

**| PRODUCT RECALL POLICY |****Introduction****Statement of Recall Plan**

Buckler Boots Ltd maintains a recall plan which provides specific procedures, defines terms, and assigns roles and responsibilities when a safety issue arises with any of its products. The plan will be activated whenever a potential recall requirement arises and includes the following elements:

1. Recall Team set up
2. Recall responsibility assignments
3. Key personnel and external contact information
4. Recall procedures
5. Communication methods

Success of the plan relies on the proper execution of plan elements and up-to-date information.

**Recall Plan Step by Step Process**

Complaint / Condition Evaluation Flow:

1. Complaint or update may be raised from a number of sources including Trade customer, End User/wearer, Internal discovery, testing report
2. Upon receipt of a safety complaint an Initial Complaint Assessment will be carried out by a Director
3. If a potential safety hazard exists then all of the Directors of Buckler Boots Ltd will be informed and further consultation will begin
4. If No risk is concluded then a complaint/update will be handled internally
5. If the Directors believe there is minimal risk then Market withdrawal steps will be triggered
6. If the Directors believe there is **significant** risk a Product Recall team will be established to determine the level of Product removal required: Product not in commerce and Product in commerce.
7. Product not in commerce: will be identified for quarantine/detain to avoid distribution to the market places
8. Product in commerce: will lead to a Product Recall initiation

Recall Flow / Steps:

1. Recall Initiated by Recall Team
2. Identify and locate All products subject to Recall
3. Product remaining under Company control – isolate/detain/quarantine
4. Product not under Company control – Implement Recall Strategy
5. Prepare Distributions Lists
6. Prepare and distribute press / trade releases (if necessary)
7. Prepare and distribute Notice of Recall to all affected Trade customers
8. Provide support to all Trade Customers to distribute Notice of Recall to all affected Trade Customers and End Users
9. Remove Products from commerce
10. Detain/quarantine recalled products
11. Verify effectiveness of Recall, if recall not deemed successful review/improve recall strategy

**Recall Procedures**

The recall procedure outlines the activities that Buckler Boots Ltd will take to manage the recall of 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

The roles and responsibilities of every individual on the Recall Team should be clearly defined in the recall plan. Oversight of the following recall elements should be assigned to a member of the Recall team. Note that individuals may be responsible for more than one recall element.

### Recall Coordinator

The recall coordinator, has been given authority by the management of Buckler Boots Ltd 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 Buckler Boots Ltd.
- Manage and coordinate the implementation of the company's product recall.
- Keep management informed at all stages of the recall.

## 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:

- Receive the complaint - a file should be maintained containing any product complaints the company receives.
- Information that should be maintained in the product complaint file is:
  - I. Complainant contact information
  - II. Reported problem with the product
  - III. Product Identification
  - IV. Product Storage
  - V. Product purchase date and location
  - VI. Illness and Injury details - Provide the complaint to knowledgeable staff for initial evaluation. If an initial assessment indicates a recall may be necessary, the Recall Coordinator assembles the Recall Team for a full evaluation.
- Determine the hazard and evaluate the safety concerns with the product.
- Determine the product removal strategy appropriate to the threat and location in commerce.
- Contact the appropriate regulatory authorities.
- Alert legal counsel, insurance, etc. as appropriate.
- Maintain a log of the events of the recall including information such as dates, actions, communications, and decisions.

## Identification of Implicated Products

It is Buckler Boots Ltd responsibility to ensure the identification of all products and quantities of products implicated in the recall. In addition, determination should be made if any other codes, brands or sizes of product handled by the company are affected. Goods can be identified by reference to the following:

- Product barcodes
- Product brand name
- Inside labelling showing product Code, product/factory order number and date made.

A distribution list should be prepared as part of the Identification process. The distribution list should at minimum identify:

- Account name (consignees) that received the recalled product(s)
- Unique trade account number assigned internally via Software systems
- Account addresses
- Contact names
- Contact telephone numbers
- Type of account (e.g., manufacturer, distributor, retailer)
- Additional information relating to product information may include:
  - Amount of product received/shipped
  - Product ship date(s)
  - Amount of product returned
  - Amount of product purchased from Trade customers

## Notification of Affected Parties

Notifications during a recall must be done in a timely manner and should include the product distribution chain, and consumers when necessary. Recall notices are typically used to notify those businesses in the distribution chain. Press releases are generally oriented to consumers but may be used to notify any affected party.

