



2ND FLOOR, NO. 213, GURUDWARA ROAD, SOUTH CITY 1,
GURUGRAM HARYANA, 122001

CIN: U47990HR2025PTC133261

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CODE OF ETHICS AND CONDUCT FOR DIRECT SELLERS

In Compliance with:

Consumer Protection (Direct Selling) Rules, 2021

Consumer Protection Act, 2019

Ministry of Consumer Affairs, Food & Public Distribution

CIN: U74999DL2019PTC358517

Registered Office:

Unit 720-722, DLF Tower-B, Jasola District Centre

Mathura Road, New Delhi - 110025

Contact: +91-11-41601212

Effective Date: January 1, 2026

Version 1.0

PREAMBLE

This Code of Ethics and Conduct ("Code") has been formulated by Fohow Healthcare India Private Limited ("Company", "Fohow", "We", "Us", or "Our") to establish ethical standards and professional conduct guidelines for all Direct Sellers associated with the Company.

The Code is designed in strict compliance with:

- Consumer Protection (Direct Selling) Rules, 2021
- Consumer Protection Act, 2019
- Guidelines issued by the Ministry of Consumer Affairs, Food & Public Distribution
- Prize Chits and Money Circulation Schemes (Banning) Act, 1978

All Direct Sellers are required to read, understand, and adhere to this Code in letter and spirit. Violation of this Code may result in disciplinary action, including termination of Direct Seller status.

1. DEFINITIONS

1.1 Direct Seller: Any individual who has been authorized by the Company to undertake direct selling activities, including promotion, offer for sale, or sale of goods or services through person-to-person interactions.

1.2 Consumer: Any person who purchases goods or services for consideration from a Direct Seller or the Company.

1.3 Prospect: Any individual who is being approached or solicited to become a Direct Seller or Consumer.

1.4 Compensation Plan: The Company's reward structure that outlines how Direct Sellers earn income from product sales and organizational development.

1.5 Pyramid Scheme: Any scheme where primary income is derived from recruiting others rather than sale of products or services to end consumers. Such schemes are illegal under Indian law and strictly prohibited.

2. GENERAL CONDUCT AND PROFESSIONAL BEHAVIOR

2.1 Honesty and Integrity

Direct Sellers shall:

- Conduct all business activities with honesty, integrity, and in good faith
- Act professionally and courteously with prospects, consumers, and fellow Direct Sellers
- Avoid any deceptive, misleading, or unethical practices
- Maintain transparency in all dealings

2.2 Compliance with Laws

- Direct Sellers must comply with all applicable central, state, and local laws of India

- Direct Sellers shall not engage in any illegal activities, including but not limited to pyramid schemes, money circulation schemes, or chain marketing schemes
- Direct Sellers must obtain all necessary licenses, permits, and approvals as required by law for conducting direct selling activities
- Direct Sellers shall not make any representations that violate Indian advertising standards or consumer protection laws

3. PRODUCT REPRESENTATION AND CLAIMS

3.1 Accurate Product Information

Direct Sellers shall:

- Provide accurate, truthful, and complete information about Company products and services
- Use only Company-approved marketing materials and product information
- Not exaggerate product benefits, features, or performance
- Clearly disclose all material information including price, ingredients, usage instructions, and any warnings or contraindications

3.2 Prohibited Medical Claims

Direct Sellers shall NOT:

- Make any medical claims, diagnoses, or treatment recommendations unless such claims are approved by appropriate regulatory authorities (FSSAI, AYUSH Ministry, Drug Controller General of India)
- Claim that products can cure, treat, prevent, or diagnose any disease or medical condition
- Use testimonials or endorsements that make unsubstantiated health claims
- Suggest that consumers should discontinue medical treatment or prescribed medications
- Represent products as alternatives to professional medical care

3.3 Comparative Claims

- Direct Sellers shall not make disparaging, false, or misleading statements about competitors' products or business practices
- Comparative claims must be factual, verifiable, and not misleading
- Direct Sellers shall respect intellectual property rights of other companies and shall not infringe trademarks, copyrights, or patents

