

I. Policy on Political Activity and Contributions

Herbalife Nutrition participates in public policymaking by informing government officials about our positions on issues that are important to the company, our members and customers. The company's global position is that it will not make contributions of any kind to political parties, political committees or candidates using company resources (including monetary and in-kind services). The Herbalife Nutrition Political Action Committee receives voluntary employee contributions to make political contributions to U.S. federal and state political parties, committees and candidates.

The company encourages employees and members to be active in political activities, provided that such engagements do not present conflicts of interest. If an individual chooses to support any political candidate or cause, he/she must do so only as an individual.

II. Herbalife Nutrition Political Action Committee (PAC) in the U.S.

In the U.S., Herbalife Nutrition maintains a political action committee (PAC) that is registered with the U.S. Federal Election Commission. The contributions made by the PAC are not funded by corporate funds and are fully funded by voluntary contributions made by Herbalife Nutrition employees in the U.S. All costs associated with maintaining the PAC are borne by the PAC.

The mission of the Herbalife Nutrition PAC is to contribute to elected officials at the U.S. federal, state and local levels who share our values and express an interest in what we do on an apolitical basis. We do not define our employees, distributors, customers or company by a political party. We look at all contributions from the perspective of how they enhance our business.

The Herbalife Nutrition PAC has been active since its creation in 2004 and has raised and distributed nearly \$1.6 million through 2021.

Herbalife Nutrition PAC Board of Directors reviews and approves all contributions made. Contributions to specific elected officials and candidates may be suggested by PAC board members and anyone who contributes to the PAC.

Contributions to the PAC and disbursements to federal candidates are reported to the U.S. Federal Election Commission (FEC) and all records are publicly available through the [FEC website](#). PAC activities are also reported to State political activity regulators in compliance with regulations. Appendix I includes itemized contributions to candidates and political committees for 2021.

The Herbalife Nutrition PAC Board of Directors makes every effort to be balanced between political parties and give to elected officials and candidates who fall into one or more of the following categories:

- They represent constituencies where we have an employee presence
- They support the promotion of nutrition, fitness and direct selling initiatives
- They support our values and mission

Management of the PAC funds requires decisions about raising and spending PAC dollars. Herbalife Nutrition PAC is managed by Herbalife Nutrition PAC Board of Directors, which consists of:

- Ibi Montesino, Senior Vice President, Managing Director, North America and PAC Chair
- Tod Gimbel, Senior Vice President, Global Government Affairs
- Randall Popelka, Vice President, North America Government Affairs and PAC Treasurer

The Herbalife Nutrition PAC is administered by a third-party vendor which provides a platform to send solicitations, write checks and reconcile the PAC account. All Herbalife Nutrition PAC activities are in compliance with Federal Election Committee rules and regulations and audited by Herbalife Nutrition's internal auditing team.

III. Trade Associations

Herbalife Nutrition joins trade associations that add value to and promote the interest of the company. The company makes payments to these associations, including membership fees and dues. This policy prohibits U.S. trade associations from using any portion of the company's membership fees and dues for political contributions. Herbalife Nutrition discloses trade associations (annual contribution >\$50,000 in membership fee and sponsorship) which we are members of. These trade associations lobby in the U.S. at the federal and state level and the approximate percentage of the membership fee that is utilized for lobbying.

- American Herbal Products Association (7%)
- Direct Selling Association (5%)
- Council for Responsible Nutrition (15%)
- Personal Care Products Council (33%)

IV. Lobbying

From time to time, Herbalife Nutrition engages in discussion on public policy issues with different levels of government. When we determine it is in the best interest of the company, we provide information and perspectives that support our point of view through our lobbyists. Herbalife Nutrition complies with all U.S. federal and state laws, including the Lobbying Disclosure Act and Honest Leadership Open Government Act. The company discloses its U.S. federal, state and local lobbying activity and expenditure as required by law by filing reports on a quarterly basis with the U.S. Congress, and these reports are publicly available in the [Lobbying Disclosure Act Online Query](#). In 2021, Herbalife Nutrition spent \$620,000 on federal lobbying activity in the U.S.

Appendix 1. Herbalife Nutrition PAC 2021 Contributions

Name of Candidate	State	Candidate Office	Party	Amount (USD)
REYES, SEAN	UT	State Attorney General	R	2,500
BLACKBURN, MARSHA	TN	State Senate	R	5,000
MCMORRIS RODGERS, CATHY	WA	State Representative	R	5,000
BERGMAN, JOHN	MI	State Representative	R	2,500
MULLIN, MARKWAYNE	OK	State Representative	R	1,000
MANCHIN, JOSEPH	WV	State Senate	D	1,000
FOXX, VIRGINIA	NC	State Representative	R	2,500
HUDSON, RICHARD	NC	State Representative	R	2,500
SINEMA, KYRSTEN	AZ	State Senate	D	2,500
CURTIS, JOHN	UT	State Representative	R	1,000
SOTO, DARREN	FL	State Representative	D	1,000
OWENS, BURGESS	UT	State Representative	R	1,000
SANTIAGO, MIGUEL	CA	State Assembly	D	500
SALAS, RUDY	CA	State Assembly	D	500
RODRIGUEZ, MONICA	CA	City Council	D	500
RODRIGUEZ, FRED	CA	State Assembly	D	500
REYES, ELOISE	CA	State Assembly	D	500
RENDON, ANTHONY	CA	State Assembly	D	1,000
MIN, DAVE	CA	State Senate	D	500
MEDINA, JOSE	CA	State Assembly	D	500
MARTINEZ, NURY	CA	City Council	D	500
KAMLAGER, SYDNEY	CA	State Senate	D	500
GIPSON, MIKE A	CA	State Assembly	D	500
GARCIA, EDUARDO	CA	State Assembly	D	500
DE LEON, KEVIN	CA	City Council	D	500
CHOI, STEVEN	CA	State Assembly	R	500
CERVANTES, SABRINA	CA	State Assembly	D	500
CARRILLO, WENDY	CA	State Assembly	D	500
CALDERON, LISA	CA	State Assembly	D	500
BUSCAINO, JOE	CA	Mayor	D	500
BARTLETT, LISA	CA	County Board of Supervisors	R	500
LIEU, TED	CA	State Representative	D	1,000
BLACKBURN, MARSHA	TN	State Senate	R	5,000
RANSONE, MARGARET	VA	State Representative	R	500
SINEMA, KYRSTEN	AZ	State Senate	D	2,500
PALLONE, FRANK JR.	NJ	State Representative	D	5,000
HORSFORD, STEVEN	NV	State Representative	D	1,000
MANCHIN, JOSEPH	WV	State Senate	D	1,000
RUIZ, RAUL MD	CA	State Representative	D	1,000
LEE, MIKE	UT	State Senate	R	2,500
CARDENAS, TONY	CA	State Representative	D	5,000
BARRAGAN, NANETTE	CA	State Representative	D	2,500
SCHIFF, ADAM	CA	State Representative	D	2,500
TOTAL				67,000