UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRAD BUONASERA and MANON BUONASERA, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

THE HONEST COMPANY, INC.

Defendant.

Case No.

CLASS ACTION COMPLAINT <u>DEMAND FOR JURY TRIAL</u>

ECF CASE

Plaintiffs Brad Buonasera and Manon Buonasera, citizens of New York, individually and on behalf of other similarly situated individuals, by and through their counsel, allege the following based upon their own personal knowledge and the investigation of their counsel.

INTRODUCTION

1. This is a proposed Class Action Complaint against The Honest Company ("Honest") for falsely, misleadingly, and deceptively labeling its products as "natural," "all natural," "naturally derived," and/or "plant-based," and for falsely, misleadingly, and deceptively labeling these products as containing "no harsh chemicals, ever!" when these products in fact contain a spectacular array of synthetic and toxic ingredients (collectively, the "Falsely Labeled Products").

2. Aware of the health risks and environmental damage caused by chemical-laden personal care and household care products, and aware that toxic chemicals can enter the body through inhalation or skin contact, consumers increasingly demand products that are natural and/or plant-based, and that omit harsh chemicals.

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3. Honest knows this. Honest also knows that consumers will pay a premium for natural and/or plant-based products that do not contain harsh chemicals.

4. To capture this growing market, Honest labels many of its personal care, baby care, and household care products as "natural," "all natural," "naturally derived" and/or "plant-based." Honest also labels its products as containing "no harsh chemicals (ever!)." *See* product labels and ingredients attached as Exhibit 1.

5. Ironically, Honest's products are not so honest, after all. Instead, Honest's products are a chemical soup, containing a substantial array and significant amount of ingredients that are synthetic – some of which Honest even admits are synthetic, and many of which are federally classified as toxic substances.

6. For example, lurking inside the "kid-friendly" and seemingly mom-worthy "plantbased" Laundry Detergent that "softens naturally" and contains "no harsh chemicals (ever!)" is a chemical cocktail of synthetic ingredients. In fact, out of the seven ingredients, *more than twothirds* (five) are synthetic, and *more than two-thirds* are "harsh," if not downright toxic.

7. In its blog (separate from its online storefront), Honest *admits* that at least one of these ingredients, phenoxyethanol, is synthetic:



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Ingredient: Phenoxyethanol

What it is: Phenoxyethanol can be found naturally in green tea, but the commercial ingredient is synthetically produced in a laboratory creating what's termed a "nature identical" chemical. Specifically, it's created by treating phenol with ethylene oxide in an alkaline medium which all reacts to form a pH-balanced ingredient.

Honest Blog, Phenoxyethanol, attached as Exhibit 2.¹

an honest look at

1

Phenoxyethanol

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Ingredient: Phenoxyethanol

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8. **Phenoxyethanol** is toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses. Even short exposure could cause serious temporary or residual injury. It is toxic to the kidneys, the nervous system, and the liver. It is extremely hazardous in case of eye contact and very hazardous in case of skin contact (defatting the skin and adversely affecting the central nervous system and peripheral nervous system, causing headaches, tremors, and central nervous system depression). It is also very hazardous in case of ingestion or inhalation. It degrades into substances that are even more toxic. It is a category 2 germ cell mutagen, meaning that it is suspected of mutating human cells in a way that can be transmitted to children conceived after exposure. Phenoxyethanol is an ethylene glycol ether, which is known to cause wasting of the testicles, reproductive changes, infertility, and changes to kidney function. Phenoxyethanol is also category 2 carcinogen, meaning that it is suspected to induce cancer or increase its incidence.

9. Case studies indicate that repeated exposure to phenoxyethanol results in acute neurotoxic effects, as well as chronic solvent-induced brain syndrome, constant irritability, impaired memory, depression, alcohol intolerance, episodes of tachycardia and dyspnea, and problems with balance and rash.

10. In this laundry detergent, Honest also includes methylisothiazolinone, a

What it is: Phenoxyethanol can be found naturally in green tea, but the commercial ingredient is synthetically produced in a laboratory creating what's termed a "nature identical" chemical. Specifically, it's created by treating phenol with ethylene oxide in an alkaline medium which all reacts to form a pH-balanced ingredient.

Exhibit 2 (Honest Blog, Phenoxyethanol).

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compound that animal testing indicates is a neurotoxin and that was named the Contact Allergen of the Year in 2013 by the American Contact Dermatitis Society. In fact, the scientific literature is replete with case studies of people developing eczematous eruptions or dermatitis following use of common personal care products containing even minuscule amounts of methylisothiazolinone (as low as, or lower than, 20 parts per million, or 0.002%).

11. Honest's ingredients are "legal" for use in personal and household care products, in that the law does not prohibit them from being used. Honest, however, did and does not claim that its products are simply "legal," it claims that its products have "no harsh chemicals (ever!)" and are "natural," "all natural," "naturally derived" and/or "plant-based." *See* Exhibit 1.

12. By deceiving consumers about the nature, quality, and/or ingredients of its products, Honest is able to command a premium price, increasing consumers' willingness to pay and take away market share from competing products, thereby increasing its own sales and profits.

13. Consumers lack the scientific knowledge necessary to determine whether personal care, baby care, and household care ingredients are natural, plant-based, or harsh. Reasonable consumers must and do rely on the company to report accurately what the product is made of.

14. Honest further encourages consumers to rely on its representations, marketing itself as an honest company that provides transparent and truthful information about its products' ingredients.

15. Honest intended for consumers to rely on its representations, and hundreds of thousands of reasonable consumers did in fact so rely.

16. As a result of its false, misleading, and deceptive labeling, Honest was able to sell its products to hundreds of thousands of consumers throughout the United States and to realize

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sizeable profits.

17. Honest's false and misleading representations and omissions violate state laws as detailed more fully below, including New York General Business Law § 349, New York General Business Law § 350, and common law.

18. Honest claims that if it "make[s] a mistake" or "can't live up to your expectations, we'll fess up and keep trying to do better, no matter what it takes." Honest Website, What You Can Expect, attached as Exhibit 3.

19. When Plaintiffs informed Honest about their claims in mid-September 2015, and detailed the synthetic and toxic nature of the ingredients in its products falsely labeled as "natural" and/or plant-based," and as containing "no harsh chemicals (ever!)," and asked Honest to correct its advertising, Honest failed to live up to that promise.

20. Plaintiffs bring this action to stop Honest's deceptive and misleading practices.

JURISDICTION AND VENUE

21. This Court has personal jurisdiction over the parties in this case. Plaintiffs Brad and Manon Buonasera are citizens of New York.

22. Honest purposefully avails itself of the laws of New York to market its products to consumers nationwide, including consumers in New York, and distributes the Products to numerous retailers throughout New York.

23. This Court has original subject-matter jurisdiction over this proposed class action pursuant to 28 U.S.C. § 1332(d), which under the provisions of the Class Action Fairness Act ("CAFA"), explicitly provides for the original jurisdiction of the federal courts in any class action in which at least 100 members are in the proposed plaintiff class, any member of the plaintiff class is a citizen of a State different from any defendant, and the matter in controversy

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exceeds the sum of \$5,000,000.00, exclusive of interest and costs.

24. Venue is proper in this District under 28 U.S.C. § 1391(a). Substantial acts in furtherance of the alleged improper conduct, including the dissemination of false, misleading and deceptive information regarding the nature, quality, and/or ingredients of the Products, occurred within this District.

PARTIES

25. Plaintiffs Brad and Manon Buonasera are individual consumers who, at all times material hereto, were citizens of the State of New York and residents of the County of New York. During the class period, the Buonasera Plaintiffs purchased Honest's Conditioning Detangler and Shampoo + Body Wash products from a Costco store located on 517 East 117th Street, New York.

26. In deciding to make these purchases, the Buonasera Plaintiffs saw, relied upon, and reasonably believed the front-label representation that the Conditioning Detangler was "natural," and the front-label representation that the Shampoo + Body Wash was "natural." These representations were a significant reason for their purchase.

27. In deciding to make these purchases, the Buonasera Plaintiffs also saw, relied upon, and reasonably believed the back-label representation on the Shampoo + Body Wash that the product contained "no harsh chemicals (ever!)" *See* Exhibit 1. These representations were a significant reason for their purchase. All the label representations were also made on Honest's website.

28. Had Plaintiffs known at the time that these products were not "all natural," "natural," "naturally derived," or "plant-based," as promised, they would not have purchased these products.

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29. Had Plaintiffs known at the time that these products contained harsh chemicals, they would not have purchased these products.

30. Plaintiffs purchased, purchased more of, or paid more for, the Falsely Labeled Products than they would have had they known the truth about the Falsely Labeled Products.

31. If Honest's products were reformulated such that its representations were truthful, Plaintiffs would consider purchasing Honest's products in the future.

32. Defendant The Honest Co., Inc. is incorporated under the laws of Delaware and maintains its principal place of business and headquarters in Santa Monica, California.

33. Honest manufactures and/or causes the manufacture of personal care, baby care, and household care products. Honest labels these products under its own name, and markets and distributes the products through its online website and through retail stores in New York, and the United States.

SUBSTANTIVE ALLEGATIONS

34. American consumers increasingly and consciously seek out natural and plantbased ingredients in their personal care and household products. Once a small niche market, natural products are now sold by conventional retailers, and their sales continue to soar.

35. Consumers value natural and plant-based products for myriad health, environmental, and political reasons, including avoiding skin irritation and disease, attaining health and wellness, help the environment, and financially supporting companies that share these values.

36. Hoping to capture this growing market, Honest produces personal care and household care products that it markets as natural and/or plant-based, and as containing "no harsh chemicals (ever!)." *See* Exhibits 1, 4.

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37. Honest carefully cultivates its image as a healthy, eco-friendly, worker-friendly

brand — the kind of company whose label claims can be trusted. Honest further markets itself as an expert source of information on infant health and ingredient identity, safety, and efficacy.

38. Honest markets itself as a different type of company that eschews the synthetic and toxic ingredients that other manufacturers typically use.

39. In particular, Honest markets itself as a company that is *honest*. Honest describes as its first standard:

Create a Culture of Honesty

We are serious about honesty – both as it applies to the integrity of our relationships and in being true to you. And, it's a standard we encourage throughout our staff, stakeholders, and customers

Honest Website, Our Principles, attached as Exhibit 5.

40. Jessica Alba, one of Honest's two co-founders, claims: "I created The Honest

Company to help moms and to give all children a better, safer start." Honest Website, Who We

Are, attached as Exhibit 6.

41. Honest's other co-founder, Christopher Gavigan, claims that Honest's products

are designed to avoid the toxic chemicals that consumers try to avoid:

Parents get a lot of advice about what to feed their children and how to baby-proof their home . . . but many are still completely unaware of the toxic risks posed by everyday basics, like diapers, home cleaners, body washes, and laundry soaps. Yet, there's growing consensus that some chemicals used in these products are linked to chronic diseases like asthma, ADHD, and even cancer. . . .

I'm thrilled to launch a brand that offers some of the most thoughtfully designed, innovative, and safest products available.

Ex. 6 (Honest Website, Who We Are).

42. Honest similarly claims that the company was founded to provide

"unquestionably safe, ecofriendly" products. Honest Website, Our Story, attached as Exhibit 7.

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43. Honest's products are intended for use on infants, children, adults, and in the home. Honest sells these products directly through its website in the form of a subscription service and distributes them nationwide to purchasers. Honest also sells the Products through traditional retail outlets.

44. Honest holds itself out as an expert in ingredient chemistry. Honest touts its chemical expertise and claims that it is "über-vigilant" about the latest science regarding toxic chemicals. Honest Website, Honestly Free Guarantee, attached as Exhibit 8.

45. Honest also touts its Scientific and Medical Advisory Board, further encouraging consumers to rely on its "natural," "plant-based," and "no harsh chemicals (ever!)" claims. Honest Website, Medical Advisory Board, attached as Exhibit 9.

46. Honest also claims that if a new risk becomes apparent, it will "modify our approach, and immediately update our formulation (that's how we roll)!" Exhibit 8 (Honest Website, Honestly Free Guarantee).

47. Upon information and belief, Honest has profited enormously from its carefully orchestrated image. In 2012 Honest's revenue was \$10 million. By 2014 it was \$150 million, with estimated revenue for 2015 to have been \$250 million.

48. Honest has also raised nearly \$70 million in venture capital to expand its capacity. Defendant has been valued at nearly \$1 billion as it prepares to undertake an initial public share offering.

PRODUCTS FALSELY LABELED AS "NATURAL" AND/OR "PLANT-BASED"

49. On its product packages (and again online), Honest prominently labels many of its products as "natural," "all natural," "naturally derived," and/or "plant-based." This representation is false as to the many products that contain synthetic ingredients.

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50. Further inducing consumers to rely on its deceptive representations, Honest does not label all its products as "natural," "all natural," "naturally derived," or "plant-based," leading consumers to believe that Honest carefully studies all its products' ingredients to ensure that the natural/plant-based claim is made only on those products that are truly natural or plant-based.

51. Representing that a product is "natural," "all natural," "naturally derived," and/or "plant-based" is a statement of fact.

52. Consumers reasonably believe that a product labeled as natural or all natural does not contain synthetic ingredients.

53. Similarly, consumers reasonably believe that a product labeled as "plant-based" does not contain synthetic ingredients. Consumers reasonably expect that a plant-based product contains only plant-based ingredients and water. Consumers reasonably expect that these plant-based ingredients may have been created *using* a synthetic processing aid, *i.e.*, a synthetic compound that helps process the plant ingredient but does not remain in the finished ingredient, *e.g.*, a synthetic agent that removes water or other substances from the plant ingredient. Consumers, however, reasonably expect that the synthetic ingredient was not reacted with the plant-based ingredient in such a way that the synthetic ingredient, in whole or in part, remains in the finished ingredient.

54. Similarly, consumers reasonably believe that a product labeled as "naturally derived" does not contain synthetic ingredients.

55. Trade associations also define natural and plant-based products as not containing synthetic ingredients.

56. Honest knows and intends that when consumers see the product labels promising the product is natural, all natural, or plant-based, consumers will understand that to mean that, at

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the very least, the product does not contain synthetic ingredients.

57. Honest's representation that certain of its products are "natural," "all natural," "naturally derived," and/or "plant-based" is false. In fact, many of these products contain one or more synthetic ingredients. *See* Exhibit 1.

58. The Falsely Labeled Products are thus not "all natural," "natural," "naturally derived," or "plant-based," and labeling them as such is misleading and deceptive.

59. The Falsely Labeled Products include but are not limited to:²

4-in-1 Laundry Packs Air + Fabric Freshener Auto Dishwasher Gel Bathroom Cleaner Bathroom Cleaner Concentrate Dishwasher Packs Dryer Cloths Floor Cleaner Floor Cleaner Concentrate Fruit + Veggie Wash Glass + Window Cleaner Glass + Window Cleaner Concentrate Laundry Detergent Oxy Boost Rinse Aid Toilet Cleaner Stain Remover Stain Remover Concentrate Wet Mopping Pads Bar Soap Bubble Bath Conditioner **Conditioning Detangler** Deodorant Face + Body Lotion

² Honest has discontinued offering some of the Falsely Labeled Products, has altered the packaging, has altered the ingredients, or has selectively marketed the products. Honest also regularly introduces new products that include artificial ingredients. The identity of these additional products will be ascertained through discovery, and these products are hereby included in the list of "Falsely Labeled Products" at issue in this action.

Shampoo + Body Wash 3-in-1 Facial Towelettes Hand Sanitizer Gel Hand Sanitizer Spray Foaming Hand Soap Soothing Bottom Wash Wipes Wipes – Travel Packs Kids' Toothpaste Toothpaste Mouthwash Housewarming Gift Set Nesting Gift Set Bathtime Gift Set Discovery Set Essentials Gift Bundle

60. These products all contain synthetic ingredients, including but not limited to:

a. *Caprylic/capric triglyceride* is an artificial compound manufactured by

hydrolyzing coconut oil, removing the free glycerine, and separating the medium chain length fatty acids by fractional distillation. The acids are then blended in the proper ratio and reesterified with glycerine

b. *Caprylyl glycol* is synthesized by the catalytic oxidation of caprylyl alkine oxides,

which are themselves often synthesized. Honest admits that its caprylyl glycol is synthetic:



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Ingredient: Caprylyl Glycol

What it is: Caprylyl glycol is an alcohol derived from caprylic acid—a natural fatty acid found in the milk of some mammals, as well as palm and coconut oils. Ours is synthetically made, but nature-identical.

