

Staying Compliant











The 4Life® mission of Together, Building People® through science, success, and service extends worldwide, with offices in 24 countries and operations in over 50 countries. People join 4Life for a variety of reasons. Many enroll to enjoy the health benefits of exclusive 4Life Transfer Factor® products.* Some people enroll as Preferred Customers, others enroll to earn part-time income, others join 4Life to build full-time businesses. Whatever your reason, we are honored to have you as a Preferred Customer or an independent distributor. Thank you for honoring the legal regulations under which the company operates.

4Life's business falls under at least two specific areas of regulation: dietary supplements and direct sales. If you are a distributor, you are an extension of 4Life. That means you must comply with these regulations. 4Life and 4Life distributors have enjoyed an excellent reputation of integrity around the world for many years. As we comply with these important regulations, we ensure our continued success.

We have included compliance training sections below, so that you can comply with regulations and help us continue to fulfill the 4Life mission of Together, Building People.

If you have questions regarding your obligations with regard to these legal requirements, we welcome your communication at compliance@4life.com.

Sections:


-  U.S. Food and Drug Administration (FDA)
-  U.S. Federal Trade Commission (FTC)
-  Direct Selling Association (DSA), DSA's Code of Ethics, and the Direct Selling Self-Regulatory Council (DSSRC)*
-  Distributor Application and Agreement/Policies and Procedures
-  Life Rewards Plan™/Income Disclosure Statement
-  Direct Selling Business Model and Direct Selling vs. Pyramid Schemes
-  Income Claims Policy
-  Product Claims Policy and Approved Product Claims
-  Dos and Don'ts of Product Claims
-  Product Sales on Third-Party Internet Sites

U.S. Food and Drug Administration (FDA)

The Food and Drug Administration (FDA) is responsible for protecting and promoting public health, which includes control and supervision of the dietary supplement industry. In 1994, the U.S. Congress created the Dietary Supplement category by enacting the Dietary Supplement Health and Education Act of 1994 (DSHEA), which amended the Federal Food, Drug, and Cosmetic Act to establish standards with respect to dietary supplements.

[Dietary Supplement Health and Education Act](#)

DSHEA mandates that dietary supplements are “not intended to diagnose, treat, cure, or prevent any disease.” Therefore, manufacturers and marketers of dietary supplements cannot say that their products diagnose, treat, cure, or prevent diseases, but they can make structure/function claims, so long as there is competent and reliable scientific evidence to support those claims.

What is a structure/function claim? A structure/function claim describes the role of a nutrient or dietary ingredient intended to affect or maintain normal structure or function of the human body. Think about supporting health and not treating disease. Please refer to  [Product Claims Policy and Approved Product Claims](#) for more discussion on structure/function claims.

What is a disease? A disease is a disordered or incorrectly functioning organ, part, structure, or system of the body resulting from genetic or developmental errors, infections, poisons, nutritional deficiency or imbalance, toxicity, or unfavorable environmental factors.

What is a disease claim? A disease claim is any statement about a product that contains a word or image that references any disease.

Why can't we make disease claims?

- Our products are not drugs. Drug manufacturers must go through a rigorous and tedious process to obtain approval from the FDA, which includes discovery and development, preclinical research, clinical research, FDA review, and FDA post-market safety monitoring. It usually takes about ten years for a drug to be developed and approved for prescription.
- In accordance with DSHEA, it is illegal to make disease claims in connection with any dietary supplement. While dietary supplement products do not go through a formal FDA review process for approval of claims, the company is required to submit to the FDA a list of claims that it intends to make about each individual product. The claims 4Life® lists are based upon competent and reliable scientific evidence relating to individual ingredients that are on the same level within a serving of the dietary supplement. Every 4Life product has a different ingredient profile, so the claims for each product vary. The list of claims compiled for each product represents the entirety of claims which can be made by the company and you as a distributor. Claims that relate to each specific product can be found in specific Product Profile Sheets on 4life.com.
- Making disease claims in connection with dietary supplements is not safe. Dietary supplement products are not tested for safety and efficacy in patients with diseases.
- Making disease claims in connection with dietary supplements is misleading to consumers. Consumers might be tempted to substitute their prescription medications (which have gone through the FDA's stringent approval process for safety) with dietary supplement products (which have not gone through the FDA's stringent approval process for safety).

