Juul Labs, Inc. | Retailer Access Control Standards

Business & Technical Requirements

The following requirements detail the technical specifications for Retail Access Control Standards (RACS), as developed and supported by Juul Labs, Inc. (JLI). RACS is a standards-based solution that implements automated sales requirements within the retailer's point-of-sale (POS) system to ensure the purchaser of JUUL products is at least 21 years of age and limit the amount of product that can be sold per transaction. RACS complies with JLI's Enhanced Access Controls for the sale of JUUL products and can be extended to other vapor and age-restricted products at the retailer's discretion. Additional trade information relating to RACS is described in JLI's Authorized Reseller Program Policy, the terms of which are available at https://www.juul.com/retailer2021. These technical specifications are subject to change.

This specifications document is intended for trade partners, such as POS vendors, back-office providers, technology platforms, and retailers with their own proprietary POS system, to support the implementation of RACS at the point-of-sale for JUUL products. Upon a retailer's implementation of RACS, JLI or its representatives may certify the retailer for compliance with RACS and the retailer may be subject to ongoing compliance monitoring to ensure the requirements are met on a continuous basis.

RETAILERS INTERESTED IN GETTING CERTIFIED: If requesting certification, you have a few options. First, you can get certified virtually by going to https://www.juullabsretailer.com/virtual-certification/. Second, you can reach out to your JUUL representative. Finally, you can call the EAC Call Center at 1 (855) 780-7966 between the hours of 9AM – 9PM ET, Monday - Friday.

1. **Identification of transactions including any JUUL products:**
    a. The POS system must be able to detect when a JUUL product is scanned as part of a transaction to prompt automated ID verification and product-quantity limits.
    b. Absent applicable checks being completed successfully, the POS system must not allow a transaction containing JUUL product to be completed.

2. **Automated age-verification (applicable to transactions including JUUL products):**
    a. ID age-verification:
        i. A barcode scanner must capture birthdate information from the ID barcode and perform an automated mathematical check to ensure that the consumer is at least 21 years of age (the federal minimum-purchasing age regardless of state requirements.) Additional information on the federal minimum-purchasing age for tobacco products, including vapor, can be found on FDA's website.
        ii. If the consumer is below 21 years of age, the transaction must automatically be restricted.
    b. ID validity:
        i. A barcode scanner or built in card reader (ID swipe) must capture expiration date information from the ID barcode and perform an automated mathematical check to ensure that the ID is not expired.
        ii. If the ID is expired, the transaction must automatically be restricted.

c. ID legitimacy:
    i. A barcode scanner must capture at least two pieces of personal information from the ID barcode and temporarily display them to the retail sales clerk on the POS screen:
        1. Piece of personal information #1: ID's full name.
        2. Piece of personal information #2: Any other piece of personal information (other than birthdate or expiration date) that is textually or numerically displayed on the front of an ID (examples: ID number; eye color; licensing state).
d. ID confirmation:
    i. The retail sales clerk must compare information displayed on the POS screen to the textual information contained on the physical ID.
    ii. The retail sales clerk must compare the photo on the ID to the consumer presenting the ID.
    iii. The retail sales clerk must be able to use the POS system to approve (no mismatch between ID photo and consumer) or decline (mismatch between ID photo and consumer) the transaction.

Note: None of the customer's information obtained through Automated age-verification should be stored during or after the transaction. Processing and storage of consumer personally identifiable information is subject to various laws and regulations. Consult with legal counsel and/or data privacy experts if you intend to process or store consumer personally identifiable information.

3. Manual exception for ID verification:

System can permit the purchaser's date of birth to be entered manually and validated automatically if the provided ID is not scannable:

<u>Types of non-scannable IDs include:</u>

- An adult who is carrying a non-scannable tribal ID.
- An adult who is carrying a non-scannable military ID.
- An adult carrying a valid passport for use in a store that does not have a passport scanner.

Note: IDs that are "not scannable" because of damage or defects are not eligible for a manual override.

a. Authorized permissions for manual exception::
    i. Role permissions: The POS system can allow the administrator to assign which role is able to perform an exception.
    ii. If permission is assigned to only managers and above, a retail sales clerk will require a manager "pin in," "badge in," or other manager authentication during a transaction for the purpose of performing a manual ID verification.
b. Exception procedure if permission assigned to only managers:
    i. The POS system should prompt the retail sales clerk informing them that only the store manager can access the workflow.
    ii. The POS system should require a manager to authenticate their credentials

iii. The POS system should prompt the manager for confirmation that the customer's ID is non-scannable and an exception applies for manual ID verifications.
iv. The POS system should prompt the manager to manually enter the customer's date of birth and expiration date as presented on their ID.
v. The POS system should automatically calculate and display the customer's age and ID expiration date as presented on their ID and entered manually by the manager.

c. ID ownership:
i. The manager must compare the photo on the ID to the consumer presenting the ID
ii. The POS system must allow for the manager to approve (no mismatch between ID photo and consumer & age is above minimum) or decline the transaction.

4. **Automated product-quantity limits (applicable to transactions including JUUL products) :**
a. The POS system must be able to automatically identify and limit the amount of JUUL products that can be purchased per transaction:
i. Devices: no more than 1 (regardless of type of pack configuration)
ii. Pod packs: no more than 4 (regardless of type or pack configuration)
b. The POS system must identify JUUL product SKUs in the following manner:
i. JUUL Device Kit counts as 1 device
ii. JUUL 4-pack Refill Kit counts as 1 pod pack
iii. JUUL 2-pack Refill Kit counts as 1 pod pack
iv. If any JUUL product contains both a JUUL Device and a pack of JUULpods, count as 1 device and 1 pod pack
c. If these limits are exceeded, the exceeding products (i.e., above 1 JUUL Device and/or 4 JUULpod packs) must be restricted and not added to the purchaser basket or otherwise restrict the transaction from proceeding to sale.
d. No manual exception is permitted for sales in excess of the automated product-quantity limits.