

# CODE OF CONDUCT



NU SKIN®





# INTRODUCTION

At Nu Skin, we help people discover their best selves. We do this by empowering people to improve lives with innovative products, rewarding opportunities, and an enriching culture.

You play a central role in these efforts, and we're proud to have you on our team. As part of our commitment to improving lives, we strive to maintain the highest standards of integrity and ethical conduct.

We established the Nu Skin Code of Conduct to help guide our behavior with respect to fellow employees, Nu Skin, our directors, our sales force, customers, other businesses, governments, local communities, and our shareholders. Each of—in every position, in every market—has a responsibility to uphold and abide by these principles. We ask that you become familiar with the principles contained in the Nu Skin Code of Conduct and encourage you to ask questions if you have any doubts or concerns about the ethical or legal implications of any situation.

Above all, we encourage you to continue to be a force for good in your community and workplace by always following the highest standards of business integrity. When we all do our part to exemplify ethical conduct, we have a greater impact in our collective business success and, most importantly, our ability to improve people's lives.

Date of Approval: April 5, 2022





# THE NU SKIN WAY

## We Are

**A FORCE FOR GOOD.** We act with integrity as individuals and as an organization. We are optimistic, compassionate, and fun. We seek to improve the lives of everyone who touches our business. We initiate and invest in sustainable solutions for our planet. We generously give back to improve individual lives, our communities, and our world.

**ACCOUNTABLE AND EMPOWERED.** We empower employees at every level to act. We accept responsibility and take personal ownership for our actions. We hold ourselves and others accountable for quality results.

**BOLD INNOVATORS.** We relentlessly pursue improvement in all we do. We refuse to rest on past achievements. We proactively reinvent our approach in response to customer needs, market trends, and evolving technologies. We find a way regardless of constraints or barriers. We act courageously to take measured risks and innovate.

**CUSTOMER OBSESSED.** We place the customer at the center of everything we do. We rigorously research and intimately understand our customers, and we design all solutions with their needs in mind. We foster community and fierce customer loyalty through personalized customer experience at every touchpoint.

**DIRECT AND DECISIVE.** We debate, decide, and deliver. We make data-driven decisions. We build trust and confidence across markets and functions through clear and transparent communication. We practice both “respectful challenge” and “disagree and commit” to deliver the best solutions.

**EXCEPTIONAL.** We unleash the potential of our employees, sales leaders, and business partners. We are learners and adapt quickly to change. We adopt a growth and abundance mindset and strive for excellence in all we do. We deliberately learn from our successes and failures and celebrate wins.

**FAST SPEED.** We accelerate the pace of work without recklessly compromising quality for speed. We act with a sense of urgency. We quickly identify and systematically eliminate barriers to speed such as red tape, decision by committee, unnecessary approvals, hierarchy, etc. We are flexible and agile. We seek simplicity.

**ONE GLOBAL TEAM.** We actively seek, encourage, and respect diverse individuals and perspectives. We seamlessly balance global alignment and local uniqueness in the interest of the collective good. We collaborate and build rather than compete and destroy. We are frugal. We manage our resources responsibly because our actions impact each other.

## We Are

**A FORCE FOR GOOD**

**ACCOUNTABLE AND EMPOWERED**

**BOLD INNOVATORS**

**CUSTOMER OBSESSED**

**DIRECT AND DECISIVE**

**EXCEPTIONAL**

**FAST SPEED**

**ONE GLOBAL TEAM**

## Our Mission

is to be a global force for good by empowering people to improve lives with innovative products, rewarding opportunities, and an enriching culture.

## Our Vision

is to become the world's leading innovative beauty and wellness company, powered by our dynamic affiliate opportunity platform.

## Our Brand Promise

is to inspire confidence today and optimism for tomorrow.



# YOU REPRESENT NU SKIN



As a member of the Nu Skin team, you represent Nu Skin.

The Code of Conduct is a set of ethical and legal principles that are designed to be a reference and resource for you when dealing with issues that may arise as part of your work. The Code of Conduct applies to all directors, officers, and employees of Nu Skin Enterprises, Inc., and its subsidiaries (referred to collectively as “Nu Skin” or the “Company”). It is not meant to address every ethical or legal issue you may encounter and should not take the place of your own good judgment. In addition to the Code of Conduct, Nu Skin has policies and training materials that provide more detailed guidance relating to the Code’s principles. If you have questions that are not addressed by the Code of Conduct or other Nu Skin policies, please contact Nu Skin’s Chief Compliance Officer, the Corporate Compliance Office, or the Compliance and Ethics Helpline.







# EMPLOYEE RESPONSIBILITIES



We are responsible for our own actions. Nu Skin expects the actions of employees to be in accordance with the Company's mission and the Nu Skin Way and to be of the highest ethical standard. You have a responsibility to understand and follow Nu Skin's Code of Conduct, local laws, and regulations, and to adhere to other Nu Skin policies and procedures. You are also responsible for reporting violations of the Code of Conduct. Employees who fail to comply with the Code or who fail to report known or suspected unethical activities, may be subject to disciplinary action.

## QUESTION

**As an employee, what should I do if I am not sure if I have observed misconduct, unethical behavior, or a violation of the Code of Conduct?**

## ANSWER

Have a discussion with your manager or a member of your management team. If you are uncomfortable reporting the issue to your manager, or if the manager is the issue, you can use the Compliance and Ethics Helpline; Healthy Workplace Hotline; Nu Skin Ethics Hotline; or contact the Legal department, Human Resources, or the Corporate Compliance Office.

Nu Skin has provided an email to address such questions and any other questions related to the Code of Conduct or compliance and ethics.

