

neumi

COMPLIANCE SHEET

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Neumi Compliance Sheet

The Federal Drug Administration (FDA) has been tasked with protecting the public from mislabeled, or dangerous consumer products. Each of the different areas that the FDA reviews includes cosmetics, supplements, and drugs all having different requirements. Unfortunately, there are a number of simple statements that can force the FDA to change the nature of the review of a product. Simple statements can take a human supplement into the world of drug, drug approvals, and major expenses or delays. In short, we cannot make claims that can be read as drug-related. Below are a few of the differences in terms that can switch the scope of FDA review. Please be sure you are careful in promoting products:

FDA Category Definitions

Cosmetic claims: Claims that a product cleanses, beautifies, promotes attractiveness or alters appearance.

Disease: Damage to an organ, part, structure, or system of the body such that it does not function properly.

Disease/drug/medical claims: Claims that a product diagnoses, prevents, treats, or cures disease.

FDA disclaimer: "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent disease."

Structure-function claims: Claims that a product helps the body stay healthy and function normally or contributes to general wellbeing, e.g., "supports the immune system."

Product Claims:

Acceptable - Can Use

- Refer to temporary emotions ("lifts mood," "reduces irritability").
- Use cosmetic claims ("cleanses," "improves appearance").
- Use terms and claims that address "structure and function" claims only with products labeled for internal use.
 - Use words such as "supports," "wellness," "appears," "health," "maintain," etc.
 - We can say "it reduces the appearance of fine lines and wrinkles"
 - We CAN NOT say "It reduces wrinkles"
 - Refer to general body parts and systems ("for heart health," "supports the immune system").
 - Use qualifiers such as "mild," "typical," "normal," "occasional," or other words to distinguish a temporary or minor condition from a symptom of the disease ("occasional stomach upset," "mild muscle soreness after exercising").
 - Refer to normal conditions associated with a natural state or process ("morning sickness during pregnancy," "hot flashes during menopause").
- Use FDA disclaimer only with structure-function claims.

Unacceptable – Cannot Use

- Don't use words such as "heals," "healing," "disease," "illness," "cure," "treat," "repair," "chronic," etc.
- Don't use disease claims.
- Don't mention any disease or illness, such as cancer, COVID-19, cold, diabetes, Alzheimer's, alcoholism, autism, hair restoration, flu, etc.
- Don't refer to symptoms of the disease such as redness, inflammation, coughing, sneezing, fever, hair loss, even hangover.
 - (The FDA has made to banish hangover remedies: hangover is caused by overindulgence in alcohol consumption; alcohol consumption is a symptom of alcoholism which is classified as a disease; therefore, according to the FDA, a hangover product is a drug by its definition!!!!)
- Don't recommend a product as a substitute for a drug, or any statement that can be read as diagnosing or interfering with a physician by suggesting that the diagnosis or physician expertise can be avoided with the use of the product.
- Don't recommend a product to augment a therapy or drug. If someone asks if our products can be used for a particular health-related use, or asks if our product will interfere with current medicines, the stock answer: "check with your healthcare provider."
- Don't imply a disease claim through pictures or symbols.

Social Media

Facebook Group, Pages and other Social Media Platforms which currently exist now or in the future (Instagram, TikTok, Pinterest, YouTube, etc):

- Any title being used MUST NOT contain any form of Neumi's brand names as the first word such as:
 - Neumi™
 - Swish
 - NutriSwish™
 - Swish30™
 - HydraStat™
 - Neumi Skin™
 - PrimaSkin™
- Above is also related to Websites, Emails and Domain names.
- Any online group where Neumi products or business are promoted must also contain "Independent Member Group" in the title such as: ABC Wellness | Independent Member Group.

Selling online

- Cannot sell products directly on any online platform such as Ebay, Amazon, Craigslist, Facebook Marketplace, etc.
- Must only use your own neumi.com for customers and members to enroll through our payment portal.
- You cannot SEO a website that sells Neumi products other than your own neumi.com website.

Marketing images:

- All images with faces or skin to be used for marketing Neumi products must be in the same lighting, preferably at the same time of day and not use a filter of any kind.
- All images being used to market neumi products must be approved by Neumi Compliance before sharing in any group or any public viewing and receive a unique code to be displayed on the image. This includes images found in other places online that are “reused” in groups.
- How to receive compliance approval:
 - a. Submit images and testimonials to the Neumi, New You! | Official Community Facebook Group. Wait for it to be reviewed and posted in the group before sharing on any other platform.
 - b. Submit images and testimonials directly to compliance@neumi.com and wait for it to be reviewed and posted in the Neumi, New You Facebook Group.

Income Claims:

- Don't share bonuses or income earned on public platforms
- Don't promise or allude if someone joins your team they can earn the same as you.
- Don't use “any statements from which a prospective purchaser can reasonably infer that he or she will earn a minimum level of income.” Earn up to \$10,000 each month,” “Make over \$3,000 a week from your couch!” or “I made \$22,222 my first month using this powerful system and so can you” are all examples of specific earnings claims.

Print Material

- On business cards, marketing material, websites, and social media pages members should give themselves the title of Independent Member.
 - Titles could also include your current/highest rank.
- All print material not created by Neumi directly MUST be approved by the Neumi Compliance Team before distribution by emailing compliance@neumi.com. Failure to do so will result in the Discipline Action Plan below.

Discipline Action Plan

Step 1: If any of the above cases are reported to compliance or found by one of our Neumi Neumi watchdog accounts (profiles managed by the compliance team) on any platform, your account will be suspended.

Step 2: When your account is suspended, you will be notified by our compliance team of the reasoning behind your account suspension.

Step 3: Once the non-compliant item is fixed, and you've notified the compliance team, we will re-activate your account. This ensures that every distributor is kept up-to-date and in-line with our Neumi Compliance Policy.

Consequences to Strikes:

- When 3 official strikes are administered to a member their account will be suspended for a full 30 days without pay.
- When 6 official strikes are administered to a member their account will be suspended for a full 60 days without pay.
- When 9 official strikes are administered to a member their account will be terminated.

Don't Say

Say

Anything about preventing, treating, or curing any kind of sickness, illness, infection, disease, chronic condition. Even statements like: "reduces redness" can be seen as disease treatment.

"Supports", "maintains", or "improves" health, wellness, of structures and functions of the body like the brain, the heart, the liver, muscles and joints, the respiratory system, cognitive function, etc.

"Fights colds, COVID, and flu"

"Helps to support the immune system"

"Relieves insomnia"

"Relieves occasional sleeplessness"

"Great for arthritis pain"

"Supports cartilage and joint function"

"Gets rid of headaches"

"May help relieve head & neck tension"

"Fights Dementia and Alzheimer's"

"May help with minor memory problems associated with the aging process"

"Helps with ADD/ADHD & Autism"

"May help with mental focus"

"Treats and cures cystic acne"

"May help with mild acne"

"Cures drowsiness & chronic fatigue"

"Helps restore mental alertness/wakefulness"

"Relieves pain"

"Helps with muscle soreness after workouts/exercise."

"Fights obesity"

"Helps with weight management along with weight loss plan."