

Arbonne Corporate Responses to Meghan Telpner

Meghan has a blog site where she was at first making accusations on her website. Arbonne reviewed Meghan Telpner's website content and have actually reached out to Meghan directly and answered her questions, through her media representative. Our goal is to share updated, accurate information with Meghan and in turn, hopefully she will do the same with her audience.

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Meghan's Question: You have claimed that due to competition, you do not publish ingredient lists on your website. Were a competitive company wanting to get them, it would certainly be possible. Therefore why do you make it so challenging for customers to get ingredient lists?

Arbonne Answer:

Arbonne has always made the ingredients of its products available to its Independent Consultants. Online, we focus our efforts mostly within the Independent Consultant portal of Arbonne's website because they use more comprehensive information for their businesses. Our Independent Consultants have access to product knowledge sheets that include not only each ingredient, but also its function in the product. It is a matter of where we focus our time. We choose to devote our attention predominantly on our valued Independent Consultants and supporting their business needs. They are free to share this information with their Clients. Our Independent Consultants take this information and engage in person to

person interaction, explanation and demonstration of our products. They are the link to our consumers. For the public, Arbonne's ingredients have always been listed on the product packaging in compliance with the regulatory requirements of each country in which we do business. That said, we are very much considering making this product ingredient information available on our consumer-facing site, as well.

Meghan's Question: I received a note from a consultant verifying and confirming that all Arbonne products are organic and GMO free. Upon calling an Arbonne customer service rep, this claim was discredited. She actually wasn't familiar with the term "GMO" or Genetically Modified. Do you have concerns that your very own reps may be misrepresenting the products to less informed consumers who trust the quality of the products at face value?

Arbonne Answer:

When an Independent Consultant signs up with Arbonne, they come from all walks of life. This is one of the very qualities that attracts people to Arbonne! Anyone can join and it requires no particular experience or expertise. We have entire departments dedicated to sales training and product support. We also use a variety of tools (email, conference calls, video training, sales support materials, webinars, breakout training sessions, Q&As, social media, an online community, etc.) to teach and train our sales force about Arbonne, the products and the business opportunity. We also have a Business Ethics Standards Team (compliance department) that handles the training and enforcement of Arbonne's Policies & Procedures. It is against Arbonne's policies to misrepresent the nature of our products and make unsubstantiated claims. When individual instances are reported to us for any such issue, we investigate and take steps to educate the individual on how to correct their behavior. Thank you for bringing this particular situation to our attention; we are always working to improve our communication, education and training when it comes to our independent distributors and our customer service department.

Meghan's Question: With the extensively long ingredient lists of science based, modified ingredients, do you believe all of your products, including consumables and cosmetics are truly as pure and simple as they could be?

Arbonne Answer:

Science does not mean unsafe or impure; in fact, the opposite is true: Science supports our philosophy: Pure. Safe. Beneficial™. Arbonne never compromises the efficacy, integrity and safety of its formulas and we conduct extensive testing of all of our products. To achieve our

goals, we turn to both nature and science. Our botanically based mission involves more time, effort and commitment to determine the efficacy of ingredients, to ensure that even beyond being inspired and produced by nature, that they meet our standard of Arbonne. We are very quality conscious and we know both the active and inert elements in our ingredients. We know all of the components of our ingredient choices. Arbonne formulates according to the strict standards of the European Union, Canada, Australia and the U.S. FDA.

Meghan's Question: Many of your products use omega 6 rich sunflower, safflower and canola oils- oils known to be genetically modified. What efforts are you making to change your suppliers to confirm the use of certified GMO-free oil sources?

Arbonne Answer:

First, we have strict standards about our ingredient choices and the vendors with whom we do business. Secondly, we test our Arbonne products and to date, we have found no Genetically Modified Organisms in our formulas. Lastly, we are in the process of finding a globally recognized GMO-free certifier to validate our formulas.

Meghan's Question: Most Vitamin D is sources from lanolin, the oil from sheep. Can you confirm the source of your vitamin D, given your commitment to being 100% vegan?

