responsibilities:

**Set the tone for your team.** Be a role model for your employees – someone they can look to as a living example of what it means to follow our Code and put our Values into action.

**Be their best resource.** Know the Code and our policies well so you can better guide your team. Keep an open door to hear their concerns and be able to refer them to the right resources for more help.

**Listen and take action.** Take your team's concerns seriously. If you learn about possible misconduct, contact the appropriate party right away. Also, never retaliate against someone who reports misconduct and watch for potential retaliation against an employee who reported a good-faith claim and/or participated in any workplace investigation or complaint process.



# Our Responsibilities

## Making good choices

How can you be sure that you're always doing what's right?  
You can't **always** be sure, but you can use your best judgment  
and ask yourself:



Is what I want to do legal?

Does it reflect our Principles  
and Values?

Does it follow our Code and  
our policies?

Is it good for Herbalife Nutrition,  
distributors and our customers?

Would my coworkers and  
others be proud of my actions?



Any “no” or “maybe” answers are a warning sign to stop and  
reconsider. Ask for help before you act.





## Our Voice

At Herbalife Nutrition, we believe every voice should be heard. If you have a concern, or you know of something that may violate our Principles, Code, policies or the law, let us know right away.

### Raising your voice

A variety of options are available to you:

#### Your manager

#### Your local Human Resources representative

#### The Herbalife Nutrition IntegrityLine, accessible either:

**Online:** Visit [IntegrityLine.Herbalife.com](https://IntegrityLine.Herbalife.com)

#### By phone:

- In the U.S., call 1-800-461-9330
- Outside the U.S., visit [IntegrityLine.Herbalife.com](https://IntegrityLine.Herbalife.com) for international dialing instructions

NOTE: The IntegrityLine is operated by an independent third party and is available 24 hours a day, seven days a week. You may share concerns anonymously, where permitted by law

**Text:** 1-213-335-2054 (U.S. only)

**Email:** [EthicsandCompliance@Herbalife.com](mailto:EthicsandCompliance@Herbalife.com)

**Mail:** Chief Compliance Officer  
Herbalife Nutrition  
800 West Olympic Blvd., Suite 406  
Los Angeles, CA 90015

### What happens next?

No matter how you voice your concern, your report will be taken seriously. We will treat it confidentially to the fullest extent possible, sending it immediately to the Ethics and Compliance Office for review and/or investigation. If you provide your name, we may contact you for more information. You may choose to remain anonymous, where permitted by law. While you may not hear specific details about the outcome of an investigation, you may be notified about the status. **Keep in mind, we do not tolerate retaliation of any kind against anyone who reports a concern in good faith or helps with an investigation.**





## Our Voice



### What if I'm not sure?

You don't need to be sure if there's a violation, but you do need to voice your concerns in good faith. Just voice them sincerely based on your observations – which is what we mean by “good faith.” Purposely making a false report violates our Code, and it could lead to disciplinary action, including termination.



### Questions and Answers

I noticed some behavior in the workplace that I feel like I should report. It seems like it could be violating our Code, but I don't have enough information to know for sure. What if my report turns out to be no big deal – could I get in trouble for reporting it?

If you report behavior that you sincerely believe may be violating our Code, policies or the law, you've made a good-faith report, and that's what matters most. We won't tolerate retaliation against you for speaking up – even if an investigation shows that there was no misconduct.



### Learn More

[Ethics and Compliance Function](#)

[Ethics and Compliance Investigation and Reporting](#)

[Whistleblowing Policy](#)



# Doing What's Right for **EACH OTHER**

We're passionate about what we do and who we are, so we do our part to protect our workplace, our assets and each other.

## In This Section:

### We Are One Team

Foster Equity, Diversity, Inclusion and Belonging

Respect Others in the Workplace

Never Retaliate

Prevent Personal Conflicts of Interest

### We Protect Our Workplace

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# We Are One Team

## Foster Equity, Diversity, Inclusion and Belonging

We see our diverse, multicultural workforce as one of Herbalife Nutrition's greatest strengths. Our varied backgrounds, talents and perspectives make us stronger and more innovative. To promote equity, diversity, inclusion and belonging, we follow policies that ensure every employee and candidate has an equal employment opportunity at Herbalife Nutrition and feels welcomed and valued.

## Live Our Principles

**Support equal opportunity for all.** Herbalife Nutrition is an equal opportunity employer, committed to ensuring employment decisions are made without regard to race, color, religion, sex, sexual orientation, gender, gender identity, gender expression, marital status, national origin, citizenship, ancestry, age, veteran status, disability or any other basis protected by law, ordinance or regulation. These are known as "protected characteristics." People managers can help ensure every employee has an equal opportunity at Herbalife Nutrition by knowing and following all Company policies that apply to their role.

**Speak up.** Help us make sure every employee has a chance to be heard. If you experience or witness potential discrimination or unfair treatment in our workplace, immediately [voice your concerns](#).



## Did You Know

**Employment decisions should be based on things like:**

- Qualifications
- Performance
- Skills
- Individual merit



## Questions and Answers

I'm considering a job applicant who has a physical disability. I'm afraid the job will be too physically challenging for her. Is this, by itself, a legitimate reason not to hire her?

**No, it isn't. Be sure to reach out to your Human Resources Business Partner. If the applicant is the best qualified for the job, we will engage in an interactive process and, absent any undue hardship, make reasonable accommodations that enable her to perform the essential functions of the job. Denying an applicant a job based solely on a disability is against the law, and it's not who we are.**



## Learn More

[Harassment, Discrimination and Retaliation Prevention Policy](#)



# We Are One Team

## Respect Others in the Workplace

Respect and trust are must-haves for any successful workplace. Harassment and discrimination erode respect and trust and can damage productivity, morale and our ability to retain good people. Herbalife Nutrition is committed to keeping our workplace a fun and fair place for everyone to work.

## Live Our Principles

**Learn to recognize harassment.** Harassment is a form of discrimination and can happen in different ways – physically, verbally or visually.

Examples of harassment may include:

- Derogatory jokes
- Degrading remarks or comments
- Offensive gestures, cartoons or images
- Suggestive or obscene emails or invitations



### Did You Know

**Harassment isn't always deliberate.**

It can be unintentional, so be aware of your own behavior and how it affects others. Practice respect in every interaction.

**Watch for sexual harassment.** This type of harassment is generally defined as unwelcome sexual advances, requests for sexual favors or other visual, verbal or physical conduct of a sexual nature. Sexual harassment includes harassment based on another person's gender or harassment based upon pregnancy, childbirth or related medical conditions. It also includes harassment of another employee of the same gender as the harasser. Sexual harassment need not be motivated by sexual desire.