What about special populations?

- Safety and efficacy of dietary supplement products have not been evaluated in pregnant and nursing women. Consumers should consult with their physician prior to use.
- Safety of dietary supplements products have not been evaluated in children. 4Life currently has eight products for children: RiteStart® Kids and Teens, 4Life Transfer Factor® Classic Chewable, 4Life Transfer Factor® Chewable Tri-Factor® Formula, 4Life Transfer Factor® RioVida® Tri-Factor® Formula, 4Life Transfer Factor® RioVida® Burst, 4Life Transfer Factor® RioVida® Chews Tri-Factor® Formula, Pre/o Biotics®, and Pro-TF® (Vanilla and Chocolate). Consumers should consult with their physician prior to use.
- People with auto-immune issues should consult with their physician prior to use.
- People who have had organ transplants should consult with their physician prior to use.

DSHEA applies to all dietary supplement manufacturers and marketers (including 4Life and you as a distributor), encompassing all labeling (product labels and any other marketing collateral in print, on websites, etc.) and marketing (including written presentations, oral presentations, video presentations, meetings, websites, social media venues, and books). No one, including physicians, are exempt from DSHEA. Most countries outside of the United States have even more prohibitions about the claims that can be made about 4Life products.




U.S. Federal Trade Commission (FTC)

The U.S. Federal Trade Commission (FTC) works to protect consumers by stopping unfair, deceptive, or fraudulent practices in the marketplace. The FTC conducts investigations, sues companies and people that violate the law, develops rules to ensure a vibrant marketplace, and educates consumers and businesses about their rights and responsibilities.

In essence, all advertising must be truthful and not misleading. Before distributing an advertisement, companies must have adequate substantiation for all objective product and income claims.


Read  [Dietary Supplements: An Advertising Guide for Industry](#) for more information.


This guide was created specifically for the dietary supplement industry because of the product claims that marketers were using once DSHEA was enacted. The guide explains how to make certain that claims have appropriate scientific support. (Please refer to  [U.S. Food and Drug Administration \(FDA\)](#) for more discussion on DSHEA.

Through their independent regulations, the FTC and the FDA work together to ensure protection and promotion of public health and truth in advertising.



Direct Selling Association (DSA) and Code of Ethics




4Life® is a proud member of the Direct Selling Association (DSA). The DSA is the national trade association for companies that offer entrepreneurial opportunities to distributors. Becoming a member company of the DSA requires a thorough vetting. This includes an application process with an inspection of the applicant's compensation plan, policies, and procedures. Learn more about the  [DSA](#).


The DSA is committed to the highest ethical business standards for its direct selling channel of business. The DSA's  [Code of Ethics](#) is a robust series of policies that every DSA member agrees to follow as a condition of membership. The Code of Ethics holds 4Life accountable to policies that protect distributors and customers and encourages the direct selling marketplace to meet these high standards. Much like the FTC, the Code of Ethics prohibits statements or promises that mislead consumers or prospective distributors and sets stringent guidelines for earnings representations, product claims, sales and marketing tactics, and policies for order cancellations and returns.

*Recently, the Better Business Bureau created the "Direct Selling Self-Regulatory Counsel" (DSSRC) to provide independent, impartial, and comprehensive monitoring of direct selling companies on an industry-wide basis to address product claims and income claims (including lifestyle claims disseminated on social media platforms. To read more about the DSSRC, please click on this link: <https://bbbprograms.org/programs/all-programs/dssrc/dssrc-home>.



4Life® Distributor Application and Agreement/ Policies and Procedures





When you joined 4Life as an independent distributor, you completed the  [Distributor Application and Agreement \(DAA\)](#), which incorporates the Terms and Conditions,  [4Life Policies and Procedures](#), and the 4Life compensation plan—the  [Life Rewards Plan™](#).

