



# **L-Nutra Product Promotion and Presentation Reference Booklet for Affiliated HCPs**



## *Table of Contents*

Introduction.....	3
Purpose.....	3
Scope.....	3
Responsibilities.....	3
Use of Approved Claims.....	4
Claims Language .....	5
Requirements for Disclaimers.....	7
Disease Names and Symptoms.....	9
What Needs to be Reviewed and Approved by L-Nutra?.....	11
Providing Hyperlinks and/or References to Scholarly Articles.....	13
Photographs and Creative Artwork.....	14
Use of Music.....	15
Use of Quotes.....	16
Use of Unaffiliated Third-Party Artwork and Stylized Names .....	17
Social Media and Other Communications for Affiliated HCPs .....	18
Speaking and Presentations.....	20
Compliance with this Guidance Document .....	22



### ***Introduction***

#### ***Purpose***

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L-Nutra (Company) is dedicated to honoring regulatory and Company guidelines. The purpose of these guidance documents is to inform, remind, educate, and provide additional information to internal and affiliated third parties regarding use of claims, disclaimers, assets from unaffiliated third parties, and approvable claims language.

#### ***Scope***

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This Guidance Document applies to the US Domestic Markets only.

#### ***Responsibilities***

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As an L-Nutra partner, we rely on your support to ensure successful and compliant marketing practices are being honored.

L-Nutra Regulatory Compliance proactively monitors all public-facing materials and content to ensure it adheres to all Company and Regulatory guidelines. If you should receive communication from L-Nutra requesting your support towards updating non-compliant content, we thank you in advance for your cooperation.

Please reach out to your personal L-Nutra contact, or email addresses listed in any agreement(s) you may have with L-Nutra with any questions.



### ***Use of Approved Claims***

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Approved claims listings are available for all L-Nutra products. Reference them while developing assets to help ensure compliance and efficiency of MLR review and approval.

1. Disclaimers are required to be used for specific claims as indicated in the approved claims listings. Additional information on use of disclaimers is below. If a disclaimer is required and is not utilized in one of the ways indicated below, MLR will not approve the asset and will request the addition of the disclaimer.
2. Claims may be modified to create “derived” claims. Derived claims, by definition, have the same meaning and information as the approved claim. If the meaning, information, or content is significantly different from the approved claim, it is considered a new claim and two exclusive things may happen:
  - a. The new claim may be submitted for review and approval by MLR. If approved, it will be added to the approved claims listing. Such consideration is given at the request of a submitter only, and is strongly recommended if regular use of the claim is desired; or
  - b. MLR will require modification of the new claim to ensure adherence to regulatory requirements and/or approved claims listings. Allowance of a one-time use of a derived claim does not guarantee ability to regularly use the claim as most derived claims are highly dependent on specific asset context and content.



## L-Nutra Product Promotion and Presentation Reference Booklet

### Claims Language

Claims are developed and accepted following Medical, Legal, and Regulatory input. Changing single words in claims can alter their meaning, and change the risks associated with the claim due to changes in interpretation by the reader. There are some basic words which L-Nutra does not allow, strongly discourages, or allows only under specific circumstances.

1. The table below offers a non-exhaustive list of language allowed, disallowed, or discouraged and should be used to help creative teams develop assets. Contact Regulatory Compliance / MLR for questions about specific words, as needed.

<b>USE THIS</b>	<b>NOT THIS</b>
Supports	Promotes, Causes, Increases, Enhances
Clinically Tested	Clinically Proven (not allowed at this time)
Your Wellbeing	Your Health
Healthy Aging	Longevity
Healthy Aging Through Cellular Rejuvenation /Autophagy	
Healthspan	Longevity, Lifespan
Metabolic Health (per claims listings only)	Metabolic disease names or symptoms
Bloating (stomach)	Gastrointestinal swelling / inflammation
Clinically Tested	Shown to be effective
Monitored for Safety	Shown to be safe
Bowel / Stool Regularity	Diarrhea (or similar), Constipation (or similar)
Support your body's natural detoxification processes (ProLon only)	Detox your body, Detox
Cellular Cleanse (ProLon only)	Cleanse
Cellular Rejuvenation / Cellular Renewal	Cellular Regeneration
Cleanse from your old habits / routine (ReSet or ProLon only)	Cleanse



## L-Nutra Product Promotion and Presentation Reference Booklet

2. The table below provides specific circumstances under which some words can be used and is a non-exhaustive list. In many instances, further guidance is also provided in approved claims listings.

