# PRODUCT CLAIMS GUIDANCE

# LORDE+BELLE DESIGNED BY SCIENCE



Part of running a business is ensuring you remain compliant with our Policies and Procedures as well as our other regulating bodies, like the FTC and FDA. This guide is to help provide guidance around product claims. For more, please visit the Lorde + Belle Policies and Procedures.

#### What is a product claim?

A product claim is a short statement about what it is that your product does. This claim can be about benefits, customer experience or the offer.

#### What you CANNOT claim (even if it is a personal testimonial):

Lorde + Belle products CANNOT claim to cure, treat, diagnose, mitigate or prevent any diseases. These statements can be perceived as medical or drug claims. Additionally, because Lorde + Belle products are cosmetic, which impact the appearance of the skin, you cannot say the function of the skin is affected in any way. Not only do these claims violate Lorde + Belle policies, they also potentially violate federal and state laws and regulations, including the FDA and FTC.

#### What you CAN claim:

Product claims that can be found on official Lorde + Belle materials, including product labeling, advertisements and official materials.

#### Personal Product Testimonials:

Personal product testimonials regarding Lorde + Belle products posted on any company-sponsored or personal social media platforms are considered by the FDA to be product claims. Please take care to represent our products truthfully and accurately. Even though you or someone you know may have a specific experience with a specific disease, and even if a claim is a direct quote, it must adhere to these guidelines in order to be compliant and approved for use.

#### The following disclaimer should be used with every product testimonial:

"Individual results can and will vary. My testimonial is not necessarily representative of all those who use Lorde + Belle products."

# Examples of what to say and what NOT to say regarding Lorde + Belle products and product claims:

#### SAY THIS:

"reduces the appearance of..." "helps with the appearance of..." "helps to..."

- "enhances the appearance of ... "
- "diminishes the visual signs of..."
- "Improves the appearance of..."

#### NOT THIS:

"eliminates wrinkles" "stimulates collagen production" "makes cells healthier" "treats puffy eyes" "cures XYZ disease" "removes acne scars"



# BEFORE + AFTER GUIDANCE

"Before and after" photos are a great way to share Lorde + Belle products! It's important that you follow the guidelines below when sharing. It's important to know that "before and after" photos claiming results for conditions other than those indicated on the product labeling may NOT be used for any purpose. For more information, please visit the Lorde + Belle Policies and Procedures.

### Guidelines for Before + Afters:

- Identify with first name, last initial and relationship to Lorde + Belle (employee, Brand Partner, Beauty Insider, Customer, spouse/relative of Brand Partner)
- Date of photos and/or time between photos
- Name of product(s) used
- Hair should be pulled back from the face
- Photos must be in focus and with a well-lit, plain background

- Photos should be taken under the same conditions (lighting, time of day, general location)
- Touch-ups and photo editing are NOT permitted
- If showcasing results on the body such as the arms, chest or legs, before and alters must be realistic, consistent with claims, and no manipulation of the skin is permitted (such as stretching or pulling it)
- Photos must be supported by and consistent with L+B's label and product claims
- Generally, suggest photos without makeup. Makeup may be worn in "before and after" photos (with proper disclosure), however, the makeup may not impact the results, or be applied in areas where the featured product(s) were used (i.e., foundation would not be permitted for skincare products.)
- If a Brand Partner wishes to use "before and after" photos or product testimonials of a Customer, friend or family member, in addition to the above requirements, the Brand Partner is responsible for obtaining and maintaining permission from the person who is the subject of the videos or testimonial.
- Do not use "before and after" photos of anyone under the age of 13. If the Customer, friend or family member is between the ages of 13 and 18, it is highly recommended to obtain the permission of a parent or guardian.

#### Examples:

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Lorde - Belle RegenPen used with Daily Cartidges and HA<sup>3</sup> Serum 3x a week for 4 weeks.

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### Have a great "before and after" to share?

Email us at compliance@lordeandbelle.com with testimonials and before and after photos to be featured on our social media and website!

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