

PRODUCT LABELING AND CLAIMS SUBSTANTIATION

JANUARY 2026

POLICY NUMBER: TMG-SEC-031

APPROVAL AUTHORITY: BOARD OF DIRECTORS



THE MAZI GROUP

1. PURPOSE

This Product Labeling and Claims Substantiation policy establishes requirements for accurate product labeling and substantiation of product claims across The Mazi Group's brands. Proper labeling protects consumers, ensures regulatory compliance, and maintains brand integrity for Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This policy applies to:

- All product labels and packaging
- All product claims (on-pack and marketing)
- All brands and product categories
- All geographic markets
- All employees involved in product development, marketing, and regulatory

3. LABELING REQUIREMENTS BY PRODUCT CATEGORY

3.1 Cosmetics (Mazi Beauty)

US (FDA) Requirements

- Identity statement (product name)
- Net quantity of contents
- Name and address of manufacturer/distributor
- Ingredient declaration (INCI names, descending order)
- Warning statements where required
- Directions for safe use

EU Requirements

- Responsible Person name and address
- Country of origin (if outside EU)
- Nominal content
- Date of minimum durability or PAO symbol
- Precautions for use
- Batch number

- Function of product
- Ingredient list (INCI)

Canada Requirements

- Bilingual labeling (English and French)
- Product identity
- Net quantity
- Dealer name and address
- Ingredient list

3.2 Antibacterial Products (On The Go Mists)

US (EPA) Requirements

- EPA registration number
- EPA establishment number
- Active ingredient statement
- Directions for use
- Precautionary statements
- First aid statements
- Storage and disposal
- Net contents
- Manufacturer information

EU (BPR) Requirements

- Product authorization number
- Active substance identity and concentration
- Product type
- Uses authorized
- Directions for use
- Hazard and precautionary statements
- First aid instructions

3.3 Electronics (Glam Switch)

- Product name and model

- Manufacturer information
- Electrical ratings
- Safety certifications (UL, CE, FCC)
- Country of origin
- Compliance marks
- Battery warnings (if applicable)
- Recycling symbols (WEEE)

3.4 Technology Products (Upvendo)

- Product identification
- Safety certifications
- Electrical ratings
- Compliance marks
- Manufacturer information

4. CLAIMS SUBSTANTIATION

4.1 General Principles

- All claims must be truthful and not misleading
- Substantiation must exist before claims are made
- Substantiation must be competent and reliable
- Level of substantiation matches claim type
- Claims must be supportable in all markets

4.2 Types of Claims

Performance Claims

- Require testing or studies
- Test conditions should reflect real use
- Statistical significance required
- Document methodology and results

Ingredient Claims

- "Contains [ingredient]" - ingredient must be present
- Percentage claims must be accurate
- "Free from" claims must be verifiable

Sensory Claims

- Consumer perception studies
- Appropriate sample size
- Proper methodology

Comparative Claims

- Fair comparison methodology
- Substantiation for superiority
- Identify comparison product

4.3 Cosmetic Claims (Mazi Beauty)

Permitted Claims

- Cleansing, moisturizing, beautifying
- Temporary effects on appearance
- Sensory attributes
- Ingredient presence

Prohibited Claims

- Drug claims (treat, cure, prevent disease)
- Structure/function claims without proper classification
- Permanent changes to body
- Unsubstantiated efficacy claims

EU Claims Regulation

- Claims must comply with common criteria
- Legal compliance
- Truthfulness
- Evidential support

- Honesty
- Fairness
- Informed decision-making

4.4 Antibacterial Claims (On The Go Mists)

- Only EPA/BPR registered claims permitted
- Efficacy testing per regulatory requirements
- Time-kill studies
- Claims must match registration
- Cannot exceed registered claims

4.5 Technology Claims (Glam Switch, Upvendo)

- Accurate capability descriptions
- Performance claims substantiated by testing
- AI accuracy claims supported by validation
- Do not overstate capabilities

5. ENVIRONMENTAL AND SUSTAINABILITY CLAIMS

- Specific and clear claims
- Avoid vague terms ("eco-friendly," "green")
- Substantiate with evidence
- Qualify claims appropriately
- Follow FTC Green Guides
- Comply with EU Green Claims requirements
- Recyclability claims must be accurate

6. "CLEAN," "NATURAL," AND "ORGANIC" CLAIMS

6.1 Clean Beauty

- Define criteria clearly
- Consistent application
- Transparent ingredient standards

6.2 Natural Claims

- Follow ISO 16128 definitions
- Specify percentage if claiming
- Accurate characterization

6.3 Organic Claims

- Certification required for organic claims
- Follow USDA, COSMOS, or other standards
- Accurate percentage claims

7. SUBSTANTIATION DOCUMENTATION

7.1 Required Documentation

- Test protocols and reports
- Study designs and results
- Statistical analyses
- Expert opinions (where applicable)
- Literature reviews
- Certificates and certifications

7.2 Documentation Standards

- Complete and accurate records
- Traceable to specific claims
- Maintained in accessible format
- Updated when substantiation changes

7.3 Retention

- Retain for product life plus required period
- Minimum 3 years after last sale
- Longer for regulated products

8. REVIEW AND APPROVAL PROCESS

8.1 Label Review

- Regulatory review of all labels
- Legal review for claims
- Marketing review for brand consistency
- Quality review for accuracy

8.2 Claims Review

- Substantiation review before claim use
- Regulatory assessment for compliance
- Legal review for risk
- Documentation in claims database

8.3 Approval Documentation

- Document all approvals
- Maintain approval records
- Track label versions

9. INTERNATIONAL CONSIDERATIONS

- Labels must comply with local requirements
- Translation accuracy verified
- Local regulatory review
- Country-specific claims assessment
- Import requirements addressed

10. LABEL CHANGES

- Change control process for label updates
- Regulatory assessment of changes
- Transition planning for old inventory
- Documentation of changes

11. ROLES AND RESPONSIBILITIES

11.1 Regulatory Affairs

- Ensure label compliance
- Review claims for regulatory acceptability
- Maintain regulatory intelligence
- Manage registrations

11.2 Product Development

- Generate substantiation data
- Conduct required testing
- Provide technical support for claims

11.3 Marketing

- Develop claims with substantiation
- Submit claims for review
- Ensure consistent claim usage

11.4 Legal

- Review claims for legal risk
- Advise on claim language
- Support enforcement matters

12. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-001: International Regulatory Compliance Policy
- TMG-SEC-002: Product Safety and Quality Control Policy
- TMG-SEC-028: Marketing and Advertising Compliance Policy

13. POLICY REVIEW

This policy shall be:

- Reviewed annually by Regulatory and Legal
- Updated for regulatory changes
- Approved by VP Regulatory Affairs
- Communicated to relevant teams

14. DEFINITIONS

- **Substantiation:** Evidence supporting a product claim.
- **INCI:** International Nomenclature of Cosmetic Ingredients.
- **PAO:** Period After Opening - time product is safe after opening.
- **Responsible Person:** EU entity responsible for cosmetic product compliance.

For questions about this policy, contact:

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