Attachment I : Compliance Plan



Title:
Temperature Monitoring
During Storage and
Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

Page **1** of **16**

Issued by: Quality Assurance Copy No.:

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Prepared by:
Operations Administrative
Coordinator

Reviewed by:
Department Management

Approved by:
QA Management

Signature:

Signature:

Signature:

Date:

10-AUG-2022

Date:

QA Management

Date:

10-AUG-2022

1.0 Purpose

- 1.1 To define a procedure for monitoring temperature in the warehouse area at Methapharm Inc. (Methapharm) and during shipment to ensure that required storage conditions are maintained.
- 1.2 To define instructions for retrieving and reviewing data from the temperature monitoring devices and system at Methapharm.
- 1.3 To define the calibration and maintenance procedures of the temperature monitoring devices at Methapharm.

2.0 Scope

- 2.1 This procedure applies to all Active Pharmaceutical Ingredients (API), drug products, and medical devices imported, distributed and/or warehoused by Methapharm including professional samples, commercial product and product used for clinical trials. Hereinafter collectively referred to as 'Goods' or 'Products'.
- 2.2 This procedure applies to all temperature monitoring devices, including, but not limited to, xTag2 Sensors and xTag Displays used for the monitoring of temperature in areas where active pharmaceutical ingredients (API), drug products, and medical devices are stored at Methapharm.
- 2.3 Products must be transported, handled and stored in a manner that mitigates the risk of exposure to temperatures outside labelled storage conditions; potentially impacting the safety, quality and effectiveness of the product.



Title:
Temperature Monitoring
During Storage and
Transportation

Effective Date: AUG 3 1 2022

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Page **2** of **16**

2.4 Temperature excursions outside of labelled storage conditions, may be acceptable provided stability data and scientific/technical justification exist demonstrating that product quality is not affected during the time period of the excursion.

2.5 For API, drug products, and medical devices which are distributed by Methapharm, but which are received and stored at a third-party logistics provider (3PL), the 3PL will follow their own internal procedures for temperature monitoring during storage and transportation. In addition, the 3PL is bound by the conditions of the Quality Agreement in place between the two companies regarding the temperature monitoring of Methapharm products during storage and transportation and the reporting of temperature excursions.

3.0 Responsibility

- 3.1 It is the responsibility of all Methapharm employees involved in warehouse activities to read, understand and follow this procedure.
- 3.2 It is the responsibility of the Operations Department to ensure all data loggers used in the warehouse are calibrated and used within their calibration period, and for managing records generated from the data loggers.

4.0 References and Related SOPs

GUI-0069 – Guidelines for environmental control of drugs during storage and transportation

QS-013 - Receiving Goods

QS-015 – Deviations and Non-conformances

QS-020 – Record Retention Requirements

QS-039 – Vendor Management

5.0 Forms/Attachments

Attachment QS-004-1 – Data Logger Locations in Warehouse

Form QS-004-2 - Maintenance Log

Form QS-004-3 - Annual Calibration Log – Warehouse Temperature Monitoring Devices

Attachment QS-004-4 – List of Calibrated Data Loggers

Form QS-004-5 - Evaluation Questionnaire



Title:

Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

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6.0 Definitions

- 6.1 Mirador™ Express Software and Web Portal: A web-based application for 24/7, real-time monitoring of temperature by Cryopak Validation Technologies (CVT). xTag Sensors are installed in the warehouse to measure temperature and transfer this information via xTag Display to the Mirador Express Server. TCP/IP protocol is used for communication between xTag Displays and the Mirador Express Server. The Mirador Server is a remote hosted solution (SaaS). The Web Portal is the main interface that shows the sensor (xTag Sensor) locations and real-time temperature readings received from sensors.
- 6.2 <u>Temperature Data Logger or Temperature Sensor</u>: A device that continuously measures the temperature of an area. Note that Data Logger and Sensor are used interchangeably within this SOP.
- 6.3 <u>Temperature Excursion</u>: A variance outside of the labelled storage condition of a product or outside of the 'normal' operating conditions of the warehouse. A temperature excursion can occur during storage and/or transportation.