<b>USE</b>	<b>Only in the following circumstances</b>
Clinically Shown	When presenting data from a single study, discussing that study only.
Promotes	Only as included in approved claims.
Endorsed By	Only when an endorsement has been explicitly agreed by the "endorsing" party. Agreement must be written and saved on file at L-Nutra.  Funding for research does not constitute endorsement.  Conduct of research at a specific university, hospital, etc., does not constitute endorsement.  Celebrity shows, videos, use of, or "spots" about ProLon, L-Nutra, Fasting Mimicking, etc. do not necessarily constitute endorsement. Review by legal counsel required.

3. Use of comparative words is generally discouraged unless included in an approved claim provided by the Company. Comparative claims can lead to legal disputes with competitors and consumers, alike. For this reason, L-Nutra prefers to use comparative words only when studies have been completed to support such use. Comparative language includes both direct comparisons to other products or companies, and indirect / implied comparisons to them.

Comparing our products to previous versions of themselves is an exception to this general rule.

Examples of comparative words include, but are not limited to, the following list. Be aware that use of these words is contextual, and you should read carefully to determine if an average person would consider your statement a comparison to a different company or product.

- Healthier (e.g., a healthier way to fast → healthier than another product?)
- Better than
- Superior to
- Safer\*
- Easier
- Improvement over

\*It is an accepted claim that ProLon is safer than a water-only fast.



### Requirements for Disclaimers

1. To know if a disclaimer is required, reference the approved claims list(s) pertinent to your product(s).
  - a. If a disclaimer is included with a claim, you may use it as written as a separate and referenced statement or write material which includes the disclaimer and claim in a single sentence, paragraph, or listing.

For example

Approved Claim: "In a clinical study, users lost weight and maintained healthy systolic blood pressure.\*"

Required Disclaimer: "\*Results based on 3 consecutive monthly cycles."

Derived Claim with disclaimer incorporated: "Based on a clinical study using 3 consecutive monthly cycles of ProLon, users lost weight and maintained healthy systolic blood pressure."

- b. If a disclaimer is not included with a claim, but you alter and approved claim (e.g., create a derived claim) a disclaimer will be needed as a stand-alone referenced statement if you leave any information from the approved claim out of the derived claim.

For example

Approved claim: "Multiple cycles of ProLon reduces visceral fat while maintaining lean body mass."

Derived Claim: "ProLon reduces visceral fat while maintain lean body mass\*."

Disclaimer: "\*Benefits seen with multiple consecutive monthly cycles of ProLon."

2. Disclaimers on written materials must adhere to the following requirements:
  - a. Must be in front size no more than 2 points smaller than the referenced claim(s) unless the claim is exceptionally large, in which case the disclaimer must be easily readable and of similar size to the rest of the font in the asset.
  - b. Disclaimer must be readable. For example, if a font size of 2 points smaller than the claim makes the disclaimer difficult to find or read, MLR will request an increase in font size.
  - c. Must appear on the same page as the claim referenced (above the fold).
  - d. If the page has banners or sections, the disclaimer must appear in the same banner or section as the claim unless it's applicable to multiple banners or sections. If it applies to multiple banners or sections, it can be at the bottom of the page where the last pointer (i.e., asterisk) is which directs to the disclaimer.
  - e. Disclaimers must be easily located, regardless of placement. They cannot be buried in other information, too small to read, etc.
  - f. If there are multiple disclaimers and/or other statements with the disclaimer, they must be separated by at least one hard return.

For example



## L-Nutra Product Promotion and Presentation Reference Booklet

Incorrect: \*Benefits seen with multiple consecutive cycles of ProLon. These statements have not been approved by the Food and Drug administration. ProLon is not intended to diagnose, treat, cure, or prevent any disease.

