

PRODUCT RECALL AND MARKET WITHDRAWAL PROCEDURES

JANUARY 2026

POLICY NUMBER: TMG-SEC-046

APPROVAL AUTHORITY: BOARD OF DIRECTORS



THE MAZI GROUP

1. PURPOSE

This Product Recall and Market Withdrawal Procedures policy establishes The Mazi Group's framework for managing product recalls and market withdrawals. Consumer safety is our highest priority, and this policy ensures rapid, effective response to product safety issues across all brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This policy applies to:

- All products sold by The Mazi Group
- All brands and product categories
- All distribution channels
- All geographic markets
- All employees involved in recall activities

3. DEFINITIONS

3.1 Recall

Removal of product from the market and from consumers due to safety concerns or regulatory violations.

3.2 Market Withdrawal

Removal of product from distribution that does not involve a safety issue (e.g., quality issue, mislabeling).

3.3 Stock Recovery

Removal of product from distribution channels only, not from consumers.

4. RECALL CLASSIFICATION

Class	Description	Action
Class I	Reasonable probability of serious adverse health consequences or death	Immediate recall, public notification

Class II	May cause temporary or medically reversible adverse health consequences	Recall, notification to customers
Class III	Not likely to cause adverse health consequences	Recall or withdrawal as appropriate

5. RECALL TEAM

5.1 Core Team

- **Recall Coordinator:** VP Quality or designee
- **Regulatory Affairs:** Regulatory notifications
- **Legal:** Legal guidance and liability
- **Communications:** Internal and external communications
- **Operations/Supply Chain:** Logistics and inventory
- **Customer Service:** Consumer inquiries
- **Finance:** Financial impact and insurance

5.2 Brand Representatives

- Affected brand leadership
- Product development
- Sales and marketing

6. RECALL TRIGGERS

- Consumer complaints indicating safety issue
- Adverse event reports
- Quality testing failures
- Regulatory notification or inspection findings
- Supplier notification of ingredient/component issue
- Contamination discovery
- Labeling errors affecting safety

7. RECALL PROCESS

7.1 Phase 1: Assessment

- Receive and evaluate information
- Gather product and distribution data
- Assess health hazard
- Determine recall classification
- Convene Recall Team
- Make recall decision

7.2 Phase 2: Planning

- Define scope (products, lots, markets)
- Develop recall strategy
- Prepare communications
- Notify regulatory authorities
- Establish logistics
- Set up consumer response

7.3 Phase 3: Execution

- Notify distribution partners
- Issue public notification (if required)
- Stop shipments
- Retrieve product from trade
- Process consumer returns
- Track recall effectiveness

7.4 Phase 4: Closure

- Verify recall completion
- Dispose of recalled product
- Submit final reports to regulators
- Conduct root cause analysis
- Implement corrective actions

- Document lessons learned

8. REGULATORY NOTIFICATIONS

8.1 United States

- FDA (cosmetics, OTC drugs)
- CPSC (consumer products)
- EPA (antimicrobial products)
- Voluntary vs. mandatory recall

8.2 European Union

- Competent authorities in member states
- RAPEX notification system
- Responsible Person obligations

8.3 Canada

- Health Canada
- Recall notification requirements

8.4 Other Markets

- Local regulatory requirements
- Distributor coordination

9. COMMUNICATION

9.1 Internal Communication

- Executive briefing
- Employee notification
- Customer service preparation
- Sales team briefing

9.2 Trade Communication

- Retailer notification

- Distributor notification
- Return instructions
- Credit/replacement information

9.3 Consumer Communication

- Press release (if public recall)
- Website notice
- Social media
- Direct customer notification
- Refund/replacement instructions

9.4 Media

- Prepared statements
- Designated spokespersons
- Coordinate with Crisis Management

10. LOGISTICS

10.1 Product Identification

- Affected products and lot numbers
- Distribution records
- Inventory locations

10.2 Product Retrieval

- Stop distribution
- Quarantine inventory
- Arrange returns from trade
- Consumer return process

10.3 Product Disposition

- Secure storage of recalled product
- Investigation and testing

- Destruction or rework
- Documentation

11. CONSUMER RESPONSE

- Dedicated phone line/email
- Trained customer service team
- FAQ and scripts
- Refund/replacement process
- Track consumer contacts

12. RECALL EFFECTIVENESS

- Track product recovery rates
- Monitor consumer returns
- Effectiveness checks
- Report to regulators

13. DOCUMENTATION

- Recall decision documentation
- Distribution records
- Communication records
- Recovery tracking
- Regulatory correspondence
- Final recall report

14. INSURANCE

- Notify insurance carrier
- Product recall insurance
- Document costs
- Coordinate claims

15. TRAINING AND TESTING

- Recall team training
- Annual mock recalls
- Traceability testing
- Update procedures based on exercises

16. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-002: Product Safety and Quality Control Policy
- TMG-SEC-032: Customer Service and Consumer Relations Policy
- TMG-SEC-044: Crisis Management and Communication Plan
- TMG-SEC-045: Insurance and Liability Management Policy

17. POLICY REVIEW

This policy shall be:

- Reviewed annually by Quality and Regulatory
- Updated after recalls or exercises
- Approved by VP Quality
- Communicated to Recall Team

For recall emergencies, contact:

Operations Department

operations@mazigroup.us | [Emergency Line]