Honest Blog, Caprylyl Glycol, attached as Exhibit 10.³

an honest look at

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Caprylyl Glycol

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Ingredient: Caprylyl Glycol

Caprylyl glycol is an alcohol derived from caprylic acid—a natural fatty acid

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c. *Caprylyl/myristyl glucoside* is produced by alcoholysis of glucose with myristyl and caprylyl alcohol under acidic conditions.

d. *Cetearyl alcohol* is a mixture of cetyl and stearyl alcohols. Cetyl alcohol is classified as synthetic by federal regulations. It is chemically synthesized by, for example: catalytic hydrogenation of the triglycerides obtained from coconut oil or tallow, oxidation of a chain growth product of ethylene oligomerized on a triethylaluminum catalyst, reaction of palmitoyl chloride and sodium borohydride, reaction of methylthiopalmitate plus Raney nickel. Stearyl alcohol is also produced synthetically.

e. *Cetearyl olivate* is synthetic, and is produced from cetyl and stearyl alcohols. Cetyl alcohol is classified as synthetic by federal regulations. It is chemically synthesized by, for example: catalytic hydrogenation of the triglycerides obtained from coconut oil or tallow, oxidation of a chain growth product of ethylene oligomerized on a triethylaluminum catalyst, reaction of palmitoyl chloride and sodium borohydride, reaction of methylthiopalmitate plus Raney nickel. Stearyl alcohol is also produced synthetically.

f. "*Cetyl esters*" is a synonym for synthetic spermaceti wax, a wax found in the head of a sperm or bottlenose whale. This synthetic wax is designed to be indistinguishable in composition and properties with natural spermaceti wax. It is a mixture of alkyl esters, most of which are produced synthetically.

g. *Cocamidopropyl betaine* is a synthetic surfactant produced by reacting coconut

found in the milk of some mammals, as well as palm and coconut oils. Ours is synthetically made, but nature-identical.

Exhibit 10 (Honest Blog, Caprylyl Glycol).

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oil fatty acids with 3,3-dimethylaminopropylamine, yielding cocamidopropyl dimethylamine. It is then reacted with sodium monochloroacetate to produce cocamidopropyl betaine. Trade associations prohibit cocamidopropyl betaine from being included in products labeled as "natural"

h. *Cocamidopropyl hydroxysultaine* is also a synthetic ingredient, prohibited by the trade associations from household products and personal care products labeled as "natural"

i. *Cocamidopropylamine oxide* is a synthetic surfactant produced by reacting hydrogenated coconut oil with dimethylamidopropylamine, and further reacting the product with hydrogen peroxide.

j. *Decyl glucoside* can be produced by reacting glucose and n-butanol in the presence of a strong acid catalyst such as p-toluenesulfonic acid or sulfuric acid, followed by the transglycosidation of the resulting butyl glucoside with fatty alcohol to yield decyl glucoside. Alternatively, it can be produced by reacting highly refined glucose with fatty acids in the presence of an acid catalyst.

k. For personal care products, *ethyl alcohol* is produced chemically, and federal regulations classify it as synthetic. Additionally, Honest Co. does not identify the denaturing agent for many of the products.

1. *Ethylhexyl palmitate* is obtained by reacting 2-ethylhexyl alcohol with palmitic acid.

m. *Glyceryl stearate* is chemically synthesized by glycerolysis or by esterification of glycerol and stearic acid.

n. According to the ingredient supplier, *guar hydroxypropyltrimonium chloride* is produced by chemically modifying guar gum by adding positively charged trimethylammonium hydroxypropyl ether side chains.

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o. *Hydroxyethylcellulose* is prepared by reacting alkali cellulose with ethylene oxide in the presence of alcohol or acetone.

p. *Hydroxypropyl guar hydroxypropyltrimonium chloride* is the hydroxyporopyl derivative of guar hydroxypropyltrimonium chloride, which itself is produced by chemically modifying guar gum by adding positively charged trimethylammonium hydroxypropyl ether side chains.

q. *Lauryl glucoside* is produced by alcoholysis of glucose and lauryl alcohol under acidic conditions. Historically, lauryl alcohol was prepared solely from natural products, but is now synthesized from ethylene.

r. *Methylisothiazolinone* is a synthetic biocide preservative produced by the controlled chlorination of dimethyl-dithiodipropionamide in solvent and then neutralized.

s. *Panthenol* is a synthetic compound, produced by adding propanolamine to optically active alpha, gamma-dihydroxy-beta,beta-dimethylbutyrolacton, such as by combining 3-amino-1-propanolamine with the lactone of 2,4-dihydroxy-3,3-dimethyl butyric acid or the panthotheinc lactone of 2,4-dihydroxy-3,3-dimethyl butyric acid.

t. *Phenoxyethanol* is produced by reacting phenol with ethylene oxide in the presence of a basic catalyst under pressure and heat. It is classified as synthetic by trade associations governing the use of the term "natural" on household and personal care products. Honest admits that phenoxyethanol is synthetic.



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Ingredient: Phenoxyethanol

What it is: Phenoxyethanol can be found naturally in green tea, but the commercial ingredient is synthetically produced in a laboratory creating what's termed a "nature identical" chemical. Specifically, it's created by treating phenol with ethylene oxide in an alkaline medium which all reacts to form a pH-balanced ingredient.

Honest Blog, Phenoxyethanol, attached as Exhibit 2.4

⁴ an honest look at

Phenoxyethanol

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Ingredient: Phenoxyethanol

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u. *PPG-4 Laureth/Myreth-5* is the reaction product of lauryl and/or myristyl alcohol with ethylene oxide and propylene oxide. It is the polyoxypropylene, polyoxyethylene ether of lauryl alcohol and/or myristyl alcohol, containing an average of 5 moles of ethylene oxide and 4 moles of propylene oxide. It is produced by activating the alkyl alcohol with a metal hydroxide, reacting the resulting alkoxide with propylene oxide and ethylene oxide, and then processing, usually with a Brønsted-Lowry type acid or a methyl halide, which can potentially lead to the generation of some 1,4-dioxane.

v. *Sodium citrate* is classified as synthetic by federal regulations. It is usually prepared by reacting sodium carbonate or sodium hydroxide with citric acid, or by reacting sodium sulfate with calcium citrate.

w. *Sodium coco-sulfat*e is synthetic, produced by isolating C12 - C18 saturated fatty acids from oils, and then sulfonating with chemicals such as sulfuric acid, sulfur trioxide, or chlorosulfonic acid.

x. *Sodium lauryl glucose carboxylate* is a novel synthetic surfactant, prohibited by trade groups from household products and personal care products labeled as "natural."

y. *Sodium methyl cocoyl taurate* is synthetic, produced by reacting taurine or a taurate salt with an appropriate fatty acid.

z. Sorbitan olivate is also synthetic, formed by the esterification of sorbitan with the

What it is: Phenoxyethanol can be found naturally in green tea, but the commercial ingredient is synthetically produced in a laboratory creating what's termed a "nature identical" chemical. Specifically, it's created by treating phenol with ethylene oxide in an alkaline medium which all reacts to form a pH-balanced ingredient.

Exhibit 2 (Honest Blog, Phenoxyethanol).

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wax obtained by partial hydrogenation of olive oil.

aa. *Triethyl citrate* is prepared by esterifying citric acid with ethyl alcohol.

bb. *Ammonium glycyrrhizate* is produced by acid precipitation of licorice root extract, followed by neutralization with dilute ammonia. Ammonia is the fifth-highest-volume chemical produced in the U.S., where it is principally produced by the partial combustion of natural gas.

cc. *Benzisothiazolinone* is a synthetic biocide that is used as a preservative.

According to ingredient suppliers, it is produced by a complex and proprietary series of chemical reactions and separations.

dd. While *bisabolol* is naturally occurring substance, the ingredient used in personal care products is alpha-bisabolol, which is synthesized by reacting ketodiene in ether with methyl magnesium iodide, and adding saturated aqueous ammonium acetate solution.

ee. According to an ingredient manufacturer, *butyloctyl salicylate* is the synthetically produced ester of Salicylic Acid.

ff. *C12-15 Pareth-7* and *C9-11 Pareth-3* can be derived from tallow. However, Honest's products are claimed to be vegan. Thus, the ingredients in Honest's product are synthesized by reacting ethylene oxide with the appropriate alcohol and alkali earth metal or alkoxide, and the reaction is terminated by an acid (e.g., hyrochloric acid). 1,4 dioxane is commonly formed as a byproduct. It is prohibited by industry associations from household products and personal care products labeled as "natural."

gg. *Calcium ascorbate* is classified by federal regulations as a chemical preservative. It is prepared from ascorbic acid and calcium carbonate in acetone or alcohol.

hh. *Coco-betaine* is artificially produced by reacting fatty dimethyl amines from coconuts with chloroacetic acid. It is classified as synthetic by trade associations governing the

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use of the term "natural" on household and personal care products.

ii. *Coco-glucoside* is chemically produced through coconut alcohol and glucose.Coconut alcohol is a mixture of the fatty alcohols from the fatty acids derived from coconut oil.Glucose is produced commercially by reacting sulfuric acid or hydrochloric acid with starch.

jj. *Dipropylene glycol* is produced by reacting propylene glycol and propylene oxide.

kk. *Ethylhexylglycerin* is a synthetic skin conditioning agent produced by the catalytic splitting of ethylhexylglycidyl ether (also an artificial compound). It is prohibited by industry associations from being included in products labeled as "natural."

ll. *Hydrated silica* is also known as synthetic amorphous silicon dioxide. It is synthetically produced by reacting an aqueous alkali metal silicate solution and a mineral acid.

mm. *Isopropyl myristate* is produced synthetically, either by reacting myristic acid and isopropanol or myristoyl chloride with 2-propanol.

nn. *Isopropyl palmitate* is a synthetic compound prohibited by industry associations from being added to household products and personal care products labeled as "natural." It is produced by reacting palmitic acid and isopropyl alcohol in the presence of an acid catalyst.

oo. *Polysorbate 20* is classified as synthetic by federal regulations, and prohibited by trade groups from being in products labeled as "natural." It is a surfactant produced by reacting sorbitol and its anhydrides with ethylene oxide.

pp. *Polysorbate 80* is similarly a synthetic substance, prohibited by trade groups from being in products labeled as "natural." It is produced by reacting oleic acid with sorbitol and ethylene oxide.

qq. *Polyvinyl alcohol* is a synthetic polymer produced by dissolving polyvinyl acetate in methanol, and adding sodium hydroxide. Alternatively, it is produced by hydrolysis of

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polyvinyl acetate by ester interchange with methanol and sodium methylate.

rr. *Potassium citrate* is classified by federal regulations as synthetic. It is prepared by reacting citric acid and potassium hydroxide, or by reacting citric acid with potassium carbonate or bicarbonate.

ss. *Potassium cocoate* and *potassium oleate* is derived from oils and potassium hydroxide (itself a synthetic substance).

tt. *Potassium sorbate* is produced by reacting sorbic acid and potassium hydroxide.It is classified as a chemical preservative under federal regulations

uu. According to federal regulations, *propylene glycol* "does not occur in nature." Instead, it is manufactured by treating propylene with chlorinated water and sodium carbonate, or by heating glyercol with sodium hydroxide.

vv. The *silica* that is in Honest's products is synthetic, as only the amorphous forms of silica, and more specifically, synthetic amorphous silica and silicates, are used in cosmetics.

ww. According to federal regulations, *sodium benzoate* is not found to occur naturally. Instead, it is chemically synthesized by reacting benzoic acid with sodium hydroxide, sodium bicarbonate, or sodium carbonate.

xx. *Sodium percarbonate*, also listed as *sodium carbonate peroxide*, is a synthetic substance produced by the reaction of sodium carbonate and hydrogen peroxide.

yy. According to federal regulations, *sodium hydroxide* is a synthetic compound, produced by the electrolysis of sodium chloride solution and also by reacting calcium hydroxide with sodium carbonate.

zz. According to federal regulations, **sodium metasilicate** is synthetic as "it does not occur naturally but rather is synthesized by melting sand with sodium carbonate at 1400 °C."

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aaa. *Sodium palmate* is synthesized by reacting palm oil with sodium hydroxide.

bbb. *Sodium polyaspartate* is a new anionic polymeric humectant derived from aspartic acid, an artificial compound.

ccc. According to federal regulations, *sodium sulfate* is prepared by the neutralization of sulfuric acid with sodium hydroxide.

ddd. *Sorbitol* occurs naturally but is produced synthetically for household products by the electrolytic reduction or the transition metal catalytic hydrogenation of sugar solutions containing glucose or fructose.

eee. *Tocopherols* are classified as synthetic substances by federal regulations, even when extracted from natural oils, done through molecular distillation, solvent extraction, or absorption chromatography.

fff. By federal regulation *triacetin* is prepared by heating glycerin with acetic anhydride alone or in the presence of finely divided potassium hydrogen sulfate. It can also be prepared by the reaction of oxygen with a liquid-phase mixture of allyl acetate and acetic acid using a bromide salt as a catalyst. It is synthetic.

ggg. By federal regulation, *calcium glycerophosphate* is prepared by neutralizing glycerophosphoric acid with calcium hydroxide or calcium carbonate. It is synthetic.

hhh. Though *calcium silicate* occus naturally in mineral form, commercial calcium silicate sold for industrial use is prepared synthetically to control its absorbing power.

iii. *Capryl/capramidopropyl betaine* is a synthetic substance, produced by reacting coconut oil fatty acids with synthetic substances, including 3,3-dimethylaminopropylamine.

jjj. *Cellulose gum* is prepared synthetically, by treating cellulose with alkali, reacting with sodium monochloroacetate, and purifying.

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kkk. *Polyglyceryl-4 laurate/sebacate* is the monoester of Polyglycerin-4 and a mixture of lauric and sebacic acids

Ill. *Polyglyceryl-6 caprylate/caprate* is the monoester of polyglycerin-6 (q.v.) and a mixture of caprylic and capric acids.

mmm. *Zinc ricinoleate* is chemically produced, such as by reacting a zinc compound with a ricinoleic acid-rich mixture obtained by cleaving glycerol from castor oil.

nnn. While *urea* exists in nature, it is synthesized for commercial use from carbon dioxide and ammonia.

ooo. *Isopropyl alcohol* is classified as synthetic by federal regulations.

ppp. According to federal regulations, *titanium dioxide* is a synthetically prepared color additive.

qqq. According to federal regulations, the color additive *zinc oxide* is manufactured by the French process, whereby zinc metal isolated from zinc-containing ore is vaporized and then oxidized.

rrr. Other ingredients are also synthetic, including *tetrasodium iminodisuccinate*, *triethoxycaprylylsilane*, *polyglyceryl-4 oleate*, *polyhydroxystearic acid*, *dl-alpha tocopherol acetate*, *hydrogenated methyl abietate*, and *hydroxyethyl ammonium methyl sulfate*.

61. Other ingredients in Honest's products may be synthetic. For example:

a. The *enzymes* used in Honest's products may be produced from genetically modified materials, as most enzymes used in household products nowadays are.

b. *Amylase* may be produced from genetically modified materials, as most enzymes used in household products nowadays are.