By completing the DAA, you agreed to abide by each term set forth in these documents. As with any contract you sign, you and the other party (in this case, 4Life) are obligated to comply with the terms of the contract. For this reason, it is important to understand each term you agreed to when you became a 4Life distributor. The DAA, Policies and Procedures, and *Life Rewards Plan* brochure are written in plain language so that they are easy to understand. Please take the time to read the Terms and Conditions on the DAA, the Policies and Procedures, and the *Life Rewards Plan* brochure. Read more in Life Rewards Plan/  [Income Disclosure Statement](#).





Life Rewards Plan™/Income Disclosure Statement

As discussed in  [U.S. Federal Trade Commission \(FTC\)](#) and  [Direct Selling Association \(DSA\) and Code of Ethics](#), 4Life® prohibits statements or promises that mislead consumers or prospective distributors with regard to income expectations and sets stringent guidelines for income claims and earnings representations. Income claims or earnings representations may be in the form of lifestyle claims, which include photos or drawings of expensive homes, automobiles, luxurious vacations, etc. Please read the  Life Rewards Plan™/  Income Disclosure Document for more information.

Carefully read the important disclaimers below so that you don't mislead consumers.

Disclaimers in the *Life Rewards Plan* brochure:

Distributor earnings vary as a result of numerous factors. Earnings statements made in this brochure are not intended to guarantee a particular outcome, but rather show what is possible based on a broad range of 4Life distributors' historical data, personal commitment, and skill level. All references to income, implied or stated, through the Life Rewards Plan are for illustration purposes only.

(With regard to incentive trips) Less than 1% of 4Life distributors qualify for incentive trips.

Disclaimer in the *Income Disclosure Statement*:

Approximately 70% of people join 4Life to experience the benefits of 4Life products and are enrolled as Preferred Customers. Those who become distributors (primarily on a part-time basis to supplement their income) may experience the benefits of 4Life products, may sell 4Life products to family and friends, and may enroll others as Preferred Customers or distributors. During the period presented, approximately 16% of all distributors received no income at all. Those distributors who received no income are comprised of distributors who are inactive but have not yet been terminated due to inactivity and distributors whose Preferred Customers and downline sales organization purchased products in amounts that did not qualify them to earn commission payments. A very small percentage of individuals sell 4Life products and build 4Life businesses on a full-time basis. Distributors do not earn any compensation for simply recruiting and enrolling Preferred Customers, as compensation is only earned on the sale of 4Life products.

Direct Selling Business Model

4Life is a direct selling company. 4Life products are sold by independent distributors to customers in one-on-one, interpersonal transactions which provide time for explanation and guidance. A 4Life distributor who chooses to build a 4Life business sells 4Life products to customers exclusively using a direct selling model of distribution.

Direct selling vs. pyramid schemes

Direct selling companies like 4Life contribute to a vibrant marketplace by selling competitive, high-quality products and providing a sustainable source of income for those who choose to resell those products. These companies:

- Provide accurate information about the company, its products, and what one can expect as a seller of the company's products and services
- May charge a nominal fee for a starter kit, which includes samples, catalogs, order forms, and other tools that help the distributor begin selling
- Have a product or service that is competitive in the marketplace and is purchased by the ultimate user
- Require sellers to hold little or no inventory and have a buyback policy to protect against inventory loading
- Base compensation primarily on the sale of products and services to the ultimate consumer—sales generated by the distributor or others that the distributor has recruited
- Describe the business opportunity and give potential sellers adequate time to make an informed decision
- Promote consumer protection and guarantees, many of which are voluntary standards that exceed the requirements of any regulations created by the FTC or mandated by federal or state law. (DSA members have also pledged to abide by a strict Code of Ethics that outlines a high set of standards for interactions with both sellers and customers.)

Pyramid schemes take advantage of and defraud people because they:

- Promise high earnings with little effort
- Promise that one can earn a substantial income merely by recruiting people into the operation
- May or may not sell a product, but if there is a product, it generally has little or no actual value
- Convince people to buy large amounts of inventory which they cannot easily sell to others and is not returnable (called "inventory loading")
- Charge large up-front fees to get involved, either as a direct payment or in the form of an obligatory payment for "products"
- Pressure people to sign up immediately by suggesting the same opportunity will not be available later
- Base compensation primarily on activity (these payments for recruitment are called "headhunting fees") and convince participants to get involved with the promise of receiving such fees when they recruit others

Pyramid scheme operators prey on victims by using misinformation to make a bad opportunity seem too good to pass up. Many critics of the direct selling model manipulate the facts to discredit legitimate companies. Some don't understand the differences themselves and add to marketplace confusion by spreading misinformation. They count on the fact that many consumers aren't familiar with the differences between frauds and legitimate companies. The best remedy is to become educated so you can make your own determination about what is real and what is a fraud.