**Keep bullying out.** Bullying often involves treating someone maliciously or threatening them physically or emotionally. Bullying might include verbal or physical threats or humiliation.

**Let us know.** No matter what form harassment or bullying takes, it won't be tolerated at Herbalife Nutrition. If you're aware of possible harassment or bullying (or if it happens to you), don't ignore it. [Voice your concerns.](#)



## Learn More

[Harassment, Discrimination and Retaliation Prevention Policy](#)



# We Are One Team

## Never Retaliate

We understand that voicing concerns isn't the easiest thing to do – but it's definitely one of the most important. Just remember, Herbalife Nutrition does not tolerate or permit retaliation against anyone for filing a good faith complaint or for participating in any workplace investigation or complaint process.

## Live Our Principles

**Report concerns sincerely and promptly.** Bring your concerns and/or questions to either your supervisor, any other Company supervisor, the Chief Compliance Officer or a Human Resources Business Partner as soon as possible after the incident. You can also submit a complaint by calling Herbalife Nutrition's toll-free, 24-hour hotline (the telephone numbers for your country are located on your Herbalife Nutrition intranet site), by accessing our [IntegrityLine](#) or by emailing the [Ethics and Compliance Office](#). By sharing our concerns in good faith, we are protecting one another, our Company and our customers.

**Recognize retaliation.** It happens in a variety of ways, but retaliation could take the form of a demotion, suspension, failure to hire or consider to hire, failure to give equal consideration in making employment decisions, failure to make impartial employment recommendations or adversely affecting working conditions or otherwise denying any employment benefit to an individual.



## Did You Know

**It's OK if you don't have all the facts.**

And it's OK to be unsure if a violation has occurred. You don't have to be right. But if you're concerned, we want to know. You won't face retaliation for sharing a concern – even if it turns out not to be true – as long as it was brought in good faith.



## Questions and Answers

**I have a concern I'd like to share, but it involves someone high up in the Company. I'm afraid I'll lose my job if I report it. What should I do?**

**The worst thing to do is to stay silent. We need to know your concern – no matter who is involved or what position they hold in the Company. We won't tolerate retaliation against you for sharing a concern in good faith.**



## Learn More

[Harassment, Discrimination and Retaliation Prevention Policy](#)  
[Whistleblowing Policy](#)



# We Are One Team

## Prevent Potential Conflicts of Interest

As Herbalife Nutrition employees, we never let personal interests, relationships or the possibility of personal gain influence our decisions or the way we do our jobs. It's up to each of us to protect our reputation by avoiding anything that could reasonably be perceived as, or give the appearance of, a personal conflict of interest.

## Live Our Principles

**Watch for possible conflicts.** It's not always easy to recognize conflicts of interest, but they occur most often in situations like:

- ✓ **Outside employment** – Working for a competitor or a company that does (or hopes to do) business with Herbalife Nutrition, or working a second job that lessens your ability to do your job for Herbalife Nutrition
- ✓ **Financial interests** – You or a family member taking a financial interest in any company that does (or hopes to do) business with us or competes with us – (See [Avoid Conflicts of Interest With Distributors and Suppliers](#) for more information.)
- ✓ **Personal relationships** – Supervising or influencing employment decisions for a family member or someone with whom you have a close personal relationship

- ✓ **Outside opportunities** – Discovering a business opportunity through your work at Herbalife Nutrition and taking it for your own personal gain
- ✓ **Herbalife Nutrition resources** – Using Herbalife Nutrition's name, property or information without approval, to support your personal interests or activities

**Have a potential conflict?** Let us know. Potential conflicts of interest must be disclosed, and approval obtained before you proceed. If you are in a situation that might affect your ability to make unbiased decisions on Herbalife Nutrition's behalf, stop and seek guidance from the Ethics and Compliance Office.



## Learn More

[Conflicts of Interest Policy](#)



## Did You Know

You might be able to tell if a situation is a conflict by asking yourself some questions. **Could this situation:**

- Influence the choices I make for Herbalife Nutrition?
- Look like a conflict to someone else?
- Benefit me or someone close to me?

If you can answer “yes” to any of these questions, it may be a conflict.



## We Protect Our Workplace

### Contribute to a Safe and Healthy Work Environment

Promoting wellness is what we do. Just as Herbalife Nutrition looks out for our customers, we also care that our employees have a safe workplace. For that reason, we expect every employee to follow our health and safety procedures – for a happier, healthier workforce.

### Live Our Principles

**Follow all safety rules.** The rules may differ depending on your location and your job, so know the rules that apply to you and follow them without exception. Report any accidents and potential hazards, complete all required safety training and, if necessary, wear any needed personal protective equipment.

**Be at your best.** When you come to work, we expect you to be ready to work – not under the influence of, or impaired by, an illegal or controlled substance or alcohol. Any of these could impair your judgment and put you and others at risk. Don't use them, possess them, purchase or sell them, or give them to anyone else in the workplace. Also, smoking and/or the use of tobacco is prohibited within all Herbalife Nutrition facilities.



### Did You Know

You make our workplace safer when you report potential hazards, such as:

- Unsafe behavior
- Weapons at work
- Safety violations
- Threats of violence
- Broken equipment
- Security breaches
- Substance abuse

**Help prevent violence.** We want the workplace to be a safe place for everyone, so we prohibit weapons on our property or while working on our behalf. Stay alert for weapons and warning signs of potential violence. Contact Global Security at [SafetySecurity@Herbalife.com](mailto:SafetySecurity@Herbalife.com) or if you're aware of a weapon at work or any other direct or indirect threat of violence, immediately call 1-844-435-7453 (1-844-HELPHLF) or local emergency services in your area (e.g., 911 in the U.S.). Otherwise, report troubling behavior to your manager, Global Security or [IntegrityLine.Herbalife.com](https://integrityline.herbalife.com).



### Learn More

[Workplace Violence Prevention Policy](#)

[Weapons in the Workplace Policy](#)

## We Protect Our Workplace

### Safeguard Company Assets

It takes a lot to build a company like Herbalife Nutrition – a great deal of hard work and investment in the resources that keep us running and growing. We trust our employees to care for Company resources and protect them from loss, damage or misuse.

### Live Our Principles

**Use our assets with care.** Use good judgment to protect Company assets, including:

- ✓ **Physical Assets** – the things we use to do our daily work, including our facilities, furniture, office supplies, computers, equipment, hardware, materials, products and vehicles
- ✓ **Technology Assets** – IT assets, such as our equipment, email, and voicemail systems, databases, software and internet access – (Secure these assets and keep personal use to a minimum.)
- ✓ **Financial Assets** – the assets that help us pay the bills, such as cash, bank accounts, stocks and our credit standing
- ✓ **Information Assets** – the information we gather or create as a company, such as our confidential information and intellectual property (See [Safeguard Confidential Information and Intellectual Property](#) and [Protect Privacy](#) to learn more.)