Correct:

\*Benefits seen with multiple consecutive cycles of ProLon. These statements have not been approved by the Food and Drug administration. ProLon is not intended to diagnose, treat, cure, or prevent any disease.

- g. If there are multiple disclaimers on a page, different symbols (i.e., asterisk, number sign, etc.) must be used for each one to make them easily aligned with the appropriate claim.
3. Disclaimers on videos must be large enough to read and must remain on the screen long enough for an average person to read completely. If there is a moving background, allow additional time for reading. This applies to videos from L-Nutra and affiliated third parties.
4. Placement of disclaimers on packaging, when not able to be placed on the same side / panel as the claim, must be approved by the MLR.
5. In some instances, there are short and long versions of the same disclaimer (i.e., for Fast Bar). By default, long version disclaimers are required to be used. If the long version will not fit on the packaging, it is too long to be read during a video or is too long for social media posts or similar, the short version of the disclaimer may be used. MLR review will include assessment of use of long vs short disclaimers.





### ***Disease Names and Symptoms***

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ProLon and Fast Bar are not approved by the FDA to diagnose, treat, cure, or prevent any disease. As such, we do not make any disease claims for our consumer products.

1. You cannot include any disease names in assets which promote L-Nutra products, unless specifically allowed and approved by the MLR (i.e., ProLon Professional Program has specific claims allowances).
2. You cannot promote L-Nutra consumer products in any asset in which the topic is discussion of a disease or disease state since such use will imply the product will treat, cure, prevent, or otherwise mitigate the disease.

For example, you cannot say anything like the following, even though it attempts to distance the product from a disease claim: "I had horrible skin acne before I tried fasting mimicking. I don't know if the fasting helped, but my acne is better."

3. The following are disease symptoms which are **not** allowed to be used in any claim about our consumer products, unless explicitly approved by MLR. The list is not exhaustive.
  - Acne (zits, skin eruptions)
  - ADD or ADHD
  - Blood Glucose / Blood Sugar
  - Cholesterol improvement
  - Confusion
  - Constipation
  - Diarrhea
  - Dyspepsia
  - Edema
  - Headache
  - Heartburn
  - Hormonal imbalance
  - Indigestion
  - Infertility / Inability to Conceive
  - Inflammation
  - Insomnia / Inability to Sleep
  - Insulin Resistance
  - Irritability
  - Itchy Skin
  - Lethargy
  - Loose Bowel / Loose Stool
  - Muscle Weakness / Weakness
  - Nausea
  - Nerves
  - Pain
  - Rash
  - Redness
  - Regeneration



## **L-Nutra Product Promotion and Presentation Reference Booklet**

- Shakiness
- Skin Blotches, Dryness, Redness, Scales / Scaliness, Tone
- Sleepy
- Sensitivity
- Soreness
- Stem Cell(s)
- Stomach Upset
- Swelling
- Tired / Tiredness
- Tremor



## L-Nutra Product Promotion and Presentation Reference Booklet

### What Needs to be Reviewed and Approved by L-Nutra?

L-Nutra maintains a Medical, Legal, Regulatory Review Board (MLR) to review promotional materials to ensure adherence to internal and regulatory requirements. Not all materials are required to be reviewed before use, depending on type. The table below indicates what materials must be reviewed, which ones can be reviewed at request, and how to submit material for review, depending on your role as a third party to the Company.

Optional review indicates that submission to MLR / L-Nutra is not required, but the party can submit for review at their discretion.

