	MOUKA LIMITED PRODUCT RECALL POLICY	**ML/QA/P/005**
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INTRODUCTION

The purpose of this document is to outline the approach and methodology to be followed in the event of a Product recall.

PRODUCT RECALL

Mouka Limited has in place a Product Development Process which deals with the complete product conversion process from inception through to product release. As a supporting mechanism, it is necessary to have a product recall process and a committee capable of functioning in a co-ordinated and efficient manner in the event of an emergency Product recall.

This process will allow the Company to remove quickly and effectively from the marketplace any product that does not comply with our own internal standards, or with government regulations or products which for any other reason are required to be removed from the trade.

Set out hereunder are the Procedures, information and guidance which will assist in effectively managing any product recall situation.

1. REASONS FOR PRODUCT RECALL

An incident leading to the need to withdraw product from the market or from distribution can be activated by:

a) A claim or threat of contamination with or without extortion;
b) A customer complaint;
c) A problem encountered within distribution;
d) A problem found within manufacturing process or design.
e) Problems found with any of the raw or packing materials used.
f) Product expiration.

The extent of recall and the steps to be taken depend on the severity of the situation.

The following classification is related to the degree of health hazard presented by the product being recalled.

1.1 Emergency Situation (Class 1)

Product is suspected or known to cause injury:

Examples are:

- The suspected contamination by poison.
- Infestation
- The suspected presence of foreign material of a nature which could cause injury

In an emergency situation, product recall will be right down to the level of the consumer. A public warning will be necessary, in addition to notifying the trade and relevant government/regulatory authorities.

This situation is classified as a Class I Recall.

In an emergency situation, the Product Recall Team will be assembled and the full provision of the Product Recall procedures will come in to play.

1.2 Priority Situation (Class 2)

Product suspected as a potential minor risk to the health of the consumer

Examples are:

- Suspected contamination with non-dangerous substances
- Suspected foreign material of a particular nature that is no danger to life or risk of injury

Recall must be aimed at all bulk stocks - depot, wholesalers and retailers. Depending on the level of distribution of the affected product, a further decision should be made about consumer stocks.

Issuing of a public notice may be unlikely.

The situation is classified as a Class 2 Recall

In a priority situation the Chief Commercial Officer (CCO) will call for the Filled Recall Form from the Coordinator of the Recall Team. The need for Recall will be ratified by the Executive Management and the Recall Committee will be notified to activate recall.

1.3 Commercial Situations (Class 3)

This applies when there is neither danger to life nor any likelihood of causing injury.

Examples are:

- Legal reasons such as endorsement propaganda or disagreement
- Obvious wrong dimensions, weight or labelling.
- Faults of offensive odour or stain.
- Appearance or physical damage.
- Brand damage.
- Over-age stock or obvious signs of deterioration.

A market withdrawal in this situation will be confined to bulk stocks in general, and will not include the consumer or many small retailers.

No public notice will be issued.

This situation is classified as a Class 3 Recall.

In a commercial situation the normal Quality Assurance procedures should be adequate to deal with the problem. All interested Company functions should be informed, and the Product Recall Coordinator should be briefed.

DESCRIPTION OF CLASS	ASSESSMENT/ LIKELIHOOD	REQUIRE ACTION	TIMELINE	CODE
CLASS 1 Severe negative impact on health that could lead to injuries or death on usage or consumption.	Distribution of fake products, Use of counterfeit or poisonous substances.	Volume is significant (>500,) – set up Recall Committee, seek legal advice. **Activate recall – bulk and user ends.** Rework, Replace or make required Refund.	Maximum of 30 Days from all traceable Consumers to Distributors and MSG. Maximum of 14 Days from all affected Distributors to Depots / Plants.	
CLASS 2 Violation of significant Regulatory requirement.	Distribution of banned items. Items that are not supposed to be imported, significant deviation from standards. Infestation, offensive odor.	Volume is significant (>500) – set up Recall Committee, seek legal advice. **Recall only bulk stock.** Rework, Replace or make required Refund.	Maximum of 30 Days from all traceable Consumers to Distributors and MSG. Maximum of 14 Days from all affected Distributors to Depots / Plants.	
CLASS 3 Deviation from finishing impression or slight deviation from standards.	Brand misrepresentation, Label placement, wrong product identification, wrong dimension, wrong fabric	Volume is significant (>500) – QC team recall bulk only. Volume is not significant (<200), quarantine stock and rework Products. **Warranty provision will suffice for treatment**	Maximum of 14 Days from all affected Distributors and MSG to Depots / Plants.	