Pyramid schemes exist, so it is important to know the facts about how to identify them—both for your own protection and to avoid missing out on great products and business opportunities provided by legitimate companies. Millions of people around the world benefit from the income they make through direct selling and the products they purchase. Direct sellers are the original word-of-mouth marketers. They use personal recommendations to connect people and products. In a time when social media makes word-of-mouth a preferred method of gathering information and making purchasing decisions, direct selling could not be more relevant.




Income Claims Policy

In their enthusiasm to enroll prospective Preferred Customers, some distributors are occasionally tempted to make income claims or earnings representations to demonstrate the inherent power of network marketing. These income claims or earnings representations may be in the form of lifestyle claims (including photos or other representations that include expensive homes, automobiles, vacations, and/or money). This is counterproductive because new distributors may become disappointed very quickly if their results are not as extensive or as rapid as the results others have achieved. At 4Life, we firmly believe that the 4Life income potential is great enough to be highly attractive without reporting the earnings of others.

While distributors may believe it beneficial to provide copies of checks or bonus reports, or to disclose the earnings of themselves or others, such approaches have legal consequences that can negatively impact 4Life as well as the distributor making the claim unless appropriate disclosures required by law are also made contemporaneously with the income claim or earnings representation. Because distributors may not have the data necessary to comply with the legal requirements for making income claims, a distributor, when presenting or discussing the 4Life business opportunity or the Life Rewards Plan to a prospective Preferred Customer, may not make income projections or income claims or disclose his or her 4Life income (including the showing of checks, bonus reports, copies of checks or bank statements.) Distributors are encouraged to review the 4Life  Income Disclosure Statement on 4life.com. Read Policies and Procedures at paragraph 3.15 here. 



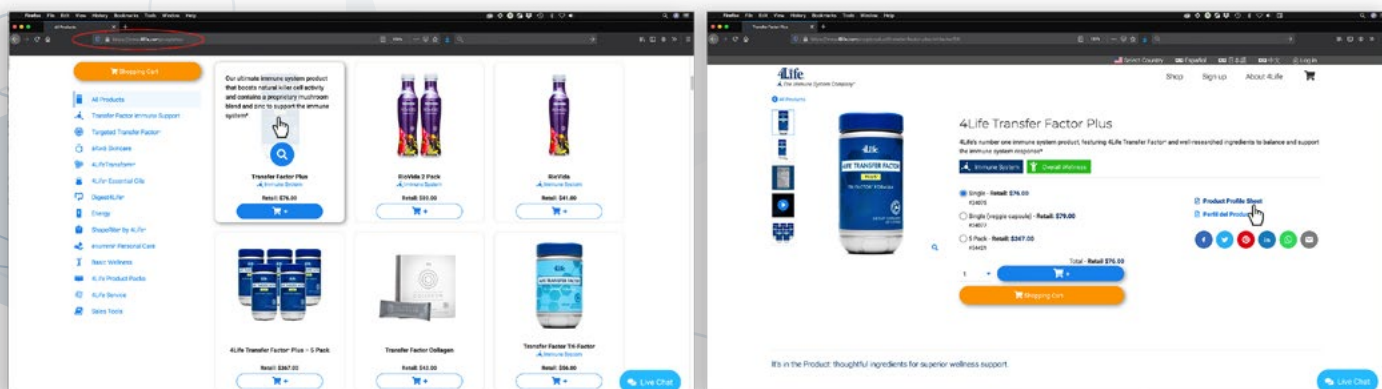
Product Claims Policy and Approved Product Claims

No claims as to any products offered by 4Life may be made except those contained in official 4Life materials. In particular, no distributor may make any claim that 4Life products are useful in the cure, treatment, diagnosis, mitigation, or prevention of any diseases. Such statements can be perceived as medical or drug claims. No distributor may use photos or other representations of 4Life products that make implied claims that 4Life products are useful in the cure, treatment, diagnosis, mitigation, or prevention of any diseases. Read Policies and Procedures at paragraph 3.14 here. 