## We Protect Our Workplace

**Focus on cybersecurity.** Protect our systems from malware and other cyber threats by following our IT policies and procedures. Regularly update and secure your passwords, never open suspicious links, stay alert for phishing scams and never install unauthorized software or use unsecured networks. Keep Company devices secure and contact [Cybersecurity](#) about suspicious activity. You are responsible for knowing the cybersecurity policies noted below and your responsibilities under these policies.



### Questions and Answers

I received a suspicious email that was marked “urgent.” The subject of the email appears to be related to a project I am working on, but I do not recognize the sender. Is it safe for me to open it?

**No. You should first verify that the email is legitimate before opening it or enabling any scripts. Follow our procedures to ensure that any actual or suspected cybersecurity incidents are dealt with properly and effectively.**



### Did You Know

#### **Your communications belong to Herbalife Nutrition.**

When you send an email or make a call using Herbalife Nutrition systems, your communications belong to Herbalife Nutrition. We reserve the right to monitor these communications, as permitted by law. Also, employees are not permitted to access the electronic communications of other employees or third parties unless authorized to do so by Herbalife Nutrition management.



### Learn More

[Corporate Security Policy](#)

[Cybersecurity Policy](#)

[Acceptable Usage Policy](#)

[Physical Security for Cybersecurity Policy](#)

[Political Activities and Contributions Policy](#)

[Distributor Events and Promotions Inventory Management Policy](#)



# Doing What's Right for **OUR COMPANY**

Our business is built on integrity — good people making good choices each day. We succeed when our choices reflect our very best and our commitment to doing business the right way.

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## We Act With Integrity

### Engage Only in Ethical and Fair Business Practices

At Herbalife Nutrition, we follow the rules and know that our products, talents and commitment to integrity will speak for themselves. We're not afraid of competition and we welcome a healthy marketplace where everyone has an equal opportunity to compete and succeed.

### Live Our Principles

**Follow antitrust and competition laws.** These laws differ from country to country, but they all support free and open competition and prohibit practices that could restrict it. Make sure you understand how these laws apply to you.

**Deal ethically in every interaction.** Be honest and fair in every interaction with distributors, competitors and business partners. Never discuss or agree with a competitor to do something that could harm another competitor's ability to compete.

**Research competitors the right way.** It's important to know the competition, but gather your intelligence ethically – using only public sources. Never seek or accept information that isn't publicly available, like confidential information from a customer or former employee of a competitor without first checking with the Legal Department.



### Did You Know

#### Talking to a competitor? Never discuss:

- Fixing prices or terms of sale
- Excluding a third party from doing business
- Bid-rigging
- Dividing or sharing markets



### Questions and Answers

**While at a nutrition industry luncheon, a representative from another company started complaining that margins on meal replacements were too low and suggested that we agree to a minimum sales price for our products. Raising our prices would increase our profit margin and be good for the Company. Can I do that?**

**No. Agreeing to a minimum sales price with a competitor is illegal and maybe even criminal.**



### Learn More

[Antitrust Policy](#)

[Competitive Intelligence Policy](#)

## We Act With Integrity

### Promote Ethical Sales and Marketing Activities

We promote our products and the business opportunity the same way we run our business – ethically and honestly. That is how we earn our distributors' and customers' trust and loyalty. They rely on us to stand by our products and our brand, so everything we say about them must be reliable.

### Live Our Principles

**Put honesty above all else.** We want to present our Company in the best light, but dishonest or misleading sales or marketing practices can harm our customers and our reputation. It can also violate the law. Know our products well and present them honestly – without stretching their capabilities, hiding their limits or disparaging competitors' products.

**Label with care.** We're proud of our products' ingredients, and we present them accurately. Follow our labeling processes and get proper approval for every new or updated promotion or claim. Also make sure any representations about our products and their use are accurate.

**Be able to back up claims.** If we make a claim, we must be ready to support it with solid facts. Make sure to use only approved claims that can be verified through well-documented evidence that we have collected fairly and ethically.



### Did You Know

**Remember, in our sales and marketing activities:  
We own what we say.**

It is not just our intent that matters. We may also be responsible for reasonable interpretations of our claims, even if those interpretations were not intended.



### Learn More

[Corporate Brand Review Policy](#)

[Claims Approval Policy](#)

[Brand and Image Rights Approval Policy](#)

[Social Media, Publicity and Releases to the Public Policy](#)





## We Act With Integrity

### Don't Give or Accept Improper Payments

We refuse to get ahead with acts of bribery or corruption, which aren't worth the harm they can do to our reputation and our communities. We believe the only success worth having is success we earn through the work we do, the products we provide and our distributor difference.

### Live Our Principles

**Prevent and avoid improper payments.** An improper payment is “anything of value” that someone offers to wrongfully influence someone else – maybe to win business or gain some business advantage. No matter what form an improper payment takes, it's not permitted at Herbalife Nutrition – and could be illegal. “Anything of value” could include:

- Bribes
- Kickbacks
- Cash or cash equivalents
- Lavish gifts, meals or hospitality
- Stock
- Special favors
- Employment
- Free products
- Discounts not available to the public
- Charitable or political contributions
- Payment of travel expenses



### Did You Know

**If a third party offers a bribe, we could be held responsible.**

It's true. We could be held responsible if someone working on Herbalife Nutrition's behalf breaks the law while representing us.



## We Act With Integrity

**Follow anti-bribery and corruption laws.** These laws vary from country to country, so get to know them and how they apply to our transactions, including the U.S. Foreign Corrupt Practices Act (“FCPA”). You must follow the FCPA inside and outside of the United States. If we violate these laws, both you and Herbalife Nutrition could face serious penalties, even prison.

**Use special care with government officials.** The rules involving government officials are even more strict, so never offer them anything of value to obtain or retain business or secure a business advantage. See [Follow the Rules in Interactions With Government Officials](#) to learn more.



### Questions and Answers

**I just heard from a trusted source that one of our service providers might be involved in a bribery incident. Since Herbalife Nutrition isn't involved and the service provider hasn't been officially charged with anything, should I ignore this?**

**No, you shouldn't. Bribery violates the law as well as our Code and Principles. Even if Herbalife Nutrition isn't involved, we need to know about this situation so we can take appropriate action.**



### Learn More

[Gifts and Hospitality Policy](#)

[Improper Payments and Related Actions Policy](#)

[Engagement of Third Parties Policy](#)



## We Act With Integrity

### Follow the Rules in Interactions With Government Officials

Our business dealings can sometimes put us in contact with government officials. Any time you interact with them, you're probably engaging in a regulated activity, and that means very specific rules apply. Be careful to know and follow those rules to avoid the appearance of improper bias or of violating applicable laws. If you are unsure about these rules, ask the Ethics and Compliance Office.