Arbonne Answer:

Yes, at Arbonne we use Vitamin D2, which is from plants; not Vitamin D3, which is from animals. Specifically, our Spray Vitamin D+B12 is sourced from plants and vegan certified.

Meghan's Question: What is the function of sucrose in your eye make-up remover?

Arbonne Answer:

The sucrose in our eye makeup remover is used as a counter-irritant; it helps calm skin.

Meghan's Question: What are the methods for testing the accumulated toxicity of the use of multiple products (i.e. Eye shadow, eye liner, mascara, eye makeup remover and eye cream)?

Arbonne Answer:

Each Arbonne product is tested analytically and then also each individual product is tested on subjects clinically. Finally, the cumulative test is done at home, with the entire regimen of multiple products by area being applied (i.e. eye, ear, etc.). We conduct rigorous, independent, third party tests for safety, toxicity, etc.

Meghan's Question: Is there any third party independent testing done on your formulations prior to submitting for approval by governing agencies? If so, what is the process and are these reports made available in full to Arbonne representatives.

Arbonne Answer:

By law, we conduct third party independent testing and this is required for doing business in Australia, Canada and the UK. We comply with these mandates. These reports contain government-required information and the process and reports vary by country. This is business conducted between our corporate office and the government; there is no business need to share it with our Independent Consultants and we do not train non-Arbonne employees on such processes.

Meghan's Question: Why is there so much secrecy around the number of reps you have in various regions?

Arbonne Answer:

There is no "secrecy" surrounding geographical and related statistics about our Independent Consultants in various locations. For the most part, we elect not to share such information unless there is a good business reason to do so. To refer to the confidentiality statement shared in an earlier answer, we are not only a privately held company and not required to disclose such information, unless there is some compelling benefit to the company, our Independent Consultants or our brand awareness, we keep such statistics confidential for competitive reasons. That said, we have shared statistical information with the media before, during formal interviews and in support of a particular news story. We do not normally share such information outside of that context.

Meghan's Question: What is the ratio in your products between completely natural, unadulterated ingredients, to synthetic/science made ingredients.

Arbonne Answer:

Most of our Arbonne ingredients are naturally derived, like plant oils, and then are formulated to react with another man-made molecule, thus forming a surfactant, or foaming agent. Some ingredients remain unchanged post-extraction, such as olive oil and jojoba oil.

Meghan's Question: Do you believe it may be misleading to have words like natural in your manifesto, when your products aren't actually claiming to be natural?

Arbonne Answer:

Just to clarify, our Manifesto includes creative, descriptive copy, including the phrase, "We're for healthy, happy and natural." As you noted, we don't claim that our products are natural. Most of our ingredients are naturally derived and we have substantial botanical content in our formulas. Our Manifesto is about much more than just our products, per se. It is our mantra and the vision we live and breathe each day and it threads throughout everything we do. The Manifesto is about our products, people, culture, community, opportunity and much more. It is our reason for being.

Meghan's Question: What kind of nutrition training is required of your sales representatives before they can start recommending nutritional supplements?

Arbonne Answer:

Arbonne offers training through our corporate office(s) support departments, educational teams, Customer Service and also through each person's sponsor. Some are certainly more educated and prepared than others; just as when you walk into a brick-and-mortar store, some sales people know more about the products than others; some have been with the company for a short time and others are more seasoned. It really depends on the individual and the amount of time and effort they put into their business. Each person's knowledge base and length of time in the business varies.

Meghan's Question: Where do you believe Arbonne ranks amongst all the products out there in terms of being pure and safe?

Arbonne Answer:

We are confident we rank very high. Arbonne is committed to our botanical mission and to providing the best possible products on the market. I love and admire the fact that over 30 years ago a man named Petter Morck founded this company on the principles of pure, safe and beneficial. These guiding principles still hold true today. We screen all of our products through our strict, meticulous ingredient policy, which is actually more robust and more relevant today than it was 30 years ago. That is not marketing lingo or simply a tag line; it is the foundation from which we continue to grow and nurture our product development to reach even greater heights. We know we have work to do, for example, in the areas of our holiday and fragrance lines, and this is a really strong objective. We pride ourselves on continually making progress and on being open and transparent with our Independent Consultants.