Approved product claims

1. When identifying the claims that can be made with regard to a specific product, an extensive scientific review of competent and reliable data is performed and documented to understand and ensure that the product provides that benefit. For example, when we claim that “4LifeTransform Burn® stimulates fat burning,” we have competent and reliable scientific evidence of this effect because of African mango seed extract, dihydrocapsiate, colesus forskholii root extract, and bitter orange with other citrus fruit extracts.*
2. With respect to DSHEA, we cannot make claims that any product cures, treats, diagnoses, or prevents any disease. We only make structure/function claims so long as we have competent and reliable data to support that claim. For example, we can say that “4LifeTransform Burn stimulates fat burning,” because “fat burning” is a function of the body, and we have competent and reliable data to support that claim. However, we cannot claim that “4LifeTransform Burn treats obesity,” because obesity is a disease.*

Always refer to the Product Profile Sheet for all approved structure/function claims.



Go to 4life.com/corp/shop, select a product and click Product Profile Sheet.

Dos and Don'ts of 4Life Product Claims

DO

1. Make structure and function claims.
2. Claim that products maintain and support health.
3. Recommend products to healthy people.
4. Read the labels. Most products are not for children.
5. Refer to the 4Life website, product profile sheets, and product labels for all product benefits and claims.

DON'T

1. Make disease claims.
2. Claim that products treat, prevent, or cure diseases or illnesses.
3. Recommend products to sick people without consultation of their physicians.
4. Recommend products to pregnant or nursing women.
5. Make up or use claims that are not on the 4Life website, product profile sheets, or product labels.

**DIETARY SUPPLEMENTS ARE NOT DRUGS
AND SHOULD NOT BE TREATED AS SUCH!**

Notes:

Product Sales on Third-Party Internet Sites

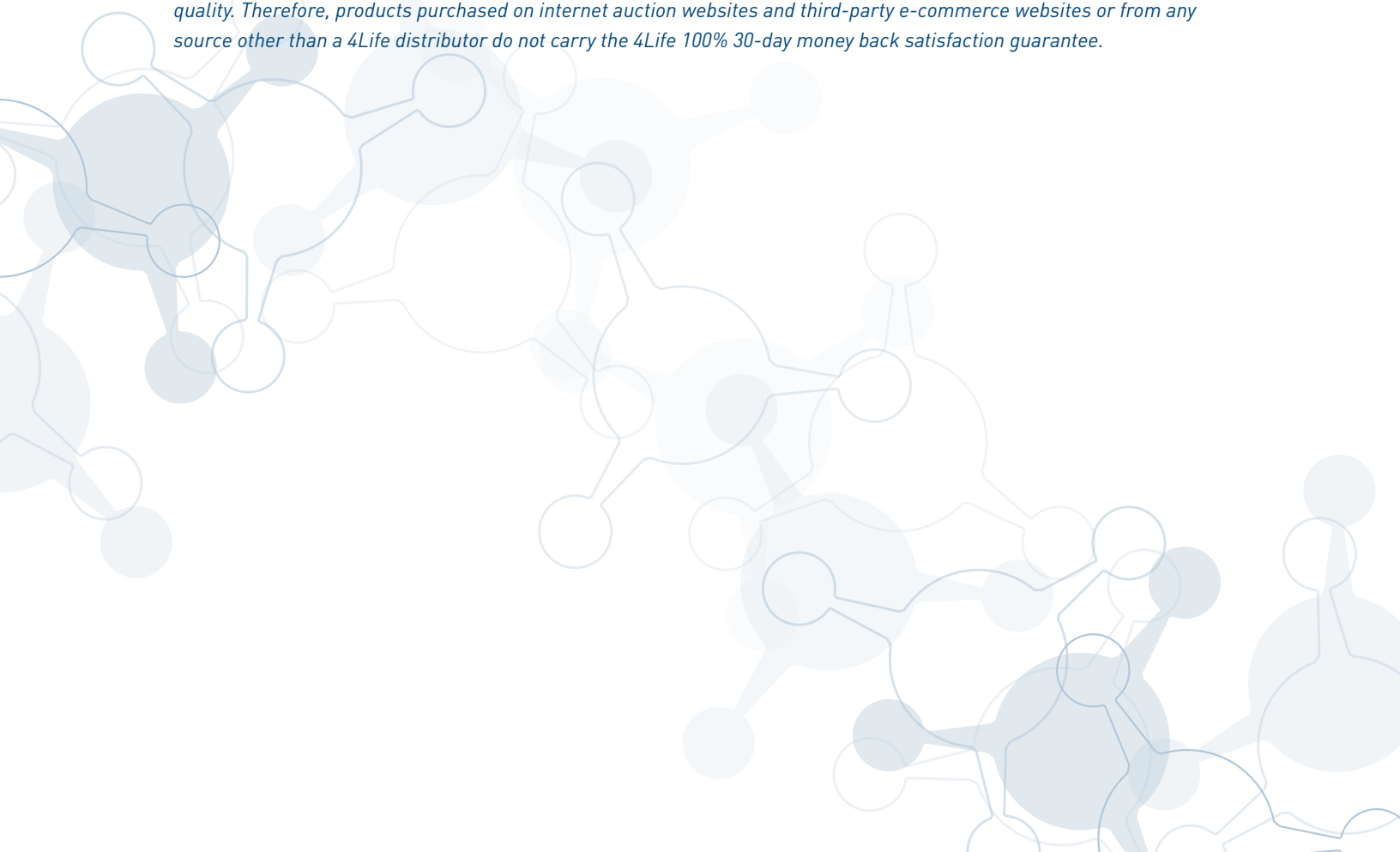
4Life® products are intended to be sold exclusively through direct selling, which encourages interpersonal transactions and time for explanation and guidance.

