



VIA EMAIL AND U.S. MAIL

March 20, 2024

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.
P.O. Box 927
Madison, CT 06443
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Re: Earnings Claims - Tupperware

Dear Ms. Smith,

Tupperware U.S., Inc. (“Tupperware” or the “Company”) is in receipt of your letter dated February 14, 2024 (the “Letter”). Thank you for the opportunity to respond and provide our findings with respect to the content of the Letter.

The Letter references a list of 25 online posts that Truth in Advertising, Inc. (“TINA”) has identified as “inappropriate income claims.” We have reviewed the posts at issue and, in summary, we found the following:

1. 75% of the listed posts (19 out of 25 posts) were from 2021 or earlier and from pages and channels no longer used.
2. Of the six more recent (2022-2024) listed posts:
 - a. Five of the six were posts made by independent sales consultants and one was made by the Company.
 - b. One from 2023 was from an independent consultant in Namibia, who was not directing the post to US citizens. We will bring the post to our colleagues’ attention for their determination as to whether this is in accordance with Namibian law. Our sales force is organized by region and a Namibian sales force consultant is not authorized to sell Tupperware® products in the US.
 - c. One post from 2023 had already been addressed by the relevant independent consultant and/or her regional sales leader from Tupperware and is no longer published.
 - d. With respect to two of the posts, we will recommend the relevant independent consultants clarify or delete the posts and we will provide them with context and guidance with respect to any future posts.
 - e. We did not find the one Company post from 2023 to be in violation of the letter or spirit of applicable law.

3. For the 19 earlier (2018-2021) posts:
 - a. We have found it more reasonable to remove the old posts than to analyze and potentially clarify them, as:
 - i. They are outdated posts that were not created with reference to current FTC, DSA, Company and other applicable guidelines.
 - ii. They are posts that are no longer intended to be referenced by anyone.
 - iii. They are posts created under a prior Tupperware team, both from a corporate and sales force perspective, so they do not offer a particularly meaningful training opportunity.
 - b. Four of these 19 posts were on an old company blog that we have since redirected to Tupperware.com.
 - c. Seven of these posts were on the Company's historical YouTube channel archive. We have since set the audience for these posts to "private" and they are now accessible only to Tupperware administrators for archival purposes.

Tupperware is committed to integrity and honesty in all its dealings. Our agreements with independent consultants underscore this commitment and make clear that any sales of Tupperware® products must be made in accordance with all applicable laws, including those relating to truth in earnings and income claims. While we understand that with a large population of independent consultants and high turnover in the Company, inadvertent lapses may happen, we do our best to address any such lapses promptly in order to maintain our commitments, remain in compliance with all applicable laws and uphold the outstanding reputation of our brand.

Thank you for helping us to address any concerns and for your commitment to upholding rigorous standards in the direct selling community.

Very truly yours,



Melanie Rheinecker

VP of Law, Americas Markets

cc: Karen Sheehan, Chief Legal Officer, Tupperware Brands Corporation
Joseph Mariano, President/CEO, DSA/DSEF
Peter Marinello, Vice President, Direct Selling Self-Regulatory Council
Pieter Swanepoel, Senior Vice President & Regional Director, US/CA, Tupperware