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FAVAO™

XANGO Distributor Weight-Loss-Claims Guidance

XANGO is excited to launch a unique weight-loss system, known as FAVAO™. This system is a comprehensive weight-loss program designed to help you achieve your weight-loss goals through supplementation, nutrition, exercise, and online community support. While the FAVAO program has a long track record of proven results, it is critical that we use proper promotion of this product line, in order to protect the business opportunity for everyone. While XANGO is poised to revolutionize the weight-loss industry with an innovative brand and our recognized responsible business practices, the world of weight-loss supplementation remains one fraught with misleading ads and bogus products. Over the last several years, the Federal Trade Commission, or FTC, has taken great interest in this segment of the supplement industry and aggressively pursued companies that make unsubstantiated, misleading, and false claims.

In order to help you, our valued Distributors, move forward confidently in the marketing and advertising of the XANGO FAVAO lifestyle program, XANGO has created this weight-loss-claims guidance document, which will be incorporated into our Distributor Advertising Guide (located under “Distributor Resources” on www.xango.com). Please read this guide carefully and use it as you talk about the FAVAO system and products. As always, XANGO’s Distributor Education & Conduct Department is available to answer any questions. Please direct your questions to educationandconduct@xango.com.

Appropriate FAVAO System Claims

The XANGO FAVAO lifestyle program incorporates cleansing, metabolism, fiber and protein supplementation that will aid you in your weight-management goals. Here is a list of those products and the approved claims that can be made. Each claim should end with an asterisk that links to the following disclaimer, which needs to be in bold font, set off in a box, legible, and in close proximity to the claim: “This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.”

XANGO FAVAO™ Body Cleanse

- Supports your body’s natural detoxification process
- Promotes healthy liver and kidney function
- Supports digestive system function and regularity resulting in healthy weight loss
- Promotes deep intestinal cleansing
- Promotes liver purification
- Supports immune function

XANGO FAVAO™ Metabolic

- Promotes a healthy metabolism and fat-burning
- Increases overall energy levels and promotes feelings of wellness
- Helps maintain blood-glucose levels already within normal range
- Helps normalize appetite

XANGO FAVAO™ Fiber

- Combines insoluble and soluble fibers, prebiotics, and probiotics to promote a healthy digestive system
- Provides healthy bacteria to supports digestive flora and nutrient absorption
- Helps maintain cholesterol levels already within normal range
- Helps maintain blood-glucose levels already within normal range

XANGO FAVAO™ Protein

- Supports the body’s natural calorie-burning process

In addition to these specific product claims, you can make general health and wellness claims, such as “I’ve never slept better,” “I can do things I couldn’t do before,” or “I’ve never felt more healthy.” Most such statements are allowable as long as they do not suggest or imply that the FAVAO system has treated or prevented a disease.

The Food and Drug Administration, or FDA, does not allow any disease claims to be made about supplements. In addition to the conditions we typically understand to be diseases (e.g., cancer, arthritis, heart disease), FDA considers obesity to be a disease; being overweight, however, is not considered a disease. Thus you cannot make any claims that the FAVAO products or system treat obesity, but you can promote them as an effective tool to treat overweight individuals. It is also important not to discuss the FAVAO system using terms such as “the obesity epidemic,” as well as discussing diseases associated with obesity, such as diabetes, heart disease, joint pain/arthritis, high cholesterol and high blood sugar.

You should also avoid suggesting that your experience with the FAVAO system has prevented or mitigated a disease, even if it is true. For example, you should not claim that participating in the FAVAO lifestyle program has allowed you to go off your medications, or that it has helped lower your disease markers, such as cholesterol, blood sugar, blood pressure, triglycerides or c-reactive protein.

Weight-Loss Claims

As mentioned above, the FTC actively monitors companies selling weight-loss products and making weight-loss claims, so it is important for you to know and understand the guidelines that the FTC has set forth.

The FTC has stated that it views the following types of claims as being inherently false and misleading:

- Testimonials claiming weight loss that exceeds what is physiologically possible under normal circumstances, for example, losing 120 pounds in seven weeks.

- Specific performance claims that are outside the realm of possibility for the products being advertised. For example: “Lose 30 pounds in 30 days!” Losing weight at the rate of a pound or two a week is the most effective way to take it off and keep it off.
- Consumers who use the advertised product can lose substantial weight while still enjoying unlimited amounts of high-calorie foods and/or without increasing their physical activity. For example: “Lose weight no matter how much you eat of your favorite foods!” “Lose weight without diet or exercise!”
- The advertised product will cause permanent weight loss (even when the user stops using the product). For example: “Lose weight permanently! Never diet again!” Even if you’re successful in taking the weight off, permanent weight loss requires permanent lifestyle changes.
- The advertised product will cause substantial weight loss for all users. For example: “Everybody will lose weight!” Your habits and health concerns are unique. There is simply no one-size-fits-all product guaranteed to work for everyone.
- Consumers who use the advertised product can lose weight only from those parts of the body where they wish to lose weight. For example: “Targets your belly fat!”
- Claims that the system provide results that are “rapid,” “fast,” “easy,” or “guaranteed.”

All claims must be in the context of the entire FAVAO lifestyle program, which includes proper nutrition, exercise, and supplementation. If you make a weight-loss claim, in addition to ensuring that it conforms to the above guidelines, you should also prominently display the following disclaimer

along with the claim: “Consumers should not expect to achieve these results. Weight loss varies from person to person depending upon body type, age, gender, individual efforts, and the consistency of adhering to the program.”

Before/After Photos

“Before” and “after” photos are a powerful way of showing the FAVAO system’s effectiveness. If you choose to create advertising that includes before and after photos, please follow this simple guideline: Take the “before” and “after” photos at the same location, using the same pose and the same lighting. The FTC has identified the following as misleading elements in “before” and “after” photos:

- **“Before” Picture:** Snapshot-quality photograph of the subject that incorporates poor posture, neutral facial expression, unkempt hair, unfashionable attire, poor lighting, and washed-out skin tones.
- **“After” Picture:** Brightly lit (sometimes studio-portrait quality) pose of smiling subject in fashionable, often skimpy, attire, shoulders held back, tummy tucked in, with a stylish hair style and carefully applied makeup.
- Other elements include a simple change in posture or body control and flexing to achieve the difference, without any real weight loss.

As you prepare sales tools with the guidance from this document, please remember that all sales tools need to be reviewed and approved by XANGO prior to use. This can be done by contacting XANGO’s Distributor Education & Conduct Department at educationandconduct@xango.com.