4. INCOME REPRESENTATIONS AND EARNINGS CLAIMS

4.1 Prohibited Income Claims

Direct Sellers shall NOT:

- • Make any income projections, promises, or guarantees to prospects or recruits
- • Represent that Direct Selling is a 'get rich quick' opportunity or requires minimal effort
- • Display or promote luxury items (cars, houses, jewelry) as typical or guaranteed results of participation
- • Make earnings claims based on hypothetical or atypical results
- • Misrepresent the amount of time, effort, or skill required to earn income

4.2 Permitted Disclosures

If discussing income potential, Direct Sellers may:

- • Share their own personal earnings with appropriate disclaimers ("This represents my personal results and is not typical or guaranteed")
- • Provide the Company's official Income Disclosure Statement (if available)
- • Explain the Compensation Plan structure without making specific income predictions
- • Emphasize that success depends on individual effort, skill, market conditions, and time commitment

5. RECRUITMENT AND SPONSORSHIP PRACTICES

5.1 Ethical Recruitment

Direct Sellers shall:

- • Present the Direct Selling opportunity honestly and realistically
- • Provide prospects with adequate time to review Company materials, Compensation Plan, and this Code of Ethics before enrolling
- • Inform prospects that participation is voluntary and involves business risks
- • Disclose any initial investment requirements, ongoing costs, and refund/cancellation policies
- • Respect the prospect's decision whether to enroll or not, without harassment or intimidation

5.2 Prohibited Recruitment Practices

Direct Sellers shall NOT:

- • Use high-pressure tactics, manipulation, or coercion to recruit
- • Require or encourage recruits to purchase excessive inventory or make large upfront investments
- • Recruit minors (persons under 18 years of age) as Direct Sellers
- • Engage in 'cross-line' recruiting (recruiting from another Direct Seller's downline organization)

- • Misrepresent the Company's relationship with any third party or government entity
- • Recruit using deceptive advertising (e.g., job postings that don't disclose the direct selling nature)

6. CONSUMER PROTECTION AND RIGHTS

6.1 Right to Information

Direct Sellers shall provide consumers with:

- • Complete product information including ingredients, usage, warnings, and contraindications
- • Clear pricing information including all taxes, charges, and delivery costs
- • Company's contact information, registered address, and customer service details
- • Information about warranties, guarantees, return policies, and complaint mechanisms
- • Direct Seller's name, contact information, and Direct Seller identification number

6.2 Cooling-Off Period and Returns

- • Direct Sellers shall inform consumers of the 30-day cooling-off period as mandated under Direct Selling Rules, 2021
- • During this period, consumers may return products and receive a full refund (excluding shipping, if applicable)
- • Direct Sellers shall not discourage or obstruct consumers from exercising their right to return
- • Direct Sellers shall assist consumers in processing returns and refunds promptly

6.3 Privacy and Data Protection

- • Direct Sellers shall collect, use, and store consumer personal data only for legitimate business purposes
- • Direct Sellers shall maintain confidentiality and security of consumer information
- • Direct Sellers shall not sell, share, or misuse consumer data without explicit consent
- • Direct Sellers shall comply with applicable data protection laws including the Information Technology Act, 2000 and Digital Personal Data Protection Act, 2023

7. PROHIBITED PRACTICES

Direct Sellers are strictly prohibited from engaging in the following activities:

7.1 Pyramid Scheme Activities

- • Emphasizing recruitment over product sales to end consumers
- • Requiring participants to purchase products primarily for the purpose of earning recruitment bonuses
- • Operating or promoting any scheme where earnings are derived primarily from recruitment fees rather than product sales
- • Participating in or promoting money circulation schemes, chain marketing, or Ponzi schemes

7.2 Deceptive Practices

- Making false, misleading, or unsubstantiated product claims
- Misrepresenting the Company's credentials, certifications, or regulatory approvals
- Using false testimonials, fake reviews, or fabricated success stories
- Impersonating the Company or its officials
- Engaging in bait-and-switch tactics

