

PRODUCT RELATED POSTS — SUMMARY GUIDANCE

Social Marketers are not permitted to make medical or disease claims about any Modere products. In some cases, even approved product benefit statements must be accompanied by proper disclaimers when promoting. It is critical to stick together and remain true to our Modere brand values including being authentic, humble and compassionate. This means you must avoid any reference, direct or implied, to COVID-19 or the coronavirus in your product-related promotional communications, including references to the economic situation, layoffs, unemployment or related references. You should not seek to leverage the current situation in promoting Modere products.

Additionally, any promotional posts of products requires a disclosure of your material connection to the opportunity. This means including terms such as Independent Social Marketer, “ad”, “sponsored” or “IndependentSocialMarketer”.

The guidance below applies to personal social media, private groups, corporate groups, videos, email and direct communication. For more information and guidance go to the Education & Compliance tools section in the back office.

	MAY POST WITHOUT DISCLAIMER	MAY POST WITH DISCLAIMER	MAY NOT POST, EVEN WITH DISCLAIMER
PERSONAL CARE PRODUCTS	Content found in the company materials and fact sheets. Provide realistic and accurate benefits that consumers may expect.	You can say that hand wash/body bar “washes away bacteria**” with the required disclaimer.	Statements that claim or imply that our products diagnose, treat, cure, or prevent any disease. This includes particular skin conditions such as (but not limited to) acne, rosacea, eczema and psoriasis. Please keep in mind, this also applies to any personal results that you or someone else may have experienced that are not within the approved product benefits.*†
HEALTH & WELLNESS PRODUCTS	Product images	Personal experiences that are consistent with approved claims for product, including FDA disclaimer. Structure/function claims from company literature, along with the FDA disclaimer either in the post or on the image that includes the claims The disclaimer is provided below. Required Disclaimer: <i>These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease. (Disclaimer in bold text. In a hairline box and linked with a symbol when not adjacent to claim.)</i>	Statements that claim or imply that our products diagnose, treat, cure, or prevent any disease. Please keep in mind, this includes any personal results that you or someone else may have experienced that are not within the approved product benefits.
HOUSEHOLD PRODUCTS	Content found in company materials and fact sheets	Any product that might have a purpose/benefit which includes a disclaimer in the product fact sheet.	Modere’s products are not to be marketed as anti-bacterial or anti-viral.*†
WEIGHT MANAGEMENT BEFORE/AFTER	NO. As a matter of clarification, there is not a distinction between a Social Marketer and customers in terms of what is allowed. A customer’s experience used in promotion is still bound by the same regulatory guidelines	YES - With the required disclaimer in the text and on the image. Required Disclaimer: <i>Results not typical. The Lean Body System requires lifestyle changes. Consult your physician prior to starting any new diet or exercise program. The typical person can expect to lose 1 to 2 pounds per week depending on a variety of factors including the amount of exercise and motivation to stick to a reduced-calorie diet.</i>	Extreme claims of unrealistic weight loss, inappropriate Photoshopped images, images that were not taken with consistent pose, lighting etc. following best practices.
PERSONAL CARE BEFORE/AFTER		YES - With the required disclaimer in the text and on the image. Required Disclaimer: <i>Independent Modere representative. Results after # days. Individual results will vary.</i>	Visual depictions of health conditions not included in the approved benefits of the product. This would include skin conditions such as but not limited to acne, rosacea, eczema, psoriasis and wounds or sores.

* The U.S. Centers for Disease Control and Prevention states that washing hands with soap and clean running water for 20 seconds is the best way to maintain good hand hygiene

† With the increased demand for household products such as Modere Hand Wash and Multi-Surface Cleaner, it is important that these items are promoted as clean alternatives to the regular cleaning products that are in short supply, rather than as anti-bacterial or anti-viral. Additionally, Mouth Rinse may not be used as a sanitizer. Please see below for specific information about three popular Modere products:

Multi-Surface Cleaner: This product is not formulated to be an anti-bacterial or anti-viral product. Multi-Surface Cleaner is intended for everyday basic household cleaning, and it works best for the removal of grease, dirt and grime from upholstery and hard surfaces. The plant-derived alcohol in Multi-Surface Cleaner is present in a very small amount. It is used as a solvent in the formula, not for sanitizing or disinfecting functions.

Hand Wash: This product is not anti-bacterial. Modere has chosen to avoid antibacterial compounds such as triclosan because they may contribute to antibiotic resistance and in large amounts have negative environmental impacts. The FDA has stated that there is no current evidence that OTC antibacterial soaps provide any benefit over that of proper washing with regular soap and water.

Mouth Rinse: This product is intended to be used as a mouth rinse only, for eliminating bad breath and supporting healthy teeth and gums. One of the key features of the Mouth Rinse is that it is alcohol-free. Mouth Rinse does not sanitize your hands or other surfaces.