2. **DECIDING RECALL LEVEL**

As much information as possible needs to be gathered about the situation. This should include:

a. Nature of problems - when and how discovered.
b. Suspicion of alleged injury or death that may have occurred; health hazard evaluation and risk assessment.
c. Recall steps in progress, if any, e.g. product hold at warehouse level.
d. Product involved, sizes and manufacturing location.
e. Total production (Invoices, Codes, batches).
f. Quality control and related production information (collect significant records).
g. Quantity shipped and location (Depots, Plants, Regional and National).
h. Legal, regulatory, public relations, insurance or financial implications and impact on principals.
i. Corrective or preventive actions and additional investigations in progress or planned.
j. Cost of goods and salvage possibilities.

A decision on the level of product recall will be taken by the Product Recall Committee Coordinator or his / her deputy / designate should be advised immediately.

In an emergency and priority situations, Mouka Executive Committee should be advised immediately.

The actual recovery of suspect stock is the responsibility of the Product Recall Team under the control of the Chief Commercial Officer.

3. SPECIFIC PRODUCT RECALL RESPONSIBILITIES

3.1 Recall Co-ordinator

In a recall situation, the coordinator will:

a. Be the focal point for all information, whether generated internally or externally.
b. Establish a "command post" as rapidly as possible.
c. Maintain a central log of all events/actions taken and all communications, both internal and external. Clerical support is essential to collect and collate recall information and to ensure it is kept up to date on an hourly basis.
d. Issue frequent status reports to the CCO.

3.2 Head Purchasing

The Head, Purchasing must represent and co-ordinate recall situations through the entire distribution chain for Unfinished Products and Raw Materials.

These responsibilities include:

a. Cessation of shipment of all suspect products.
b. The identification and embargo of all suspect product in transit.
c. Impounding and segregating suspect product at distribution and warehouse facilities to prevent accidental shipment.
d. Tracing suspect product through the coding system used on individual containers and other cases.
e. Establishing collection points and avoiding possible mix-up between good and recalled product.
f. Receiving recalled product from outside locations and holding in a warehouse in a clearly demarcated area.
g. Ensuring reliable and rapid communications with all Regional Sales Managers to facilitate recovery of suspect product.
h. Identifying Suppliers of suspect product and advising team accordingly.
i. Implementing the destruction of suspect product, if instructed by the Product Recall Coordinator.
j. Maintaining an account of costs.

3.3 National Customer Service Manager

The primary responsibility of the Company in an emergency recall is to remove product from the trade as quickly as possible. The NCSM and Regional Business Managers are responsible for the recovery of suspect products from distribution, Depots and retail channels not within the Company's control. A representative of Sales will be permanently appointed to the Product Recall Team with responsibility to co-ordinate this function. These functions include:

a. Organising the removal of suspect product off retail customer shops as rapidly as possible. (Through the operation of the product recall team all the required information on product assessment, extent of the recall, order numbers, customer lists, codes, cases, shipping dates, shipping information and location of the product will be available.)

b. If suspect product must be recalled from customers, the provision by Distribution of customer shipment listings.
c. Requiring regional sales personnel or agents to implement to the removal of product at local level. (Clear information must be provided on the coding of product to be recalled and sales/local representative provided with the facilities to identify these codes).
d. Organising temporary help, as the scale and urgency of the recall demands.
e. Maintaining a list of temporary personnel agencies for ready mobilisation, which can, in extreme cases, provide assistance for the rapid recall by region/sales territory. (e.g. Rent-a-Student)
f. Ensuring excellent communication between the collection of suspect product by Sales with the Distribution organisation responsible for receiving and segregating suspect product.
g. Maintaining a file on all customers affected by the recall. (Establish forms for recording dispersion, identification of suspect product, reimbursement and costs).
h. Providing accurate accounting for the reimbursement (cash or credit) of all recalled product in accordance with established Company procedures.
i. Protecting shelf space by instituting replacement orders.
j. Maintaining a record of all key customers and names of contacts with whom all enquiries will be made in the event of a recall.
k. Establishing key customers own product recall policies.

