



Global Marketing and Sales guidelines

Please note that this policy may be reviewed and changed from time to time.



Table of Contents

Version Control	3
Purpose	4
Scope	4
Policy	5
Breaches and Obligations	7

Version Control

Version	Description	Author	Date
1.0	Initial Document	Jo Buckman	31/03/2024

Purpose

SFI Health is a global supplement and nutraceutical company, our products are classified according to local market regulations. In most markets in which we operate, our products are available for patients to purchase, primarily from Pharmacies, Retail Stores, Healthcare Professionals, and selected e-commerce channels.

We encourage Patients to seek medical advice before using our products. In other markets our products are available only after a prescription from a healthcare professional is secured.

Whilst sales of our products may be unrestricted in most markets in which we operate, we recognise misuse, intentional or otherwise can result in adverse health outcomes and we take our commitments to patient safety seriously.

Scope

This policy applies to all personnel employed by or engaged to provide services to SFI Health, including, but not limited to, employees, officers, and temporary employees of SFI Health and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "employees").

Every employee is responsible for reading, understanding and complying with this policy. SFI Health Managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy.

Policy

1. Transparency

- a. **Honest Representation:** All marketing, advertising, and sales materials and interactions must accurately represent our products, their benefits, and potential outcomes. We avoid misleading statements, false claims, or exaggerations.
- b. **Ethical conduct:** All marketing, advertising and sales activities and interactions abide by the principles laid down in this document.
- c. **Clear Disclosures:** Clearly disclose any potential risks, contraindications or limitations associated with our products. Provide transparent information about ingredients, sources, and scientific evidence supporting product claims.

2. Customer, Consumer Privacy and Data Protection

- a. **Confidentiality:** Respect consumer privacy by safeguarding personal information. Ensure compliance with data protection laws and industry standards.
- b. **Informed Consent:** Obtain explicit consent before collecting, storing, or processing any personal data. Clearly communicate the purposes and uses of the collected information.

3. Scientific Accuracy and Substantiation

- a. **Scientific Rigor:** Base all product claims on sound scientific evidence. Ensure that studies and research supporting claims are conducted impartially and are peer reviewed.
- b. **Substantiation:** Maintain documentation supporting all product claims and be prepared to provide evidence upon request. Avoid making claims that cannot be substantiated.

4. Social Responsibility and Cultural Sensitivity

- a. **Social Impact:** Consider the potential social impact of marketing and advertising campaigns. Avoid content that may perpetuate stereotypes, discriminate, or offend any group based on race, ethnicity, gender, religion, or any other characteristic.
- b. **Cultural Sensitivity:** Tailor marketing and advertising strategies to respect and reflect diverse cultural values and norms across different regions.

5. Compliance with Laws and Regulations

- a. **Legal Compliance:** Adhere to all applicable local, national, and international laws and regulations governing marketing, advertising, and sales activities.
- b. **Regulatory Approvals:** Ensure that all products comply with regulatory requirements and have obtained necessary approvals before marketing or selling.

6. Fair Competition and Anti-corruption

- a. **Fair Practices:** Engage in fair competition and refrain from engaging in deceptive or unfair trade practices. Compete ethically and within the boundaries of antitrust laws.

- b. **Anti-corruption:** Prohibit bribery, corruption, and any form of unethical influence in marketing, advertising, and sales practices.

7. Training and governance

- a. **Employee Training:** Provide ongoing training to employees involved in marketing, advertising, and sales to ensure they understand and adhere to ethical guidelines.
- b. **Oversight and Reporting:** Establish mechanisms for internal oversight, reporting, and resolution of ethical concerns. Encourage a culture of transparency and accountability.

8. Continuous Improvement

- a. **Feedback Mechanism:** Collect, analyse and report feedback from consumers, stakeholders, and employees to continuously improve ethical practices.
- b. **Adaptation to Industry Changes:** Stay abreast of industry trends and changes in ethical standards to adapt and enhance the code accordingly.

By adhering to this Global Marketing, Advertising, and Sales Ethical Practices Code, we aim to build trust, foster long-term relationships with our customers, and contribute positively to the health and well-being of individuals worldwide.

Procedure

SFI Health Employees are to report any conduct that they believe to be a violation of this policy to the Human Resources (HR) department. Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy.

Breaches and Obligations

SFI Health will not tolerate retaliation against an employee for reporting a concern in good faith or for co-operating with an investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. SFI Health and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Approved by:

Group Head of Marketing and Scientific Affairs

March 2024