7.0 Procedure

7.1 Daily Monitoring of Temperature in the Warehouse





Title:

Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

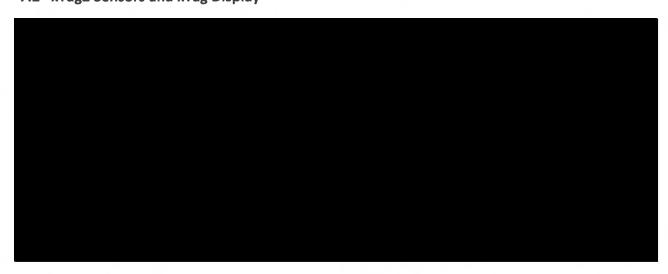
Section: Operations

SOP Number: QS-004.005

Page **4** of **16**



7.2 xTag2 Sensors and xTag Display





Title:

Temperature Monitoring During Storage and Transportation

Effective Date:

AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

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7.3 Mirador Express Software





Title:

Temperature Monitoring
During Storage and
Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

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Title: **Temperature Monitoring**

During Storage and Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

Page **7** of **16**

7.3.4 How to Run a Report in the Web Portal





Title:

Temperature Monitoring During Storage and Transportation

Effective Date: AUG

AUG 3 1 2022

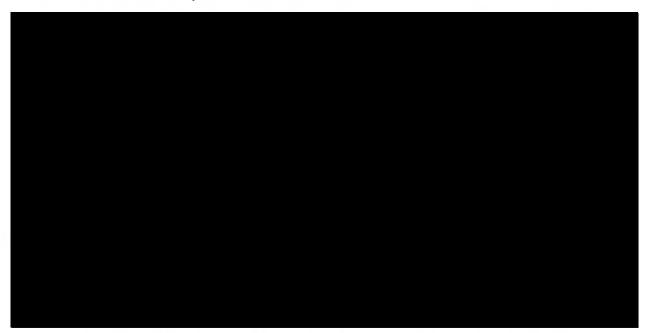
Section: Operations

SOP Number: QS-004.005

Page **8** of **16**



7.4 Alarms from Mirador Express Software





Title:

Temperature Monitoring During Storage and

Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

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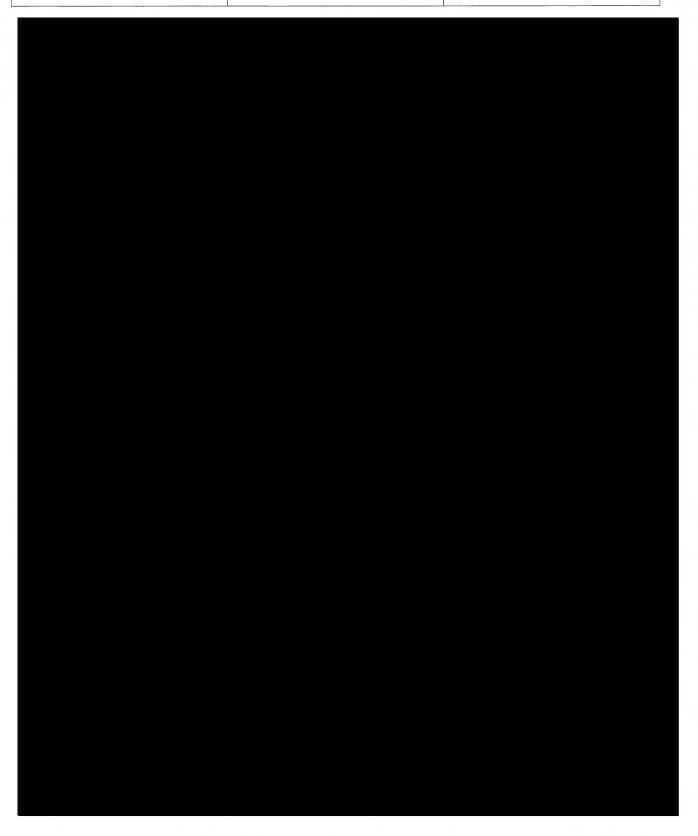
Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