Email address:  
[complianceandethics@nuskin.com](mailto:complianceandethics@nuskin.com)

## Making the Right Decision

If you are ever faced with a difficult decision and are unsure what action to take, first ask yourself these questions:

1. **Is the action consistent with our Mission and the Nu Skin Way?**
2. **Will it protect Nu Skin's reputation?**
3. **Am I demonstrating the highest ethical standards?**
4. **Would I feel comfortable reporting this decision to someone I respect?**

If your answer to any of these questions is "no", ask before acting! Consult with your manager or the Corporate Compliance Office.



# MANAGEMENT RESPONSIBILITIES



Managers are expected to exemplify the highest standards of business conduct. Managers should set an example for all employees and are expected to ensure their staff members fully understand and comply with the Code of Conduct, Nu Skin policies and procedures, and applicable laws and regulations. Managers are also responsible for encouraging the high standards noted in the Code of Conduct as part of each employee's daily work activities. Managers should foster a work environment that rewards honesty and open communication, where employees feel comfortable raising questions and concerns regarding the law or the Code of Conduct. Employees' concerns or allegations should be received and handled by managers with respect and in a professional manner. Managers have a responsibility to report to Human Resources, Legal department, or the Corporate Compliance Office when ethical concerns are brought to them.





# ADDRESSING & REPORTING CONCERNS

Nu Skin strongly encourages an open and honest environment where you can freely express your concerns and report violations of Nu Skin policies, this Code of Conduct, and applicable laws.

Nu Skin provides different reporting options depending on the nature of the concern or violation. If the matter is a concern related to employee relations or Human Resource concerns in the workplace, you should refer to the Healthy Workplace Policy and related Healthy Workplace Hotline. If the concern is a violation of policy, internal controls, or fraudulent behavior, you should use Nu Skin's Ethics Hotline.

If you have a question regarding an ethical issue or concern or want to report a violation of this Code of Conduct, other Nu Skin policies, or applicable laws, we encourage you to talk to your manager or supervisor, or other members of the management team. They can work with you to resolve the matter or help direct you to the best reporting options. In some circumstances, you may want to communicate directly with the Corporate Compliance Office, or members of the Legal or Human Resources Departments in your market or region. This option is always available to you. We encourage you to report violations and suspected violations promptly.

If you report a suspected violation to your manager or another member of the management team and you believe appropriate action has not been taken, we encourage you to contact Nu Skin's Corporate Compliance Office. If you want to report anonymously, you may use either

the Nu Skin Healthy Workplace Hotline or the Nu Skin Ethics Hotline depending on the nature of the violation. Nu Skin policies prohibit intimidation, retribution, or any other form of retaliation for reports of misconduct made in good faith.

The following options have been established for you to report a violation of the Code of Conduct:

1. Address complaints with immediate supervisor or manager
2. Contact any of the individuals listed below
3. Send an anonymous concern or complaint by calling the Nu Skin Ethics Hotline or submitting the concern online.
4. Submit an anonymous concern online if that concern is related to a Human Resource matter.

Each of the hotline websites allow for reporting concerns in various additional languages. Each market has an independent hotline telephone number that can be accessed when selecting your market on the Nu Skin Ethics website and allows for reporting in your local language.

## QUESTION

**Is there a way to report a violation anonymously?**

## ANSWER

Yes. If you prefer to report concerns anonymously, you can use either Nu Skin's Ethics Hotline or the Nu Skin Healthy Workplace Hotline. If your concern or complaint relates to employee relations or Human Resource concerns in the workplace, the Healthy Workplace Hotline is available for your use. Each Nu Skin Market has a unique telephone number that can be found on the hotline websites that allows you to make an anonymous report by telephone to operators in your local language. Nu Skin policy prohibits retaliation against employees who raise concerns, participate in an investigation, or otherwise seek advice.

## QUESTION

**Where can I get information about Nu Skin's Whistleblower Policy or the Healthy Workplace Policy?**

## ANSWER

A link to Nu Skin's Whistleblower and Healthy Workplace Policies can be found on the front page of Insider. For the Whistleblower Policy, navigate to Reporting a Concern and select "Ethics Reporting Policy". For the Healthy Workplace Policy, navigate to Global Resources and under "Policies" select "Healthy Workplace". If you need further information, please contact Nu Skin's Corporate Compliance Office or Human Resources.

LEGAL DEPARTMENT  
CHAYCE CLARK  
GENERAL COUNSEL  
[CCLARK@NUSKIN.COM](mailto:CCLARK@NUSKIN.COM)  
1-801-345-3801

CORPORATE COMPLIANCE  
JOHN FOWLES  
CHIEF COMPLIANCE  
OFFICER  
[JFOWLES@NUSKIN.COM](mailto:JFOWLES@NUSKIN.COM)  
1-801-345-5040

HUMAN RESOURCES  
BARR HILL  
VICE PRESIDENT OF  
GLOBAL SERVICE  
DELIVERY  
[CBHILL@NUSKIN.COM](mailto:CBHILL@NUSKIN.COM)  
1-801-345-0256

BOARD OF DIRECTORS  
EDWINA WOODBURY  
AUDIT COMMITTEE CHAIR  
[EDWINA.WOODBURY@CHAPELHILLPRESS.COM](mailto:EDWINA.WOODBURY@CHAPELHILLPRESS.COM)



# ADDRESSING & REPORTING CONCERNS

## Investigation of Reported Concerns

All concerns reported to either the Healthy Workplace Hotline or the Nu Skin Ethics Hotline are taken very seriously and are handled in a strict, confidential manner by a committee consisting of senior management from Human Resources, Legal, Corporate Compliance, and others as assigned by the General Counsel. The concerns are reviewed, and the case is assigned to the appropriate member of the committee to lead an investigation. Individuals who report concerns have the ability at any time to provide additional information through the Nu Skin Ethics Hotline or the Health Workplace Hotline. Investigations are handled in accordance with the Nu Skin Internal Investigation Guidelines. The committee reports regularly to the NSE Global Ethics Committee, Executive Management, and the Audit Committee of the Board of Directors regarding all investigations under the Whistleblower and Healthy Workplace Programs. Nu Skin policies prohibit intimidation, retribution, or any other form of retaliation against individuals for reports of misconduct made in good faith.