Third Party	Type of Material	Review Required?	Submission Directions
Affiliates / Influencers ( <10,000 followers)	Social Media Posts	Optional	If desired, use <u>either</u> : <ul style="list-style-type: none"> <li>• Submission directly to review system by internal contact (preferred)</li> <li>• Email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a></li> </ul>
Affiliates / Influencers ( ≥10,000 followers)	Social Medial Posts	Yes	Either: <ul style="list-style-type: none"> <li>• Submission directly to review system by internal contact (preferred)</li> <li>• Email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a></li> </ul>
Affiliates / Influencers (any number of followers)	Blog Posts, Articles, Web Pages, Advertorials, and similar	Yes	Either: <ul style="list-style-type: none"> <li>• Submission directly to review system by internal contact (preferred)</li> <li>• Email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a></li> </ul>
Speakers / KOLs	Presentation Decks	Yes	Decks are created and provided by Medical Education.  Changes must be requested and managed through Medical Education contact(s) who will ensure MLR review and approval prior to use.
	Social Media Posts	Optional	If desired, email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a>
	Blog Posts, Articles, Web Pages, Advertorials, and similar	Yes	Email <a href="mailto:reviewrequests@l-nutra.com">reviewrequests@l-nutra.com</a>
Affiliated HCPs	Presentation Decks for Patient Education or Public Use	Yes	Decks are created in cooperation with Medical Education and Professional Sales (i.e., Rep or another Team member).  Changes must be requested and managed through Professional Sales and Medical Education contact(s) who will ensure MLR review and approval prior to use.



## L-Nutra Product Promotion and Presentation Reference Booklet

Third Party	Type of Material	Review Required?	Submission Directions
Affiliated HCPs	Social Media Posts	Optional	If desired, email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a>
	Blog Posts, Articles, Web Pages, Advertorials, and similar	Optional	Email <a href="mailto:reviewrequests@l-nutra.com">reviewrequests@l-nutra.com</a>
Affiliated Distributors	Social Media Posts	Optional	If desired, use <u>either</u> : <ul style="list-style-type: none"> <li>• Submission directly to review system by internal contact (preferred)</li> <li>• Email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a></li> </ul>
	Blog Posts, Articles, Web Pages, Advertorials, and similar	Yes	Either: <ul style="list-style-type: none"> <li>• Submission directly to review system by internal contact (preferred)</li> <li>• Email <a href="mailto:reviewregeusts@l-nutra.com">reviewregeusts@l-nutra.com</a></li> </ul>
	Presentation Decks	Yes	Decks are developed in cooperation with B2B contact and Medical Education.  Changes to approved decks must be requested and managed through your B2B contact Medical Education contact(s) who will ensure MLR review and approval prior to use.



### Providing Hyperlinks and/or References to Scholarly Articles

L-Nutra strictly governs the provision of hyperlinks and references to scholarly articles, and MLR review includes assessment of references.

1. Assets for HCPs
  - a. HCP-focused assets can provide hyperlinks and references to scholarly articles as HCPs are trained and educated to read and assess them.
  - b. Use of article titles may be limited by the MLR depending on the potential for implied or direct claims as many article titles do reference disease states.
  - c. Use of author names, journal names, date of publication, and DOIs without the article title will ensure there are no implied or direct disease claims when providing such references.
  - d. Assets which HCPs will share with patients are not approved to contain references or hyperlinks to scholarly articles (see Assets for Consumers, below).
  - e. In addition to scholarly articles, unpublished data is referenced as "Data on File". This phrase is not required if all data which supports a claim is published. Disclaimers generally include this phrase when required, and do not include it when it's not required.
  - f. Links from L-Nutra sites to external sites must be accompanied by appropriate pop-ups. Digital Marketing manages L-Nutra sites and will appropriately place the pop-up warnings per internal SOP. MLR will ensure pop-ups are placed as required during audits, website reviews, etc.
2. Assets for Consumers
  - a. Consumer-facing assets **do not** contain references or hyperlinks to scholarly articles when the asset is promotional of an L-Nutra product(s).
  - b. "Data on file" is not required to be used in disclaimers for consumer-facing assets, even when included in the disclaimer in claims listings, and may be removed in such instances.
  - c. The above limitations and allowances apply to patient-facing assets developed for and usable by HCPs, and when from L-Nutra.



### ***Photographs and Creative Artwork***

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All photographs and creative artwork become part of the context for an asset (i.e., video, print piece, package, email, etc.), and can convey a claim or implied claim to the viewer. The photographs and creative artwork are therefore subject to the same level of scrutiny from MLR as claims.

1. If a photograph or creative artwork is a representation of our food (i.e., bowl of soup, Fast Bar, ingredients), and does not contain labels, packaging, or written materials in frame which have claims:
  - a. Such photographs or creative artwork can be considered interchangeable without MLR review and approval.
  - b. Such photographs or creative artwork can replace a different photo / artwork with direct or implied claims without MLR review and approval.
2. Photographs and artwork which are considered direct or implied claims must be reviewed and approved by the MLR prior to use and must be submitted with the written material(s) which they will accompany. They will not be approved as independent assets.