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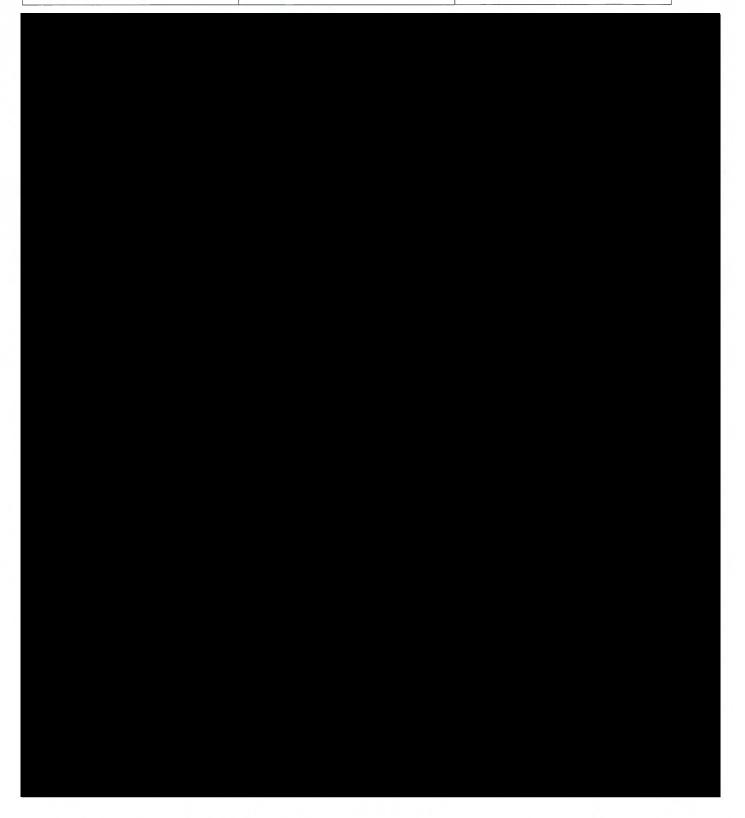
Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

Page **11** of **16**





Title:
Temperature Monitoring
During Storage and

Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

Page **12** of **16**



7.5 Calibration and Maintenance of Data Loggers and IR Thermometer





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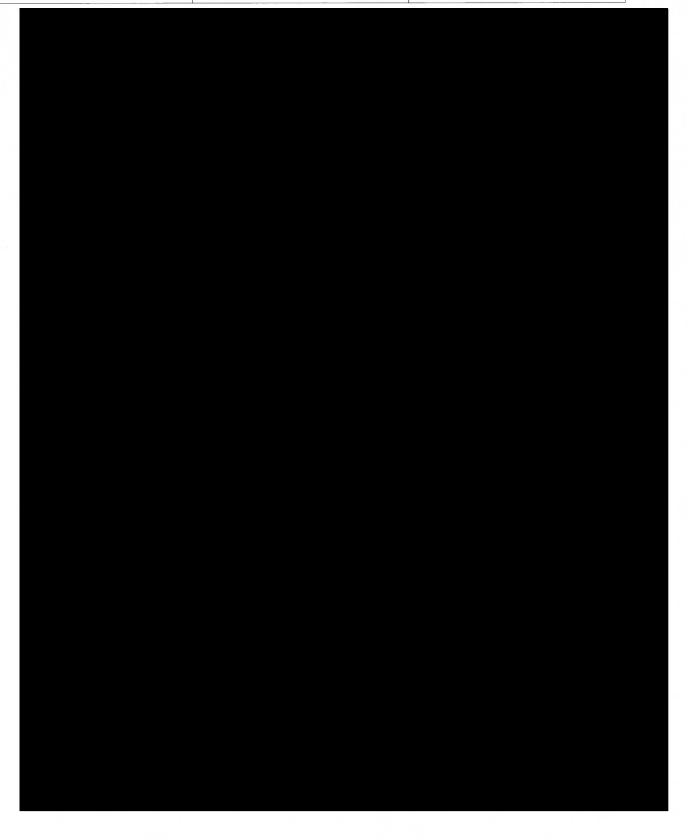
Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