### Live Our Principles

**Work ethically with government officials.** If you interact with government officials, know and follow all policy and legal requirements – and be sure to check your local policies, which may be more restrictive. Pay special attention to rules about gifts and hospitality – and never give, offer or promise a government official an “improper payment” (a bribe or anything of value that is offered to wrongfully influence someone's actions in order to obtain or retain business or secure an improper business advantage). Also remember we don't offer or make payments to government officials to encourage them to quickly perform some administrative action they are supposed to do anyway.

**Escalate government inquiries.** If you are approached by a government official to respond to a government investigation or law enforcement matter, contact the Legal Department immediately and follow their direction.

**Focus on honesty and transparency.** If your job involves interacting with government officials for government permits, licenses or other government authorizations:

- Be honest and transparent.
- If hiring third parties to interact with the government, know and follow all internal requirements for due diligence and pre-approvals. Remember that we cannot use a third party to do something we cannot do. See [Work Responsibly With Third Parties](#).



### Did You Know

**Government officials have their own rules.**

No matter what our policies say, some government officials may have to comply with department ethics rules or laws that are even stricter. Always get advice before interacting with government officials.



## We Act With Integrity

**Follow lobbying laws.** If you work with public officials on Herbalife Nutrition's behalf to help shape public policy, you're involved in "lobbying," which is highly regulated. Be sure to know and understand the laws that apply, including gift and hospitality laws and compliance requirements.

**Be careful when hiring government officials or their family members.** Special rules apply for hiring current or former government employees or their family members. Before even starting the process, contact the Ethics and Compliance Office for guidance.



### Learn More

[Gifts and Hospitality Policy](#)

[Improper Payments and Related Actions Policy](#)

[Engagement of Third Parties Policy](#)

[Notification and Escalation of Government-  
or Law Enforcement-Initiated Matters Policy](#)





## We Act With Integrity

### Don't Misuse Material Nonpublic Information

Making an investment based on information that a reasonable investor would consider important and is not publicly known is insider trading, and it's illegal. That's why we never use or share material nonpublic information that we learn through our jobs to buy or sell securities in Herbalife Nutrition or in other companies.

### Live Our Principles

**Don't trade on material nonpublic information.** If you learn information about Herbalife Nutrition or another company that the public doesn't know about, and the information could influence a reasonable investor's decision to buy or sell securities, then neither you nor anyone else may use this information to buy, sell or otherwise trade securities. **The summary provided on this page, including the list of examples of nonpublic information and list of transactions prohibited under the Company's Insider Trading Compliance Policy, is not complete and you should refer to the Company's [Insider Trading Compliance Policy](#).**

Material nonpublic information can include:

- New or developing products
- Marketing strategies
- Financial earnings or losses
- Potential business deals
- Information about customers or third parties
- Major management changes
- Proposed mergers or acquisitions
- Potential legal action or investigations



### Did You Know

#### Information is considered public only when:

Herbalife Nutrition makes it public – either through a press release, government filing or some other official communication, and one full trading day has lapsed following such public disclosure.



## We Act With Integrity

**Don't "tip" it to others.** It's illegal to share material nonpublic information with anyone else, including your family or friends because they may trade on the "tip." Giving a "tip" like this – even if you do not profit from it – can result in severe legal penalties, even prison time, so avoid anything that might look like tipping. Herbalife Nutrition's policies and the law prohibit you from trading if you have in your possession material nonpublic information.



### Questions and Answers

**While on a conference call, I inadvertently learned about a possible major acquisition the Company may be making soon. This information is not public and is material. Is it OK to buy stock in the Company based on something confidential that I learned on a conference call that may or may not happen?**

**No. Even if it hasn't happened yet (and still may not), this potential major acquisition is material nonpublic information, and it would be illegal to trade on it.**



### Learn More

[Insider Trading Compliance Policy](#)

[Insider Trading FAQs](#)

[Confidential Company Information Policy](#)

## We Are Accountable

### Ensure Product Quality and Safety

We connect with our customers through our products. That is how they come to know us and trust us. We have the commitment to strengthen that connection by never compromising when it comes to the quality and safety of our products – by expecting and accepting nothing less than our very best.

### Live Our Principles

**Keep our standards high.** If you have responsibility for development, manufacturing or distribution of our products, you impact our overall product quality. Following Herbalife Nutrition's safety and quality standards and those required by law is fundamental to our core Principles and Values. Insist that our employees and suppliers meet those high quality standards as well. If you become aware of anything that puts our product safety or quality at risk, [voice your concerns](#), whether they happen at Herbalife Nutrition or with one of our suppliers.

**Protect our product in the supply chain.** Quality matters from production through distribution of Herbalife Nutrition's products. If you work in our supply chain and distribution system, follow our procedures and stay alert for lapses in quality, safety or security. Track them and promptly voice your concerns about any issues, incidents or risk exposures.



**Learn More**

[Quality Manual Policy](#)





## We Are Accountable

### Safeguard Confidential Information and Intellectual Property

Developing products that make people healthier is serious business, involving serious research, technologies and strategies. The information behind our products and distributor network makes Herbalife Nutrition unique in the marketplace, so we handle our confidential information and intellectual property with care and protect it from misuse or disclosure.

### Live Our Principles

**Recognize what to protect.** Through your job, you may have access to all kinds of information that Herbalife Nutrition has gathered or created that could be harmful if exposed, including:

**Confidential Information** – sensitive information about Herbalife Nutrition, our employees, customers or third parties that's not generally available to the public. It could include information about:

- Potential acquisitions or investment plans
- Marketing plans
- Projected sales or earnings
- New product ideas or product formulations
- Manufacturing methods
- Distributor or preferred customer lists
- Employee lists and salaries

**Intellectual Property** – the things we create that make Herbalife Nutrition unique. You are responsible for protecting the Company's intellectual property and also for respecting the rights of other owners.

This means you must:

- Consult the Legal Department if you have an invention or innovation to present to the Company.
- Clear proposed brands, taglines, logos and designs with the Legal Department before use.
- Consult the Legal Department in order to license or sell any copyright, patent right, trade secret or trademark.

And must not:

- Copy or republish the print or internet assets, music, videos, brands, logos or designs of others without a license.
- Endorse or republish third-party works without clearing it first through the Legal Department.
- Use a patented technology without a license.



### Did You Know

#### Leaks can be stopped.

If you suspect a leak of confidential information, don't ignore it. Let us know so we can prevent harm from being done. **Voice your concerns** right away.