Examples of photographs and artwork considered to contain direct or implied claims:

- Before and After photographs (requires the same clothing style, lighting, and angle in both photos)
  - Depictions of weight loss
  - Depictions of healthy body types
  - Depictions of autophagy, cell functions, and scientific / medical ideas or principles (reviewed for accuracy and for applicability to product)
3. Repositories of photographs and artwork which do not require MLR review and approval (see #1 in this section, above), are encouraged.



### ***Use of Music***

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An infringement of copyright becomes a legal issue when someone uses copyrighted material without gaining consent from the artist for authorization. Music which is royalty-free is not subject to such legal issues.

1. Royalty-free music must be used if a contract or authorization from the artist has not been received.
2. When agreements or contracts are required for music which is not royalty-free:
  - a. The L-Nutra Legal Department can be consulted to determine correct agreements / contracts to be used when copyright authorization is required.
  - b. L-Nutra personnel and affiliated third parties are not authorized to enter into any agreement or contract on behalf of L-Nutra without consultation with and approval from the Legal Department.
  - c. Legal Department approval must be provided on file (i.e., as an attachment to the MLR submission, or in L-Nutra files MLR can access) or use of the quote will not be allowed.
3. If royalty-free music is being used, submission to the MLR must include this information (i.e., as an editorial comment, attached documentation, link to a website, etc.) to support expeditious review. Similarly, if the music is allowable based on agreement or contract, that document must be referenced to support review. If neither is provided, MLR will return the submission and request correction / response.



### ***Use of Quotes***

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An infringement of copyright becomes a legal issue when someone uses copyrighted material without gaining consent from the person being quoted, or their estate (as applicable), for authorization. Quotes in the public domain are not subject to these legal issues.

1. Searches can be conducted to determine when an estate exists which controls quotations. There are commonly estates which have such control for most famous individuals and authors, regardless of date of publications, death, speeches, etc.
2. Quotes in the public domain must be used if a contract or authorization from the quoted person or the estate has not been received.
3. When agreements or contracts are required for quotes not in the public domain:
  - a. The L-Nutra Legal Department can be consulted to determine correct agreements / contracts to be used when copyright authorization is required.
  - b. L-Nutra personnel and affiliated third parties are not authorized to enter into any agreement or contract on behalf of L-Nutra without consultation with and approval from the Legal Department.
  - c. Legal Department approval must be provided on file (i.e., as an attachment to the MLR submission, or in L-Nutra files MLR can access) or use of the quote will not be allowed.
4. If a quote is in the public domain, submission to the MLR must include this information (i.e., as an editorial comment, attached documentation, link to a website, etc.) to support expeditious review. Similarly, if the quote is allowable based on agreement or contract, that document must be referenced to support review. If neither is provided, MLR will return the submission and request correction / response.





### **Use of Unaffiliated Third-Party Artwork and Stylized Names**

Many companies, universities, governmental agencies, and other entities have specific rules governing use of their identifying artwork (i.e., logos, insignia, icons, emblems, etc.) and even their names when written in their identifying stylized font. All such identifying artwork and stylized names can be subject to copyright and intellectual property (IP) laws and regulations.

In addition, many of these institutions, organizations, and companies consider use of their artworks, stylized names, etc. to imply their endorsement of a product, company, person etc. For this reason, if artwork or stylized names are used with permission of the owner, ensure it is made clear in accompanying language that the use is not a direct or implied endorsement.