Page **13** of **16**





Title:
Temperature Monitoring
During Storage and
Transportation

Effective Date: AUG 3 1 2022

Section: Operations

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7.6	While the Data Loggers are out for Calibration
7.7	Challenging the Data Loggers Alarms
7.8	Temperature Monitoring During Transportation



Title:

Temperature Monitoring During Storage and Transportation

Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

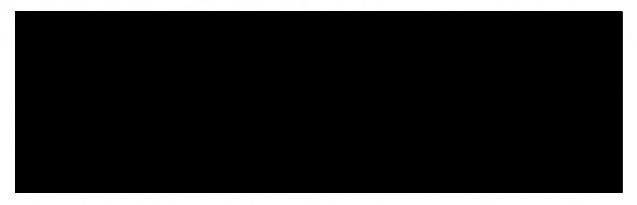
Page **15** of **16**



7.9 Reporting Deviations



7.10 Thirty Party Logistics Provider (3PL)



8.0 Records





Title:

Temperature Monitoring During Storage and Transportation

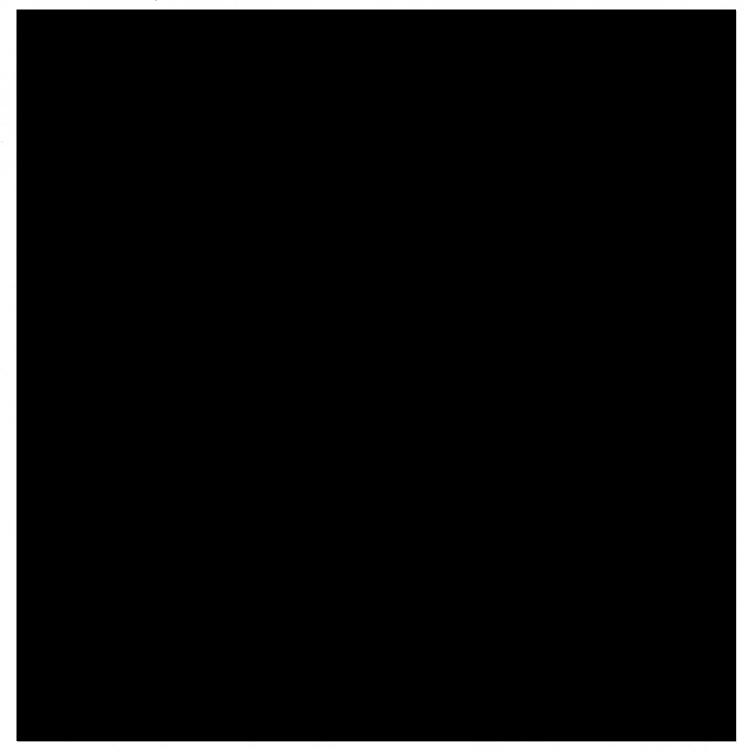
Effective Date: AUG 3 1 2022

Section: Operations

SOP Number: QS-004.005

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9.0 Revision History



<i>metha</i> pharm	Title: Data Logger Locations in Warehouse	Attachment QS-004-1.005
	Effective Date: AUG 3 1 2022	Page 1 of 1
Prepared By:	Reviewed By: 7. 3	Approved By:
Date: Aug. 10, 2022.	Date: 10 - AUG- 2027	Date: aug 10. 7022

<i>metha</i> pharm	Title: Maintenance Log	Form QS-004-2.005
	Effective Date: AUG 3 1 2022	Page 1 of 1
Prepared By:	Reviewed By: 1. 3	Approved By:
Date: 10, 2022	Date: 10 - 4 U 6. 2022	Date: aug 10. 2022

<i>metha</i> pharm	Title: Annual Calibration Log - Warehouse Temperature Monitoring Devices	Form QS-004-3.005
A	Effective Date: AUG 3 1 2022	Page 1 of 1
Prepared By:	Reviewed By: 7-3	Approved By: 4066 aco
Date: Aug. 10 , 2022	Date: 10-AUG-2022	Date: aug 10. 2022