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c. *Glycerin* can be naturally produced, but is typically chemically manufactured by, e.g., hydrogenolysis of carbohydrates, by hydration of epichlorohydrin followed by reaction with sodium hydroxide; reaction of allyl alcohol with hydrogen peroxide; reaction of allyl alcohol with peracetic acid followed by hydrolysis. Glycerin can also be produced from propylene oxide, where propene is epoxidized to propylene oxide, which is then isomerized to allyl alcohol. A second epoxidation is carried out with peracetic acid, and the resulting glycidol is hydrolyzed to glycerol.

d. *Acetic acid* may be chemically synthesized, such as by oxidation of acetaldehyde derived from ethylene, liquid phase oxidation of butane, and reaction of carbon monoxide with methanol derived from natural gas.

e. *Menthol* can be produced from mint oils or prepared synthetically.

f. *Sodium bicarbonate* may be chemically synthesized, depending on the processing methods used. In cosmetic products, sodium bicarbonate is typically artificially produced by the Solvay process, where carbon dioxide is bubbled through a solution of sodium chloride and ammonia to precipitate sodium bicarbonate.

g. *Sodium cocoate* is the sodium salt of coconut acid. Coconut acid is produced by hydrolysis and isolation of fatty material from coconut oil, and is then distilled. The result is then reacted with sodium hydroxide to produce sodium cocoate.

62. Honest has concealed the nature, identity, source, and/or method of preparation of additional ingredients, which may also be synthetic ingredients. Thus, discovery is necessary to uncover the true nature of other ingredients in Honest's products.

PRODUCTS FALSELY LABELED AS CONTAINING <u>"NO HARSH CHEMICALS (EVER!)"</u>

63. On most of its product packages, Honest labels its products as containing "no harsh chemicals (ever!)" *See* Exhibit 1. Honest also shows this promise online, and repeats the promise on each webpage for each product. *See* Exhibit 4.

64. Representing that a product contains "no harsh chemicals" is a statement of fact.

65. Consumers reasonably believe that a product labeled as not containing harsh

chemicals will not contain toxic or hazardous chemicals.

66. To further encourage consumers to rely on its promise of "no harsh chemicals

(ever!)," Honest provides an "honestly FREE guarantee."

What's it mean? In a nutshell:

You can rest easy knowing The Honest Company DOES NOT USE healthcompromising chemicals or compounds.

Exhibit 8 (Honest Website, Honestly Free Guarantee) (red font in original).

67. Honest gives consumers its own definition of non-toxic:

We define "non-toxic" as chemicals that are generally safer for humans and the environment. While most manufacturers' assessments of toxicity only take acute impacts into consideration, we also assess chronic impacts, exposure routes, unique windows of vulnerability, and a wide spectrum of potential health impacts including carcinogenicity, teratogenicity, allergenicity, neurotoxicity, and more.

Honest Website, What Does Non-Toxic Really Mean?, attached as Exhibit 11.

68. Honest's promise of "no harsh chemicals (ever!)" is false.

69. By way of example, the above products contain the following harsh chemicals:

a. The toxicological properties of *sodium coco-sulfate* have not been

thoroughly investigated. Animal testing, however, indicates that sodium coco-sulfate is a skin

irritant and a severe eye irritant (causing eye damage that remains irreversible 21 days after

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exposure). It is closely related to sodium lauryl sulfate, a toxic compound consumers frequently try to avoid. Sodium coco-sulfate is toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses.

b. *Phenoxyethanol* is toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses. Even short exposure could cause serious temporary or residual injury. It is toxic to the kidneys, the nervous system, and the liver. It is extremely hazardous in case of eye contact and very hazardous in case of skin contact (defatting the skin and adversely affecting the central nervous system and peripheral nervous system, causing headaches, tremors, and central nervous system depression). It is also very hazardous in case of ingestion or inhalation. It degrades into substances that are even more toxic. It is a Category 2 germ cell mutagen, meaning that it is suspected of mutating human cells in a way that can be transmitted to children conceived after exposure. Phenoxyethanol is an ethylene glycol ether, which is known to cause wasting of the testicles, reproductive changes, infertility, and changes to kidney function. Phenoxyethanol is also Category 2 carcinogen, meaning that it is suspected to induce cancer or increase its incidence. Case studies indicate that repeated exposure to phenoxyethanol results in acute neurotoxic effects, as well as chronic solvent- induced brain syndrome, constant irritability, impaired memory, depression, alcohol intolerance, episodes of tachycardia and dyspnea, and problems with balance and rash.

c. *Methylisothiazolinone* is a synthetic biocide and preservative. It is highly toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses. It is also very toxic to aquatic life with long-lasting effects. It is classified as a category 1 skin sensitizer, meaning that repeated skin contact causes an allergic response in a substantial number of persons. In these sensitized individuals, very low future

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exposure can cause itching and a skin rash. It was named the Contact Allergen of the Year for 2013 by the American Contact Dermatitis Society. In fact, the scientific literature is replete in case studies of people developing eczematous eruptions or dermatitis following use of common personal care products containing even minuscule amounts of methylisothiazolinone (as low as, or lower than, 20 parts per million, or 0.002%). The European Union's Scientific Committee on Consumer Safety ("SCCS") concluded that, as to its potential to elicit contact allergy, no information was available to evaluate its safety in rinse-off products, and no safe concentration has been adequately demonstrated for in leave-on cosmetic products (including "wet wipes"). Methylisothiazolinone also causes category 1 eye damage (serious eye damage that remains irreversible 21 days after exposure), and category 1A skin corrosion, *i.e.*, it irreversibly damages the skin after short exposure. In animal tests, the substance caused visible necrosis after less than 3 minutes of exposure.

d. *Lauryl glucoside* is classified as a skin irritant and as a category 1 skin sensitizer, meaning that repeated skin contact causes a skin allergy in a substantial number of persons. In these sensitized individuals, very low future exposure can cause itching and a skin rash. Furthermore, it causes serious eye damage that remains irreversible 21 days after exposure.

e. *Guar hydroxypropyltrimonium chloride* is very toxic to aquatic life with long-lasting effects. According to the ingredient manufacturer, prolonged skin contact may also cause skin irritation, redness, drying and flaking.

f. *Cocamidopropylamine oxide* is hazardous to humans and very toxic to aquatic life with long-lasting effects. It causes serious eye damage that remains irreversible 21 days after exposure. It causes category 1B skin corrosion, meaning that it irreversibly damages

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the skin after short exposure; in animal tests, the substance caused visible necrosis after less than 1 hour of exposure.

g. *Cocamidopropyl betaine* is very toxic to aquatic life. To humans, it is a skin irritant and causes serious eye damage that remains irreversible 21 days after exposure.

h. *Cetearyl alcohol* is inherently toxic to aquatic life, toxic to the mucous membranes, and is hazardous by definition under federal law. Its use in cosmetic products has not been adequately assessed.

i. *Caprylic/Capric Triglyceride* is classified as a skin and eye irritant. It is also inherently toxic to aquatic life.

j. *Acetic acid* is a substance that, on short exposure, could cause serious temporary or residual injury even if prompt medical treatment is given. It is classified by multiple federal laws as a hazardous and toxic substance. The National Institute for Occupational Safety and Health (NIOSH) determined that concentrations as low as 50 parts per million is immediately dangerous to life or health, meaning it poses an immediate threat to life, would cause irreversible adverse health effects, or would impair an individual's ability to escape from a dangerous atmosphere. Animal testing indicates that it may affect genetic material and cause reproductive effects. It is a single exposure Category 1 systemic toxin, causing damage to the blood system after a single exposure. It is also presumed to damage the respiratory organs after a single exposure. Repeated or prolonged contact with spray mist may produce chronic eye irritation, severe skin irritation, and/or respiratory tract irritation leading to frequent attacks of bronchial infection. Accidental eye contact has caused irreversible corneal paralysis and muddiness. It is highly corrosive to the skin and causes second degree burns after contact for a few minutes. A harmful contamination of the air can be reached rather quickly on evaporation of

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this substance at below room temperature (20°C/68°F). It is also harmful to aquatic life.

k. *Benzisothiazolinone* is a registered pesticide. It is very toxic to aquatic life with long-lasting effects. It causes contact dermatitis and, according to the ingredient supplier, serious eye damage that remains irreversible 21 days after exposure, including corneal injury, vision impairment, and even blindness. It is toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses.

1. *Coco glucoside* is harmful to aquatic life with long-term effects. It is a skin irritant that causes serious eye damage that remains irreversible 21 days after exposure.

m. *Ethylhexylglycerin* is toxic to aquatic organisms, with long-term adverse effects. It is also harmful to humans, with eye contact causing serious eye damage.

n. Federal law classifies *hydrated silica* as a toxic and hazardous air contaminant.

o. *Potassium citrate* is hazardous through all routes of exposure (skin, eye, ingestion, and inhalation). It causes category 1A skin corrosion, meaning that it irreversibly damages the skin after short exposure. In animal tests, the substance caused visible necrosis after less than 3 minutes of exposure.

p. *Potassium sorbate* is acutely toxic, based on animal testing. Its use in cosmetic products is restricted in Europe. It is also hazardous in case of skin contact, eye contact, ingestion, or inhalation. Animal testing indicates it to be a possible mutagen.

q. Animal testing data indicates that *propylene glycol* may cause adverse reproductive effects and birth defects. It is very toxic to aquatic life and a skin irritant. It is classified as a category 1 skin sensitizer, meaning that repeated skin contact causes a skin allergy in a substantial number of persons. In these sensitized individuals, very low future exposure can

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cause itching and a skin rash.

r. *Sodium benzoate* is toxic to the female reproductive system, and it is suspected to be toxic to the male reproductive system. It is also a suspected mutagen, meaning that it is suspected of producing inheritable mutations in human germ cells in a way that can be transmitted to children conceived after exposure. It may cause birth defects, and may also be toxic to blood, the liver, and the central nervous system. It is hazardous by definition under federal law, and is acutely toxic based on animal testing. It causes serious eye damage that remains irreversible 21 days after exposure, and is a category 1 skin sensitizer.

s. *Sodium borate decahydrate* is harmful to aquatic life with long-lasting effects. It is a Category 1B reproductive toxin, meaning that, based on animal testing, it is presumed to cause effects on human reproduction or development and may damage fertility or the unborn child. According to ingredient suppliers, "ample" evidence exists that exposure to the material directly causes human developmental disorders and reduced human fertility. According to ingredient suppliers, it can accumulate in the testes and deplete germ cells and cause withering of the testicles. Hair loss, skin inflammation, stomach ulcer and anemia can also occur. It is a Category 1 target organ systemic toxin in humans, as after a single exposure, it causes damage to the central nervous system, and generally low exposure causes damage to the kidneys, nervous system, and respiratory organs. It is a skin and eye irritant.

t. *Sodium percarbonate*, a.k.a. sodium carbonate peroxide is toxic to aquatic life with long-lasting effects. It is very hazardous in case of skin contact and causes serious eye damage that remains irreversible 21 days after exposure.

u. *Sodium metasilicate* is toxic by definition under federal law, based on animal testing demonstrating that the substance is lethal even in very small doses. It causes

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serious eye damage that remains irreversible 21 days after exposure. It is highly corrosive to the skin, causing irreversible damage after short exposure; in animal tests, the substance caused visible necrosis after less than 1 hour of exposure. It is acutely toxic if ingested, even in minute amounts. Human ingestion of 1 mL/kg causes changes in tubules (including acute renal failure and necrosis), hematuria, and nausea or vomiting.

v. *Isopropyl alcohol* is regulated by federal law as a toxic and hazardous substance. The National Institute for Occupational Safety and Health (NIOSH) determined that concentrations as low as 2000 parts per million is immediately dangerous to life or health, meaning it poses an immediate threat to life, would cause irreversible adverse health effects, or would impair an individual's ability to escape from a dangerous atmosphere. It is a Category 2 eye irritant, causing adverse effects on the cornea, iris, conjunctiva. It causes transient target organ effects after single exposure, such as narcotic effects and respiratory tract infection.

w. *Titanium dioxide* is a skin and eye irritant. It is hazardous by definition under federal law. Animal studies indicate it may also be a mutagen.

x. *Zinc oxide* is dangerous to the environment and very toxic to aquatic life with long lasting effects. It is hazardous by definition under federal law.

y. Other compounds, including *isopropyl myristate, potassium oleate, silica, sodium carbonate, sodium hydroxide, sodium sulfate, vanillin, behentrimonium chloride, glyceryl stearate,* and *sodium lauroyl sarcosinate* are harsh and – for some – also classified by federal law as hazardous or toxic substances.

THE REPRESENTATIONS ARE FALSE, DECEPTIVE, AND MISLEADING

70. Honest's conduct deceived and/or was likely to deceive the public. Consumers were deceived into believing that the listed ingredients are not synthetic, are "natural" and/or

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"plant-based," and are not harsh chemicals. Instead, these ingredients are synthetic. Some are also known or suspected toxins, carcinogens, and/or environmental hazards, and are not reasonably expected by consumers to be added to the products.

71. Consumers would not know the true nature of the ingredients merely by reading the ingredient label. Discovery of the true nature of the ingredients requires knowledge of chemistry and federal regulations beyond that of the average reasonable consumer.

HONEST'S DECEPTIVE AND MISLEADING OMISSIONS

72. Honest deceptively and misleadingly conceals other material facts about the Falsely Labeled Products, including:

a. the true nature of the Falsely Labeled Products' ingredients;

b. that the Falsely Labeled Products contain artificial substances and synthetic substances, substances that are synthetically manufactured, or are produced or processed using synthetic ingredients, artificial ingredients, toxins, carcinogens, pollutants, genetically modified organisms, and/or hazardous substances;

c. that the Falsely Labeled Products are not "natural" and/or not "plantbased";

d. that the Falsely Labeled Products contain harsh chemicals, including toxic compounds;

e. that the Falsely Labeled Products are not what a reasonable consumer would consider to be "natural" and/or "plant-based;"

f. that the Falsely Labeled Products contain chemicals that a reasonable consumer would not expect in a product labeled as containing "no harsh chemicals (ever!)."

73. Plaintiffs and the members of the Class are not at fault for failing to discover

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Honest's wrongs earlier, and had no actual or presumptive knowledge of facts sufficient to put them on inquiry notice.

74. The production process Honest uses for many of its ingredients is known only to it. Honest has not disclosed such information to Plaintiffs and the Class members. For example, Honest adds "enzymes" to its products, but does not identify the enzyme added, nor whether the enzyme is created from synthetic biology. Honest also has not identified the denaturing agent used in its denatured alcohol. These facts are not ascertainable and are still not known to Plaintiffs, the Class members, and reasonable consumers. Honest's concealment tolls the applicable statute of limitations.

75. To this day, Honest continues to conceal and suppress the true nature, identity, source, and method of production of the ingredients in the Falsely Labeled Products.

HONEST KNEW THE REPRESENTATIONS WERE FALSE

76. Honest holds itself out to the public as a trusted expert in the natural, plant-based, and non-harsh products arena.

77. Honest knew what representations it made regarding the Falsely Labeled Products. It also knew what ingredients were added to each product, as (presumably) all product ingredients are listed on the product packages.

78. Honest is governed by and knows the federal regulations that govern the labeling of the Falsely Labeled Products, and thus was aware that many of the ingredients are synthetic and/or toxic.

79. In September 2015, Plaintiffs' counsel provided Honest with all the material allegations included in this Complaint. Honest was thus specifically notified that its products labeled as "natural" and/or "plant-based" contained synthetic substances and harsh compounds.

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80. Honest thus knew all the facts demonstrating that its Falsely Labeled Products were falsely advertised.

HONEST INTENDED CONSUMERS RELY ON ITS MISREPRESENTATIONS

81. Honest made the false, deceptive, and misleading representations and omissions, intending for Plaintiffs and the Class members to rely upon these representations and omissions in purchasing one or more of the Falsely Labeled Products.

82. In making the false, misleading, and deceptive representations and omissions at issue, Honest knew and intended that consumers would purchase the Honest products when consumers would otherwise purchase a competing product or employ an alternate regimen (such as using vinegar for household cleaning).

83. In making the false, misleading, and deceptive representations and omissions at issue, Honest also knew and intended that consumers would pay a premium for natural and/or plant-based products and products that are free of harsh chemicals, furthering Honest's private interest of increasing sales of its products and decreasing the sales of the all-natural and/or plant-based products that are truthfully marketed by its competitors.