## Retaliation

Regardless of the type of misconduct reported, Nu Skin will not tolerate retaliation against anyone who makes a good faith report of what they believe to be a violation of laws, regulations, the Code of Conduct, or company policies. Any employee who in good faith submits such a report or a complaint of discrimination or harassment, or who participates in the investigation of such a complaint, will not be adversely affected in the terms and conditions of their employment because of the complaint or participation. Retaliating against someone involved in making a good faith complaint or who otherwise participates in the investigation of the reported misconduct is grounds for discipline, up to and including termination. If you believe you have been retaliated against because you reported misconduct, you should notify the Corporate Compliance department or report it through the Nu Skin Ethics Hotline or Healthy Workplace Hotline. All such claims will be thoroughly investigated and resolved as appropriate.

## Discipline for Violators

Employees, Directors, Officers, or members of management who violate the Code of Conduct, or any local or foreign laws are subject to disciplinary action, including termination. Disciplinary action also may be taken against anyone who directs or approves infractions, fails to promptly report a violation, or retaliates against someone who makes a report in good faith.

## Waivers of the Code of Conduct

Only Nu Skin's Board of Directors or its Audit Committee may grant a waiver of the Code of Conduct for Nu Skin's directors, executive officers, or chief accounting officer. Any approval by Nu Skin of a material departure from any provision of the Code of Conduct, or any failure by Nu Skin to take action within a reasonable period of time regarding a material departure from any provision of the Code of Conduct that has been made known to an executive officer, is considered to be a waiver of the Code of Conduct.







# THE WORKPLACE



The following are the standards employees should uphold and encourage in others with whom they work related to the workplace.

You are responsible for your own conduct and should always take proper care with the use of company property, time, and resources. All Nu Skin employees have a duty to safeguard and protect Nu Skin's assets, including but not limited to reputation, cash and other financial assets, Nu Skin's names and trademarks, physical plant and equipment, computers, computer software, supplies, records, electronic data, and customer and sales force information. All company assets should be used efficiently and for legitimate business purposes.

**Safety** – We are committed to providing our employees with a safe and healthy work environment. We strive to comply with all applicable safety and health laws and regulations wherever our employees work. Employees are responsible to promptly report accidents and conditions they believe are unsafe.

**Equal Employment and Opportunity** – Nu Skin is an equal opportunity employer and is committed to the fair treatment of all employees. Applicants and employees are evaluated on their qualifications, demonstrated skills, and achievements and not by gender, gender identity, sexual orientation or sexual preference, age, color, race, religion, national origin, disability, veteran status, marital status, pregnancy, or any other status protected by law.

**Diversity** – At Nu Skin, differences are encouraged and respected. You should help create and maintain a work environment where everyone feels comfortable and respected, regardless of individual differences, talents, or personal characteristics. Sensitivity and respect for local traditions and customs in countries where we conduct business is essential. Diverse employee experiences give us a broader perspective in a global business environment.

**Discrimination** – Discrimination occurs when someone is treated differently or singled out because of gender, gender identity, sexual orientation or sexual preference, age, color, race, religion, national origin, disability, veteran status, marital status, pregnancy, or any other status protected by law. Discrimination is prohibited in all work situations, including hiring, firing, promotions, training, wages, and benefits.



# THE WORKPLACE

**Harassment** – Nu Skin is committed to providing you with a work environment free from harassment, intimidation, and abuse from other employees, sales force members, customers, vendors, and other individuals in the workplace. At Nu Skin, harassment of any kind will not be tolerated and is strictly prohibited, including but not limited to:

- derogatory or insensitive jokes, pranks, or comments;
- questions or comments about religious practices or involvement;
- slurs or epithets;
- unwelcome sexual advances or invitations;
- non-verbal behavior such as staring, leering, or gestures;
- ridiculing or demeaning comments;
- innuendos or veiled threats;
- intentionally excluding someone from normal workplace conversations and making them feel unwelcome;
- displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory or sexually offensive;
- offensive comments about appearance or other personal or physical characteristics, such as sexually charged comments or comments on someone's physical disability;
- unnecessary or unwanted bodily contact such as groping or massaging, blocking normal movement, or physically interfering with the work of another individual; or
- express or implied threats or demands that a person submit to sexual or romantic advances or engage in social relationships as a condition of continued employment, to avoid some other loss, or in exchange for some other benefit.

You are encouraged to report any type of harassment incidents immediately, whether the harassment is directed at yourself or another employee. Nu Skin will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you are aware of a threat or risk to any of our employees.

Nu Skin will not tolerate retaliation against anyone who makes a good faith report of what they believe to be misconduct, harassment, or discrimination. We take claims of retaliation seriously. If you believe you have been retaliated against because you reported misconduct, you should notify the Corporate Compliance department or report it through the Nu Skin Ethics Hotline or Healthy Workplace Hotline.







# THE WORKPLACE

**Alcohol and Illegal Drugs** – Nu Skin is committed to maintaining a work environment free from drugs and alcohol. You are prohibited from manufacturing, distributing, selling, possessing, or using alcohol or illegal drugs (or prescription drugs in an unregulated manner) while at work, on company property, or in company vehicles. For additional guidance, refer to the complete policy on alcohol and illegal drugs.



## QUESTION

**I overheard a co-worker threaten another employee who is afraid to report the incident. What should I do?**

## ANSWER

You should encourage the employee to report the incident. If the employee is still hesitant, you should report the incident immediately. Nu Skin will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you are aware of a threat or risk to any of our employees. Nu Skin will ensure there is no retaliation toward anyone who either reports a concern or participates in the investigation process.