1. Use of any third-party identifying artwork or stylized names in L-Nutra assets is controlled and subject to review.
2. Some entities allow use of their identifying artwork and stylized names, but have specific requirements such as font size, color, type, etc.
  - a. In all instances, L-Nutra will adhere to third-party requirements when we wish to include their artwork or stylized names on our assets.
  - b. Third parties commonly publicize these requirements on their websites, but if difficult to locate, the internal IP Legal Counsel / Legal Department may support their identification.
  - c. A link to or document with the requirements must be submitted to MLR with the asset so the asset can be reviewed against them.
3. If there are no requirements or limitations found for the entity, internal / external IP Legal Counsel must provide approval to use the third-party artwork and/or stylized name, or MLR will withhold approval.
  - a. If Counsel allows use, documentation of this decision is required (i.e., as an attachment to the asset when submitted to MLR, or as a document or decision available in L-Nutra files accessible to MLR).
  - b. Counsel may provide approval prior to or during the MLR review process. It is most efficient to gain Counsel approval prior to submission to the MLR.
4. The following entities are known to require explicit (written) approval for use of stylized names, logos, etc. This is a non-exhaustive list. Written approval must be on file at L-Nutra, if procured.
  - US Federal Government – all agencies, including NIH, NIA, FDA, etc.
  - Harvard
  - Yale
  - Princeton
  - University of Pennsylvania
  - University of Michigan (UofM)
  - The Ohio State University
  - Mayo Clinic
  - Johns Hopkins



### **Social Media and Other Communications for Affiliated HCPs**

Following guidelines is essential for HCPs to ensure they and L-Nutra are safeguarded from adverse regulatory authority findings. Internet sites and social media posts are sources of content that regulatory authorities can and will review to ensure both you and L-Nutra are adhering to L-Nutra policy and procedures, and regulatory guidelines as they are public information. Internet and Social Media posts and pages are not safeguarded through medical practice considerations in the eye of the regulatory authorities.

1. Disclosures of affiliation status
  - a. When posting to your own social media site or webpage, you do not have to disclose your affiliation with L-Nutra if you are promoting product use.
2. Relating Personal or Professional Experience
  - a. If you convey personal or professional experience in the public setting, ensure it is clear that it is your professional opinion or clinical or personal experience, and the information is not the position of L-Nutra.
    - This applies to when you make a claim which is not the same as an approved claim from L-Nutra (i.e., you lost more weight than our claims say you will, you want to say your skin is clearer which is not a claim we make, etc.)
    - Use an asterisk next to your personal claim, and at the end of the post you can use the statement or one similar:  
  
“\*These results are my experience with ProLon and are not claims from the manufacturer.”
    - Use terms like “In my experience...,” “I followed this recommendation...,” “I found this information useful...” or similar.
  - b. If you convey personal or professional experience in the private individual medical setting to a patient, you may do so without use of limitations, disclaimers, or other statements.
3. Fasting Support
  - a. You may publicly provide support to patients who are fasting by sharing information as it appears on the Pro-Lon Tips and FAQs shared with you and at <https://prolonfmd.com/faq/>. Other resources are prohibited in your role as an L-Nutra affiliate.
  - b. You may provide fasting support to individual patients in the private medical setting according to your personal medical experience and knowledge, using the FAQs and Tips as you deem appropriate and best for the individual patient.
4. Overall Guidelines
  - a. No one can talk about experience with a product they have not tried, including HCPs and/or their staff.
  - b. All posts, articles, advertorials, etc. must be honest and truthful. Don't mask how you were introduced to an L-Nutra product. If you think a product was terrible, you cannot promote the product as terrific or enjoyable.



## **L-Nutra Product Promotion and Presentation Reference Booklet**

- c. All persons must avoid claims and statements that are not factual or cannot be substantiated.
- d. All persons must consider trademark law and avoid using content that is not allowed for mass consumption. For example, Jane cannot use Michael Jackson's "Thriller" when creating a Halloween ad for L-Nutra. L-Nutra does not have the rights to use "Thriller." This rule also applies to celebrity endorsements or use of character; this includes cartoon characters. See the above sections on music, quotes, artwork, creative artwork, etc. for further information.



### Speaking and Presentations

L-Nutra speakers, Key Opinion Leaders (KOLs), and affiliated HCPs are required to adhere to the following presentation and speaking guidelines. Doing so helps ensure that regulatory requirements are adhered to, and safeguards both L-Nutra and the speaker by ensuring adherence to regulatory requirements and allowances, and L-Nutra policies and procedures.

Many of the below-listed requirements are also found in agreements in the case of contracted speakers and KOLs.