84. Honest knows that consumers prefer natural and plant-based products, and products that do not contain harsh chemicals. Honest knows that consumers will pay a premium for these products or would not purchase these products at all unless they were natural and/or plant-based, and/or contained no harsh chemicals, as advertised.

85. Similarly, independent surveys confirm that consumers will purchase more natural products than conventional products, and will pay a premium for natural products.

CONSUMERS REASONABLY RELIED ON HONEST'S MISREPRESENTATIONS

86. Consumers frequently rely on label representations and information in making

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purchase decisions, especially in purchasing food, personal care, or household products.

87. When Plaintiffs and the Class members purchased the Falsely Labeled Products, Plaintiffs and the Class members saw the false, misleading, and deceptive representations detailed above, and did not receive disclosure of the facts concealed, as detailed above.

88. These misrepresentations were uniform and were communicated to Plaintiffs and every other member of the Class at every point of purchase and consumption.

89. Plaintiffs and the Class members were among the intended recipients of Honest's deceptive representations and omissions.

90. Plaintiffs and the Class members reasonably relied to their detriment on Honest's misleading representations and omissions.

91. Honest's false, misleading, and deceptive misrepresentations and omissions deceived and misled, and are likely to continue to deceive and mislead, Plaintiffs, the Class members, reasonable consumers, and the general public.

92. Honest's misleading affirmative statements further obscured what it failed to disclose. Thus, reliance upon Honest's misleading and deceptive representations and omissions may be presumed.

93. Honest made the deceptive representations and omissions with the intent to induce Plaintiffs and the Class members to purchase the Falsely Labeled Products. Plaintiffs' and the Class members' reliance upon such representations and omissions may be presumed.

94. Honest's deceptive representations and omissions are material in that a reasonable person would attach importance to such information and would be induced to act upon such information in making purchase decisions. Thus, Plaintiffs' and the Class members' reliance upon such representations and omissions may be presumed as a matter of law. The materiality of
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those representations and omissions also establishes causation between Honest's conduct and the injuries sustained by Plaintiffs and the Class members.

HONEST'S WRONGFUL CONDUCT CAUSED PLAINTIFFS' INJURY

95. As an immediate, direct, and proximate result of Honest's false, misleading, and deceptive representations and omissions, Honest injured Plaintiffs and the Class members in that they:

a. paid a sum of money for a product that was not as represented;

b. paid a premium price for a product that was not as represented;

c. were deprived the benefit of the bargain because the Falsely Labeled Products they purchased were different from what Honest warranted;

d. were deprived the benefit of the bargain because the Falsely Labeled Products they purchased had less value than what was represented;

e. did not receive a product that measured up to their expectations as created by Honest.

96. Had Honest not made the false, misleading, and deceptive representations and omissions, Plaintiffs and the Class members would not have been injured as listed above. Accordingly, Plaintiffs and the Class members have suffered "injury in fact" as a result of Honest's wrongful conduct.

97. Plaintiffs and the Class members all paid money for the Falsely Labeled Products, but did not obtain the full value of the advertised products due to Honest's misrepresentations and omissions. Plaintiffs and the Class members purchased, purchased more of, or paid more for, the Falsely Labeled Products than they would have had they known the truth about the Falsely Labeled Products. Accordingly, Plaintiffs and the Class members have suffered "injury in fact" and lost money or property as a result of Honest's wrongful conduct.

HONEST BENEFITTED FROM ITS MISLEADING AND DECEPTIVE REPRESENTATIONS AND OMISSIONS

98. As the intended, direct, and proximate result of Honest's false, misleading, and deceptive representations and omissions, Honest has been unjustly enriched through more sales of Falsely Labeled Products and higher profits at the expense of Plaintiffs and the Class members. As a direct and proximate result of its deception, Honest also unfairly obtained other benefits, including the higher value associated with a "natural" brand and the resulting higher stock value, redirecting sales to it and away from its competitors, and increased sales of its other products.

CLASS ALLEGATIONS

99. Plaintiffs Brad Buonasera and Manon Buonasera, bring this action pursuant to Rule 23 of the Federal Rules of Civil Procedure on behalf of themselves and all other similarly situated New York residents defined as follows:

All New York residents who purchased the Falsely Labeled Products (as defined herein) from a retail location within New York.

100. Excluded from the Class are officers and directors of Honest; members of the immediate families of the officers and directors of Honest; Honest's legal representatives, heirs, successors, or assigns; and any entity in which they have or have had a controlling interest.

101. Plaintiffs bring the Class pursuant to Federal Rules of Civil Procedure 23(a),23(b)(1), 23(b)(2), and 23(b)(3).

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102. At this time, Plaintiffs do not know the exact number of the Class members; given the nature of the claims and the number of sales that Honest has made of the Products, Plaintiff believes that the Class are so numerous that joinder of all members is impracticable.

103. There is a well-defined community of interest in the questions of law and fact involved in this case. Questions of law and fact common to the members of the Class that predominate over questions that may affect individual Class members include:

- (a) whether Honest misrepresented and/or failed to disclose material facts concerning the Falsely Labeled Products;
- (b) whether Honest's conduct was unfair and/or deceptive; and
- (c) whether Honest breached an express warranty created through the labeling and marketing of its Falsely Labeled Products.

104. Plaintiffs' claims are typical of those of the Class because Plaintiffs, like all members of the Class, purchased one or more of Honest's Falsely Labeled Products at a premium price, relying on Honest's false and misleading representations, and Plaintiffs sustained damages from Honest's wrongful conduct.

105. Plaintiffs will fairly and adequately protect the interests of the Class because Plaintiffs are similarly situated with, and have suffered similar injuries as, the members of the Class they seek to represent. Plaintiffs feel that they have been deceived, wish to obtain redress of the wrong, and want Honest to be stopped from perpetrating similar wrongs on others. Plaintiffs are adequate representatives of the Class because their interests do not conflict with the interests of the Class members they seek to represent, and they have retained counsel competent and experienced in conducting complex class action litigation, who were the first to publicly

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uncover the true scope and extent of Honest's wrongs. Plaintiffs have no interests adverse to those of the Class members, and they will vigorously prosecute this litigation.

106. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. Specifically, no Class has a substantial interest in individually controlling the prosecution of a separate action. The damages suffered by each individual Class member likely will be relatively small, especially given the burden and expense of individual prosecution of the complex litigation necessitated by Honest's conduct. Thus, it would be virtually impossible for the Class members individually to redress effectively the wrongs done to them.

107. The prerequisites to maintaining a class action for injunctive or equitable relief are met as Honest has acted or refused to act on grounds generally applicable to the Class, thereby making appropriate final injunctive or equitable relief with respect to the Class as a whole.

108. Upon information and belief, there are no pending lawsuits concerning the products at issue in this case. Concentration of the litigation concerning this matter in this Court is desirable, the Class is comprised solely of New York residents and is of a moderate size, and the difficulties likely to be encountered in the management of a class action are not great. The resolution of the claims of all Class members in a single forum, and in a single proceeding, would be a fair and efficient means of resolving the issues raised in this litigation.

109. The prosecution of separate actions by Class would create a risk of establishing inconsistent rulings and/or incompatible standards of conduct for Honest.

110. Honest's conduct is generally applicable to the Class as a whole and Plaintiffs seek, *inter alia*, equitable remedies with respect to the Class as a whole. As such, Honest's

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systematic policies and practices make declaratory relief with respect to the Class as a whole appropriate.

111. The Class is specifically identifiable to facilitate provision of adequate notice and there will be no significant problems managing this case as a class action. Notice to the Class can be made through various means, such as in-store leaflets, website advertisements, notices on the labels of the packages, and/or direct notice to those consumers for which Honest knows the e-mail or physical mailing address.

CAUSES OF ACTION

COUNT I

(Violation of the New York General Business Law § 349)

112. Such acts of Honest, as described above, and each of them constitute unlawful, deceptive, and fraudulent business acts and practices.

113. As more fully described herein, Honest's misleading marketing, advertising, packaging, and labeling of the Falsely Labeled Products is likely to deceive a reasonable consumer. Indeed, Plaintiffs and the other Class members were deceived regarding the characteristics of Honest's Falsely Labeled Products, as Honest's marketing, advertising, packaging, and labeling of the Falsely Labeled Products misrepresents and/or omits the true nature, quality, and/or ingredients of the Falsely Labeled Products.

114. There is no benefit to consumers or competition from deceptively marketing and labeling products. Indeed, the harm to consumers and competition is substantial.

115. Plaintiffs and the other members of the Class who purchased the Falsely Labeled Products suffered a substantial injury as alleged herein. Plaintiffs and the other members of the Class who purchased the Falsely Labeled Products had no way of reasonably knowing that the

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Falsely Labeled Products they purchased were not as marketed, advertised, packaged, and labeled. Thus, they could not have reasonably avoided the injury each of them suffered.

116. Honest has violated, and continues to violate, § 349 of the New York General Business Law, which makes deceptive acts and practices unlawful. As a direct and proximate result of Honest's violation of § 349, Plaintiffs and other members of the Class have suffered damages in an amount to be determined at trial. Had Plaintiffs and the Class members known the true facts, they would not have purchased the products, would have purchased fewer products, or would not have been willing to pay the premium price Honest charged for the products.

117. Pursuant to New York General Business Law § 349, Plaintiffs seek an order of this Court that includes, but is not limited to, an order enjoining Honest from continuing to engage in unlawful, unfair, or fraudulent business practices or any other act prohibited by law.

118. Plaintiffs and the other members of the Class may be irreparably harmed and/or denied an effective and complete remedy if such an order is not granted.

119. The unfair and deceptive acts and practices of Honest, as described above, present a serious threat to Plaintiffs and the other members of the Class.

120. THEREFORE, Plaintiffs pray for relief as set forth below.

COUNT II

(Violation of the New York General Business Law § 350)

121. Such acts of Honest, as described above, and each of them constitute unlawful, deceptive, and fraudulent business acts and practices.

122. As more fully described herein, Honest's misleading marketing, advertising, packaging, and labeling of the Falsely Labeled Products is false advertising likely to deceive a

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reasonable consumer. Indeed, Plaintiffs and the other Class members were deceived regarding the characteristics of Honest's Falsely Labeled Products, as Honest's marketing, advertising, packaging, and labeling of the Falsely Labeled Products misrepresents and/or omits the true nature, quality, and/or ingredients of the Falsely Labeled Products.

123. There is no benefit to consumers or competition from deceptively marketing and labeling products. Indeed, the harm to consumers and competition is substantial.

124. Plaintiffs and the other members of the Class who purchased the Falsely Labeled Products suffered a substantial injury as alleged herein. Plaintiffs and the other members of the Class who purchased the Falsely Labeled Products had no way of reasonably knowing that the Falsely Labeled Products they purchased were not as marketed, advertised, packaged, and labeled. Thus, they could not have reasonably avoided the injury each of them suffered.

125. Honest has violated, and continues to violate, § 350 of the New York General Business Law, which makes false advertising unlawful. As a direct and proximate result of Honest's violation of § 350, Plaintiffs and other members of the Class have suffered damages in an amount to be determined at trial. Had Plaintiffs and the Class members known the true facts, they would not have purchased the products, would have purchased fewer products, or would not have been willing to pay the premium price Honest charged for the products.

126. Pursuant to New York General Business Law § 350-e, Plaintiffs seek to recover their actual damages or \$500, whichever is greater, and seek to have these damages trebled.

127. Pursuant to New York General Business Law § 350, Plaintiffs also seek an order of this Court that includes, but is not limited to, an order enjoining Honest from continuing to engage in false advertising or any other act prohibited by law.

128. Plaintiffs and the other members of the Class may be irreparably harmed and/or

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denied an effective and complete remedy if such an order is not granted.

129. The unfair and deceptive acts and practices of Honest, as described above, present a serious threat to Plaintiffs and the other members of the Class.

130. THEREFORE, Plaintiffs pray for relief as set forth below.

COUNT III

(Based on Breach of Express Warranty)

131. Honest provided Plaintiffs and other members of the Class with written express warranties including, but not limited to, warranties that its Falsely Labeled Products were "natural," "all natural," "naturally derived," "plant-based," and contained "no harsh chemicals (ever!)."

132. These affirmations of fact or promises by Honest relate to the goods and became part of the basis of the bargain.

133. Plaintiffs and members of the Class purchased the Falsely Labeled Products, believing them to conform to the express warranties.

134. Honest breached these warranties. This breach resulted in damages to Plaintiffs and other members of the Class, who bought Falsely Labeled Products but did not receive the goods as warranted.

135. As a proximate result of the breach of warranties by Honest, Plaintiffs and the other members of the Class did not receive goods as warranted. Plaintiffs and the members of the Class therefore have been injured and have suffered damages in an amount to be proven at trial. Among other things, Plaintiffs and members of the Class did not receive the benefit of the bargain and have suffered other injuries as detailed above. Moreover, had Plaintiffs and the

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Class members known the true facts, they would not have purchased the products, would have purchased fewer products, or would not have been willing to pay the premium price Honest charged for the products.

136. THEREFORE, Plaintiffs pray for relief as set forth below.

COUNT IV

(Unjust Enrichment)

137. As a result of Honest's deceptive, fraudulent, and misleading labeling, advertising, marketing, and sales of the Falsely Labeled Products, Honest was enriched at the expense of Plaintiffs and the other members of the Class through the payment of the purchase price for Honest's Falsely Labeled Products.

138. Under the circumstances, it would be against equity and good conscience to permit Honest to retain the ill-gotten benefits that it received from Plaintiffs and the other members of the Class, in light of the fact that the Falsely Labeled Products purchased by Plaintiffs and the other members of the Class were not what Honest purported them to be. Thus, it would be unjust or inequitable for Honest to retain the benefit without restitution to Plaintiffs and the other members of the Class for the monies paid to Honest for such Falsely Labeled Products.

139. THEREFORE, Plaintiffs pray for relief as set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment on behalf of themselves and the proposed Class providing such relief as follows:

A. Certification of the Class proposed herein under Federal Rule of Civil Procedure

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23(a), (b)(1), (b)(2), and (b)(3); appointment of Plaintiffs as representatives of the Class; and appointment of their undersigned counsel as counsel for the Class;

B. A declaration that Honest is financially responsible for notifying members of the Class of the pendency of this suit;

C. An order requiring an accounting for, and imposition of a constructive trust upon, all monies received by Honest as a result of the unfair, misleading, fraudulent, and unlawful conduct alleged herein;

D. Restitution, disgorgement, refund, and/or other monetary damages, together with costs and disbursements, including reasonable attorneys' fees pursuant to the applicable statutes and prejudgment interest at the maximum rate allowable by law;

E. Injunctive relief on behalf of the Class pursuant to New York General Business Code § 349 and common law, enjoining Honest's unlawful and deceptive acts;

F. Statutory damages in the maximum amount provided by law; and

G. Such further relief as this Court may deem just and proper.

JURY TRIAL DEMANDED

Plaintiffs and the Class members hereby demand a trial by jury.