## QUESTION

**My co-workers tell jokes that are offensive and of a sexual nature. Should I just ignore it?**

## ANSWER

No. Nu Skin does not tolerate this behavior. If jokes or stories are offensive to you, you should either directly let your co-worker who is telling the offensive jokes know that you find the jokes offensive and ask him or her to stop; or, if you are not comfortable doing so, promptly report this to your supervisor or manager or to the Human Resources Department.

## QUESTION

**At a Nu Skin event a member of our sales force made sexual comments to one of my coworkers. Because we are here to serve our sales force, I didn't say anything. Was that correct?**

## ANSWER

No. Nu Skin is committed to providing a work environment safe from harassment from co-workers, vendors, and sales force members. You should encourage your team member to report the incident immediately, and if they are uncomfortable, you should report it yourself to your management or Human Resources.



# THE WORKPLACE

## Computer Usage and Electronic Communications at Nu Skin –

Nu Skin's computer systems and networks are private systems and are to be used only by authorized users. These systems are established and maintained for the purpose of conducting company business and may not be used for personal business or personal commercial solicitations, for sending or receiving discriminatory or harassing messages, for viewing pornography, or for receiving and distributing other material that is inflammatory, maliciously defamatory, or otherwise illegal. This policy does not limit an employee who has authorized access to the company's email system from using that system during non-work time for communicating about wages, hours, working conditions, and other issues as authorized by the National Labor Relations Act.

Electronic communications and data created using company systems and transmitted on company networks are the property of Nu Skin. All such communications and data must be stored on equipment and sites under the control of Nu Skin. You should not expect that such communications or any data created, stored, or transmitted on company systems and networks will be kept confidential. Nu Skin has the right, in certain circumstances and in accordance with applicable privacy laws, to monitor electronic transmissions and to access data and communications that use its systems. However, in accordance with Utah law, Nu Skin is prohibited from requesting the usernames or passwords of an applicant's or employee's social media accounts.

**Privacy** – Nu Skin is committed to respecting and protecting the privacy of all employees, customers, brand affiliates, and other third parties of whom Nu Skin processes personal data. Nu Skin acts in accordance with the requirements of the various privacy and data protection laws applicable in the markets where it operates and strives to ensure the protection of the personal data that it processes. You have a responsibility to prevent any inappropriate disclosure of such information and keep it confidential. Please refer to the Nu Skin Privacy Policy for more information and guidance.

## QUESTION

**My co-worker told me that I shouldn't email personal information through my work email because other people at Nu Skin can read it. Is that true?**

## ANSWER

Yes, in certain circumstances and in accordance with privacy laws, Nu Skin has the right to access and monitor email and instant message communications that are transmitted or stored on company computers or servers, including in connection with investigations and discovery in litigation.

## QUESTION

**What are the guidelines for talking about Nu Skin on social media?**

## ANSWER

You may participate and talk about Nu Skin on social media; however, only specifically authorized company representatives can post material or comments on behalf of Nu Skin. When posting about Nu Skin on an online or social platform, you should make it clear that you do not represent Nu Skin, and your views do not represent the views of Nu Skin. You should also not take public positions on company issues and never post discriminatory, defamatory, untrue, obscene, or inflammatory comments, particularly about Nu Skin, its employees, salesforce, or affiliates. In addition, information or materials regarding anything confidential, proprietary, or not public knowledge should never be included in social media. Doing so could impact your status with Nu Skin. The full employee social media policy can be found in PolicyTech at [nuskin.policytech.com](http://nuskin.policytech.com). If you have additional questions regarding social media, contact your local or corporate social media teams.

In recent years, individuals, companies, and governments have grown increasingly concerned about the security of personal data. As a result, laws protecting personal data and how it may be collected, accessed, shared, and used are becoming more common.

Many of us have access to personal data related to our brand affiliates, customers, vendors, consultants, employees, and others. While protecting this data may now be a legal requirement, for us at Nu Skin, protecting others' privacy is also first and foremost a matter of trust.





# MARKETPLACE STANDARDS

We value our relationship with our customers, vendors, suppliers, and other business partners and strive to enhance the marketplace for everyone involved through high standards of ethical conduct and adherence to applicable laws and regulations. We are committed to dealing fairly with customers, sales force members, vendors, suppliers, competitors, and employees, including avoiding conflicts of interest, manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. We strive to work with vendors, suppliers, and other business partners who exemplify our own high standards of integrity and business conduct. We will not knowingly do business with vendors, suppliers, sales force members, consultants, or other service providers of any kind who are not similarly committed to operating in accordance with the laws and standards consistent with the Code of Conduct.

**Gifts and Entertainment: Giving and Accepting** – In many industries and markets, giving or receiving gifts might be understood to be a part of business relationships. Entertainment gifts include meals and/or attendance or participation in sporting events, theater, or other similar activities. Gifts could include promotional or business favors such as shirts, card holders, electronic gadgets, etc. Gifts might also include Nu Skin products and cultural or traditional breads, cakes, candies, and other similar items. You may give or accept occasional gifts or entertainment that are reasonable complements to business relationships and comply with Nu Skin's Global Anti-Bribery and Anti-Corruption Policy and Gift and Entertainment Policy. Gifts and entertainment should be legal under local law, acceptable under reputable customary local business practices, of reasonable value and infrequent, and should not influence business decisions.