## We Are Accountable



**Handle it with care.** No matter what kind of confidential information you have access to (or who it belongs to), keep it secure. Only access the information you need to do your job. Never share it with anyone who isn't authorized or doesn't have a legitimate business need for it, whether they're inside or outside of Herbalife Nutrition.

**Don't disclose it – even accidentally.** You could inadvertently share confidential or material nonpublic information if you discuss it in public or on social media. Never store it or send it on personal devices or on unsecured networks. Follow our policies to protect personal information. See [Protect Privacy](#) to learn more.



### Questions and Answers

**My team is close to finalizing plans for a new product. I'm very excited and would like to tell my friends about it. Is that OK, as long as I ask them not to share this with anyone?**

**No. You can't rely on your friends to protect this information. Keep it to yourself and only discuss it with those who have a legitimate business need to know. Wait until it has been made public before sharing.**



### Learn More

[Confidential Company Information Policy](#)



## We Are Accountable

### Follow the Rules for Gifts and Hospitality

We're always courteous in our business dealings, but when courtesies involve offers of gifts or hospitality, we never let them affect our judgment – we make fair and unbiased decisions. We don't offer gifts or hospitality to obtain special treatment for ourselves or Herbalife Nutrition, and we don't accept inappropriate gifts or favors from a company that does (or seeks to do) business with us.

### Live Our Principles

**Follow our policy.** Gifts and hospitality may be customary in business, but they can also lead to conflicts of interest. Act ethically when working on Herbalife Nutrition's behalf. Know and follow our [Gifts and Hospitality Policy](#) as well as any local version of this policy that applies to you. Remember that local rules might be more restrictive. And when offering anything of value to others outside of Herbalife Nutrition, first ask whether they are allowed to accept it according to their policies. Never accept inappropriate gifts or favors from a company that does (or seeks to do) business with us. If you are unsure about these rules, ask the [Ethics and Compliance Office](#).



### When is an offer OK? Any offers you give or receive ...



#### Should be:



#### Should NOT be:

Of reasonable value

Expensive

Customary given the occasion, culture and stature of the recipient

Extravagant or in the form of cash or a cash equivalent, like gift cards

Offered infrequently

Offered frequently

Offered for a legitimate business purpose or traditional holiday occasion

Offered to influence a business or government decision or gain an advantage

Legal and appropriate

Illegal or against our policies or our Principles



## We Are Accountable

**Use extra care with government officials.** When a government official is involved, keep in mind, the rules are far more strict. Except in a very few cases (like a coffee or a small meal) you may not offer anything of value, not even common courtesies, without first receiving approval. For more information, see our [Gifts and Hospitality Policy](#) and the [Follow the Rules in Interactions With Government Officials](#) sections of this Code for more detail. Remember that some local policies have additional requirements, and always follow the local policies that apply to you.



### Questions and Answers

One of our new vendors has offered me theater tickets. May I accept them?

**It depends. It may be acceptable if the vendor is attending with you, the value of the tickets is not extravagant and it would not appear as if the vendor is trying to influence you in some way. Consult the Ethics and Compliance Office before accepting.**



### Learn More

[Gifts and Hospitality Policy](#)

[Conflicts of Interest Policy](#)

[Engagement of Third Parties Policy](#)



### Did You Know

#### Can't turn it down? We can help.

We know it's not always easy to refuse an offer or return a gift. If you receive something inappropriate, talk to Ethics and Compliance right away. That way, the Company can handle it for you – either cordially returning the gift or donating it.



## We Are Accountable

### Maintain Accurate Books and Records

A healthy business requires healthy recordkeeping. Accurate books and records do much more than show us how our business is doing. They help Herbalife Nutrition make critical, strategic decisions and take our business to the next level. They are also required by law. Each of us must maintain our records with care, ensuring their accuracy and transparency.

### Live Our Principles

**Be accurate and thorough.** Whether it's a transaction, an expense or a timekeeping record, document it accurately. No matter what information you provide, record it clearly and thoroughly – never intentionally falsifying information, mischaracterizing it or omitting anything important. Also provide any supporting documentation and obtain necessary approvals whenever required.

Our records include things like:

- Invoices
- Contracts
- Purchase orders
- Expense reports
- Payroll records
- Time records
- Benefit claims
- Safety and quality reports

**Handle records with care.** Know and follow our [Records Management Policy](#), which tells you how to properly store and dispose of our records. Check the policy closely before destroying or discarding any record (especially those records needed for an

audit or investigation). If you receive a notice of a “legal hold” on any record, follow the instructions and don’t dispose of the record until you are authorized.

**Document gifts and hospitality properly.** When requesting reimbursement for any gift or hospitality, include the recipient's name, title, and employer, including whether the employer is a government body. Accurately describe the business purpose, give relevant facts and circumstances of the gift or hospitality, and include supporting documentation.



### Did You Know

#### If you handle our records, stay alert.

You could spot warning signs of possible fraud, bribery or money laundering. Watch for:

- False entries
- Misleading statements
- Serious omissions

See something that doesn't seem right? [Voice your concerns](#) immediately.



### Learn More

[Records Management Policy](#)  
[Internal Control Responsibilities Policy](#)  
[Journal Entries Policy](#)

[Gifts and Hospitality Policy](#)  
[Corporate Travel and Entertainment Policy](#)



# We Are Trustworthy and Transparent

## Protect Privacy

Herbalife Nutrition works with all kinds of data, including the personal information of our distributors, customers, suppliers, employees and third parties. They entrust it to us, and we won't break our promise to them. We follow the law and protect it from possible misuse or disclosure.

## Live Our Principles

**Follow privacy laws – everywhere.** Protecting personally identifiable information (PII), also sometimes referred to as personal information or personal data, is more than a business requirement – it's a legal requirement. Data privacy laws differ from country to country, and it's up to us to know how they apply wherever we work and do business. If you handle PII for your job (whether it belongs to our employees, distributors, customers, suppliers or third parties), follow the law and our policies in order to properly handle, store and dispose of it.

PII is information that could identify someone directly or indirectly, such as but not limited to:

- Name, address, phone number or email address
- Date of birth
- Credit card or banking information
- Social security number or government identification number
- Medical records, information and history
- Fingerprint and other biometric data
- Online identifier
- Location data

**Keep private information private.** If you don't need PII for your job, don't gather it. Only access what you need and only use it for legitimate business purposes. Don't share PII with anyone who isn't authorized (either inside or outside of Herbalife Nutrition).



### Did You Know

**The little things you do can help protect privacy:**

- Gather the minimum amount of PII needed.
- Honor lawful requests to access, correct or delete PII.
- Make sure third parties protect PII as we do.
- Store PII on approved Company devices and networks.
- Follow our cybersecurity policies and procedures.