3.4 **R&D/Quality Assurance Manager**

The R&D/ Quality Assurance Manager will have responsibility for technical information and advice for the product recall team.

Responsibilities are:

a. To provide all necessary technical support services through the Company's own resources, or through reliable and experienced external consultants.
b. To document procedures for the collection of samples, including specific requirements for samples subject to forensic examination. These procedures should cover:
c. Persons responsible for handling the samples.
d. Specific requirements, e.g. gloves to handle samples.
e. To ensure the availability of special analytical resources R & D to provide an immediate screening for poisons, harmful micro-organisms and other possible dangerous contaminants.
f. Carryout necessary laboratory tests.
g. To Investigate and advise on the possibility of salvaging the recalled product.

4. **COMMUNICATIONS**

4.1 **Contact**

The key to a successful product recall is prompt action and communication.

The product recall procedures must include a communications system identifying which will be managed by the Distribution Manager

a. The names, titles and day and night telephone numbers of all key personnel and alternates who have responsibilities in the event of a product recall.
b. Persons who must be informed immediately to implement the product recall procedures.
c. Instructions and directions for the use of e-mail, communication apps, product pick-up services, air express or other communication systems when information or samples need to be transmitted quickly.

4.2 **Logging Actions and Events**

All personnel involved in a recall, particularly if illness or injury is involved, should maintain a complete log of events. This should include recording of telephone calls. (Check list to be established for telephonists.)
The reasons for recalls can often lead to legal action. These logs must be delivered to the Recall Co-ordinator at the end of the action. No copies shall be made.

4.3 **Confidentiality**

All communications issued from the Recall Co-ordinator's office will be treated as strictly confidential and will only be sent to those individuals having a "need to know".

4.4 **Government/Regulatory Agencies**

Once the Product Recall Team decides that a product recall is necessary, then the relevant Government Department/Regulatory Agency must be notified. All contacts with the Government/Regulatory agency shall be made through appropriated member of the committee.

This person is to be nominated by the Product Recall Coordinator.

The Company can expect the Government/Regulatory agency to take actions and the Recall Co-ordinator should alert members of the team to be prepared.

Such actions may include:

a. Investigation of the facts, collection of samples for laboratory analysis, visits to production facilities and warehouse, etc.
b. Evaluation of our findings and classification of the recall.
c. Evaluation of the recall procedure to recover product to appropriate level.
d. Public notice.
e. Assistance to the Company in the recall.
f. Monitoring the product recovery and effectiveness thereof.
g. Monitoring the stock of recalled product.
h. Regulatory actions such as seizure, injunction, embargo and prosecution.

5. INTER-COMPANY DISTRIBUTION

All relevant resources and records of ML shall be made available to facilitate the recall.

If a product recall is implemented for a product which was produced by or for the Company, it shall be the responsibility of the Company to recover same.

The Head, Purchasing must ensure that all imported or outsourced brands must have specifications in the Company format. These specifications require the names and home telephone numbers of key management in the producing company.

6. MOCK RECALL

A mock recall shall be conducted once in two years by the Recall Co-ordinator.

The exercise should be conducted as if it were a real recall to confirm that the system and its inter-related components are in readiness. As a minimum, a mock recall should test the plant traceability system and product location at one distribution centre, the ability to handle internal and external communication, recovery of product and to correct the situation and replace effected stock.

A final report should be issued by the Product Recall Co-ordinator evaluating the state of readiness, efficiency and accuracy of the recall exercise, and any recommendation for procedural changes or improvements.

8. PRODUCT TRACING

Product cannot be effectively tracked and removed from the distribution chain or the market unless it can be adequately identified. The following routine controls are vitally important in the event of a recall.

