

Retra Advertising Controls Policy

Approved by: Mark Jarvis

Approval date: October 1, 2026 Effective date: October 1, 2026 Version: 1.0

Purpose and scope

Retra requires review and oversight of corporate and promoter marketing for Retra Global supplements and Retra Health services. This policy applies to social posts, videos, websites, presentations, emails, texts and promotional direct messages. It governs approval, product and treatment claims, promoter guidance, and monitoring and corrective action.

1. Approval before publication or sharing

Promoters may share only current corporate materials from the approved resource collection, exactly as released and with required disclosures. New or modified materials require written approval before publication or sharing, including changes to captions, images, testimonials, translations and linked pages.

Marketing reviews the complete message and its destination. Qualified reviewers assess health claims and product eligibility as required. The Compliance Lead records each decision as Approved, Revise or Rejected, including the reason, date and final version. Required revisions must be reviewed before release. A material's creator may not be its sole approver.

Submissions must be sent to the designated review contact. Materials awaiting approval must not be published or shared.

2. Product and treatment claims

Retra must maintain approved wording for each cleared product or service, together with supporting evidence, required disclosures and reviewer names. Products and claims awaiting review must remain on hold. Qualified regulatory or legal reviewers confirm eligibility for the formulation, route, market and partners. Clinical reviewers assess medical accuracy when required.

- Supplements may use only supported, approved claims. Claims that a supplement diagnoses, treats, cures or prevents disease are prohibited.
- Prescription and compounded products may use only approved corporate descriptions. Promoters must not provide dosing advice, recommend treatment or promise prescriptions or results. Medical questions must be referred to the licensed provider.
- Compounded medications must not be described as FDA-approved. Claims that a product has no side effects are prohibited. Disclaimers do not make unsupported claims acceptable.

- Testimonials, before-and-after photographs and earnings claims require review. Provider, pharmacy and certification statements must be verified before use.

3. Promoter guidance and disclosures

Marketing must provide Promoters with this policy, the approved wording, and current corporate resource collection. Marketing must communicate material changes promptly and retain training and acknowledgement records.

Promoters must clearly disclose their financial connection near an endorsement. Marketing must notify Promoters when an asset is withdrawn. Promoters must stop using withdrawn materials.

4. Monitoring and corrective action

Marketing must check accessible public web and social content weekly for Retra names, product names and prohibited claims. Each month, Marketing must review a documented sample of active Promoters, prioritizing paid advertisers, high-volume Promoters and previous violations. All reported or flagged high-risk content must be reviewed. The scope and results must be recorded, including checks with no findings.

Each identified issue must be documented with its URL, screenshot, responsible person and action taken. Serious violations require immediate cessation, with a target of verified removal within 24 hours of detection. Other corrections must be completed within two business days of notice. Misleading content must be paused while revisions are reviewed.

Marketing must verify correction or removal before closing a case and escalate missed deadlines and repeat violations to the Compliance Lead. Corrective action may include education, a written warning, retraining, suspension or termination under the Promoter Agreement. Severe violations may escalate immediately.

Responsibilities and contact details

Responsibility	Responsible person
Marketing review and promoter communication	Kyle Mickleburgh, VP of Marketing
Compliance Lead and final approval	Angelina Whittington, Legal Counsel
Regulatory or legal review	Angelina Whittington, Legal Counsel
Clinical review when required	Dr. Thomas Seastrunk, DO
Monitoring and correction follow-up	Kyle Mickleburgh, VP of Marketing

Submission and reporting contact: Kyle Mickleburgh, kyle@retraglobal.com

Approved resource collection: RetraNews.com

Recordkeeping

Marketing must maintain a review and monitoring log with supporting files, including drafts, decisions, approved versions, claim evidence, published examples, monitoring results and verified corrections. Promoter training acknowledgements must be retained separately.