7.3 Harassment and Unethical Conduct

- Harassing prospects, consumers, or fellow Direct Sellers
- Making unsolicited or excessive contact (calls, messages, visits) after a prospect has declined interest
- Engaging in discrimination based on race, religion, caste, gender, disability, or any other protected characteristic
- Sexual harassment or creating a hostile environment
- Threatening, intimidating, or coercing others

7.4 Unauthorized Activities

- Selling Company products through unauthorized channels (e.g., e-commerce platforms, retail stores) without Company approval
- Selling counterfeit, adulterated, or unauthorized products
- Creating unauthorized marketing materials, websites, or social media accounts using Company trademarks
- Modifying or tampering with Company products or packaging
- Participating in competing direct selling companies that conflict with this agreement

8. DIGITAL MARKETING AND SOCIAL MEDIA GUIDELINES

8.1 Social Media Conduct

When promoting Fohow products or opportunity on social media, Direct Sellers shall:

- Clearly disclose their relationship as an independent Direct Seller
- Use hashtags like #FohowDistributor or #IndependentDistributor
- Comply with platform-specific advertising policies (Facebook, Instagram, WhatsApp, YouTube, etc.)
- Not use Company trademarks in personal account names without approval
- Avoid spamming, unsolicited messaging, or adding people to groups without consent

8.2 Online Content Guidelines

- All online content must comply with this Code of Ethics

- Direct Sellers shall not post before-and-after photos making unsubstantiated health claims
- Direct Sellers shall not create fake profiles or use bots for promotional activities
- Direct Sellers shall not purchase fake followers, likes, or engagement
- Direct Sellers shall respond professionally to negative comments or complaints

9. COMPLIANCE AND ENFORCEMENT

9.1 Reporting Violations

- Direct Sellers who witness violations of this Code must report them to the Company immediately
- **Reports can be submitted to: compliance@fohow.in or +91-11-41601212**
- The Company will maintain confidentiality of complainants to the extent permissible by law
- No retaliation against good-faith reporters will be tolerated

9.2 Investigation and Disciplinary Action

The Company reserves the right to investigate any alleged violation. Disciplinary actions may include:

- Written warning
- Probation with mandatory compliance training
- Suspension of Direct Seller privileges (temporary or permanent)
- Withholding or forfeiture of commissions and bonuses
- Termination of Direct Seller Agreement
- Legal action, if warranted

The severity of action will depend on the nature and gravity of the violation, past conduct, and mitigating circumstances.

10. TRAINING AND CONTINUOUS EDUCATION

- The Company will provide initial and ongoing training on this Code of Ethics, Direct Selling Rules, product knowledge, and professional sales practices
- **All Direct Sellers must complete mandatory compliance training within 30 days of enrollment**
- Periodic refresher training will be required to maintain active status
- Direct Sellers are responsible for staying informed about updates to this Code, Company policies, and applicable laws

11. ACKNOWLEDGMENT AND ACCEPTANCE

By enrolling as a Direct Seller with Fohow Healthcare India Private Limited, I acknowledge that:

- I have read and understood this Code of Ethics and Conduct in its entirety
- I agree to abide by all provisions of this Code
- I understand that violations may result in disciplinary action including termination
- I will conduct myself professionally and ethically at all times
- I am responsible for ensuring my downline Direct Sellers are aware of and comply with this Code

DIRECT SELLER ACKNOWLEDGMENT

Direct Seller Name: _____

Direct Seller ID: _____

Signature: _____

Date: _____

Place: _____

12. COMPANY CONTACT INFORMATION

For questions, concerns, or compliance reporting:

FOHOW HEALTHCARE PRIVATE LIMITED

CIN: U74999DL2019PTC358517

Registered Office:

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Phone: +91-124-4903441

Compliance Email: dr.singh@fohow.com

Customer Care: dr.singh@fohow.com

Website: <https://india.hiwavo.com/>

DISCLAIMER

This Code of Ethics and Conduct is subject to periodic review and amendment. The Company reserves the right to modify this Code at any time. Direct Sellers will be notified of material changes, and continued participation constitutes acceptance of amendments. This document is governed by the laws of India, and disputes shall be subject to the jurisdiction of courts in New Delhi, India.

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