

BRAND AMBASSADOR GUIDELINES

Purpose and Scope

Almased USA is committed to transparency and honesty in all of its advertising messages and promotional communications with consumers. Like other types of advertising, endorsements must be truthful and not misleading. Consumers must understand when a social media endorsement is sponsored by us.

These Guidelines apply to all Brand Ambassadors, agencies, independent contractors, speakers, writers, bloggers, talent, and any other individual or entity engaged in promotional communications on behalf of Almased USA on social media or other non-traditional media. These Guidelines also apply to agencies who manage these individuals and entities. For countries outside the US, Almased USA considers many of the requirements in these Guidelines to be best practices for engaging in social media.

Brand Ambassadors Must Comply with Our Standards of Conduct

With respect to promotional statements or other claims made on social media platforms and on other non-traditional media about Almased USA and our products/services/brands (including but not limited to the Products), Brand Ambassadors must adhere to the following principles:

- Brand Ambassadors may only make statements that:
 - reflect their honest beliefs, opinions, or experiences; and
 - are transparent about their connection to Almased USA.
- Brand Ambassadors may not:
 - make deceptive or misleading claims to consumers about our products/services/brands, or our competitors' products/services/brands;
 - make any claims about our products/services/brands, or our competitors' products/services/brands, that are not backed up by evidence;
 - disclose any of our confidential information;
 - engage in any communication that is defamatory or infringes upon the intellectual property, privacy, or publicity rights of others;
 - offer for sale or solicit products on behalf of Almased USA;
 - make offensive comments that have the purpose or effect of creating an intimidating or hostile environment;
 - use ethnic slurs, personal insults, obscenity, or other offensive language; and
 - make any comments or post any content that in any way promotes unsafe activities that could lead to an unsafe situation involving Almased USA's consumers or other individuals.

Brand Ambassadors must also refrain from creating fake followers or engagement on social media platforms, such as:

- Buying followers.

- Using bots to grow audience size by automating account creation, following, commenting, and liking.

Disclosing a Material Connection Clearly and Conspicuously

When posting about our products/services/brands, Brand Ambassadors must disclose their material connection to Almased USA clearly and conspicuously.

These Guidelines do not require specific language to disclose a material connection, but Brand Ambassadors must communicate the material connection effectively so that consumers:

- Can easily find it.
- Can easily understand it.
- Obtain sufficient information to make a judgment about the value of the endorsement.

To ensure a disclosure is clear and conspicuous, appropriate consideration should be given to the limitations and nature of the platform being used. Brand Ambassadors must:

- Ensure the disclosure is:
 - well-placed so it can be easily noticed; and
 - prominent so it can be easily read.
- Avoid burying the disclosure:
 - in a bio;
 - below the fold;
 - in a hyperlink, like a “Legal” or “Disclosure” button; or
 - among a series of hashtags, other disclosures, or general copy.
- Superimpose a material connection disclosure on images, including on Snapchat and Instagram Stories. The disclosure should be:
 - easy to notice and read in the time that followers have to look at the image; and
 - well-contrasted against the image.
- In video posts, including podcasts:
 - place the disclosure both within the video itself, and in the description of the video; and
 - display the disclosure long enough for a consumer to be able to read and understand it.
- In Instagram posts, disclose a material connection before the “More” button.
- For a live stream, repeat the disclosure as needed to ensure that consumers see it or keep it posted throughout the live stream.
- If the posts are part of an online chat or tweets, or a similar thread, make the disclosure clearly in the first entry into the conversation thread, and then add to subsequent entries at regular intervals depending on the media and the length of the thread.
- Disclose the material connection even when just tagging a Product in a photo.

- For a television or radio talk show appearance, disclose the material connection verbally when promoting our Products.

FTC Guidance

Brand Ambassadors agree to comply with the FTC guidance on endorsements (which can be found on the FTC's website), specifically:

- Guides Concerning the Use of Endorsements and Testimonials in Advertising (Endorsement Guides).
- The FTC's Endorsement Guides: What People are Asking.
- The Do's and Don'ts for Social Media Influencers.
- Brand Ambassadors should be aware that:
 - followers may know about a Brand Ambassador's connection to Almased USA;
 - a Brand Ambassador's opinions should be based on honest beliefs and experiences;
 - a Brand Ambassador should refrain from making statements about our products/services/brands that are measurable; and
 - any comparisons must be based on actual, personal experiences with all products being compared – they should not extrapolate beyond personal experiences.

When a Brand Ambassador Fails to Comply with These Guidelines

Brand Ambassador agrees to immediately correct any failure to disclose a material connection or communication of any unsubstantiated claims by a Brand Ambassador.

Brand Ambassador also agrees take the following steps:

- If an agency or other third party manages or is otherwise involved with the Brand Ambassador relationship, alert the third party to the issue.
- Determine whether a correction is needed, and how best to make it. If Almased USA determines that a correction is required, Brand Ambassador agrees to follow Almased USA's instructions concerning how to make the correction.

Brand Ambassador agrees to promptly take these steps without any additional compensation.

Best Practices for Disclosures

Brand Ambassadors are required to disclose material connections to Almased USA. Listed below is sample disclosure language. Alternative but substantively comparable language may also be used where appropriate. Although Almased USA does not require specific disclosure language, it does prohibit certain hashtags and other disclosure practices specifically found by the FTC as insufficient. The goal for a material connection disclosure is to ensure it is readily seen and understood by consumers.

Statements about the material connection should identify the nature of the connection, such as:

- For receipt of free products:

- I received free [products/samples] from Almased;
- Almased sent me free [products/samples] to review;
- Almased gave me this product to try; or
- Thanks Almased for the free products.
- I was hired by Almased to post about its products;
- I have partnered with Almased to promote its products; or
- I am a compensated brand ambassador for Almased.
- For incentivized consumer reviews:
 - I received a [sweepstakes entry/discount/coupon] for making this review.
 - I am part of Almased's program that gives me [free samples/coupons/discounts]; or
 - Reviewers on this page received a [sweepstakes entry/discount/coupon] for making their reviews.
- For personal relationships:
 - I am [a friend of/related to/the [NAME OF ALMASED USA PRINCIPAL].
- For other material connections:
 - "Advertisement";
 - "Sponsored";
 - "Paid ad"; or
 - "Ad." (this would go at the beginning of the statement to indicate the statement is an ad).
- For television or radio talk show appearances where our Products will be promoted, a Brand Ambassador should verbally make the material connection to us known, such as stating:
 - Almased gave me this _____ (product or sample) _____;
 - I was paid by Almased to...; or
 - I am working with Almased to....

If using a hashtag to identify a material connection, make it unambiguous, such as:

- #ad.
- #paid.
- #sponsored.
- #Almasedambassador.
- #Almasedendorser.
- #Almasedpartner.

Avoid ambiguous hashtags to identify material connections, such as:

- #sp.
- #spon.
- #thanksAlmased.
- #teamAlmased.
- #ambassador.
- #consultant.
- #partner.
- #adviser.
- #collab.

Additionally, if Brand Ambassador has posted a “Disclosure and Relationships Statement” section on their blog, website, profile page, or similar site, the statement should:

- Fully disclose how the endorser is working with Almased USA.
- Disclose how the endorser works with other companies generally.
- List any conflicts of interest that may affect the credibility of the sponsored or paid reviews.