## QUESTION

**What should I do if I am requested to provide a gift, entertainment, or a favor to a sales force member, vendor, or government official and feel pressured to comply with the request to maintain a good relationship with the individual? What is an allowable gift or entertainment?**

## ANSWER

This is an area that often requires good judgement on your part. As a rule, gifts and entertainment must be legal under local law and should be reasonable in value and infrequent. Gifts of any kind must be appropriate for the occasion and position of the individual(s) receiving the entertainment. Gifts should be of a promotional or cultural nature. Cash gifts or cash equivalent gifts are never appropriate and violate Company policy unless specifically addressed otherwise in a relevant Company policy. You must properly document any gift or entertainment provided and include the business purpose, the nature of the gift/entertainment, those present, and those receiving the gift. In many cases, you must obtain prior approval from the proper level of management before providing a gift to business contacts or a government official. Gifts and entertainment are specifically covered by the Global Anti-Bribery and Anti-Corruption Policy, which provides guidance for when these items are allowed and the required documentation. Please consult the Global Anti-Bribery and Anti-Corruption Policy before providing or receiving gifts or entertainment. If you feel pressured to comply with a request to provide a gift to maintain a good relationship with the individual making the request, that could be a warning sign that the gift is not for a proper business purpose. Maintaining a relationship is never worth violating U.S. or local laws or regulations relating to providing gifts to others in the commercial marketplace or to government officials. If you have questions or concerns related to gifts or entertainment, please contact the Corporate Compliance Office or the Legal Department in your market or region.



# MARKETPLACE STANDARDS



Requesting or soliciting gifts, entertainment, or other gratuities is unacceptable. Giving or receiving a cash gift or cash equivalent is not acceptable unless specifically addressed in an applicable Company policy. Nu Skin's Global Anti-Bribery and Anti-Corruption Policy and other local policies regarding gifts and entertainment provide more specific details relating to giving and receiving gifts and entertainment. Gifts and entertainment that are provided to business contacts or government officials, as defined in Nu Skin's Global Anti-Bribery and Anti-Corruption Policy, must be properly approved, and cleared, recorded, and classified in Nu Skin's financial records.

## Do's and Don'ts for Accepting Gifts

Gift-giving and entertainment practices may vary in different cultures. Any gifts and entertainment that you accept as a Nu Skin employee in the course of your business dealings must comply with the law and be consistent with local custom and reputable business practices and must not violate Nu Skin's or the giver's gifts and entertainment policies. It is never acceptable for you to request or solicit gifts, favors, entertainment, or other gratuities of any kind from vendors, suppliers, service providers, sales force members, customers, or any other party. You should never accept an offer or gift of cash or a cash equivalent.

If a vendor, supplier, service provider, sales force member, customer, or any other party offers you a gift in the course of your business dealings with that party, you should always keep the following in mind:

### Do:

- Consider whether the offered gift is legal under local law and consistent with local customs and reputable business practices;
- Ask yourself honestly whether the offered gift is reasonable in value and a valid complement to the business relationship;
- Comply with all applicable Nu Skin policies with respect to the offered gift;
- Ask the giver if the offered gift complies with the giver's policies on gift-giving;
- Consider whether accepting the gift could give rise to a conflict of interest or a perception of a conflict of interest;
- Obtain prior written approval from the appropriate level of management (usually your supervisor) before you accept the offered gift.

### Don't:

- Request or solicit a gift from a vendor, supplier, service provider, sales force member, customer, or any other party, whether in the course of a request for a bid, a vendor selection process, a contract signing or renewal, or any other business dealings;
- Accept cash or any cash equivalent such as any gift certificate, gift card, voucher, loan, or marketable security under any circumstance;
- Accept any gift in return for awarding Nu Skin's business to a vendor, supplier, or service provider;
- Accept frequent gifts from the same party – any gift you accept should be modest in value and infrequent as a reasonable complement to the valid business relationship;
- Keep any gift for yourself that could be shared with your whole business unit or department.



# MARKETPLACE STANDARDS

**Conflicts of Interest** – You have an obligation to act in the best interest of Nu Skin and to avoid even the appearance of a conflict of interest. A conflict of interest exists when your personal interest interferes in any way, or even appears to interfere, with the interests of Nu Skin. For example, a conflict of interest exists when you or a family member benefits personally from a business decision over which you have influence. Additionally, a conflict of interest occurs when you solicit or accept gifts, payments, loans, services, or any form of compensation from vendors, suppliers, sales force members, customers, competitors, or others seeking to do business with Nu Skin. Never let your business dealings or decisions on behalf of Nu Skin be influenced, or appear to be influenced, by receipt of a gift for business, personal, or family interests. If you or a family member might receive personal or financial benefit from a business decision in which you may participate, you should disclose the relationship and ask to be insulated from participating in the decision. You should avoid any situation that creates or appears to create a conflict of interest, and any such potential conflict of interest should be reported to your supervisor, Human Resources, or the Corporate Compliance Office.

## QUESTION

**What kind of a relationship would be considered a conflict of interest?**

## ANSWER

Any relationship, whether with a romantic partner, friend, family member, former employee, sales force member, vendor, etc., may be considered a conflict of interest if your relationship with this person could affect your decisions, or impact the Company or the livelihood of you or the other individual. Conflicts of interest also arise when an employee, officer or director, or a member of their family, receives improper personal benefits as a result of their position with Nu Skin, including loans or guarantees of obligations.

## EXAMPLE

Your brother has recently opened a printing business and has asked you to redirect Nu Skin's business to his printing company. You would like to support him in the new venture. Even if contracting with your brother is in the best interest of Nu Skin, you have a conflict of interest and should not be involved in the business decision. You should disclose the relationship and turn the decision over to your supervisor or a person designated by your supervisor who can analyze the potential business relationship more objectively.

## EXAMPLE

You are offered and accept free gifts, entertainment, or free products from a potential vendor, and you are involved in the vendor selection process where that vendor is a possible candidate to provide services or products to the Company. This would be a conflict of interest since you have benefited personally because of your position with the Company, and this could also result in a perceived or actual unfair partiality towards that vendor.