A distributor may not list or sell 4Life products on online auction websites (such as eBay), online retail websites, or ecommerce websites (such as Amazon). Nor may a distributor knowingly sell 4Life products to a third party, or otherwise assist a third party, who sells 4Life products on online auction websites, online retail websites, or e-commerce websites.

Distributors may display and/or sell 4Life products at trade shows and professional expositions. Distributors may not display and/or sell 4Life products at swap meets, garage sales, flea markets, or farmer's markets without the prior written consent of the company. Distributors may not display and/or sell 4Life products on internet auction sites (such as eBay), online retail websites, or e-commerce websites (such as Amazon). Distributors may sell 4Life products on their external website, but only in accordance with Policies 3.2 and 5.2 from the Policies and Procedures document.

In the event that you receive complaints from customers about finding 4Life products on an e-commerce site at prices that are lower than the 4Life customer/distributor price, we suggest this response:

Distributors are prohibited from selling 4Life products on third-party ecommerce websites and Amazon.com. However, from time to time, 4Life products appear on third-party e-commerce websites (such as amazon.com). Quality assurance demands that 4Life products are sold exclusively through 4Life independent distributors. Products appearing on internet auction websites and third-party e-commerce websites bearing a 4Life label may be counterfeit products, products that have exceeded their expiration date, or products that have been mishandled in any number of ways that could compromise their quality. Therefore, products purchased on internet auction websites and third-party e-commerce websites or from any source other than a 4Life distributor do not carry the 4Life 100% 30-day money back satisfaction guarantee.











Official 4Life Websites and Social Media Websites

While there are websites and social media websites that might appear to be official 4Life websites and social media websites, they are not and may contain product and income information that is erroneous. To avoid confusion, below is a list of official 4Life websites and social media websites:

Official 4Life websites:

-  4life.com
-  foundation4life.org
-  4lifefortify.com

Official 4Life social media websites:

-  facebook.com/4life
-  twitter.com/4life
-  instagram.com/4life
-  youtube.com/4life



Frequently Asked Questions

Why can't we make disease claims?

The current U.S. dietary supplement law states that dietary supplements do not go through FDA review for approval of disease claims, although we are required to submit the structure/function claims we intend to make before a supplement is on the market. In addition, we don't want patients to substitute their medications with 4Life products. Dietary supplements do not go through the necessary research to show efficacy in treating diseases.