### Learn More

[Personal Information Policy](#)



## We Are Trustworthy and Transparent

### Avoid Conflicts of Interest With Distributors and Suppliers

The way we work with others directly impacts Herbalife Nutrition's reputation. For that reason, our interactions with distributors and suppliers must always reflect our Principles and Values. We never use business relationships for personal gain, and we rely on you to avoid anything that looks like a conflict of interest.

### Live Our Principles

**Act in Herbalife Nutrition's best interests.** If you work regularly with suppliers, vendors or consultants, remember that you're working on Herbalife Nutrition's behalf – not your own. If you or a family member receives some financial benefit from a current or potential supplier, vendor or service provider of Herbalife Nutrition, it could give the appearance of a conflict. You should never have a financial interest with any business entity that does or seeks to do business with Herbalife Nutrition, unless you have first disclosed it and obtained a waiver as required in our Conflicts of Interest Policy.

**Maintain a reasonable separation with our distributors.** Keeping our business operations separate from our distributors avoids the appearance of unfair business decisions. For this reason, Herbalife Nutrition employees and their spouses are prohibited from being distributors, cohabitating or pursuing romantic relationships with our distributors. Except under very limited circumstances, Herbalife Nutrition prohibits conducting business or contracting with distributors (or companies with financial ties to one or more distributors) for Herbalife Nutrition goods or services.



### Questions and Answers

**Recently, one of our suppliers asked me to do some consulting work for his company. This work wouldn't interfere with my work at Herbalife Nutrition, and I could really use the extra money. May I accept this job offer?**

**Most likely not. Accepting work from a Herbalife Nutrition supplier could make it hard to be objective in decisions that you make on behalf of our Company and create a conflict of interest. Talk to your manager or the Ethics and Compliance Office for guidance right away.**



### Learn More

[Conflicts of Interest Policy](#)

## We Are Trustworthy and Transparent

### Work Responsibly With Third Parties

We put a great deal of care into choosing the right third-party business partners that bring the greatest value to the Company. When those relationships are based on integrity and a shared commitment to our Code, our Values and the law, our Company thrives.

### Live Our Principles

**Choose ethical and qualified partners.** If you're involved in selecting or engaging Herbalife Nutrition's third parties, do your homework to make sure they are reliable and reputable. Also choose them objectively, never letting personal bias or self-interests influence your choice. When required, follow Herbalife Nutrition's procurement processes to ensure we uphold Herbalife Nutrition's high standards and consult our [Global Procurement Policy](#).

Our third parties include:

- Vendors
- Suppliers
- Service Providers
- Agents
- Contractors
- Consultants

**Government Service Providers.** Herbalife Nutrition has determined that vendors who interact with government officials on behalf of Herbalife Nutrition pose a higher risk to the Company and, therefore, require greater scrutiny. Additional steps are required for engaging a government service provider such as performing due

diligence and obtaining pre-approvals. If you plan to engage a government service provider, consult our [Engagement of Third Parties Policy](#) and contact the Ethics and Compliance Office.

**Watch their work.** Monitor third parties to make sure their work has a positive impact – both on our business and our reputation. Be on the lookout for potential wrongdoing, including legal, environmental, human rights or safety violations. Help them understand and uphold our Code and policies and [voice your concerns](#) if you see anything that doesn't seem right.



### Learn More

[Government Service Providers Process](#)

[Conflicts of Interest Policy](#)

[Improper Payments and Related Actions Policy](#)

[Engagement of Third Parties Policy](#)

[Global Procurement Policy](#)



### Did You Know

**We choose our third parties based on:**

- Our Company's needs
- Price
- Quality
- Services offered
- Experience and qualifications
- Reputation



# Doing What's Right for **OUR WORLD**

We are much more than a business – we make good things happen in our world, doing what's best for our environment, our communities and the lives of everyone our business touches.

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## We Work Properly in the Global Marketplace

### Follow Laws Around the World

We strive to comply with laws and regulations wherever we do business. Our sanctions screening policies require we screen our business partners, both distributors and vendors, before payment to prevent payments to sanctioned parties and our policies require that we not honor international boycotts that violate tax or export laws. We understand that although requirements and customs can vary around the world, we are committed to following the laws that apply to us and avoiding any improper deals.

### Live Our Principles

**Follow trade laws.** If your work involves imports or exports, a variety of laws may apply to you. Laws vary depending on the country, so know them and follow them, including U.S. laws, which always apply. These laws involve the way products, services, technology, technical information or software move between countries. See our [Global Logistics Policy](#).

**Don't trade with prohibited partners.** Make sure the company has done research on new vendors or distributors before conducting business with them. This includes making sure our business partners don't appear on the U.S. government's list of prohibited (or "sanctioned") individuals and businesses. See our [Sanctions Compliance Policy](#).



## We Work Properly in the Global Marketplace

**Don't violate U.S. boycott laws.** Keep in mind that Herbalife Nutrition does not participate in boycotts of particular countries if they violate U.S. anti-boycott laws. If you are asked to participate in a boycott, refuse to cooperate and speak up. If you have questions consult our [Boycott Policy](#).

**Be accurate and thorough.** Classify every international transaction accurately. Make sure to include accurate labeling, documentation, licensing and approvals. Take care with your paperwork, including showing the final destination and final use.



### ? Did You Know

#### Multiple laws may apply.

There may be times when the laws of several countries apply, and they may seem to conflict. If that happens, check with the Legal Department to help you comply.

### Questions and Answers

**While planning to attend a nutrition industry conference in another country, I forgot to ship some samples ahead of time. Is it OK if I simply put them into my checked luggage?**

**No. You must first determine if the samples are subject to any customs restrictions or Export Controls. Contact the Legal Department to discuss your ability to take any of our products across international borders.**

### Learn More

[International Transportation of US Import, US Export and Foreign to Foreign Shipments Policy](#)

[Sanctions Compliance Policy](#)

[Boycott Policy](#)

[Global Logistics Policy](#)



## We Work Properly in the Global Marketplace

### Respect Human Rights

We believe every person, everywhere, has the right to live and work with freedom and dignity. The work we do at Herbalife Nutrition should positively impact their lives, preserve their basic human rights and comply with all applicable laws to prevent abuse.

### Live Our Principles

**Act responsibly.** Human rights can be impacted throughout our operations – from the way we source and manufacture our products through sales and distribution. No matter your job, follow the laws carefully that apply to protect human rights. Focus on making sure people have:

- Safe work conditions
- Fair pay
- Legal and reasonable work hours
- A choice of whether or not to work
- Freedom of association or collective bargaining

Remember, the laws of different countries may apply, depending on where you do business. Know the laws and how they affect your work. If you are unsure about these laws, ask the Legal Department.