# MARKETPLACE STANDARDS

## PROTECT NU SKIN'S INTERESTS AND REPUTATION

Always ask:

- Is this business decision biased in any way?
- Will I gain something personally by using this vendor or engaging in this transaction?
- Will a family member benefit personally if I do this as part of my job responsibilities?
- Am I gaining a benefit for me or my family from a vendor, supplier, or sales force member based on my status as a Nu Skin employee?
- Am I using Nu Skin property or assets for personal gain?
- Is my interest divided between what is best for me and what is best for Nu Skin by doing this?
- Would my actions harm Nu Skin's brand or reputation if they were publicly disclosed?

If your answer to any of these questions is "yes", consult with the Corporate Compliance Office before deciding.

**Outside Business Interests** – You may not engage in activities that compete with the business activities of Nu Skin. If you have a personal business or second job in addition to your employment with Nu Skin, or if you participate in an outside board membership for a profit or non-profit company, you should discuss the business, second job, or outside board membership with your manager to ensure a clear understanding and prevent conflicts of interest. You may not use company resources or your position for personal gain or take advantage of opportunities for personal gain that are discovered through the use of company resources or position. Employees, officers, and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

**Accuracy of Company Records** – It is essential that Nu Skin's official records be complete and accurate to reflect the true state of the business at all times. Financial books, records, and accounts must be recorded in compliance with applicable laws, accounting practices, and company policies. You must comply with internal controls and have a responsibility to report any attempt by another employee or manager to override or violate internal controls.

Undisclosed or unrecorded funds, assets, or liabilities are not allowed. The making of false or misleading entries, records, or documentation is prohibited. You must cooperate fully with the Chief Accounting Office, Internal Audit Department, and our independent public accountants to help ensure that all of Nu Skin's financial books, records, and accounts are accurate.





# MARKETPLACE STANDARDS

**International Marketplace** – U.S. and international laws, and local laws in the markets where Nu Skin does business, often mandate very specific requirements. For example, failure to comply with a country's import and export laws may constitute a crime, which could result in a fine and/or imprisonment. If you are involved in any way with imports and exports, including working with or through customs brokers or import-export agencies of any kind, you must carefully follow this Code of Conduct and any relevant company policies, including Nu Skin's Global Anti-Bribery and Anti-Corruption Policy. If you have a concern about these or other international legal issues, consult with the Legal Department.

**Anti-Corruption** – You are required to comply with Nu Skin's Global Anti-Bribery and Anti-Corruption Policy and any applicable supplemental anti-bribery and anti-corruption policies or corporate guidelines in particular markets. This means that you are required to comply with local and international anti-corruption laws everywhere Nu Skin does business. Nu Skin prohibits employees from directly or indirectly (including through an agent, consultant, or any other third-party provider of goods or services engaged by the company) making a payment to or providing a gift with the purpose of improperly influencing the act or decision of government officials or representatives. Great care must be taken in this regard because anti-corruption laws define such officials and representatives very broadly.

Nu Skin's Global Anti-Bribery and Anti-Corruption Policy also prohibits commercial bribery, which includes making a business decision based on a personal benefit given or offered by a vendor, supplier, sales force member, competitor, or any other party. Never solicit or accept gifts, bribes, or kickbacks from anyone, including those in the commercial marketplace. Similarly, Nu Skin prohibits offering or giving a bribe or kickback to any vendor, supplier, sales force member, competitor, or any other third party.

Because the rules and policies relating to anti-corruption are complex, employees should consult Nu Skin's Global Anti-Bribery and Anti-Corruption Policy, any applicable market-specific supplemental anti-bribery and anti-corruption policies, and the Corporate Compliance Office regarding any questions. If you become aware of any possible corruption violations, your first objective should be to stop the conduct and report the violations to the Corporate Compliance Office or through the Nu Skin Ethics Hotline.

## QUESTION

What would be a common situation that may lead to a possible violation of Nu Skin's Global Anti-Bribery and Anti-Corruption policy?

## ANSWER

In general, any of the following (or similar activities) may violate the law if our intent is or appears to be to improperly influence an individual to do something, not to take some kind of action, or to give the company an unfair or improper advantage:

- Giving or receiving gifts,
- Retaining consultants to interact on our behalf with government officials,
- Making charitable donations,
- Sponsoring events (which often include the need to interact with government agencies or officials for permitting or other venue-related purposes), and
- Paying for travel for outside parties

Additionally, extra care must be taken when engaging outside parties to provide goods or services to Nu Skin in the areas of product registration, customs clearance, obtaining a business license, or any other service or activity in which an outside party will represent Nu Skin or its position to any government official, agency, or entity.

## EXAMPLE

A consultant we've engaged to assist us with a product registration or obtaining customs clearance or a business license suggests that they could guarantee success if we paid them an extra amount – perhaps even through an official "consulting invoice." If the consultant then uses the "extra" fee or a portion of an unusually large fee received from Nu Skin to provide a gift or make a payment to government officials approving a registration or license, it would be a potential violation of anti-corruption laws, even though done by an outside consultant providing a service to the Company instead of by the Company itself. If you are asked to pay an "extra" fee or provide a gift to secure a benefit or an advantage for the Company, please notify the Chief Compliance Officer, the Corporate Compliance Office, or the Legal Department in your market or region immediately for advice and do not act until you have received such direction.

## QUESTION

What should I do if I become aware of a possible anti-corruption violation?

## ANSWER

The first objective should be to stop the conduct or related activity. You should report any possible anti-corruption violations to the Corporate Compliance Office or through Nu Skin's Ethics Hotline as set forth in Nu Skin's Global Anti-Bribery and Anti-Corruption Policy.



# MARKETPLACE STANDARDS

**Sanctions, Boycotts, and Trade Restrictions** – The United States federal government and many other governments use economic sanctions and trade embargoes against companies, individuals, and even other governments for political or national security purposes. You must take care not to engage any outside provider of goods or services if that company or its beneficial owners are included on a U.S. or other relevant international sanctions watchlist. Please contact the Corporate Compliance Office for assistance in determining whether this is the case in specific transactions.