Title: List of Calibrated Data
Loggers

Effective Date: AUG 3 | 2022

Prepared By: Reviewed By: Approved By:

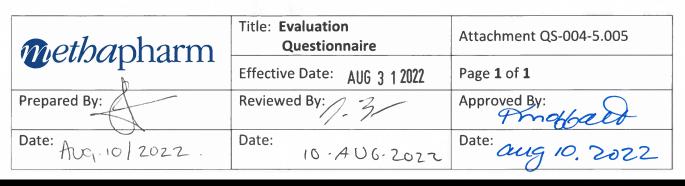
Date: Aug. 10, 2022

Date: 10 - AUG. 2022

Title: List of Calibrated Data
Attachment QS-004-4.005

Page 1 of 1

Approved By: Aug. 10, 2022





Title:

Section: Operations

Sanitation

SOP Number: QS-005.005

Standard Operating Procedure

Effective Date: OCT 1 4 2021

Page **1** of **5**

Issued by: Quality Assurance

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Prepared by:
Operations Administrative
Coordinator

Reviewed by:
Department Management

Approved by:
OA Management

Signature:
Sept 22, 2021

1.0 Purpose

To provide a procedure for the regular sanitation and maintenance of the Methapharm Inc. (Methapharm) Warehouse.

2.0 Scope

- 2.1 This procedure covers the sanitation activities regularly performed by Operations Personnel and Contract Janitorial staff in the warehouse where active pharmaceutical ingredients (API), drug products and/or medical devices are stored.
- 2.2 For any API, drug products and medical devices which are imported, distributed and/or wholesaled by Methapharm, but which are received and stored at a third-party logistics provider (3PL), the 3PL will follow their own internal procedures for sanitation activities.

3.0 Responsibility

- 3.1 It is the responsibility of Operations Personnel and Contract Janitorial staff who have access to the warehouse, to read, understand, and follow this procedure. All activities controlled under this procedure must be documented and verified.
- 3.2 Methapharm QA is responsible for reviewing, signing, and dating completed Sanitation and Floor Washing Logs.

4.0 References and Related SOPs

HPFBI Good Manufacturing Practices (GMP) Guidelines – C.02.007 FDA 21 CFR 211.56 QS-020 – Record Control and Retention



Title: Section: Operations

Sanitation SOP Number: QS-005.005

Standard Operating Procedure

Effective Date: 007 1 4 2021 Page 2 of 5

5.0 Forms/Attachments

Form QS-005-1 – Sanitation Log

Form QS-005-2 – Annual Floor Washing Log

Form QS-005-3 – Evaluation Questionnaire

6.0 Definitions

6.1 IPA: Isopropyl Alcohol (70%)

6.2 <u>Third Party Logistics Provider (3PL)</u>: A third party company used for incoming receipt of goods, warehousing, distribution of goods and other fulfillment services on behalf of Methapharm.