DATED: February 12, 2016

THE GOLAN FIRM

Golah

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TERRELL MARSHALL DAUDT & WILLIE PLLC

Beth Terrell bterrell@terrellmarshalll.com Samuel Strauss sstrauss@terrellmarshall.com 936 N. 34th St., Suite 300 Seattle, WA 98103 Phone: (206) 816-6603 Fax: (206) 319-5450

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Exhibit 1

HONES Z YONES honest shamp00 2-in-1 hydrating nourishing cleanser natural hypoallergenic tear-free ^{sweet} orange vanilla

17.0 fl. oz. (500 mL)

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Natural & organic ingredients gently Natural moisturize & nourish your baby g family's entire body from head to toe super versatile. Super easy. Super safe! Organic aloe, chamomile & calendula gently soothe & nourish Jojoba & quinoa proteins strengthen & fortify Organic coconut oil moisturizes & protects . Perfectly pH balanced to remove dirt without stripping natural oils & protect tender skin & delicate hair No harsh chemicals (ever!) - honestly clean & extremely satisfying Tear-Free • Hypoallergenit • Plant-Based Non-Toxic · Pediatric in Tested Color-Safe • pH Ba anced To Use: Wet hair & skin vith warm water. Gently massage over entire bod " and scalp, then rinse Singing is optional, but encouraged. Caring Caution: For external use only, Avoid contact with eyes. If any adverse reaction develops, stop use & contact your physician. As with all natural products, changes in color may occur. No Animal Testing or By-Products INGREDIENTS: ALOE BARBADENSIS (ALOE) LEAF JUCE, WATER SODIUM LAURYLGLUCOSIDES HYDROXYPROPYLSULFONATE, SODIUM METHYL COCOYL TAURATE, COCAMIDOPROPYL HYDROXYSUTANE SODIUM LAURYL GLUCOSE CARBOXYLATE, LAURYL GLUCOSDE, GAR HYDROXYPROPYLTRIMONIUM CHLORIDE, CALENDULA OFFICINUS ROWER EXTRACT*, CHAMOMILLA RECUTITA (MATRICARIA ROWER EXTRACT*, CITRUS AURANTIUM DULCIS (DRANGE PEL OL, VANILLA PLANIFOLIA FRUIT EXTRACT, CITRUS TANSEMA (TANGERINE) PEEL OIL, COCOS NUCIFERA (COCONUT) OL IRIETHYL CITRATE UXDOCUTZED, IO 1080, PROTEIN, HYDROXZO TRIETHYL CITRATE, HYDROLYZED JOJOBA PROTEIN, HYDROLYZED QUINDA, GLYCERIN, DISODIUM COCO-GLUCOSIDE CITRUE SODIUM CITCOCORDICAL SUCCESSION CITRUE SODIUM CITRATE, CAPRYLHYDROXAMIC ACID, CAPRYLIL GUOL *CERTIFIED ORGANIC INGREDIENT Join us at Honest.com or call 888-862-8818 We'd love to hear from you! Proudly Made in the USA © 2014 Dist. & Sold Exclusively by The Honest Company, Inc. Santa Monica, California 90404 Please

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INGREDIENTS: ALOE BARBADENSIS (ALOE) LEAF JUICE*, WATER, SODIUM LAURYLGLUCOSIDES, HYDROXYPROPYLSULFONATE, SODIUM METHYL COCOYL TAURATE, COCAMIDOPROPYL HYDROXYSULTAINE, SODIUM LAURYL GLUCOSE CARBOXYLATE, LAURYL GLUCOSIDE, GUAR HYDROXYPROPYLTRIMONIUM CHLORIDE, CALENDULA OFFICINALIS FLOWER EXTRACT*, CHAMOMILLA RECUTITA (MATRICARIA) FLOWER EXTRACT*, CITRUS AURANTIUM DULCIS (ORANGE) PEEL OIL, VANILLA PLANIFOLIA FRUIT EXTRACT, CITRUS TANGERINA (TANGERINE) PEEL OIL, COCOS NUCIFERA (COCONUT) OIL*, TRIETHYL CITRATE, HYDROLYZED JOJOBA PROTEIN, HYDROLYZED QUINOA, GLYCERIN, DISODIUM COCO-GLUCOSIDE CITRATE, SODIUM CITRATE, CAPRYLHYDROXAMIC ACID, CAPRYLYL GLYCOL *CERTIFIED ORGANIC INGREDIENT

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our promise to you

natural hypoallergenic color-safe vegan tear-free pH balanced

> More at HONEST.COM

SIL

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Exhibit 1

HONES honest' shampoo body wash ultra calming natural hypoallergenic tear-free dreamy lavender 10.0 FL 07. (296 ML) E

Our calming 2-in-1 cleanser is designed to gently cleanse the entire body from head to toe. Lavender essential oils balanced with organic botanicals are perfect for a dreamy bed time routine.

Super versatile. Super easy. Super safe!

- · Lavender essential oil calms & relaxes sweet dreams!
- · Aloe, chamomile & calendula gently soothe & nourish
- · Coconut oil, jojoba protein & quinoa extract moisturize & soften skin
- · Perfectly pH balanced to cleanse without over-drying
- No harsh chemicals or synthetic fragrances (ever.)

Natural • Hypoallergenic

To Use: Wet hair and skin with warm water. Gently massage and wash thoroughly over entire body and scalp, then rinse. Singing is optional, but encouraged.

Caring Caution: For external use only. Avoid contact with eyes. If any adverse reaction develops, stop use and contact your physician.

As with all natural products, changes in color may occur.

MCREDIENTS: WATER (AQUA, EAU), COCAMIDOPROPYL HYDROXYSUA SOUM LAURALGLICOSIDES HYDROXYPROPYL SULFONATE, SODUM MEN GOOM, TAURATE, LEUCONOSTOC/RADISH ROOT FERMENT FUTRATE, SOU LORDE, SODUMI AURYL GLICOSE CARBOXYLATE, LAVANDLAHREND LAWADLA ANGUSTIFOLIA (LAVENDER) OIL, VANILLIN, CALENDLA OFFINA FUMER EXTRACT", CHAMOMILLA RECUTTA (MATRICARIA) FLOWER KIRACT HUMER EXTRACT, CHAMOMILLA RECUTTA (MATRICARIA) FLOWER HUMER EXTRACT, GLICOSIDE, CAPRYLYL GLYCOL, BETAINE, TRIFITAL OTRATE SU HUMER EXTRACT, GLICOSIDE, CAPRYLYL GLYCOL, BETAINE, TRIFITAL OTRATE SU HUMER EXTRACT, GLICOSIDE CITRATE, CITRIC ACID. "ORGANIC INGENE

Not tested on animals & no animal by-products. Made in the state of th Made in the USA with US & imported materials. Voin US at Honest.com or call 888-862-8818 We'd love to hear from you!

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Exhibit 1

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Our calming bath with super foaming bubbles cleanses and helps retain moisture for delicate skin. Lavender essential oils balanced with organic botanicals are perfect for a dreamy bedtime routine.

Long-lasting, super foaming bubbles make for a delightful bathtime routine!

- Lavender essential oil calms & relaxes sweet dreams!
- · Organic chamomile & calendula gently soothe & nourish
- · Jojoba protein & quinoa extract help enrich delicate skin
- Perfect for everyday bath routines & bonding time
- · No harsh chemicals or synthetic fragrances (ever!) - honestly clean & extremely satisfying

Natural • Tear-Free • Hypoallergenic Vegan • Biodegradable • pH Balanced

To Use: Pour approximately 2-4 capfuls directly under warm running water. Let the fun begin!

Caring Caution: For external use only. Avoid contact with eyes. If any adverse reaction develops, stop use & contact your physician.

As with all natural products, changes in color may occur may occur.

INGREDIENTS: WATER (AQUA, EAU), LAURYL GLUCOSIDE, DECYL GLUCOSIDE COOLITER (AQUA, EAU), LAURYL GLUCOSIDE, DECYL GLUCOSIDE, COCAMIDOPROPYL HYDROXYSULTAINE, GLYCERIN, LAVANDUL A MICH AMBRIDA LAVANDULA ANGUSTIFOLIA (LAVENDER) OIL, LAVANDULA HYBRIDA OIL, HYDROLYSESTIFOLIA (LAVENDER) OIL, LAVANDULA HYBRIDA OIL, HYDROLYZED JOJOBA PROTEIN, CALENDULA OFFICINALIS FLOWER EXTRACT*, CHAMOMILLA RECUTITA (MATRICARIA) FLOWER EXTRACT*, CHAMOMILLA RECUTITA (MATRICARIA) ALOE BARBADENICIO: CHENOPODIUM QUINOA SEED EXTRACT. ALOE BARBADENSIS LEAF JUICE, COCOS NUCIFERA (COCONUT) OIL*, TRIETHYL CITRATE, CALCIUM GLUCONATE, CITRIC ACID ***ORGANIC INGREDIENT**

Not tested on animals & no animal by-products. Made in the

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Biodegradable • pH Balanced A streat any time day or night, especially shower. Apply thoroughly daily to Caution: For external use only. Avoid theyes. If any adverse reaction stop use & contact your physician.

WATER (AQUA), CAPRYLIC/CAPRIC TRIGLYCERIDE, PARKI PARKI CUA), CAPRYLIC/CAPRIC TRIGLYCERIDE, ALCOHOL, ALCOHOL, CAPRYLIC/CAPRIC TRIGLYCERIDE, ALCOHOL, ALCOHOL, CAPRYLIC/CAPRIC TRIGLYCERIDE, ALCOHOL, ALCOHOL MATER (AQUA), CAPRYLIC/CAPRIC TRIGLYCO TURATE, CETEARYL BUTTER*, CETEARYL ALCOHOL MEDIDIA OFFICINALIS FLOWER EXTRACT MATERICAPIAN OFFICINALIS FLOWER EXTRACT MATERICAPIAN OFFICINALIS FLOWER EXTRACT ARECUTITA OFFICINALIS FLOWER EXTRACT, ALOE USAF EXTRACT, ALOE DEAR MATRICARIA) FLOWER EXTRACT, ALOE BE DITTA (MATRICARIA) FLOWER EXTRACT, ALU BE DITRA (MATRICARIA) FLOWER EXTRACT, ALU AUGA EUROPAEA (OLIVE) FRUIT OIL*, SIMMONDSA MITAANUS TINCTORIUS (SAFFLOWER) SEED OL MITAANUS TINCTORIUS (SAFFLOWER) SEED OL

AND AOD, HYDROXYETHYLCELLULOSE, MARKANDE CERTIFIED ORGANIC INGREDIENT



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Making skin happy, one cheek at a time.

- Lavender essential oil helps calm & relax sweet dreams!
- Chamomile, calendula & aloe help calm & soothe
- Organic olive, shea & jojoba oils nourish & moisturize
- No harsh chemicals or synthetic fragrances (ever!)

Natural • Hypoallergenic • Vegan Biodegradable • pH Balanced

To Use: Great any time, day or night, especially after bath/shower. Apply thoroughly daily to help nourish and moisturize skin.

Caring Caution: For external use only. Avoid contact with eyes. If any adverse reaction develops, stop use & contact your physician.

INGREDIENTS: WATER (AQUA, EAU), CAPRYLIC/CAPRIC TRIGLYCERIDE BITYROSPERMUM PARKII (SHEA) BUTTER*, CETEARYL ALCOHOL, GLYCERID STEARATE, GLYCERIN, CETEARYL OLIVATE, SORBITAN OLIVATE, LAVANDUA ANGUSTIFOLIA (LAVENDER) OIL, LAVANDULA HYBRIDA (LAVANDIN) OL CATTHAMUS TINCTORIUS (SAFFLOWER) SEED OIL*, OENOTHERA BENNS EVENING PRIMAROSE) OIL*, OLEA EUROPAEA (OLIVE) FRUIT OIL*, SIMMONOSA DINENSS (JOJOBA) SEED OIL*, CALENDULA OFFICINALIS FLOWER EXTRACT, OMMMILLA RECUTITA (MATRICARIA) FLOWER EXTRACT*, ALOE BARBADENSS LAF JUCE, TRIETHYL CITRATE, SODIUM NITRATE, GAMMA-NONALACTONE MUDL, CAPRYLHYDROXAMIC ACID, HYDROXYETHYLCELLULOSE, XAVTHAN GM, CAPRYLL GLYCOL



Honestly Free Guarantee made without: silicones, parabens, phthalates, synthetic fragrances, dyes, formaldehyde carriers, PEGs, gluten, or most common allergens



Honest to Goodness Your purchase helps fund research & training to advance the healthy development of children ages 0-3.



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Taking care of business - check to check! Finally, the convenience of a disposable of a plant-based alternative. Finally, the convenience of a disposable of the baby wipe is now available in an instruct, non-toxic, biodegradable . & plant-based alternative. The section of the part of the only wipe you'll ever need - from sensitive, wet bottoms & the plant extracts to promote healthy skin souther of the abstructure, ingredients cleanse with plant extracts to promote healthy skin southers & granked-up toys. Thread with a botancial blend of pomegranate (antioxidants), chamonile & cucumber (to molicurize). Thread state and the abstructure of the only wipe pomp to the disposable of the structure of th

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Caring Caution: For laundry use only. Keep out of reach of bildren & pets. Mild eye irritant — flush with water for 15 inutes and consult physician as necessary. Not intended lygarments labeled as flame-resistant, as it may reduce theresistance.

MEMENTS: DEIONIZED WATER, HYDROXYETHYL AMMONIUM NEM SULATE (CANOLA-BASED SOFTENER), PROPYLENE BUIL ORGANIC DIOL), DIPROPYLENE GLYCOL (ORGANIC DIOL), BENISTIMAZOLINONE (PRESERVATIVE)

No Animal Testing or By-Products Proudy Made in the USA

> Honestly FREE of: fragrances. enzymes, dyes, phosphates, 1,4-dioxane, chlorine, DEA, formaldehyde, petrochemicals, caustics & optical brighteners

Join us at Honest.com or call 888-862-8818 We'd love to hear from you!

We guarantee your complete satisfaction.

or every purchase, a donation is made to families in need.

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honest^o oxyboost

Non-chlorine bleach stain & odor remover color-safe • hypoallergenic



free & clear 15.2 oz. (432 grams)

WHITENS 4 FRESHENS



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Exhibit 1

Easy Dosing grease, dirt, coffee/tea, egg, • Natural 5-in-1 action: stain remover, whitener, color brightener, deodorizer & water softener Naturally-derived ingredients use oxygen for effective destaining & deodorizing . Keeps your whites white & colors bright without harmful chlorine or phosphates -· Effectively breaks down organic stains like food, juice, spit-up, Color-Safe . diaper waste & life's unexpected messes



Page 35 of 141 abrics labeled dry clean of DED WITH NATURAL SODA ASH TO (BIODEGRADABLE, COHOL RON ic a HYDROGEN WATER A SODA ASH TO SOFTEN hals & no an

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honest laundry detergent



advanced plant-based cleaning hypoallergenic • pH balanced • biodegradable



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To Use: •Line 1: Front-loading/HE •Line 2: Top-loading/Standard

For tough spots or stains, pour detergent directly onto stained area, rub lightly & wash as usual.

INGREDIENTS: PURIFIED WATER, COCAMIDOPROPYL BETAINE (COCONUT-BASED CLEANSER), SODIUM COCO SULFATE (COCONUT-BASED CLEANSER), COCAMIDOPROPYLAMINE OXIDE (COCONUT-BASED CLEANSER), PHENOXYETHANOL (PH-SENSITIVE PRESERVATIVE), METHYLISOTHAZOLINORE (PRESERVATIVE), EQUISETUM HIEMALE (HORSETAIL PLANT) EXTRACT

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honest laundry detergent



advanced plant-based cleaning biodegradable • hypoallergenic • pH neutral



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HONE

SINES

Exhibit 1

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honest[®] deodorant

lavender vanilla

effective, non-sticky & delightfully refreshing odor protection

^{natural} • ultra pure ^{long-lasting} • hypoallergenic

^{4.0} fl. oz. / 115 mL

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wally neutralize & instantly refresh!

Exhibit 1

etnatural deodorizing blend effectively fights A soothes skin

ni tea tree, witch hazel, lemon & eucalyptus meodors&condition skin, while lavender & vanilla Rasweet, fresh scent (better than perfume!) entiperspirants, doesn't clog ducts & allowing for natural breathability la natural, safe & effective deodorant, Muharmful chemicals (ever!)

way directly to underarms. Apply as often as he instant refreshing feel. Remmable. Keep away from heat & open flame.