1. General Information and Guidelines for all presentations
  - a. When you speak for L-Nutra, you represent the company and are subject to the same regulations and liability as L-Nutra. This guideline protects You as well as the Company.
  - b. In all instances, disclose all material and financial relationships at the start of your presentation.
  - c. Do not make any disease claims or claim ability to prevent, treat, diagnose, or cure any disease with L-Nutra products, regardless of the target audience or presentation platform.
2. Guidelines for Presentations to Professionals in an Academic setting

You are entitled to express your professional opinion during an academic presentation; however, adhere to the following:

  - a. Ensure proper disclosure of financial relationship(s).
  - b. Present data in the context of research, i.e., using expressions like "study subjects" or "volunteers," rather than "patients" when describing study methods and results.
  - c. Do not extrapolate the results to other scenarios if the evidence is insufficient, i.e., from one disease state to another, or animals to humans.
  - d. Do not use brand names or trademarks during a professional presentation.
  - e. Do not make or imply disease claims.
  - f. If you are providing a personal opinion on the product/technology, state it explicitly.
  - g. If you discuss your experience, be clear it is your personal experience (not of the position of the manufacturer).
  - h. Refer attendees to L-Nutra for any commercial questions
3. Guidelines for Presentations which Include Patients and/or the General Public
  - a. Presentations to general audiences are more scrutinized by regulatory bodies.
  - b. Be sure to disclose your financial relationship(s).
  - c. Do not make direct or implied disease claims.
  - d. Limit Q&A to only discussing the data in the context of research. Do not provide direct patient management advice for disease management.
  - e. If a question is asked whether this type of diet would be useful for someone's medical condition:



## L-Nutra Product Promotion and Presentation Reference Booklet

- Do not give clinical advice using preliminary results, especially if the research is pre-clinical.
  - State that you cannot make specific clinical recommendations for any individual and that it is important for them to speak to their healthcare professional (HCP).
- f. Avoid sharing personal experience. If you must, be clear that the shared information is only your experience, does not speak to general outcomes, and is not a recommendation.
4. Guidelines for Presentations for a L-Nutra event
- a. Disclose the financial relationship
  - b. Present only the slide deck that is approved by L-Nutra
  - c. Any changes to a slide deck must be pre-approved by L-Nutra prior to use



### **Compliance with this Guidance Document**

1. Regulatory Compliance will implement this Guidance Document's requirements when completing asset reviews and social media audits.
2. Regulatory Compliance will conduct surveillance and audit activities based on the requirements within this Guidance Document, regulatory requirements, and L-Nutra policies and procedures.
3. Affiliates, influencers, KOLs, speakers, affiliated HCPs, affiliated distributors, and other third parties working with or for L-Nutra are responsible to respond when notified of compliance issues and/or investigations.

Prompt correction of identified non-compliance is required within the time frame specified by L-Nutra.

The following list indicated the L-Nutra party responsible for communicating with affiliated third parties when a investigation or non-compliance issue is identified:

- a. Affiliated HCPs – Professional Sales Representative, Regulatory Compliance Personnel
  - b. Affiliates / Influencers – Affiliate / Influencer Contacts, Regulatory Compliance Personnel
  - c. Contracted Speakers / KOLs – Regulatory Compliance Personnel, Medical Education / Medical Affairs
4. For internal parties, Regulatory Compliance will manage all communications regarding non-compliance investigations and required actions per internal SOP.
  5. All internal and affiliated third parties are required to adhere to this Guidance Document. Failure to do so will result in a Regulatory Compliance investigation.
    - a. External parties may find more details in contractual agreements, directions for social media campaigns, and similar documents, as applicable.
    - b. Internal parties will find more details on MLR and Regulatory Compliance requirements in internal policies and procedures.
  6. Failure to make corrections within corrected time frames, or repeated failures to follow regulatory requirements, this Guidance Document, and/or other L-Nutra policies or procedures will result in actions taken by Regulatory Compliance as indicated in the following:
    - a. Affiliated third parties – Agreements and/or SOP 11.001 Third Party Non-Compliance Policy
    - b. Internal Personnel – SOP 01.010 L-Nutra Compliance Policy