

MARKETING AND ADVERTISING COMPLIANCE POLICY

JANUARY 2026

POLICY NUMBER: TMG-SEC-028

APPROVAL AUTHORITY: BOARD OF DIRECTORS



THE MAZI GROUP

1. PURPOSE

This Marketing and Advertising Compliance Policy establishes The Mazi Group's standards for truthful, fair, and compliant marketing across all brands. Our marketing must accurately represent our products and services while complying with applicable laws and regulations. This policy applies to Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This policy applies to:

- All marketing and advertising activities
- All channels: digital, print, broadcast, social media, in-store
- All brands and products
- All employees involved in marketing
- Agencies and partners creating marketing on our behalf
- All geographic markets

3. CORE PRINCIPLES

- **Truthfulness:** All claims must be truthful and not misleading
- **Substantiation:** Claims must be supported by evidence
- **Fairness:** Marketing must not be deceptive or unfair
- **Transparency:** Material information must be disclosed
- **Responsibility:** Consider impact on consumers and society

4. REGULATORY FRAMEWORK

4.1 United States

- FTC Act (deceptive and unfair practices)
- Lanham Act (false advertising)
- CAN-SPAM Act (email marketing)
- TCPA (telemarketing and SMS)
- COPPA (marketing to children)
- State consumer protection laws

4.2 European Union

- Unfair Commercial Practices Directive
- Consumer Rights Directive
- ePrivacy Directive
- GDPR (marketing consent)
- EU Cosmetics Regulation (claims)

4.3 Canada

- Competition Act
- CASL (anti-spam)
- Consumer Packaging and Labelling Act

5. TRUTHFUL ADVERTISING

5.1 General Requirements

- All claims must be truthful and accurate
- Do not make false or misleading statements
- Avoid deceptive implications
- Consider overall impression, not just literal truth
- Disclose material limitations

5.2 Claim Substantiation

- Have substantiation before making claims
- Substantiation must be competent and reliable
- Match level of proof to type of claim
- Maintain substantiation files
- Update claims if substantiation changes

5.3 Types of Claims

Performance Claims

- Support with testing or studies
- Ensure tests are representative

- Disclose test conditions if material

Comparative Claims

- Ensure fair and accurate comparisons
- Compare similar products/features
- Have substantiation for superiority claims
- Do not disparage competitors unfairly

Testimonials and Endorsements

- Reflect honest opinions of endorsers
- Disclose material connections
- Ensure claims are substantiated
- Monitor ongoing accuracy

6. BRAND-SPECIFIC REQUIREMENTS

6.1 Mazi Beauty (Cosmetics)

- Comply with FDA cosmetic labeling requirements
- Do not make drug claims for cosmetics
- Follow EU Cosmetics Regulation claims guidelines
- Substantiate efficacy claims with testing
- "Clean," "natural," "organic" claims must be accurate
- Avoid exaggerated before/after imagery

6.2 Glam Switch (AI Technology)

- Accurately represent AI capabilities
- Do not overstate accuracy or results
- Disclose limitations of technology
- Be transparent about data use
- Avoid discriminatory implications

6.3 On The Go Mists (Antibacterial)

- Comply with EPA/BPR requirements for claims

- Use only registered claims
- Include required label statements
- Substantiate efficacy claims with testing

6.4 Upvendo (B2B Technology)

- Accurately represent software capabilities
- Substantiate ROI and performance claims
- Clear pricing and terms
- Honest competitive comparisons

7. DIGITAL MARKETING

7.1 Online Advertising

- Same truthfulness standards as traditional advertising
- Clear and conspicuous disclosures
- Disclosures visible on all devices
- Native advertising must be identified

7.2 Social Media

- Disclose material connections with influencers
- Use clear disclosure language (#ad, #sponsored)
- Ensure influencer claims are substantiated
- Monitor influencer content
- Contracts must require compliance

7.3 Email Marketing

- Obtain consent where required
- Include unsubscribe mechanism
- Honor opt-outs promptly
- Accurate sender information
- No deceptive subject lines

7.4 SMS Marketing

- Obtain express written consent
- Clear opt-in process
- Easy opt-out mechanism
- Comply with TCPA requirements

8. PRICING AND PROMOTIONS

8.1 Price Advertising

- Advertised prices must be available
- Disclose all material terms
- Sale prices must be genuine reductions
- "Free" offers must be truly free

8.2 Promotions and Contests

- Clear official rules
- Disclose material terms
- No purchase necessary (where required)
- Comply with state/country requirements
- Legal review for promotions

9. ENVIRONMENTAL CLAIMS

- Environmental claims must be substantiated
- Be specific about environmental benefits
- Avoid vague terms ("eco-friendly," "green")
- Qualify claims appropriately
- Follow FTC Green Guides
- Comply with EU Green Claims Directive

10. CHILDREN'S MARKETING

- Do not target marketing to children under 13

- Comply with COPPA for online collection
- Age-appropriate content only
- No deceptive practices targeting children
- Parental consent where required

11. REVIEW AND APPROVAL

11.1 Review Process

- Marketing materials reviewed before publication
- Legal/compliance review for sensitive claims
- Substantiation documented
- Approval documented

11.2 What Requires Review

- New product claims
- Comparative advertising
- Testimonials and endorsements
- Environmental claims
- Health or safety claims
- Promotions and contests
- Influencer partnerships

12. AGENCY AND PARTNER REQUIREMENTS

- Agencies must comply with this policy
- Include compliance requirements in contracts
- Provide policy training to agencies
- Review agency-created content
- Retain approval authority

13. RECORD KEEPING

- Retain marketing materials

- Maintain substantiation files
- Document approvals
- Retain records per retention policy

14. TRAINING

- Marketing team training on compliance
- Brand-specific training
- Updates for regulatory changes
- Agency training

15. ROLES AND RESPONSIBILITIES

15.1 Marketing Teams

- Create compliant marketing materials
- Obtain substantiation for claims
- Submit materials for review
- Implement required changes

15.2 Legal/Compliance

- Review marketing materials
- Advise on compliance requirements
- Monitor regulatory developments
- Investigate complaints

16. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-016: Data Privacy and Protection Policy
- TMG-SEC-029: Social Media and Influencer Marketing Policy
- TMG-SEC-030: Brand Protection and Trademark Usage Policy
- TMG-SEC-031: Product Labeling and Claims Substantiation

17. POLICY REVIEW

This policy shall be:

- Reviewed annually by Marketing and Legal
- Updated for regulatory changes
- Approved by CMO and CLO
- Communicated to marketing teams

18. DEFINITIONS

- **Substantiation:** Evidence supporting an advertising claim.
- **Material:** Information likely to affect consumer decisions.
- **Endorsement:** Message reflecting opinions of someone other than the advertiser.
- **Native Advertising:** Advertising that matches the form of surrounding content.

For questions about this policy, contact:

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