ALCOHOL DENAT*, WATER/AQUA, MICH HAZEL) LEAF WATER*, POLYGLYCERYL-4 OLEATE, HAMAMELIS MAMATE, ALOE BARBADENSIS (ALOE VERA) ALVERAL ALOE BARBADENSIS (ALOE VERA) ATERNIEDUA (ROMAN CHAMOMILE) FLOWER OIL*, ATERNIFOLIA (TEA TREE) LEAF OIL*, CITRUS LIMON POT MARIGOLDI FICINALIS (SAGE) OIL*, CHAMOMILLA POT MARIGOLD) FLOWER EXTRACT*, CHAMOMILLA MARIGOLD) FLOWER EXTRACT*, CHAMOUNIA MARICARIA) FLOWER EXTRACT*, GLYCERIN*, LAVANDULA (ANDER) FLOWER EXTRACT*, GLYCERIN*, LAVANDER (ANDER) OIL* *CERTIFIED ORGANIC INGREDIENT



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SLS, alcohol, phthalates, parabens, fragrances, MEA, OEA, TEA, phenois, PEGs, silicones, glycols & most common ellergens

Honast to Goodness Your purchase helps fund education & skill-training for youth to pursue their dreams



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hised with aloe & chamomie to cleanse & condition, wing skin fresh & hydrated	fuched with natural olive oil & plant botanicals to Metively dissolve & remove makeup without rinsing	Extra gentle for delicate eyes & sensitive skin	dical-grade, sustainably harvested plant-based cloth
puing sk	finched v electively	Extra gent	Medical-o

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ONES

SANONES

Exhibit 1

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free & cli

20.3 oz. (576 gra

honest dishwasher packs

SPARKLING

advanced plant & mineral-based cleaning effective • biodegradable • non-toxic

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Exhibit 1

n a concentrated, premeasured pack natic dishwasher models

Selean vour plates, glassware, cutlery

e those premeasured packs super

able chemicals

sidues or worries!

less & No Waste mperatures



R & BRIGHTENER), SODIUM CITRATE (CITRUS-DERIVED R & BRIGHTENER), SODIUM CARBONATE PEROXIDE (SOLID TE (MINERAL-BASED SOFTENER), SILICA (ANTI-CAKING & SER), SODIUM POLYASPARTATE (BIODEGRADABLE WATER BLE WATER SOFTENER), ALPHA AMYLASE (SOIL-REMOVING /INYL ALCOHOL (BIODEGRADABLE, WATER-SOLUBLE FILM) Page 48 of 141



Honestly FREE of: SLS fragrances, glycols, dyes, phosphates, 1,4-dioxane, chlorine, DEA, formaldehy & Caustics



Honest to Goodness For every purchase, a donation is made to amilies in need.....

Caring Caution: Avoid contact with eyes. In case of eye contact, flush with water for 15 minutes.

Do not ingest. If swallowed, drink water and consult your physician.

Keep out of reach of children & pets.

No Animal Testing or By-Products

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Exhibit 1

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EDIENTS: GLY ALE IINERAL), W B ALL D ٩, Sp CAL OFFICINALE (GING) VENSIS CAMELLIA SI T** MA BICA UNAIE (B) CA (MIN VERA SI)N States and



Innovative blend of plant & mineral-based ingredients carefully developed to ar • Pure 4-In-1 performance: cleaning + stain fighting + brightening + softening cleaning experience

• All washers (HE & standard) + all temperatures (cold or hot) + all colors + all fa

• Suitable for ALL family laundry - natural & synthetic washables, including we •Conversion, pre-measured packs means no over-pouring & saves you money

fine washables

0.00 . pertect for babies & sensitive skin - NO harshelmical residues, chlorine, fre or worries!

formaldenyde, caustics A dioxane, chorine, expersion view & optical brighteners VCOS, DTOSDAR65

Page 53 of 141

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honest toilet cleaner



Grime scene to squeaky clean in one eco-friendly flush!

- Powerful, non-toxic cleaning action hygienically removes stains, calcium, limescale, mold & mildew
- Tea tree oil, citric acid & plant-based cleansers battle bacteria & decimate dirt
- Eucalyptus essential oil keeps your bathroom smelling clean & fresh (no harmful fumes or VOCs)
- Easy-rinse formula leaves nothing behind but a natural shine

To Use: Flush the toilet & squirt under the rim & all around the bowl. Let soak for a few minutes. Lightly scrub & flush again.



Honestly FREE of:

ammonia, chlorine bleach, hydrochloric acid, synthetic fragrances dyes, phosphates, oxalic acid, para-dichlorobenzene, bromine. acetophenone, caustics, ammonium nonoxynol-4 sulfate & most common allergens



Honest to Goodness For every purchase, a donation is made to

families in need.

MGREDIENTS: WATER, CITRIC ACID (PLANT-BASED PH REGULATOR) CAPBYLYLMYBISTYL ALUCOSIT PLANT-BASED (PLEANSER), GLUCONIC ACID (PLANT-BASED PH REGULATOR), XANDIAN GLM, (NATIAR (SCORTY COMADCER), POTASSIUM SORBATE (PLANT-BASED PH REGULATOR), XANDIAN ANSUS (PLA) (AVETIDEN UP, PLANT, PUTASSIUM SORBATE (PLANT-BASED PRESERVATIVE) LAWADOULA ANSUS (PLA) (FRA 1975, FEATURE), POTASSIUM SORBATE (PLANT-BASED PRESERVATIVE) LAWADOULA ANSUS (PLA) (PLANT-BASED), PLANT-PUTASSIUM SORBATE (PLANT-BASED PRESERVATIVE) LAWADOULA ANSUS (PLANT-TRA 1975, FEATURE), PARTASSIUM SORBATE (PLANT-BASED PRESERVATIVE) LAWADOULA ANSUS (PLANT-PLANT-BASED), PLANT-PUTASSIUM SORBATE (PLANT-BASED), PLANT-BASED PRESERVATIVE), AND (PLANT-BASED), PLANT-BASED (PLANT-BASED), PLANT-BASED), PLANT-BASED (PLANT-BASED), PLANT-BASED), PLANT-BASED (PLANT-BASED), PLANT-BASED), PLANT-BASED, PLA

Caring Caution: 1940 but of each or deal track patients and a methods and the first state of the second st

the contraction of By-Products

361 - A Honest cont We'd love to hear from your

and a set of



Honestly FREE of: ammonia, chlorine bleach, hydrochlonic acid, synthetic fragrances, dyes, phosphates, oxalic acid, para-dichlorobenzene, bromine, acetophenone, caustics ammonium nonoxynol-4 sulfate & most common allergens	Honest to Goodness For every purchase, a donation is made to families in need.	INGREDIENTS: WATER, CITRIC ACID (FLANT-BASED PH REGULATOR), CAPRYLYLMYRISTYL GLUCOSIDE PLANT-BASED CLEANSFRI, GLUCONIC ACID (FLANT-BASED PH REGULATOR), XANTHAN GUM (NATURAL VISCOSITY FRHANDER) POTASSIUM SORIVATE (PLANT-BASED PH REGULATOR), XANTHAN GUM (NATURAL VISCOSITY FRHANDER) POTASSIUM SORIVATE (PLANT-BASED PHESERVATIVE), LAVANDULA ANGUSTIFOLA (LAVENDER) OIL FUDADY FUS GLOBULUS (EUCALYPTUS) LEAF OIL, MELALEUCA ALTERNIFOLIA (TEA TREE LEAFOL	ution: a set of the of children & pets, avoid contact with	
amm dyes aceto comi	Factor Factor	INGREDIENTS: WAI PLANT-BASED CLE VISCOSITY ETHIANC USCOSITY ETHIANC ULAVENDENDON TEATREE LEAP A	Caring Caution:	

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Exhibit 1

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Case 7:16-cv-01125 Document 1-3 Filed 02/12/16 Page 7 of 28

Exhibit 1

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Page 58 of 141 DENAI 1 CAPRVI V EB-ALCOHC SA -BAS EH AN C.

powerful, plant-based formula safely removes tough stains DOOLS

carpet & other washable fabrics specially effective on organic stains on laundry, upholster No harsh chemicals (ever!)

S, synthetic fragrances, glycol, dyes, ohosphates, 1,4-dioxane, chlorine, **DEA, formaldehyde, caustics** & optical brighteners Honestly FREE of $\overline{\mathbf{v}}$

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Page 60 of 141

honest stain remover

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South Lagrades


٠. 64363636362 n_n, HONES THE ဂြ O S SANOY air + fabric freshener lar 9.3 fl. oz. / 275 mL

orobenzene, butane acetone & mos Jai de l diethylene glyco f: phthalates, syntl terpene, forn rolidone, monoethyl ether, BI common allergens ð benzene, nethylpy onesti agran

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Exhibit 1

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NON-TOXIC, NATURAL AROMATHERAPY

- Zinc salts naturally eliminate & neutralize odors
- Orange cedar & cypress essential oil biend leaves a warm & earthy scent
- Only pure essential oils no synthetic fragrances!









<image><section-header><section-header>

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- Our ultra-pure, high-performance Automatic Dishwasher Gel powerfully cuts through grease & food, removing stubborn stains & leaving your dishes clean, shiny & spot-free
- Plant-based ingredients beautifully clean all your plates, glassware, silverware & bakeware
- Won't etch metal or silver
- •Effective in all temperatures
- •Leaves nothing behind but clean no harsh chemicals (ever!)
- Totally free from fragrances, dyes & worries!

To Use: Fill just 1 detergent cup (if excess sudsing occurs, use less).



TO WATCH SODRIM CITRATE (CORN-BASED COMPLEXING AGENT), CAPRYLYL/MYHISTYL GLUCOSIDE IN CITIN, ACID ICTINUS BASED SOFTENING AGENT), XANTHAN GUM (CORN-BASED THICKENER) REAMING ACIDS CATALYST), POTASSILM SOFIBATE (FOOD GRADE PRESERVATIVE)

Provide the set of contact with eyes, flush with cool water for



Page 70 of 141

honest auto dishwasher gel



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honest auto dishwasher gel

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Page 73 of 141 I PARI \geq Ā OSPERN SODIUM HYDROXIDE FRIN ā & SODIUM J SODIUM PALMATE (PALM OIL* DR($\overline{\alpha}$ M SODIL ంర **NGREDIENTS:** S S S $\overline{\mathbf{\omega}}$ COCONU (SHEA) SALVIA SIMM ARM







net wt. 5 oz / 140 g









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Exhibit 1

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Exhibit 1

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honest foaming hand soap lemongrass 8.5 fl. oz. (250 mL)



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Exhibit 1

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Exhibit 1

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• 100% non-toxic, plant-based formulase through & effectively removes unwanted	toxic pesticides & chemical residues	 Pathogens, waxes, dirt, handling olisition on both conventional & organization 	•	· Significantly more effective than cleaning (results based on specific microbial test	· Inhibits browning & helps food last up (based on independent lab tests)
ž	â		and a second		te a transfer

ould, plant-based formula safely cuts effectively removes unwanted

sticides & chemical residues

the formula leaves no taste or odor behind Whing & helps food last up to 200% longer more effective than cleaning with water alone amboth conventional & organic produce) Ms, waxes, dirt, handling oils & bacteria Med on specific microbial testing) Independent lab tests)



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als & causti



- Powerful, plant-based formula leave all types of glass gleaming & crystal clea
- Only 4 natural ingredients cut throu all kinds of grime -like grease, gri dust, fingerprints & nose-prints
- Repels dust and won't leave behind naze, streaks or risky residues
- Naturally nontoxic & biodegradable honestly squeaky clean

Page 94 of 141

No harsh chemicals (everi)

1.] GLUCOSI CAPRYLYL/WYRISTYI Ü 5 うう 2 A SURFAC E 3) 5 ŀ 1

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delivers delightful fruity freshness that kids love! Boosting overall oral health: fluoride-free formula helps brighten teeth, promote healthy teeth & gums, & fight dental plaque buildup.

Now, who's ready for a smiling contest?

- Calcium helps protect & strengthen tooth enamel
- Baking soda gently polishes teeth
- Aloe, ginger & bisabolol help soothe gum irritation

To Use: Brush teeth thoroughly, preferably after each meal but at least twice a day, or as directed by a dentist. Supervise & instruct children under 6 years of age in good brushing habits (to minimize swallowing). Children under 2 years of age: consult a dentist or physician.

> Honestly FREE of: SLS, sulfates, saccharin, fluoride, artificial sweeteners.

artificial flavors, parabens, triclosan, gluten & dyes

INGREDIENTS: CALCIUM GLYCERIN, CARBONATE (MINERAL), WATER, ALOE BARBADENSIS (ALOE) LEAF JUICE**, LAUROYL SARCOSINATE (COCONUT-DERIVED CLEANSER). CARRAGEENAN (SEAWERD-STABILIZER). CALCIUM (MINERAL), **GLYCEROPHOSPHATE** (BOTANICAL SOOTHER), BISABOLOL ZINGIBER OFFICINALE (GINGER) ROOT EXTRACT**, CAMELLIA SINENSIS (GREEN TEA) LEAF EXTRACT**, FLAVOR*, SODIUM BICARBONATE (BAKING SODA), HYDRATED SILICA (MINERAL), SODIUM CHLORIDE (COMMON SALT) *ALL NATURAL STRAWBERRY FLAVOR ** DERIVED FROM CERTIFIED ORGANIC BOTANICALS


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AI CILIM 1 MΔ ŀ 41 したからた SA -38a. STABILIZ . (BUTAN IAI F ([]]] CAMELLIA SINENSIS **[**[]] SI AV 1 443 **BAKING** (MINE \mathbf{b} ×ΔII. RHY FI AVA D ORGANIC BOTANICALS K

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honest rinse aid

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Exhibit 1

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Spot-Free Shine for Brilliantly Clean Dishes!

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Honestly FREE of:

SLS, synthetic fragrances, glycol, acrylic acid polymers, dyes, phosphates, 1,4-dioxane, chlorine, DEA, formaldehyde & caustics

To Use: Fill the rinse agent reservoir on your dishwasher. Do not overfill. Check levels regularly & refill as needed.

*Number of loads based on average manufacturer's specifications & release amounts

INGREDIENTS: PURIFIED WATER, PPG-4 LAURETH MYRETH-5 (PUANT-BASED CLEANSER), UREA (SALT-BASED OXIDIZING AGENT) CITRUS LIMON (LEMON) PEEL OIL, PHENOXYETHANOL (PH-SURGITIVE PRESERVATIVE), METHYLISOTHIAZOLUNONE (PRESERVATIVE)

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- Bottoms rejoice Helps keep diaper area clean & refresher. daunting diaper duty, too!
- Organic aloe soothes & nurtures delicates
- · Witch hazel & botanical extracts gently des

Hypoallergenic Non-Toxic DH Balan

INGREDIENTS: ALOE BARBADENSIS (ALOE) LEAF JUNE WITH HAZEL) WATER, GLYCERIN, SODIUM LAURYL GUXXX 18 CHAMOMILLA RECUTITA (MATRICARIA) FLOWER EXTRACTION EXTRACT*, VANILLA PLANIFOLIA FRUIT EXTRACT, CITRUS I # CITRUS AURANTIUM DULCIS (ORANGE) PEEL OIL, PANTHERILIE SODIUM PHYTATE, CAPRYLYL GLYCOL, CAPRYLHYDROXAMICAL *CERTIFIED ORGANIC INGREDIENT

siejoice. refreshed - great for extra

a delicate skin agently cleanse

Balanced Plant-Based

AUCOSE CARBOXYLATE, LAURYL GLUCOSIDE, AUCOSE CARBOXYLATE, LAURYL GLUCOSIDE, A DITRICT', CALENDULA OFFICINALIS FLOWER AT OTRUS TANGERINA (TANGERINE) PEEL OIL, ANTHENOL, TRIETHYL CITRATE, SODIUM CITRATE, A DIAMIC ACID

Area during changes. Wipe clean



Honestly FREE of: SLS, sulfates phthalates, parabens, fragrances dyes, formaldehyde, MEA, DEA, TEA & most common allergens Case 7:16-cv-01125 Document 1-5 Filed 02/12/16 Page 1 of 25



 Powerful, natural 4-in-1 formula for all your floor mopping needs Easily fits into standard swivel or standing mops / sweepers Extra durable & thick quilted pad (made with sustainably harvested wood pulp) effectively lifts dirt & absorbs messes Will not damage wax or other protective floor finishes No risky or harsh residues – babies & pets will rejoice! 	Honestly FREE of: ammonia, SLS, synthetic fragrances, coal tar dyes, cresol, nonylphenol ethoxylate, phosphates, MEA, DEA, TEA, caustics & most common allergens	honest wet mopping pads advanced plant-based floor care clean - shine - restore - protect
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Exhibit 1	an a	Page 108 of 141	te i t
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	Easily elimination rust, hard wat wat besky nasties	• Dissolves & pride pride of the pride of th	· No harsh che
	N - Service Se	- Disso depoi	Ĕ Q Z

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Page 111 of 141

Aloe, ginger, & bisabolol help gently soothe gums

Green tea extract rich in antioxidants support overall oral health

Witch hazel & menthol cleanse & freshen

Extra aromatic mint for a truly refreshing taste

No fluoride, artificial sweeteners, artificial flavors, or dyes

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Exhibit 1

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Providence and production of control particles of Scorning Dectanoidation rectness & chapping Easy to use spray is allocity values formity - No barlets

Spire diversion of the diversion of the

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Exhibit 1



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All reactions of the second states of the



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in facts (continued)

tive ingredients Water, Glycerin, Hydroxypropyl Mar, Citrus Aurantium Dulcis (Orange) Oil, Vanilla Anniolia Fruit Extract, Aloe Barbadensis Leaf Juice, Calendula Officinalis Flower Extract, Chamomilla Recutita Hower Extract, Triethyl Citrate, Citric Acid

Antiseptic & antimicrobial protection made with plant-based ingredients • Soothing botanicals help reduce drying, redness & chapping

•NO harsh chemicals (ever!)