Distribution Chain contacts will be notified by appropriate means (telephone, fax, email, letter, etc.). It is recommended that a written recall notice be provided to all consignees. The Recall Notice must include all relevant recall information:

- Confirm receipt of the Notice of Recall with all accounts. A record of all account communications should be maintained.
- Consumers should be notified by the most effective method available. If appropriate, a press release can be used to notify consumers. Considerations for preparing a press release include:
  - Issuance of a press release should be the highest priority and should be issued promptly.
  - Give retailers information to readily identify recalled products, e.g., UPC codes, date codes, model numbers and any other critical identifying information
  - Give retailers information on any in-transit shipments that may contain the recalled product
  - Ask retailers to stop sale of recalled product
  - Ask retailers to isolate inventory of recalled product and give them instructions on how to return and/or dispose of these products so they are not released for sale
  - Ask retailers to block sale at register
- Trade account customers will be asked to update their affected Trade Account customers and end user retail customers through the use of pre prepared instore/till area posters email updates and if appropriate letter communications.
- If the trade customer has contact details for the trade account and / or end users affected the Product Recall team of Buckler Boots Ltd can assist the customer in making communications via email/ telephone or letter.
- Buckler Boots Limited will utilise it external Sales Personnel to assist via store visits to help co-ordinate trade account and end user notifications.

## 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 commerce.

- Products in commerce should be detained, segregated, and handled in a manner determined by the recalling firm.
- Products that are still in the recalling firm's control (e.g. inventory located onsite, in transit, in off-site storage, and in offsite distribution) should be detained, and segregated.
- All quantities and identification codes shall be documented to assist in the reconciliation of product amounts.

### Control of Recalled Product

When Buckler Boots Ltd chooses to retain recalled product, control must be regained to prevent re-entry of the product into commerce.

- All affected product returned will be clearly marked, not for sale or distribution, and stored in an area that is separated from any other products.
- All quantities and identification codes shall be documented to assist in the reconciliation of product amounts.

### **Product Disposition**

The final disposition of the recovered product must be determined. The final disposition must be reviewed and approved by the Recall Team.

Options include:

- Destruction - Products determined to be unsafe may be destroyed and disposed by appropriate means.
- Recondition – Products may be reworked to remove the safety risk.

All quantities, identification codes, and disposition shall be documented.

### **Recall Effectiveness**

Buckler Boots Ltd 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. Steps include:

- Verifying that all consignees have received the notification.
- Verifying that consignees have taken appropriate action. - If the response from our consignees is less than 100%, then the recall should be deemed ineffective, and the recall strategy should be reassessed. Certain circumstances (e.g. amount of product actually returned vs. expected, potential for consumption, shelf-life, etc.) may also require a reassessment of the recall strategy.
- All verifications shall be documented.

### **Termination of a Recall**

Termination of the recall may be considered after all reasonable efforts have been made to remove the affected products from commerce, including reconciliation, recall effectiveness, and disposition.

### **Corrective Action / Working with the Factories**

Upon identification of a product safety issue/fault immediate steps will be taken by the Recall Coordinator to liaise with the Far East Product Agent to submit a sample for relevant independent testing. If a wider scale batch issue is suspected the factory will be asked to immediately provide a quality assessment report on the fault/s identified. Where the responsibility for the fault lies with the factory compensation claims will be lodged by Buckler Boots Ltd and the Factory will be instructed to collect all affected isolated/detained/quarantined products concerned.

Buckler Boots Ltd and its agent will work closely with the factory to learn and understand how the fault originated and agree steps moving forward to rectify the issue for future production as well as improved quality control procedures.

In terms of situations where there has been deliberate adjustment of the product specification and tested components without the approval of Buckler Boots Ltd, the Directors will reserve the right to terminate engagements following a proper and formal investigation.

**Signed on behalf of Buckler Boots Limited**



**Director**  
**23-01-2023**