Traceability Points

1. Finished Product – Outer Packaging Details and Information
2. Work-In-Progress Product – WIP Stamp codes
3. BOM & Formulations
4. Raw Material Sources and information

8.1 Package Codes / Identification

a. All brands marketed by the Company should be coded, both on the individual package and the outer case, to indicate the "Production Date" Plant of Production.

b. Such codes, when available, must be recorded in the Invoice or Plant Data books documents/waybill (where possible).

c. As a policy, the Company should move towards an open form of coding for all brands which is best suited to facilitate recall in an emergency situation.

d. Package codes must be related to processing records so that any product, which needs to be retrieved can be identified quickly and completely.

e. Products and packaging identified for Recall shall be duly tagged/marked as follows – **RED** for Class 1, **AMBER** for Class 2 and **BLUE** for Class 3.

8.2 Raw Materials /Processing Aids

All Raw Materials and processing aids must be:

Identified with the name of the supplier and allocated a lot number relating to source, origin and order which is registered in the Company records and is traceable through to the final product in the market place.

8.3 Specifications

All Raw Materials and processing aids must have accurate and up to date specifications. These must be reviewed at regular intervals of no longer than one year.

8.4 **Approved Suppliers**

- Suppliers' lists must be maintained and Raw materials and processing aids purchased only from approved suppliers.
- The Head Purchasing must maintain the names of the General Manager, Production Manager and Quality Assurance Manager of each of the companies from which Raw Materials and processing aids are purchased.

There is an over-riding tracing requirement to be able to identify for any product placed on the market and the history of this product in relation to specific Raw Materials or processing aids.

All records should be computerised to facilitate an efficient tracing system.

8.5 **Customers**

The CCO should ensure that up-to-date lists of Distributors, Institutional Outlets, MSG, and major retailers stocking Company brands are available at all times. This should include the names and telephone numbers of contact personnel in these organisations.

9. PRODUCT RECALL UPDATE

This manual will be regularly reviewed and kept up to date. The review period will not be greater than 36 months.

The R&D/QA Manager has responsibility to initiate review with inputs of the entire Recall Team and shall be duly vetted by Executive Management and approved accordingly.

10. POST-INCIDENT AUDIT

Post-incident audits of costs and implications are to be done in respect of material incidents.

MOUKA LIMITED SPECIFICATION FOR CODING ON PACKAGING CONTAINERS, CANS AND INDIVIDUAL PACKAGE

Each unit will show the Product Name, Production Date, on the label or on the package itself. An easily legible numerical code is preferred (see ML Generic Data Coding and Packaging Specification).

PRODUCT RECALL COMMITTEE

1. National Customer Service Manager (Coordinator)
2. Head, Purchasing
3. Senior Marketing Manager
4. R&D/QA Manager
5. Relevant Regional Business Manager
6. Security Manager
7. Distribution Manager
8. Legal Unit

RECALL FLOW CHART

Notify CCO to engage Executive Management

- **National Customer Service Manager - 24Hrs after confirming Complaints**

Assemble the Recall Management Team

[RD/QA Manager, Snr Marketing Manager, Head Purchasing, Regional Business Manager, Legal Unit, Security Manager / Other Health Agencies

- **Natioanl Customer Service Manager - 24hrs after executive order**

Identify all Products to be recalled and evaluate reports and complaints.

- 84hrs after complainst have been revalidated

Segregate and Direct Quarrantine at Plants and Depots.

- 24hrs after confirming Complaints

Prepare the Press Release (if required). Prepare Return and Recal Routes and guidelines.

- 48hrs after executive orders

Prepare Activity, Manning and Resposibility List with timelines.

- 48hrs after executive orders

Prepare and distribute the Notice of Recall

- 48hrs after Executive orders

Execute Recall

- 84hrs to last for a maximum of 30 Days after executive otrders

Control the recalled product(s)

Decide what to do with the recalled product(s)

Fix the cause of the recall if the problem is an internal manufacaturing / Processing defect.

Return, Replace or Refund accordginly. Evalute cost and efetciovenss of Recall. Prepare and Send Managemegt Report