Honestly Free Guarantee

Made without: triclosan, benzalkonium chioride, quats, parabens, synthetic fragrances, structs chlorine, formaldehyde carriers, petrochemics or most common allergens



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Honest to Goodness

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Your purchase helps fund health education and gives products free of harsh chemicals to schools schools and childcare centers.

Colls Dist. & Sold Exclusively by Not tested on animals & no animal by-products.

with US & imported materials

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PULY FREE OF

45. synthetic fragrances. glycol, dyes, phosphates. 14-dioxane, chlorine, DEA formaldehyde, caustics & optical brighteners

Exhibit 1

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Page 128 of 141 MGREDIENTS: PURIFIED ETH IL ALCOHOL DENAT. (FEH FROM CORN SUGARS). SOON BORATE (MINERAL CLE APRYLYL GLUCO AYRIST RIGAR-BASED A, GUICONATE (PL N#1-8 SOFTENER), ī. Т KSITINE PRESERVATIVE/ ALIGHTEOLIA ORGANNIC LAVENDER (N. METHYLISOTHIAZOLINONE (P C

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INGREDIENTS: WATER, ETHYL ALCOHOL (FERMENTED FROM CORN SUGAR), CAPRYLYL/MYRISTYL GLUCOSIDE (PLANT-BASED CLEANSER), POTASSIUM SORBATE (PLANT-BASED PRESERVATIVE), ACETIC ACID (NATURAL BUFFERING AGENT), GLUCONIC ACID (PLANT-BASED BUFFERING AGENT), CITRUS GRANDIS (N.O.P. CERTIFIED ORGANIC GRAPEFRUIT) OIL, UMONENE (ORANGE) OIL, ROSMARINUS OFFICINALIS (ROSEMARY LEAF) OIL





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INGREDIENTS: WATER, ETHYL ALCOHOL (FERMENTED FROM CORN SUGAR), CAPRYLYL/ MYRISTM GLUCOSIDE (PLANT-BASED CLEANSER), SODIUM GLUCONATE (PLANT-BASED WATER-SOFTENER), SODIUM CITRATE (PLANT-BASED WATER-SOFTENER), POTASSIUM SORBATE (PLANT-BASED PRESERVATIVE), CITRIC ACID (PLANT-BASED PH REGULATOR), ALOE BARBADENSIS (ALOE) LEAF JUICE, EUCALYPTUS GLOBULUS (EUCALYPTUS) LEAF OIL, MENTHA ARVENSIS (WILD MINT) LEAF OIL, MELALEUCA ALTERNIFOLIA (TEA TREE) LEAF OIL


e carriers nemicals, caustics, ol Guaran most common allergens bleac X O L U ces. maidehv vrinated leibe Ĩ C seuo Detro 1 L ũ Ţ **>**の a

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Exhibit 1

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honest glass + windo[,] cleaner



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	Laundry Detergent	Shampoo + Body Wash	Hand Soap	Face + Body Lotion
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(Hypoallergenic	Natural • Non-Toxic • pH Balanced	Biodegradable	
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An allowed to the form	n - Anna I Barra An	C	Honest to Geodress	
			- 1	of 14

in this Discovery Set you'll find 5 essential family dems made with non-tester natural A safe indredients -

Exhibit 1







9/22/15, 12:56 PM

(HTTBS://WWW.HONEST.COM)

FREE TRIAL (HTTPS://WWW.HONEST.COM/ACCOUNT/SELECT-BUNDLE) ABOUT US (HTTPS://BLOG.HONEST.COM/ABOUT-US) SOCIAL GOODNESS (HTTPS://WWW.HONEST.COM/SOCIAL-GOODNESS)

 LIVING (/CATEGORY/LIVING)
 FOOD (/CATEGORY/FOOD)

 WELLNESS (/CATEGORY/WELLNESS)
 DESIGN + STYLE (/CATEGORY/DESIGN-STYLE)

 INSIDE HONEST (/CATEGORY/INSIDE-HONEST)



15 (https://blog.honest.com/what-is-phenoxyethanol/#disqus_thread) WELLNESS () WHAT IS PHENOXYETHANOL?



(https://blog.honest.com/wp-content/uploads/2013/04/phenoxyethanol-definition1.png)

This is part of our ongoing series helping consumers better understand chemicals, chemistry, and product formulations. We translate the science, bust the myths, and give you an honest assessment, so you can make informed choices for your family!

Ingredient: Phenoxyethanol

What it is: Phenoxyethanol can be found naturally in green tea, but the commercial ingredient is synthetically produced in a laboratory creating what's termed a "nature identical" chemical. Specifically, it's created by treating phenol with ethylene oxide in an alkaline medium which all reacts to form a pH-balanced ingredient.

What it does: Fights bacteria. Most personal care products are made with a lot of water and a variety of nutrients (consider all of the natural oils and botanicals in Honest products!) which makes an incredibly hospitable breeding ground for microorganisms. What's worse – the product might smell and look just fine, but be swarming with bacteria or fungi that are dangerous to your health. Effective preservatives are vital for ensuring safety!

Why we use it: We use phenoxyethanol in a very low concentration as a preservative in 5 of our products (Stain Remover, Multi-Surface Spray, Dish Soap, Hand Soap & Laundry Detergent) because the most accessible alternatives for these types of formulas include parabens and formaldehyde-releasing preservatives. Both are classes

What is Phenoxyethanol? - Ingred Casser on the Obdest Som Document 1-7 Filed 02/12/16 Page 2 of 5

9/22/15, 12:56 PM

of chemicals with demonstrable evidence of potential health risks, whereas phenoxyethanol is very safe at low levels. It's been tested on the skin and eyes and it is non-irritating and non-sensitizing at levels of 2.2% or lower while being effective at only 1% concentrations. The European Union and Japan both approve its use up to that 1% level and our formulas fall well below the recommendation at 0.5% or less (depending on the specific product).

Even better, phenoxyethanol doesn't react with other ingredients, air, or light. This kind of stability makes it an especially effective preservative.

What's more, it's included in the Handbook of Green Chemicals (http://books.google.com/books?

id=pKrBNbkE2c0C&pg=PR7&lpg=PR7&dq=handbook+of+green+chemicals&source=bl&ots=4DmRHxRpdl&sig=DIC8k5cC6DmxeapAx9q2mzbPwlg&hland is also Whole Foods Premium Body Care

(http://www.wholefoodsmarket.com/department/article/premium-body-care-standards) approved. And, their standards, developed by a team of scientists over the course of years, are some of the strictest available. If these two credible sources give it a thumbs-up, we do, too.

Why we're featuring it today: We regularly hear from customers concerned about this ingredient because there's quite a bit of online controversy about its safety. You'll find it being mentioned as everything from a developmental and reproductive toxicant to being linked to cancer. Fundamentally, it's poorly interpreted science.

Here's the real deal: Most of the studies that have found significant negative health impacts are based on full-strength or high-dose exposures. In real life usage, exposures are quite small. That's why it's approved at levels up to 1%. It's all about the final formulation.

Think of it like a cupcake recipe. You wouldn't want to eat a mouthful of salt, or raw egg, or flour, or probably any other ingredient that goes into a cupcake. (Not only would it taste disgusting, eating a bunch of salt or raw eggs could make you sick!) But mixed in just the right amounts, baked just the right way, a cupcake is divine. That's the magic of chemistry! Product formulations work the same way.

We'd like to point out a study that helped inform our decision to use it – a study conducted on pre-term newborn babies

(http://www.unboundmedicine.com/evidence/ub/citation/12183146/Use_of_2_2_phenoxyetha a phenoxyethanol-based antiseptic as the preferred, gentle formula that's quickly metabolized by even a premature baby's system.

Now, we're not trying to write-off our customers concerns about this ingredient – honestly, it's not perfect, but there are not many preservatives that are. Even alcohol can be harsh and has it's limitations.

Given all this, we recognize that phenoxyethanol isn't perfect, and we are actually already trying to find a replacement. It's the spirit of the company and our commitment to you, to always try to do better!

We certainly stand behind the safety of our products, but we know there's always room for improvement and we take all of our customers' feedback and concerns to heart.

Have any other questions or concerns about phenoxyethanol? We're happy to hear them and help you better understand this ingredient!

Learn more:

 International Journal of Toxicology Final Report on the Safety Assessment of Phenoxyethanol (http://ijt.sagepub.com/content/9/2/259.abstract) Search Honestly ...

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Password
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(http://၃/ศรากคาวิชียัตชี/ที่อีที่ธราใ.com/ABOUT-US/)



 CIR Safety Review: (http://www.cosmeticsinfo.org/ingredient_more_details.php? ingredient_id=516) The CIR Expert Panel reviewed safety data on Phenoxyethanol and noted that it was practically nontoxic via oral and dermal administration. (https://WWW/BSr/@WWW/BONESTGCOM/ABOUT-US/GIVING-BACK)

(http://w/www.gatalogian.com/share?	
u=https://beibtjp://beibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjbeibtjb	
is- is- is-	
phenox plathaxxplbjthaxxpld&haxl=W/ hat+is+Phenoxyethanol%3F+)	
15 Comments Honestly	🤨 Login 👻
Recommend 3 🔁 Share	Sort by Newest -



anohkos · 6 days ago

Join the discussion...

so you're basically saying having poison in our bodies is ok if it does not ecxeed 1% of any given product we use? Your articles are misleading and dangerous, please do the appropriate HONEST research!

A V · Reply · Share ·



Angela Henderson · 18 days ago

http://www.fda.gov/NewsEvents/...



Christina · 25 days ago

I like that you are trying to educate people about ingredients. I am not currently using any of your products but found your blog while doing research on phenoxyethanol and other possible allergens. I have been experiencing strange allergic reactions to something in the products that I am using. Out of the eight products sitting here on my desk that I am using everyday...5 of them contain phenoxyethanol. These are on my skin and in my hair everyday. 3 of them are from the same company and I purchased them thinking that they were more natural, organic, non-gmo and made with plant based ingredients therefore more healthy. Individually it would seem they are...but I am beginning to see that my exposure is much greater than I could have imagined. Wishing you all the best.



Erika Summers · a month ago

The issue is, many products contain it so it's not such a low does anymore. Just like 1 cupcake isn't so bad but a dozen is!

∧ ∨ · Reply · Share ·



none · a month ago

It is not found in green tea. This is a lie. It is a completely synthetic chemical. The Honest Co is not honest at all! I will not be purchasing your products. 1 < | < | < | Reply | Share | > |

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Summr 🖈 none 🔸 12 days ago

Wow. I'd like to suggest you do a little research (and investigate your sources) before making ignorant statements. Though I do concede it is becoming increasingly difficult to find truth and reputable info these days. Can't even trust the word "organic" anymore. However, phenoxyethanol is in fact found, naturally, in green tea. This company makes no claim they use plant based phenoxyethanol. That is made clear in the article. I for one appreciate there candor.

And no, I do not have any ties to this company nor have I ever purchased anything from them. Happened upon the article quite by accident, never been here before.

∧ | ∨ · Reply · Share ·

Ahmed · 3 months ago



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Tel:+18888628818)



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Citrate?

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OUT Story what you can expect

Honest

Go ahead, ask us anything. We'll tell all. While we really do try our best in all regards, if we make a mistake or can't live up to your expectations, we'll fess up and keep trying to do better, no matter what it takes.

Social Goodness

We believe in doing our part, and we are on a "mission to build healthier, safer families". In partnership with you, we are committed to making real change possible, and hope to inspire others to do the same. We hope you'll join us by taking part in our community, sharing our educational efforts, or purchasing one of our products, to help fuel our efforts for even a deeper impact.

Support

Parenthood got you feeling overwhelmed? We've been there (actually, still are) and we've got your back. From delivering our products direct to your doorstep on a reliable schedule, to making our services customizable and affordable, to providing educational and community-building opportunities – we're always here to help, no matter what.

Peace of Mind

Parents have more than enough to worry about. You can sleep easy (between night feedings) knowing our products are made with safer ingredients for your entire family. We love to do what we do and like to have fun, but we're serious about sustainability and our impact on the Earth.

Delightful Design

Do you dread diaper duty? Loathe laundry? We can't do it for you, but we can make doing it a little more enjoyable. We are operational ways and the second statement of the se

product design that's functiona durable – and also beautiful, fre Have a Question? We're here to help!

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Our Principles



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Exhibit 4



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smallest decisions can have big impacts - sometimes good, sometimes bad. We created The Honest Company to fulfill our big dreams, hoping we would make the right choices - following our hearts and consciences, with each detail and every decision - that would result in positive impacts (sounds kind of like parenting, right?).

Here are the standards we developed from that vision. Standards we regularly revisit and refine, because at our core we simply want to always try to be better.



Create a Culture of Honesty

We are serious about honesty - both as it applies to the integrity of our relationships and in being true to you. And, it's a standard we encourage throughout our staff, stakeholders, and customers. But, that's just the beginning. In all we do, we want to make each day a little more fulfilling, inspired, and downright better.

Make Beauty

Your home sets the stage for your life. We design our products that add to the beauty of your surroundings (instead of things you want to hide in drawers and under sinks). We like to play with rich colors, whimsical details, modern shapes, and multi-cultural inspirations.



Outperform

Modern families are busy and everything matters. That's why we craft products that will perform to the highest standards of effectiveness. Products that take care. Products that exceed expectations. Products guaranteed to not only satisfy, but also delight. We are relentless in the pursuit to be attentive to every detail.

Service Matters

We know exceptional service is important, and we intend to go above and beyond, and way over the top. We believe that a deeper level of trust can be built with incredible service. And knowing when to say "sorry", dedicate to making it right...all with a super big smile. Serving you better is also about listening and being open to dialogue - that's when we have the opportunity to learn the most (so thank you).

Sustain Life

We believe if you can make an amazing product without harming people or the planet, you should (and we do believe we can). We feel tremendous responsibility to this planet we call home. We are serious about being honest stewards of the natural environment and protectors of the (little) people. Therefore, we seek to inspire new solutions, reduce our collective impact, cause no unnecessary harm, and make products that are as non-toxic and healthy as possible. We take this very seriously, so please feel free to get an in-depth look about our Health & Sustainability Standards.



Be Accessible

We strive to make our products as affordable as possible. And what's more convenient than having it shipped right to your door? We want every family to have the opportunity to be a part

Our Principles | Find Out What Wealer 7.16Holes 2012 Document 1-11 Filed 02/12/16 Page 2 of 2

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of The Honest Company experience. Accessibility is a promise to openly listen to you & collaborate–so that with you, we can continually become better and always improve.