**Third-Party Due Diligence** – You have a responsibility to help protect Nu Skin’s brand and reputation. As a vital part of this effort, before engaging any outside vendor, supplier, or service provider to provide goods or services to Nu Skin, or before Nu Skin makes any charitable donation, all employees involved in such transactions must do appropriate due diligence to understand the background of that outside party to make sure it is a good and reputable company or organization. You must complete this due diligence research before making the final decision to engage the outside party and then keep a record of the due diligence work, as required by company policy. You are responsible for performing the correct due diligence procedures where relevant before committing Nu Skin to an engagement or payment.



Additionally, you must contact the Corporate Compliance Office or the Legal Department immediately if you receive a request to participate in or cooperate with an international boycott or to comply with the boycott rules of a particular territory, including a request to certify that products were not owned, manufactured, or shipped by a boycotted or “blacklisted” entity. An example might include a request to enter into an agreement containing provisions refusing to do business with or in Israel or with “blacklisted” companies.



# MARKETPLACE STANDARDS



**Records Management** – Records will be managed in accordance with Nu Skin’s Data Classification and Handling and the Record Retention Policies. It violates Nu Skin policy, and, in many jurisdictions, it is unlawful to destroy, conceal, alter, or falsify any business record or document for the purpose of obstructing, hindering, or influencing, in any way, any lawsuit or other legal or government inquiry, proceeding or an investigation.

**Intellectual Property** – You may not knowingly infringe upon the intellectual property rights of others. Intellectual property rights include trademarks, copyrights, trade secrets, and patents. Additionally, you should not disclose or be asked to disclose the confidential or trade secret information of other companies. Nu Skin owns and depends on a wide range of intellectual property assets such as information, processes, product formulations, and technology that give us a competitive advantage. You are responsible to help protect Nu Skin’s intellectual property.

**Product Quality and Safety** – Consumers expect more from Nu Skin’s brands. Nu Skin ensures that consumers can trust Nu Skin products to have superior quality and safety. One of Nu Skin’s primary responsibilities is to maintain high quality and safety standards, ensuring products are safe for consumers. As part of the Code of Conduct, you should report concerns or issues that might endanger product quality and/or safety.



# MARKETPLACE STANDARDS



**Marketing** – Nu Skin is committed to maintaining the integrity associated with its products and business opportunity. Nu Skin strives to ensure that materials related to product and opportunity, marketing, advertising, promotion, packaging, or display do not misrepresent facts or provide misleading impressions or representations. You must help ensure that Nu Skin’s marketing and other materials are not misleading and report situations or information that might be misstated.

**Fair Competition** – You must comply with all applicable competition laws, which are called “anti-trust laws” in the United States. Such laws protect consumers and other companies from unfair competitive practices such as price-fixing or other cartel behaviors that interfere with normal market forces. You should consult with the legal department in your market or region for more information about competition laws for your position.

**Anti-Money Laundering** – You must comply with all laws related to money laundering. Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. Never become involved in money laundering and know who you are doing business with by following our third-party due diligence procedures. Never support crime or terrorism. If there is ever a question or a concern, please raise them to the Legal Department.

## QUESTION

**My job isn’t related to marketing, and I don’t interact with sales force members. Why is this important for me?**

## ANSWER

It’s not just about the policies—it’s about managing and protecting our brand and reputation. If marketing or other materials are misleading about the products or the business opportunity, it does a disservice to the company’s valuable reputation. Every employee, regardless of position, has a role in protecting and improving Nu Skin’s brand and reputation.

## QUESTION

**Why should I spend so much effort with each piece of communication when we are all so busy trying to help our sales force and the company to grow?**

## ANSWER

Growth is not sustainable unless it is solidly based on facts and provides realistic expectations. We genuinely care about protecting customers. Don’t ever communicate anything that might damage the trust someone has in you or Nu Skin.





# INVESTMENT COMMUNITY

As a publicly traded company, Nu Skin must abide by the strict regulations of the Securities and Exchange Commission (SEC), New York Stock Exchange (NYSE), and other regulators. Nu Skin works hard to build and maintain confidence and trust with our shareholders and the financial community. It is our responsibility to act in the best interests of Nu Skin in ways that maintain our good reputation while following all applicable laws and regulations.

**Material Nonpublic Information and Confidentiality** – Prior to official public disclosure, material nonpublic information should not be shared with employees who do not need to know the information or with individuals outside of Nu Skin, other than Nu Skin’s advisors who are assisting Nu Skin with the matter. Nu Skin is committed to providing full, fair, accurate, timely, and understandable disclosures in reports and documents filed with or submitted to the SEC and in other public communications.

Care should also be taken with confidential information even if it does not rise to the level of material nonpublic information. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. You should maintain the confidentiality of information entrusted to you by the Company or its customers, except when disclosure is authorized or legally mandated.

## QUESTION

**What is deemed material nonpublic information?**

## ANSWER

Information is considered “material” if a reasonable investor would consider it important in deciding to buy, hold, or sell securities. Any information that could be expected to affect the Company’s stock price, whether it is positive or negative, should be considered material. Examples may include projections of future earnings or losses, consolidated financial results, such as revenue or earnings, major business developments, and significant safety or quality issues related to Nu Skin’s products. There is no bright-line standard for assessing materiality; rather, materiality is based on an assessment of all the facts and circumstances and is often evaluated by enforcement authorities with the benefit of hindsight.

Information that has not been disclosed to the public is generally considered to be “nonpublic” information. To establish that the information has been disclosed to the public, it may be necessary to demonstrate that the information has been widely disseminated, such as if it has been disclosed through newswire services or public disclosure documents filed with the SEC.