The regulations in my country are different than in the United States. In my country, disease claims are allowed.

Can I make disease claims about 4Life products?

No. 4Life can't be associated with disease claims, not only because it is the United States law, but because you might be infringing your local law as well. The U.S. law on dietary supplements is not as strict as the law in most countries. Additionally, if you make disease claims on the internet and the U.S. government sees those claims, 4Life is still at risk. If distributors in other countries, especially in the United States, see those claims, they may start making disease claims in their countries and in the United States and put 4Life at further risk.

I have found reputable studies about some structure/function benefits of an ingredient in a particular 4Life product. These structure/function claims are not described on the 4Life website or the product label. Since I have good evidence, can I make those claims about the product?

There are likely several reasons why 4Life didn't include those claims in its marketing materials, and we don't want to send inconsistent messages about our products. There are extensive guidelines that we follow to create claims, and each product was designed for a specific indication. However, you may send a request to include the claims, along with the evidence, to productsupport@4life.com.

I found scientific studies that describe the benefits of certain ingredients in 4Life products in preventing cancer. Since these are highly reputable studies, may I make claims that 4Life products prevent cancer?

Despite scientific evidence, we cannot make disease claims because that breaks the law that governs dietary supplements. Dietary supplements don't go through the FDA pre-market approval for disease claims. The FDA does not provide this service of evaluation of dietary supplements for disease claims, and thus dictates that the label must contain the statement: "This product is not intended to diagnose, treat, cure, or prevent any disease."

May I recommend 4Life products to people with organ transplants?

Before taking any 4Life product, people should consult with their physicians first. Products that boost the immune system, e.g., 4Life Transfer Factor products, might cancel the action of the medications taken after organ transplant (immunosuppressants).

What about special populations?

- Safety and efficacy of products have not been evaluated in pregnant and nursing women.
- We currently have eight products labeled for children:
 - RiteStart® Kids & Teens
 - 4Life Transfer Factor® Chewable Tri-Factor® Formula
 - 4Life Transfer Factor® Classic Chewable
 - 4Life Transfer Factor® RioVida® Tri-Factor® Formula
 - 4Life Transfer Factor® RioVida® Chews Tri-Factor® Formula
 - 4Life Transfer Factor® RioVida Burst® Tri-Factor® Formula
 - Pre/O Biotics®
 - Pro-TF® (Vanilla and Chocolate).



Is it safe to break open encapsulated products and add the powder to my infant's formula?

No. The concerns for products given to infants or children include the potential for choking and the safety of the ingredients themselves.

I am a doctor. May I recommend 4Life products to my sick patient to help him or her get better?

No. 4Life products are not intended to diagnose, treat, cure, or prevent any disease.

Is it safe for me to take more of a product than indicated on the label directions? My upline leader, who is a doctor, recommended a higher dose.

No. 4Life takes great care in considering the amount of ingredients from a safety standpoint for each product. Do not exceed the amount of product indicated on the label directions.

I am taking a 4Life product and I don't feel well, but the person who sold the product to me told me that feeling sick is a natural detoxification process and that I should keep taking the product. Should I continue to take the product?

No.

Is it safe to give my pet 4Life products that are labeled and intended for human consumption?

No.

Is it safe to combine 4Life products?

A good guide is to first look at the benefits of each of the products. Then, look at the ingredients of each of the products. In general, it's safer to combine products that contain different ingredients so that you don't ingest too much of one ingredient, and it's best to use products that are different from each other that are designed to work synergistically. We recommend that you consult with your physician before taking and combining 4Life products.

Where can I find everything I can say about 4Life products?

Visit 4life.com, click Shop, and go to a particular product page. The Product Profile Sheet lists all of the approved claims.

Are 4Life products for everyone?

No. Consult with your physician before taking any 4Life product.

What is a structure/function claim?

A structure/function claim describes the role of a nutrient or dietary ingredient intended to affect or maintain normal structure or function of the human body.

Is 4Life a member of the Direct Selling Association?

Yes.

What information will I find in Life Rewards Plan brochure?

The Life Rewards Plan brochure includes information on how to get paid with the Life Rewards Plan™, plus rewards that 4Life distributors can enjoy through building a 4Life business.