Pay it Forward

As parents, we teach our kids to be kind and respectful citizens and as a company, we feel it's just as important. We are committed to both individual and corporate social responsibility – taking selfless actions that benefit others. This includes charitable partnerships, working with advocates on promoting policy changes that better protect our children and planet, and supporting the efforts of our employees with paid community service days and direct matches of non-profit donations.



Fun!

We constantly seek ways to create it, have it, and share it as much as possible LOL !

Together we can make it better™.

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Jessica Alba | Founder

Jessica Alba is a Golden Globe-nominated actress whose career includes roles in films such as "Fantastic Four" and "Little Fockers," as well as television series like "Dark Angel," "The Office" and "Entourage."

The California native comes from modest beginnings, and never lost her zeal to share her good fortune with others. She is actively involved with charities such as Safer Chemicals Healthy Families, ONE, Habitat for Humanity, Project HOME and more.

But, there is one role she enjoys above all others: Mom. "Being a mom is the most profound experience I've ever had," she says.

As a mother of young daughters (4-year-old Honor and newborn Haven), Jessica admits she feels an intense responsibility to give her children the best possible start.

"When I became a mom, I finally became the person I am, that I always should have been," she says. "It's the most satisfying job in the world. But, it can also be overwhelming and confusing. I created The Honest Company to help moms and to give all children a better, safer start."



Christopher Gavigan has devoted his life to helping families nurture the healthiest, happiest babies and children.

"Parents get a lot of advice about what to feed their children and how to baby-proof their home," he says, "but many are still completely unaware of the toxic risks posed by everyday basics, like diapers, home cleaners, body washes, and laundry soaps. Yet, there's growing consensus that some chemicals used in these products are linked to chronic diseases like asthma, ADHD, and even cancer."

A father of 3 children, Christopher is the former CEO of Healthy Child Healthy World (a national nonprofit empowering parents to protect their children from toxic risks), author of a best-selling book , and instrumental in catapulting health message into millions of homes with a collaboration with WebMD.

"Everything I stand for and all I've done over the last 15 years has come to this moment," he says of The Honest Company. "I'm thrilled to launch a brand that offers some of the most thoughtfully designed, innovative, and safest products available."

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OUT STOTY what we're about



Get Started!

Once upon a time...

A dad named **Christopher** and a mom named **Jessica** found themselves utterly frustrated trying to find the perfect products for their babies and homes.

We both wanted an ideal: not only effective, but unquestionably safe, eco-friendly, beautiful, convenient, and affordable – everyone should have it. We believed every baby deserved the best we can create for them. We are dreamers.

But, more importantly, we are doers.

You know what they say, if you want it done right, you gotta do it yourself.

We tried to think of all the qualities we would want in a dream brand – savvy style, sustainability, and extraordinary service & convenience all wrapped in a passion for social goodness, tied with a bow of integrity and sprinkled with a little cheeky fun.

We knew it wouldn't be easy juggling all these demands, but we're parents, we're used to multi-tasking.

So, our goal is to relieve you of a few tasks by delivering the best family essentials to your doorstep – to simplify your life and bring more delight to every day. Our dream is to re-define the "family brand" and create something – with you – that's better for all families, everywhere.

Together we can make it better™.

ONES

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We believe the products people use should be safe and non-toxic (surprisingly, many companies don't!) not filled with questionable, risky, untested, or harsh ingredients. We also believe it's better to be safe than sorry when deciding what goes in our products and we're vigilant about the latest science regarding chemicals and health to ensure we're being mindfully cautious.

Based on these beliefs, we created our Honestly FREE Guarantee - a core commitment we make to you and your children. And, it's another way for us to be Honest - educating, empowering and inspiring people to make better choices for their health & families. Providing clear, credible, transparent information. No smoke and mirrors. No confusion.

What's it mean? In a nutshell:

You can rest easy knowing The Honest Company DOES NOT USE health-compromising chemicals or compounds.



We use a broader definition for toxicity.

While most manufacturers only assess toxicity through the lens of acute (immediate) impacts, our Honest approach also takes full consideration of potential chronic (long-term) impacts, exposure routes, unique windows of vulnerability, and a wide spectrum of potential health impacts including carcinogenicity, teratogenicity, allergenicity, neurotoxicity, and more. It's a lot more to consider and weigh, but we think our children are worth it. (Read all about what "nontoxic" means to us.)



We create meaningful lists.

Some companies play on consumers' fears by saying they don't use certain chemicals in their products — even if that type of product never contains it. (For example, some food brands label their chicken "hormone-free" and pop a premium price tag on it when the reality is that ALL chicken is hormone-free because the USDA banned the practice in the 1950s!) You can trust that the Honestly FREE Guarantee you find on each product is a meaningful list specific to that product. Each one is a unique and important list of questionable ingredients that are commonly found in similar products from other manufacturers - that we never use.



While each product has a unique guarantee, as a company we keep a master list of toxic offenders we'll never consider for use in anything. Period. We confirm, to the best of our knowledge, based on information from our raw material & packaging suppliers and manufacturing partners, that our products are

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Honestly FREE of: phthalates (DEHP, BBP, DBP, DMP, DEP); PVC; formaldehyde; alkylphenols; benzene; TEA (Triethanolamine); MEA (Monoethanolamine); parabens; phosphates; chlorine; chlorinated or brominated solvents; ceteareth 20; polyethylene glycol (PEG); resorcinol; bronopol; quaternium 15; nanoparticles; triclosan; sulfur oxides;

organohalides; hexavalent chromium; DMDM hydantoin; organophosphate pesticides; 1,4 - dioxane; SLS/SLES (sodium lauryl/laureth sulfates); optical brighteners; mineral oil; petrolatum; BPA (bisphenol-A); a-chlorotoluene

This is just the short list of hundreds of risky chemicals that many conventional manufacturers use, and we've opted NOT to. And our list is always growing.

The only exception to this claim (to be perfectly transparent and honest) is that we cannot account for background contamination or cross-contamination. For example, most soils naturally contain trace amounts of arsenic which can then end up in plants grown in the soil. This is standard for all products, no matter who the manufacturer is, but we do our best to proactively find the purest, most unadulterated ingredients and all natural sources.



We stand behind the safety of our products, but that doesn't stop us from trying to do better. Every. Single. Day.

You can rest assured that we're doing our very best to understand every nuance of the complex world of toxicology. We're hyper-attentive to staying abreast of the latest science, actively consulting our medical advisory panel, conducting chemical safety profiling, referring to green chemistry reports, adapting to new international standards, and examining credible lists of unacceptable ingredients (like the International Chemical Secretariat's Substitute It Now list). And should any new regulations, studies, or real risks become apparent and concerning to us or our community, we quickly assess the data, modify our approach, and immediately update our formulation (that's how we roll)!

If you ever have a question, we're happy to answer it. And, if you ever have a recommendation, we're grateful to hear it.

Together we can make it better [™]!

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need for successful adulthood.

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DEBORAH FRANK Certified Nurse Midwife

Deborah Frank is a certified nurse-midwife and the first CNM to be granted practice privileges at UCLA, Cedars-Sinai Medical...





The Honest Company has ambitious social impact goals, aiming to transform early learning environments

where children spend the majority of their time and ensure youth have the education and training they

To support these goals, The Honest Company has assembled a Scientific & Medical Advisor Board,

philanthropic and social responsibility vision, provide ongoing guidance for this strategy, and most

importantly, foster network building and dialogue that will strengthen the childcare field as a whole.

bringing together thought leaders on the health and safety of children to advise and inform our

scientific & medical advisory board

DR. CARA NATTERSON Pediatrician and author of Worry Proof

Dr. Cara Natterson, a graduate of Harvard University and the Johns Hopkins School of Medicine, is a respected pediatrician and the...





DR. RICKI POLLYCOVE OBGYN and Board of Trustees American Society of Breast Diseases

Ricki Pollycove is a board certified OBGYN, with a practice focused on comprehensive, integrative gynecology with a focus...

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DR. THALIA FARSHCHIAN Naturopathic Doctor, National College of Natural Medicine

Dr. Thalia Farshchian is a licensed naturopathic doctor educated at the National College of Natural Medicine in Portland, OR...



DR. ASA BRADMAN Associate Director of Exposure Assessment of the Center for Environmental Research and Childen's Health at UC Berkley School of Public Health

Dr. Asa Bradman is an environmental health scientist and expert in exposure assessment and epidemiology



JESSICA DONZE BLACK RD, MPH, Clinical Dietitian at the Washington Center for Weight Management and Research

Jessica Donze Black RD, MPH is a child nutrition expert with nearly twenty years of experience in clinical, community and policy...

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3 (https://blog.honest.com/caprylyl-glycol/#disqus_thread) WELLNESS () WHAT IS CAPRYLYL GLYCOL?



(https://blog.honest.com/wp-content/uploads/2013/12/Caprylyl-glycol-definition1.jpg)

This is part of our ongoing series helping consumers better understand chemicals, chemistry, and product formulations. We translate the science, bust the myths, and give you an honest assessment, so you can make informed choices for your family!

Ingredient: Caprylyl Glycol

What it is: Caprylyl glycol is an alcohol derived from caprylic acid—a natural fatty acid found in the milk of some mammals, as well as palm and coconut oils. Ours is synthetically made, but nature-identical.

THE HONEST BLOG

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What it does: Caprylyl glycol is an effective conditioner and moisturizer that also DISCLAIMER: Content on this site is not a substitute for professional medical or healthcare advice, diagnosis, treatment, dietary, or safety advice, nohelps: threase the shelfs in ways product advice regain to the safety advice of the site is at your own risk. This site contains the opinions advice, and does not represent the opinions and views of The Honest Company. Given the interactive nature of this site, we cannot endorse guarantee, or responsible for the accuracy or efficacy of any content generated by our users or bloggers.

Why we use it: Not only is this multitasking antimicrobial conditioning agent plant-TERMS OF USE (HTTP:///WWW/HOWEST.COM/TERMS)/ PRIVACY POLICY (HTTP:///WWW.HOWEST.COM/PRIVACY)

Care approved (http://www.wholefoodsmarket.com/department/article/whole-bodyquality-standards). And their standards, developed by a team of scientists over the course of years, are some of the strictest available. If they give it a thumbs-up, we do too.

Why we're featuring it today: Many sites and sources tout the crimes of glycols and warn consumers to avoid them. They're irritating. They're harmful to your skin. They're found in antifreeze! Clearly, with those types of accusations people often ask us why we'd use caprylyl glycol. But here's the deal: Glycols are a broad class of chemicals and they are not created equal.

"Glycol" simply means that the chemical structure of the ingredient contains two hydroxyl groups (made up of oxygen and hydrogen). As you can guess from that broad of a definition, this class of chemicals includes tons of compounds: propylene glycol, polyethylene glycol, butylene glycol, diethylene glycol, ethylene glycol (the notorious antifreeze ingredient), and more.

Caprylyl glycol is just one of many glycols and, while some may be nasty and undesirable in body care products, this one is not. The Cosmetic Ingredient Review (CIR) Expert Panel (http://ijt.sagepub.com/content/31/5_suppl/147S.short) reviewed all available data just last year and assessed this ingredient as safe as currently used. It also gets the aforementioned seal of approval from the scientists at Whole Foods, which makes this ingredient as good as gold in our book.

Have any other questions about caprylyl glycol? Let us know in the comments and we'll do our best to respond!

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Lisa Waite Mua · 2 months ago

After alot of reactions over the years i have finally found out that this is the culprut. It makes my skin burn really bad

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Christy Keaton · 3 months ago

I am allergic to propylene glycol and was just trying to figure out if I would have the same reaction to caprylil glycol.

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BuckeyeBabye1 · a year ago

I came across this article when I did a Google search for "caprylyl glycol vs propylene glycol", because my 13 month old son has severe diaper rash (not bleeding but almost blistery, and he's only ever had mild diaper rash while teething) and I read an article on WebMD (http://www.webmd.com/children/... that says not to use wipes "with alcohol or propylene glycol ... while diaper rash is present [because they] may burn the skin and spread bacteria."

While I haven't used your wipes yet (though I keep hearing wonderful things about your company and intend to buy some in the near future), we've been using Huggies Natural Care wipes for a few months and they contain caprylyl glycol just like yours. My question is even though it appears to be the better and more natural version, does caprylyl glycol irritate severe diaper rash like regular alcohol or propylene glycol would?

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http://wayback.archive.org/web/20150318073138/http://blog.honest.com/what-toe2001-toWebATT-Deg/#8sgNONaJOXIC" REALLY MEAN?

With increasing awareness about the toxicity of products, you'll find the term "nontoxic" on more products than ever before. On one hand, this is a stunning success on the part of all the advocates who have fought for product safety for the past generation. Go team! On the other hand, without standardized regulations for the term, it's hard for the average consumer to understand what it means and when it's simply greenwashing.



(/web/20150318073138/http://blog.honest.com/wp-content/uploads/2013/03/What-Does-Non-Toxic-Mean-to-Honest1.png)

Allow us to try to make some sense of the situation.

First of all, let's look at the most basic definition of "non-toxic" (and it's probably exactly what you'd assume). Simply put, "non-toxic" means something will not cause harm to health or the environment.

Sounds pretty straightforward, right? Well, it's not. When it comes to the real life application of the word, it's not quite so black and white because, technically speaking, all things can cause harm at some level — even water.

As the 16th century toxicologist Paracelsius said, "All substances are poisons; there is none which is not a poison. The right dose differentiates a poison and a remedy."

The dose (or exposure level) of a chemical is where things start to get really tricky. Some things, like Vitamin D, are necessary for good health but can be fatal in high doses. Others, as scientists only recently learned

(/web/20150318073138/http://www.nature.com/news/toxicology-the-learning-curve-1.11644), pose higher risks at lower doses (as in the case of hormone disruptors). Add in the fact that all the chemicals we are exposed are constantly interacting with each other and potentially turning into new chemicals or creating byproducts and you have quite a complicated mess—called life.

Yes, it's true. All of life is made of chemicals (water is a chemical) and since the dawn of time, they've all been interacting and doing wonderful and sometimes horrible things. Humans have added tens of thousands more into the mix in the past few generations and that's complicating things even more, but the essential facts don't change. And, the fact is, nothing is completely non-toxic.

Now that you have a basic understanding of what "non-toxic" means (or doesn't mean) as it relates to the science of toxicology, what do you think it means in regards to product labels and marketing?

Not much. Currently, as it applies to products and labeling, "non-toxic" is not a regulated or universally defined claim.

According to Consumer Reports' Eco-Label Guide (/web/20150318073138/http://www.greenerchoices.org/eco-labels/label.cfm? LabelID=131&searchType=Label&searchValue=nontoxic&refpage=labelSearch&refgstr=label%3Dnon%252Dtoxic):

"Non-toxic" is not meaningful and can be misleading. There is no definition or standard used for judging whether a consumer product or its ingredients are "non-toxic," and no assurance that such a claim has been independently verified. A product that does not meet the definition of "toxic" according to the Consumer Product Safety Commission should not necessarily be considered non-toxic.

Essentially, manufacturers get to individually define what they mean by "non-toxic" long as their product isn't acutely toxic as defined by government regulations). An they don't necessarily need to tell you how they define it.

We're happy to tell you!

We define "non-toxic" as chemicals that are generally safer for humans and the environment. While most manufacturers' assessments of toxicity only take acute impacts into consideration, we also assess chronic impacts, exposure routes, uniq windows of vulnerability, and a wide spectrum of potential health impacts including carcinogenicity, teratogenicity, allergenicity, neurotoxicity, and more.

We know that perfection is impossible, but that doesn't stop us from trying to do better. Every. Single. Day. You can rest assured that we're doing our very best to understand every nuance of the complex world of toxicology. If you ever have a question, we're happy to answer it. And, if you ever have a recommendation, we're grateful to hear it.

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