7.0 Procedure



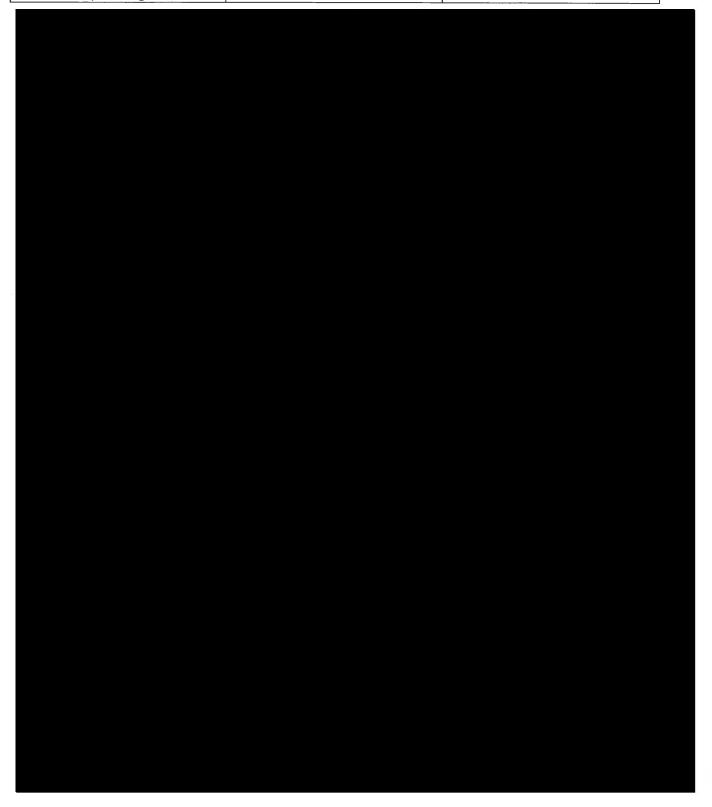


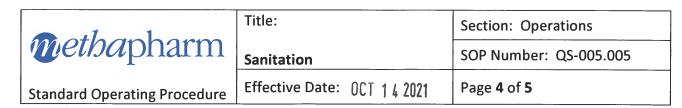
Title: Section: Operations

Sanitation SOP Number: QS-005.005

Standard Operating Procedure | Effective Date: 0CT 1 4 2021

2021 Page **3** of **5**





8.0 Records





Title: Section: Operations

Sanitation SOP Number: QS-005.005

Standard Operating Procedure

Effective Date: OCT 1 4 2021 Page 5 of 5



• 411.	Title: Sanitation Log	Form QS-005-1.005
<i>metha</i> pharm	Effective Date: OCT 1 4 2021	Page 1 of 1
Prepared By:	Reviewed By:	Approved By:
	Malew	trobbatt
Date: \$007 27 2021	Date: Sept 27, 2021	Date: 540 28. 2021

<i>metha</i> pharm	Title: Annual Floor Washing Log	Form QS-005-2.005	
Wecuse priariti	Effective Date: OCT 14 2021	Page 1 of 1	
Prepared By:	Reviewed By:	Approved By:	
Date: 27/2021	Date: Sept 27, 2021	Date: Sept 28.2021	



<i>metha</i> pharm	Title: Evaluation Questionnaire	Form QS-005-3.005
	Effective Date: OCT 1 4 2021	Page 1 of 1
Prepared By:	Reviewed By:	Approved By:
Date: 27/2021	Date: 8pt 27, 2021	Date: Sept 28.2021



Section:	Operations
S	Section:

Pest Control SOP Number: QS-006.003

Effective Date: OCT 1 4 2021 | Page 1 of 3

Issued by: Quality Assurance	Col	py No.: Electronic Copy

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Prepared by: Operations Administrative Coordinator	Signature:	Date: Sept. 27/2021
Reviewed by: Department Management	Signature:	Date: Sept 27, 2021
Approved by: QA Management	Signature:	Date: Sept 28. 2021

1.0 Purpose

To provide a procedure for Pest Control of the Methapharm Inc. (Methapharm) Warehouse.

2.0 Scope

- 2.1 This procedure covers to Pest Control activities in the Warehouse where active pharmaceutical ingredients (API), drug products and/or medical devices are stored.
- 2.2 For any API, drug products and medical devices which are imported, distributed and/or wholesaled by Methapharm, but which are received and stored at a third-party logistics provider (3PL), the 3PL will follow their own internal procedures for pest control activities.

3.0 Responsibility

- 3.1 It is the responsibility of the Methapharm Operations Department to ensure that an active and effective Pest Control program is in place at Methapharm.
- 3.2 Methapharm Operations Department is responsible for confirming any corrective actions taken in response to an infestation or incident are completed.

4.0 References and Related SOPs

HPFBI Good Manufacturing Practices (GMP) Guidelines – C.02.004

FDA 21 CFR 211.56

QS-015 – Deviations and Non-conformances

QS-020 - Record Control and Retention

QS-040 – Contractors and Consultants



Title:	Section:	Operations
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Pest Control SOP Number: QS-006.003

Effective Date: OCT 1 4 2021 | Page 2 of 3

5.0 Forms/Attachments

Form QS-006-1 – Evaluation Questionnaire

6.0 Definitions

6.1 <u>Third Party Logistics Provider (3PL)</u>: A third party company used for incoming receipt of goods, warehousing, distribution of goods and other fulfillment services on behalf of Methapharm.