**Hold third parties accountable.** We expect our third parties to protect human rights as we do. Therefore, we only work with suppliers who support our mission throughout their supply chain, with a focus on social and human rights, high-quality products, a safe environment and compliance, governance and integrity.



### Did You Know

**Herbalife Nutrition prohibits all human rights violations, such as:**

- Child labor
- Human trafficking
- Forced or compulsory labor
- Physical punishment

## We Work Properly in the Global Marketplace

### Help to Protect the Environment

We only have one world, and we all should protect it. Herbalife Nutrition is committed to doing just that – minimizing our impact by following environmental laws and continually searching for ways to operate a cleaner, more efficient and caring company.

### Live Our Principles

**Follow environmental laws.** As a global company, Herbalife Nutrition follows the environmental laws and regulations of many different countries. Know them, follow them and act responsibly:

- Submit accurate environmental reporting data.
- Pay special attention to the way we manufacture our products – follow all policies and regulations.
- Watch for hazards and violations in the way we source materials, manage emissions or handle and dispose of toxic materials.

**Do your part.** Help reduce the amount of waste Herbalife Nutrition produces by taking every opportunity to recycle or re-use resources and conserving resources like water, paper and electricity.

**Speak up for the environment.** Never ignore an environmental hazard in any part of our business. Voice your concerns immediately about improper waste disposal, spills or release of pollutants.



### Questions and Answers

I'm a relatively new hire, so I'm still learning about our manufacturing processes. I did notice some coworkers who seemed to be disposing of a hazardous chemical in an unsafe way. I don't want to be a troublemaker, but should I say something?

Yes, you should. Just because you're new, it doesn't mean your voice shouldn't be heard. Voice your concerns right away, and remember, we don't tolerate retaliation against anyone who does.



### Did You Know

**Damage to the environment = damage to our reputation.**

Anyone at Herbalife Nutrition who harms the environment also harms the communities we serve and our good name. We – and those who work on our behalf – must be responsible and take action to protect our environment.



## We Work Properly in the Global Marketplace

### Continue to Be a Good Corporate Citizen

We build trust when we act as a good corporate citizen, ensuring that our business and our actions bring positive value to our world and our communities. Each of us plays an important role – through our own commitment to excellence and social responsibility.

### Live Our Principles

**Set the best example.** You can help us demonstrate good corporate citizenship with your daily focus on product quality and safety and making sure your every decision benefits people and our world. We also encourage you to get involved at the community level, participating in local charitable activities and Herbalife Nutrition-sponsored volunteer opportunities. For more information, contact the [Corporate Social Responsibility Team](#).

**Uphold the law.** A variety of laws apply to our business around the world. We rely on you to know and follow them, no matter where you work or which countries you do business with. If local laws conflict with U.S. law or Herbalife Nutrition's Code or Values, follow the stricter requirement.

**Respect communities and culture.** The wider our reach extends, the more communities we encounter. When you interact with new communities, remember that you embody the Herbalife Nutrition brand. Represent us well. Be respectful of all cultures and customs, but make sure any local business practices don't conflict with our Code or the law.



### Did You Know

**Our good corporate citizenship shows in our:**

- Fair labor practices
- Health and wellness promotion
- Charitable donations
- Care for the environment
- Community support and education
- Volunteer activities

## We Work Properly in the Global Marketplace

### Follow the Rules for Engaging in Charitable Activities

Changing our world for the better isn't just something we aspire to, it's something we actually do – making our communities better places to live through our own daily work and our support of local charities. Herbalife Nutrition encourages us to get involved and make change happen.

### Live Our Principles

**Follow your passion.** What causes do you care about most? Herbalife Nutrition encourages you to give your support, either financially or by volunteering. Unless your volunteer time is approved as part of a company-sponsored volunteer program, you must not volunteer on Company time. Please review your local benefits policies, check with your manager or contact local Human Resources for more information. Don't contribute in Herbalife Nutrition's name or use Company resources. And don't solicit donations from anyone providing services to Herbalife Nutrition. Guidelines regarding product donations and charitable giving are available in the [Charitable Contributions Policy](#).

**Help Herbalife Nutrition help others.** Herbalife Nutrition offers a variety of opportunities for you to get involved with charitable events and causes. Look for these opportunities and join your colleagues to have an impact in your community. For more information, contact the [Corporate Social Responsibility Team](#).

**Watch for and avoid conflicts.** Make sure that your charitable activities never interfere with your work at Herbalife Nutrition or the decisions you make on our behalf.

**Look out for potential bribery.** Do not make any charitable donations if there is reason to believe the donations may be used to pay a bribe.



### Learn More

[Charitable Contributions Policy](#)

[Conflicts of Interest Policy](#)

[Related Party Transactions Policy](#)



### Did You Know

**You can put our purpose in action.**

The Herbalife Nutrition Foundation (HNF) is a 501(c)(3) nonprofit corporation. Contact [HNF](#) to learn more about their mission and how to donate.



## We Communicate Responsibly

### Don't Promote Political Interests in the Workplace

Politics is a popular topic of conversation, but at Herbalife Nutrition, we believe politics should stay personal. While we encourage you to support candidates or causes of your choice, we expect you to participate as an individual – without using Company time or resources.

### Live Our Principles

**Keep our workplace neutral.** Never single anyone out for their political views. Don't ask or pressure any colleagues, vendors, customers or partners to contribute to or otherwise support a political candidate or cause.

**Participate on your own.** When you support a particular candidate, be sure to use:

- ✓ **Your own time** – Never do your volunteer work for a particular candidate on Company time.
- ✓ **Your own funds** – Remember, the Herbalife Nutrition Political Action Committee (PAC) contributes to candidates, but we will not reimburse you for any donations you make to the PAC or independently to a candidate for elected office. For more on the Herbalife Nutrition PAC, please see page 45.
- ✓ **Your own resources** – Don't use Company equipment or systems (like email) to promote a candidate or cause.



### Did You Know

**You're free to support whomever you like and vote accordingly, and it won't affect your employment at Herbalife Nutrition.**



## We Communicate Responsibly

**Don't lobby on Herbalife Nutrition's behalf.** We're committed to complying with lobbying laws, which govern attempts to influence public policy. Before you communicate with government officials, know how these laws apply. Use care in your conversations, avoiding anything that could look like an attempt to influence them on Herbalife Nutrition's behalf.

### Herbalife Nutrition Political Action Committee (PAC)

Herbalife Nutrition maintains a voluntary, bipartisan Political Action Committee (PAC) to represent the Company with elected officials. Its purpose is to support candidates for federal and other elected offices who understand Herbalife Nutrition's concerns on political and policy issues of importance to our industry.

