

## PRODUCT RECALL PROGRAM

### Introduction

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La Sentinelle Group is dedicated to manufacturing the highest quality products possible. We take care to ensure that only best quality products leave the premises. In the event that a product does get shipped out which is of questionable quality, the recall program, as outlined in this manual, will be put into action.

Product recall is indicated when a product we manufacture could represent a hazard to the consumer. Our recall program will effectively remove that product from circulation.

All products manufactured at La Sentinelle Group have a specific job number attached to them which links to various information such as production date and raw materials used. In the event of a problem with any product, we will contact all our customers who received the product by phone and have the product returned.

In the case of a very serious health hazard we will issue a public warning via the news media, either on a local or regional basis to ensure the public safety.

### Aim

The main objectives of this recall plan are:

1. Stop the production and distribution of the affected hazardous product.
2. Effectively notify Management, customers and concerned persons for the recall.
3. Remove the affected product from the warehouse and/or distribution areas.
4. Dispose of the affected product.
5. Implement a corrective action plan to prevent another incident.
6. Upon completion of the recall, management will conduct a post recall meeting to evaluate the recall.

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### Scope

A recall is conducted to protect public health and safety. A withdrawal is generally undertaken for quality purposes or as a precautionary measure before an official recall. This Manual outlines the process for both a recall and a withdrawal.

### Recall Procedures

The recall procedure outlines the activities that La Sentinelle Group will take to manage the recall of our product(s) which has/have been determined to be unsafe.

The procedure contains the major recall elements below:

- Assignment of Roles and Responsibilities
- Evaluation of the Complaint or Condition
- Identification of Implicated Products
- Notification of Affected Parties
- Removal of Affected Products

### Assignment of Roles and Responsibilities

#### Recall Coordinator ( Jennifer IP )

The recall co-coordinator has been given authority by the management of La Sentinelle Group to execute the activities of the recall. Responsibilities of the Recall Coordinator include, but are not limited to:

- Assure the documentation of all recall decisions and actions in a master recall file.
- Initiate the formation of the recall committee.
- Activate various components within the company for priority assistance.
- Make recall decisions on behalf of La Sentinelle Group.
- Manage and coordinate the implementation of the company's product recall.
- Keep management informed at all stages of the recall.

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### Recall Committee

La Sentinelle Group Product Recall Committee is composed of the various components of the company's organization. The following functions are represented on the committee (an individual may be responsible for more than one function):

- Management
- Sales and Marketing
- Planning Department
- Printing Department
- Finishing Department
- Store and Delivery

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### Assigned Responsibilities

#### **Assignment**

1. Management of the Recall – Mohamed Owadally Business Unit Manager is responsible for the coordination of all recall activities.
2. Assemble the Recall Committee – Mohamed Owadally Business Unit Manager is responsible for communicating the decision to recall to the members of the Recall Committee and that each member knows their responsibilities.

#### **Evaluation**

1. Management Approval of the Recall – Areff Salauroo Quality Manager is responsible to decide if the recall should go forward.

#### **Identification**

1. Create a Product Recall Log – Mohamed Owadally Business Unit Manager is responsible to create and maintain a product recall log to document all events, when they occur and the company's response to each.
2. Identify all Products to be recalled – Mohamed Owadally Business Unit Manager is responsible for identifying all products which need to be recalled.

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### Notification

1. Prepare the Distribution List – Head of Store Department is responsible for preparing the recalled product distribution list.
2. Notification to concerned client – Mohamed Owadally Business Unit Manager is responsible for notifying client of concerned outlets and quantity involved.

### Removal

1. Detain and Segregate all Products to be Recalled which are in La Sentinelle Group store – Head of Store Department is responsible to ensure that all products to be recalled in La Sentinelle Group Store are not distributed.
2. Decide what to do with the recalled product(s) – Areff Salauroo Quality Manager is responsible for determining the action to be taken on the recalled product (destruction, reworking, and redirection).

### Evaluation of the Complaint or Condition

Complaint receipt, processing, and evaluation are the first steps in the recall process. The steps involved in the evaluation process are:

1. Receive the complaint – A file is maintained containing any product complaints the company receives.  
The file includes the following information.
  - i. Complainant contact information
  - ii. Reported problem with the product
  - iii. Product Identification

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- iv. Product Storage
  - v. Product purchase date and location
  - vi. Illness and Injury details
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2. Provide the complaint to Mohamed Owadally Business Unit Manager for initial evaluation. If an initial assessment indicates a recall may be necessary, the Recall Coordinator assembles the Recall Committee for a full evaluation.
  3. Determine the hazard and evaluate the safety concerns with the product.
  4. Determine the product removal strategy appropriate to the threat and location.
  5. Contact the appropriate regulatory authorities.
  6. Alert legal counsel, insurance, etc. as appropriate.
  7. Maintain a log of the events of the recall including information such as dates, actions, communication, and decisions.

### Identification of Implicated Products

It is La Sentinelle Group responsibility to ensure the identification of all products and quantities of products implicated in the recall. In addition, determination should be made if any products handled by the company are affected.

A distribution list is prepared as part of the Identification process.

The distribution includes the following information:

- Product Name
- Total quantity manufactured
- Delivery dates
- Total quantity delivered
- Total quantity stored
- Account addresses ( Outlets )
- Client names

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### Notification of Affected Parties

Notifications to concerned client during a recall will be done in a timely manner through appropriate means (telephone, fax, email, letter, etc.).

Relevant documents (Distribution List) will be provided.

### Removal of Affected Product

The procedure for product removal can be divided into five components including: removal, control, and disposition of affected product, recall effectiveness, and recall termination.

#### Removal

- All reasonable efforts must be made to remove affected products from production, storage and collection of distributed product.
- All affected product returned will be clearly marked and stored in an area that is separated from any other food products.

#### Control of Recalled Product

- All recalled products quantities will be counter verified to ensure right product and quantity have been returned.

#### Product Disposition

- Destruction - Products determined to be unsafe for human consumption will be destroyed and disposed by appropriate means.
- All quantities, identification codes, and disposition will be documented.

#### Recall Effectiveness

- La Sentinelle Group is responsible for determining whether the recall is effective. Recall Effectiveness Checks verify that all consignees have been notified and have taken the appropriate action.

#### Termination of a recall

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- Termination of the recall may be considered after all reasonable efforts have been made to remove the affected products.

### Mock Recall

In addition to an annual verification of the recall plan, La Sentinelle Group will conduct a mock recall exercise twice a year or whenever there are significant changes to the plan or personnel. The Mock Recall Exercise will be conducted after offices hours or on a non-working day. The exercise will be carried out within two hours.

The mock recall will include the following elements:

- Selecting a product which has reached the consumer market.
- Tracing the product from the raw materials to the finished product.
- Verifying communications systems (e.g. contact information, test emails, etc.) to outside contacts.
- Modifying the recall plan to correct any problems encountered during the test.

Records of these mock recalls will be documented and filed appropriately.

- The recall plan will be reviewed within 60 days in the event 100% of the product is not recovered within 2 hours.