

**UTS**

United Tooling Solutions

UTS Ltd Product Recall Policy and Procedures

UTS is committed to distribute only safe, suitable products to our customers. We consider it our duty and moral responsibility to remove products from sale that have been deemed unsafe or in violation of Product Safety Standards as well as the UK's National Standards Body.

The procedures outlined in this document are designed to carry out a recall or market withdrawal, ensuring the efficiency of the product to protect the physical and economic health of our customers. The purpose of a recall is to locate the product identified for recall, remove the product from distribution and provide accurate information to all parties involved. The recall is concluded when relevant authorities and/or assigned personnel determine that all reasonable efforts have been made to remove or correct the product.

A product recall is a critical procedure and is managed as a priority and cannot be rescheduled. When a product recall is received or has been determined, it will take priority over all other business operations. The term "Product Recall" indicates an urgent matter and requires immediate attention.

The terms outlined in this policy instruct us to identify the source of products distributed to each customer in the event of any complications with any products or lot being identified. Those products can then be located and isolated.

A log of customers and products shipped are maintained and any customers who are affected will be promptly notified by email or letter of the recall and the course of action that will follow. A letter or email is drafted and mailed within 2 working days of the recall notification. "URGENT - Product Recall" will be prominently displayed on the envelope / message.

Once the defective product has been recovered it will be returned to the Supplier or manufacturer (if there is no risk of further contamination) to determine whether the product can be reprocessed or if it must be destroyed; if the latter is chosen then destruction must be witnessed by proper authorities, or the product shipped to an approved disposal facility.

The responsibility of this policy is enacted by the UTS Ltd operations director in conjunction with operations managers. In the event of the company becoming aware of an already dispatched nonconforming product, these managers will initiate the following product recall procedure.

Withdrawal & Recall

1. Key staff & management are to be informed immediately.
2. non-conforming product details are to be obtained from records using the traceability system.
3. Details of supplier delivery destination and quantity of all non-conforming products to be ascertained and documented.
4. Our supplier contact, and delivery destination are to be contacted as soon as possible thereafter. Details of the non-conforming product will be given to this/these person(s) and a recall request made to isolate the non-conforming product for return. A record of these communications will be maintained. Where necessary (e.g., in case of difficulty in contacting the customer), emails or registered letters will also be dispatched or contact in person attempted.



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5. All recalled, withdrawn or returned products will be examined by a nominated competent staff member/manager

6. On return of the non-conforming product to the site, a label is to be used to identify the product according to the company traceability system.

7. All products from the same batch and products deemed to be related are to be investigated and its conforming/non-conforming status reassessed and communicated to the supplier or manufacturer.

8. If a situation arises where a known non-conforming product has reached the final consumer, all necessary resources are to be used to establish the identity of the consumer and notify the consumer of the problem and retrieve the non-conforming product as soon as possible.

9. If necessary, a product recall notification may be prepared detailing:

- Company Name
- Product Name
- Product Details
- Batch Identification/barcode
- Reasons for the Recall
- Action Required
- Contact Details

10. If it is established that the recalled product has been resold over a wide area to unknown consumers, the printed media (and radio) will be used to issue a product recall notice. (The supplier or manufacturer will action the required communication to all concerned based on our feedback).

11. All available resources shall be used to protect the customer from harm in such circumstances.

12. The cause of the issue shall be fully investigated, and corrective action implemented and verified with the Competent Authority via our supplier or manufacturer before resumption of product supply.

13. A withdrawal/recall record must be maintained to capture all appropriate information about the product recall/withdrawal. The incident will be recorded in our electronic Quality Action Register. The manager handling the incident must ensure that the record is maintained and up to date during the recall/withdrawal. This will be verified and authorised by QHSE or the Operations Director upon completion of the withdrawal/recall. This record will include:

- List of all communications (including phone calls), their time, date, name of person and brief details of the communication.
- Any actions/decisions made.



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14. A detailed investigation will be carried out following the non-conformance:

- Determine what may have gone wrong in the process.
- Quantify the product affected.
- Determine the degree, if any to which the safety and quality of the product has been affected.
- Document results of any analysis carried out on the non-conforming product.
- Document details of corrective action carried out to (a) ensure the product was dealt with in a safe manner and (b) to prevent recurrence of non-conformance. Reference any staff training that may be required as part of the corrective action

15. All documentation relating to the issue will be collated and made available to all the stakeholders concerned with the product recall event.

16. This withdrawal/recall procedure will be reviewed on a regular basis to ensure its continued validity, the procedure as listed above followed and the relevant information recorded in the withdrawal/recall record

SIGNED:

Chris Taylor

DATE: 13/2/2025