The [Political Action Committee](#) welcomes employee recommendations. Please reach out to inquire how you can help.



### Questions and Answers

**I'm a manager and am pretty sure that the people on my team all support my favorite candidate. Is it OK to encourage them to buy tickets for an upcoming fundraiser?**

**No, it isn't. It's inappropriate to encourage them this way. You can't be sure of their political views, and because you're their manager, they may feel extra pressure to buy tickets.**



### Learn More

[Political Activities and Contributions Policy](#)

[Conflicts of Interest Policy](#)





## We Communicate Responsibly

### Use Caution When Speaking on Behalf of Herbalife Nutrition

We understand the value of the Herbalife Nutrition name and the reputation we've built in more than 90 countries around the world for helping people achieve good nutrition and healthy active lives. To maintain that reputation, we rely on designated spokespersons to speak on our Company's behalf.

### Live Our Principles

**Protect our good name.** Unless you are designated to speak for Herbalife Nutrition, always direct inquiries to the proper resource. There may be times when you're tempted to help, share personal insights or set the record straight, but it's always better to rely on the experts who will make sure we speak with one voice.

- For inquiries from the media or invitations to speak or present on behalf of Herbalife Nutrition, contact our Corporate Communications Department.
- For analyst or investor inquiries, contact [Investor Relations](#).
- For sponsorships and endorsements, contact the Legal Department.



### Did You Know

**Poor communication can do major damage.**

Make sure the things you say NEVER:

- Misinform anyone
- Make promises we can't keep
- Disclose confidential information
- Harm our reputation
- Violate our Code or our Values





## We Communicate Responsibly



**Think before you speak.** In every business interaction, remember that you represent Herbalife Nutrition, and what you say reflects on you, on our Company and on how others view us. In all business communications, whether written, electronic or verbal, be respectful and professional. If you choose to share Company information on your own social media channels, it is important to be transparent when discussing Company news, endorsing products or promoting services to avoid confusing or potentially misleading readers about the nature of your relationship with the Company.



### Questions and Answers

One of our suppliers asked if I would provide a written endorsement for them to use in their marketing materials. I would like to do this, based on our long working relationship. Would that be OK?

**Maybe.** Contact the Legal Department first to tell them about the request and to gain their approval before agreeing to provide the endorsement. We will want to make sure that any information provided is accurate and will not adversely affect the Herbalife Nutrition name or reputation.



### Learn More

[Corporate Alliances Policy](#)

[Analyst and Investor Relations Communications Policy](#)

[Social Media, Publicity and Releases to the Public Policy](#)



## We Communicate Responsibly

### Use Social Media Responsibly

Herbalife Nutrition supports and encourages the use of social media as a way to express oneself, exchange ideas and build relationships. As employees, we must understand our responsibility to use good judgment in our online activity and comply with all applicable laws and Company policies.

### Live Our Principles

**Remember: Perception matters.** Remember, everything you post is public. In your online communications, be aware of the information you're sharing and the perception you're creating of our Company, our brand and our people.

**Do not speak for Herbalife Nutrition without authorization.** Only authorized employees can use social media to speak officially on behalf of our Company. If you choose to write anything related to Herbalife Nutrition, its products or business opportunity, identify yourself as an employee and make it clear that your views are your own and do not necessarily represent the views of our Company. You should only provide truthful testimonials and if you make any claims, they should be Company-approved ones.

**NOTE:** We support your right to [voice your concerns](#) regarding matters protected by applicable law, which includes engaging in certain activities related to your terms and condition of employment.



## We Communicate Responsibly

**Protect people and information.** Take care that you:

- Don't post anything that would be harassing or discriminatory. Please see the [Harassment, Discrimination, and Retaliation Prevention Policy](#) as well as any applicable local addendum(s).
- Don't post any confidential or proprietary information.
- Don't post photos from Company-sponsored events or activities without the permission from the people in the pictures prior to posting.



### Questions and Answers

**I just read a critical blog post about Herbalife Nutrition. It's full of incorrect information and written by someone who doesn't fully understand what we do. Would it be OK for me to post a comment to educate the writer (and everyone reading the blog)?**

**No. Even though your aim is to correct misinformation, you should contact your manager or the Global Social Media Team for guidance so an appropriate response can be posted on the Company's behalf.**

**After trying a new product, I would like to tell everyone on social media how amazing it is. Is that OK?**

**It's OK to do this as long as the information you share is your honest opinion, you conspicuously disclose that you work for Herbalife Nutrition and any claims you make about the product are consistent with approved Company claims.**



### Learn More

[Social Media, Publicity and Releases to the Public Policy](#)

[Harassment, Discrimination and Retaliation Prevention Policy](#)



## Before You Go

### Think about this ...

You may not realize it, but you've just done one of the best things you can do for our Company. By simply reading the Code, you now understand what *Doing What's Right* means at Herbalife Nutrition and the key role you play.

Now it's time to take what you've learned and apply it to your daily actions. Refer to the Code often – whenever you need a little help in deciding the right thing to do. After all, it's the little things we do each day that show the world *Who We Are*.

If you have questions or thoughts about anything we've presented, or if you suspect a violation of our Code, policies or the law, talk to your manager or any of the resources provided in this document. Thank you for your time and attention to making our Company the best it can be.



## Where to Go for Help

If you have a question, Herbalife Nutrition offers a variety of resources to contact for help:

Issues or Concerns	Contact
To ask questions, report potential misconduct or other ethical concerns	<p><b>Your manager</b>  <b>Your local Human Resources representative</b>  <b>The Herbalife Nutrition IntegrityLine, accessible either:</b></p> <p><b>Online:</b> Visit <a href="https://IntegrityLine.Herbalife.com">IntegrityLine.Herbalife.com</a></p> <p><b>By phone:</b></p> <ul style="list-style-type: none"> <li>• In the U.S., call 1-800-461-9330</li> <li>• For locations outside the U.S., visit <a href="https://IntegrityLine.Herbalife.com">IntegrityLine.Herbalife.com</a></li> </ul> <p><b>Text:</b> 1-213-335-2054 (U.S. only)</p> <p><b>Email:</b> <a href="mailto:EthicsandCompliance@Herbalife.com">EthicsandCompliance@Herbalife.com</a></p> <p><b>Mail:</b> Chief Compliance Officer  Herbalife Nutrition  800 West Olympic Blvd., Suite 406  Los Angeles, CA 90015</p>
For legal questions	The Legal Department
To view Company policies	<a href="https://herbalife.policytech.com/">herbalife.policytech.com/</a>
For media inquiries	Corporate Communications Department
For analyst or investor inquiries	<a href="#">Investor Relations</a>
For sponsorships and endorsements	The Legal Department

