

Enterprise Paper Product Recall Policy

Enterprise Paper Co. Ltd. is dedicated to supplying the highest quality products possible. In the event that a product does get shipped out which is of questionable quality, the recall program, as **outlined in this policy, will be put into action.**

Product recall is indicated when a manufacturer gives notice that their product is affected by defects that will affect the performance of the product, or could represent a hazard to the consumer. Our recall program will effectively remove that product from circulation.

All products manufactured by our suppliers have production dates and/or lot codes attached to them. In the event of a problem with any product, we will contact all our customers and/or vendors who received the product by phone, e-mail or fax and have the product returned.

We will work to ensure that 99 - 100% of the product in question is returned or accounted for, either at the distributor level or at the end user level.

Intent

The main objectives of this recall plan are:

- 1. Stop the distribution and sale of the affected product.
- 2. Effectively notify Management and customers of the recall.
- 3. Efficiently remove the affected product from the marketplace.
- 4. Recall products for repair or replacement.
- 5. Identify, recall and repair the affected products located in the warehouse and/or distribution areas.
- 6. Dispose of products that are non-useable.
- 7. Request a root cause analysis and report the effectiveness and outcome of the recall from the vendor.
- 8. Implement a corrective action plan to prevent another recall.
- 9. Upon completion of the recall, management will conduct a post recall meeting to evaluate the recall.

Recall Terms and Definition

Product recall is initiated when a Supplier or Customer contacts us and advises that there may be product found to contain serious defects in manufacturing, parts, or where the product may represent a health hazard to the consumer. The procedures implemented should effectively remove the product from circulation, and ensure that customers are able replace the product.

Recall Team

It is important to have a team responsible for traceability. The Team is responsible for coordinating all aspects of the product recall. A recall coordinator is to be appointed and members of a recall team identified from the various functional areas. Together the team will assist the Recall Coordinator in the event of the recall all members must ensure that all procedures are carried out effectively and efficiently. The team is to receive appropriate training so that they understand their responsibilities.

The Recall Process

1st Stage - Investigation of Complaint

Once we have been notified of the recall or customer complaint, it is necessary to start documentation and detailed product tracking. The record keeping of the incidents will keep things organized and demonstrate due diligence (in a court of law). This will result in a simpler and quicker recall or tracking procedure. It also reduces the short term and long term costs of the recall or complaint.

The investigation of the customer complaint is the first step of the recall procedure.

- 1. Gather information from the customer about the nature of the product complaint.
- 2. Assemble the personnel needed to conduct a product complaint investigation.
- 3. Conduct a thorough investigation into the problem with the affected product.
- 4. Determine the nature and potential causes of the problem.
- 5. Determine any other product(s) that may potentially be affected.
- 6. Complete the Problem Report with all information.
- 7. Determine, from the criteria below, whether:
- 8. Product Recall: Potential health hazard during use of product(s).
- 9. Product Withdrawal: a quality related issue with the affected product(s).
- 10. No Corrective Actions: an isolated incident with the affected product(s).
- 11. Based on the above results, proceed to 2nd stage for the tracking of Finished Product, Work-In-Progress, or Materials.

2nd Stage - Tracking of Product

There are 3 types of tracking

- 1. Finished Product All Finished Product shipped can be tracked using the computer database.
- 2. **Work-In-Progress Product** All Work-In-Progress products can be tracked using the computer database.
- 3. **Materials** All Materials received can be tracked by the Receiving Log kept in the accounts payable department.

Tracking Procedures

(A) Finished Product (products which HAVE been partially or completely distributed):

- 1. Assemble the personnel needed to conduct tracking of a finished product.
- 2. Identify the affected and any other potentially affected product(s), product code(s) and production date(s).
- 3. Determine, from the production records the quantity of affected product(s) produced.
- 4. Determine, from the Shipping Log in the accounts payable area, the last day of shipment (and the customer) for the affected product(s).
- 5. Determine from computer database, all the customers who purchased the affected product(s) during this period. (i.e. period = day of packaging to last day of shipment)
- 6. Determine, from the Inventory Records, the remaining quantity of the affected product(s) in our inventory.

(B) Work-In-Progress (products which HAVE NOT been distributed):

- 1. Assemble the personnel needed to conduct tracking of a work-in-progress product
- 2. Identify the affected and any other potentially affected product(s), product code(s) and production date(s) from the production records.
- 3. Determine, from the Production Records, the quantity of the affected product(s) produced.
- 4. Locate the affected product(s) and isolate them for inspection and repair.
- 1. Determine, from the computer database, all the customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment)
- 2. Determine, from the Inventory Records, the remaining quantity of the affected product(s) in our inventory.

(C) Materials

- 1. Identify the affected and any other potentially affected material(s) and lot number(s)/quality control code/receiving date(s).
- 2. Determine, from the Receiving Log record, the quantity and the receiving date of the affected material(s) received.
- 3. Based on the type and size of the material, determine all the finished product(s) associated with the affected material(s).

- 4. Determine, from the Production Records the period of use for the affected material(s).
 - (A) Given the affected period and product, determine from the Inventory Records the quantity of the affected product(s) associated with the affected material(s) in this period.
 - (B) Determine, from the Vendor Production Records the day the affected product(s) entered into our inventory (i.e. packaging date).
 - (C) Determine, from the Shipping Log in the accounts payable, the last day of shipment (and the customer) for the affected product(s).
 - (D) Determine, from the computer database, all the customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment)
 - (E) Determine, from the Inventory Records, the remaining quantity of the affected product(s) in our inventory.
 - (F) Locate any remaining affected packaging material(s) from the storage shelves.

3rd Stage A - Product Recall

- 1. Assemble the Recall Team.
- 2. Gather all information collected in the tracking process.
- 3. Detain and segregate all products to be recalled which are in our control. Adhere a HOLD sign and complete the QA Incident Hold Form.
- 4. Fax the Notification of Recall to the affected customers.
- 5. Ensure the following information:
 - a. Name and Product Code of the withdraw/recalled product(s).
 - b. Production date(s) of the withdraw/recalled product(s).
 - c. Reason for the withdraw/recall.
 - d. Quantity of withdraw/recalled product(s) distributed.
 - e. Quantity of withdraw/recalled product(s) in inventory.
 - f. Area(s) of distribution and customers affected.
- 6. Coordinate and monitor the recovery of all affected product(s).
- 7. Conduct reconciliation on the total quantity of recalled product and affected product in inventory against the total quantity produced.
- 8. Randomly remove and submit samples of recalled product(s) for independent testing.
- 9. Collect testing results and discuss the results/corrective action.

3rd Stage B - Product Withdrawal

- 1. When it is determined to be a product withdrawal follow the following steps;
- 2. Assemble the Recall Team.
- 3. Gather all information collected in the tracking process.
- 4. Detain and segregate all products to be recalled which are in our control. Adhere an ON HOLD label and complete the QA Incident Hold Form.
- 5. Fax the Notification of Withdrawal to the affected customers. Request that all product recovered be sent to our company
- 6. Coordinate and monitor the recovery of all affected product(s).
- 7. Conduct reconciliation on the total quantity of withdrawn product in inventory against the total quantity produced.
- 8. Collect testing results and discuss the results/corrective action with the Recall Management Team.

Product Recall Chart