# INVESTMENT COMMUNITY

## PERSONAL BLOGS

### QUESTION

**I have a personal blog where I share my thoughts and feelings with my friends. What should I consider before including any work-related information?**

### ANSWER

Be careful. Online outlets such as social media, blogs, instant messaging, networking sites, etc. are subject to the same rules as any other communications. Do not disclose any material nonpublic information. For example, do not write about upcoming product launches, changes in executive management, financial information, or any other material nonpublic information. Also, avoid writing about other sensitive or confidential information, such as relationships with our sales force or vendors and personal employee information.

If you have a question or need additional information, please contact Corporate Communications.

other financial investment professionals, stockholders, the media, or others, unless you are specifically authorized to do so. No individual should speak for Nu Skin without prior consultation with Corporate Communications. Nothing in this policy should be construed to limit an employee's right to discuss employment concerns on their own behalf or for other coworkers in accordance with the National Labor Relations Act.

## INQUIRIES FROM MEDIA OR RESEARCH FIRMS:

### QUESTION

**I received a phone call from a reporter or research firm asking for more information about our industry and an upcoming product launch. I want to be helpful – what do I do?**

### ANSWER

The best and most helpful plan of action in this situation is to thank the individual for their interest in Nu Skin, let them know you are not the person they need to talk to and immediately direct them to the Corporate Communications Department.

Nu Skin has an obligation to ensure any information it reports or provided in responses to inquiries are accurate. In order to ensure that Nu Skin complies with the applicable laws and its duty to the public, all communication with the media, analysts, and research firms should be made, approved, or coordinated through the Corporate Communications and/or Investor Relations Department.

You may not discuss company business or information, including financial results or company plans, with analysts,

## EXTERNAL GROUP MEETINGS:

### QUESTION

**As part of my Nu Skin duties, I often meet with our sales force, business associations, or the media. These groups often ask for feedback or updates on Nu Skin's success, how sales are going, etc. Since I am authorized as part of my Nu Skin responsibilities to meet with these groups and have these discussions, am I restricted as to what I can say or discuss?**

### ANSWER

Although your job may include meeting with the public or the media to discuss Nu Skin business, you must be careful regarding what information you discuss. This applies to all employees, whether you work with the media or not. You should not discuss, provide, or announce information that has not already been "officially" made public or that conflicts with or is in addition to information that has been made public. Government regulations dictate very specific and formal ways for publicly traded companies to release or make public information that is of interest to financial markets. Sales or recent changes in sales trends, product launch or information on the success of product launches, or similar information all have potential impact on financial markets. Great care must be taken to ensure that your discussions include only information already released to the public through formal methods and that your discussion is consistent with information officially provided to the public – such as financial market guidance. If you have further questions, you should contact the Corporate Communications Department or the Legal Department or Corporate Compliance departments.



# INVESTMENT COMMUNITY



**Securities Trading** – To ensure fairness and integrity in financial markets, you are prohibited from trading Nu Skin securities while in possession of material nonpublic information or providing tips to others to trade Nu Skin securities or other companies' securities on the basis of material nonpublic information.

Nu Skin's policy relating to securities trading is intended to avoid even the appearance that any Nu Skin employee is trading on inside information. Employees who involve themselves in insider trading (either by personally engaging in trading or by disclosing material nonpublic information to others) could be subject to immediate termination by Nu Skin and prosecution by government authorities. If doubt exists as to whether the information is material and nonpublic, employees should not trade until they have consulted with the Legal Department.

## QUESTION

I want to sell some of my Nu Skin stock. The fiscal quarter just ended, but I am not in a management or financial reporting job, so I normally do not know the company's quarterly revenue or earnings results, nor do I need to know this information to be able to do my job. However, just a few minutes before contacting my broker to sell my stock, I was in a conversation in which another employee mentioned the amount of revenue Nu Skin earned during the quarter that just ended. Can I still sell my stock?

## ANSWER

No. The revenue information that was mentioned in the conversation is material information. Therefore, you cannot sell your stock until after Nu Skin has publicly announced its quarterly revenue and enough time has passed for the announcement to be absorbed by the marketplace.



# COMMUNITY STANDARDS



NU SKIN  
FORCE FOR GOOD  
FOUNDATION

Your influence extends to the communities in which you work and live. In keeping with Nu Skin's mission to be a force for good, you have an opportunity and responsibility to benefit the community in which you live by getting involved in charitable causes, participating in political processes, and always conducting yourself uprightly with regard for the rights and interests of your fellow citizens.

**Compliance with the Law** – Nu Skin is committed to observing all laws and regulations and to be a good corporate citizen wherever it operates.

**Community Involvement** – Nu Skin believes in contributing to the communities in which it operates. The Nu Skin Force for Good Foundation and other charitable organizations supported by Nu Skin employees around the world illustrate our commitment to becoming a force for good. You are encouraged to become actively involved in your communities and in charitable organizations.

**Environment** – You are expected to comply with all applicable environmental laws and regulations, and to report any incidents contrary to this policy. Nu Skin is committed to minimizing the impact of the business on the environment and supporting sustainable business practices. You are encouraged to conserve, recycle, and use energy programs that promote clean air and water and reduce landfill waste.

**Fair Employment** – Nu Skin prohibits the use of child labor, exploitation of children, forced labor, physical punishment or abuse, or involuntary servitude in any of its operations worldwide. You must comply with applicable minimum age for employment laws, wage and hour laws, minimum wage and overtime laws, and maximum hour rules. Never require anyone to work without pay or for unpaid overtime.

**Political Contributions and Political Activities** – Nu Skin encourages employees to participate in the political process in the communities in which they live. However, financial contributions by Nu Skin to political candidates may be prohibited or regulated in certain countries. Consequently, financial contributions by or on behalf of Nu Skin must be pre-approved by the General Counsel.





