

# Political Activities and Contributions Policy and Practices

## I. Political Activities and Contributions

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Herbalife participates in public policymaking by sharing our expertise and informing government officials about our positions on issues that are important to the Company, our Independent Distributors and customers. The Company makes contributions to political parties, organizations, committees or candidates using Company resources (including monetary and in-kind services) only when permitted under applicable local and international laws, as well as internal procedures.

## II. Policy on Political Activities and Contributions

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The Company encourages employees and members to be active in the political process, including making voluntary personal contributions to candidates or parties if they choose and within the scope of activity permitted by law. The Company cannot and will not assume any responsibility or obligation with respect to any contribution payments made by employees on their own initiative.

No officer or employee of the Company may seek reimbursement or any form of compensation from the Company for personal political contributions, volunteer activities or political expense.

No employee may use any Company property or facilities or the time of any company employees for a political activity, except as may be authorized by the Company in the course of its lawful activities and in accordance with its policies and procedures.

No officer or employee of the Company may make a political contribution for or on behalf of the Company in connection with any election without proper authorization from Company.

## III. Herbalife Political Action Committee (PAC) in the U.S.

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In the U.S., Herbalife has established a Political Action Committee (PAC) that is registered with the U.S. Federal Election Commission. The Herbalife PAC supports certain U.S. federal and state political parties, committees, elected officials and candidates who support our corporate mission without political bias. The Herbalife PAC is fully and solely funded by voluntary contributions made by Herbalife employees in the U.S. of a certain level of authority. We do not identify or distinguish our employees, distributors, customers or company by political affiliation.

The PAC Board 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](#). The PAC activities are also reported to state political activity regulators in compliance with regulations. Appendix I includes itemized

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contributions to candidates and political committees for 2023.

The PAC Board 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:

- Represent constituencies where we have an employee presence.
- Support promoting of nutrition, fitness, and direct selling initiatives.
- Support our values and mission.

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

## IV. Trade Associations

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Herbalife joins trade associations that add value to and promote the interest of the Company. Through trade associations, we monitor and participate in policy discussions on topics including direct selling, trade, health and nutrition, and environmental sustainability. The Company supports these associations through its payment of membership fees and dues, as well as attendance and participation at association events. In Appendix 2, Herbalife discloses trade associations (annual contribution >\$50,000 in membership fee and sponsorship), which we are members of, and have lobby activities in the U.S. at the federal and state level, along with the approximate percentage of the membership fee that is utilized for lobbying.

## V. Lobbying

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From time to time, Herbalife directly engages with different levels and agencies of government on public policy issues that impact our business. When appropriate, we provide information and perspectives that support our point of view through our lobbyists. Herbalife complies with all political contribution and lobbying laws and regulations in markets where we operate. In the U.S., Herbalife complies with federal and state laws, including the Lobbying Disclosure Act and Honest Leadership Open Government Act. Appendix 3 summarizes the Company's U.S. federal, state and local lobbying activities and expenditure. The same information is filed quarterly with the U.S. Congress and is publicly available on the [Lobbying Disclosure Act Online Query](#). In the E.U., Herbalife is registered with the [E.U. Transparency Register](#), where we disclose fields of interest, membership of associations, (con)federations, networks or other bodies and costs associated with activities covered by the register, including lobbying activities.

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## Appendix 1. Herbalife PAC 2023 Disbursement

Name	Amount	State	Office	
Foxx, Virginia	\$2,500	NC	U.S. House	R
Lesko, Debbie	\$2,500	AZ	U.S. House	R
Moran Victory Committee (JFC)	\$5,000	KS	Joint Fundraiser	R
Armstrong, Kelly	\$1,000	ND	U.S. House	R
Hern, Kevin R	\$1,000	OK	U.S. House	R
Allen, Rick	\$1,000	GA	U.S. House	R
Cmte for Hispanic Causes (CHC-Bold PAC)	\$2,500	DC	Federal PAC	D
McMorris Rodgers, Cathy	\$5,000	WA	U.S. House	R
VIBE PAC (Cardenas-CA-USH)	\$2,500	CA	Federal Leadership PAC	D
Nunn, Zach	\$1,000	IA	U.S. House	R
Soto, Darren	\$2,500	FL	U.S. House	D
Cuellar, Henry	\$2,500	TX	U.S. House	D
Curtis, John	\$2,500	UT	U.S. House	R
Getting Stuff Done PAC (Sinema-AZ-USS)	\$5,000	AZ	Federal Leadership PAC	I
Bonta, Rob	\$1,000	CA	State Att. General	D
<b>Total</b>	<b>\$37,500</b>			

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## Appendix 2. Herbalife membership of U.S. trade associations in 2023 with annual contribution >\$50,000 in membership fee and sponsorship

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(Approximate percentage of the membership fee that is utilized for lobbying)

- American Herbal Products Association (7%)
- Direct Selling Association (9%)
- Council for Responsible Nutrition (15%)
- Personal Care Products Council (26%)

## Appendix 3. Herbalife lobbying activity in 2023

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- Herbalife reported spending \$600,000 on federal lobbying-related activities in the U.S., and we disclosed in the [Lobbying Disclosure Act Online Query](#).
- Herbalife registered in the [E.U. Transparency Register](#), where we disclosed €900,000 to €999,999 as costs associated with activities covered by the E.U. Transparency Register, which includes lobbying activities.