7.0 Procedure





Title: Section: Operations

Pest Control SOP Number: QS-006.003

Effective Date: OCT 1 4 2021 Page 3 of 3



8.0 Records

9.0 Revision History



	Title: Evaluation Questionnaire	Form QS-006-1.003
methapharm	Effective Date: OCT 1 4 2021	Page 1 of 1
Prepared By:	Reviewed By:	Approved By
Date: \$1,2021	Date: Sept 27,2021	Date: Sept 28. 2021





Title:	Section: Operations
Hygiene	SOP Number: QS-007.003

Effective Date: OCT 1 4 2021

Page **1** of **3**

Electronic Copy Issued by: Quality Assurance Copy No.:

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Prepared by:	Signature:	Date:
Operations Administrative		Sont 27/2021
Coordinator		Sept 2 / WZ
Reviewed by:	Signature:	Date:
Department Management	Stelen	Sept 27, 2021
Approved by:	Signature:	Date:
QA Management	Probable	Date: Sept 28. 2021

1.0 Purpose

To provide a procedure for personal hygiene requirements for the Methapharm Inc. (Methapharm) warehouse.

2.0 Scope

- 2.1 This procedure applies to all employees at Methapharm who have access to any area of the Warehouse where active pharmaceutical ingredients (API), drug products and/or medical devices are stored and handled.
- 2.2 For any API, drug products and medical devices which are imported, distributed and/or wholesaled by Methapharm, but which are received and stored at a third-party logistics provider (3PL), the 3PL will follow their own internal procedures for hygiene activities.

3.0 Responsibility

It is the responsibility of all Methapharm employees involved in warehouse activities to read, understand, and follow this procedure.

4.0 References and Related SOPs

HPFBI Good Manufacturing Practices (GMP) Guidelines – C.02.008 FDA 21 CFR 211.28

5.0 Forms/Attachments

Form QS-007-1 - Evaluation Questionnaire



Title:	Section: Operations
Hygiene	SOP Number: QS-007.003

Effective Date: OCT 1 4 2021

Page **2** of **3**

6.0 Definitions

6.1 Third Party Logistics Provider (3PL): A third party company used for incoming receipt of goods, warehousing, distribution of goods and other fulfillment services on behalf of Methapharm.

7.0 Procedure



8.0 Records



Title:

Section: Operations

Hygiene

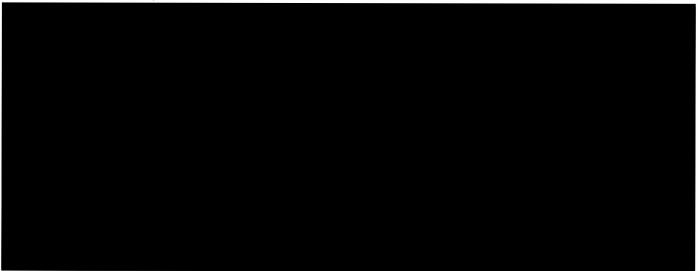
Effective Date:

OCT 1 4 2021 Page

SOP Number: QS-007.003

Page **3** of **3**

9.0 Revision History



<i>metha</i> pharm	Title: Evaluation Que st io nra ire	Form QS-007-1.003
Weisorphanin	Effective Date: 0CT 1 4 2021	Page 1 of 1
Prepared By:	Reviewed By:	Approved By:
Date: Slpt 27/2021	Date: 27, 2021	Date: Sept 28.2021



Title: Section: Operations

Receiving Goods

SOP Number: QS-013.007

Standard Operating Procedure

Effective Date: OCT 20, 2023 | Page 1 of 13

Note: Controlled Copies are identified in SOP footer.

Prepared by:	Name:	Signature/Date:
Operations Supervisor	Jaime Theoret	Refer to QT-9 QMS
Reviewed by:	Name:	Signature/Date:
Director, Operations	John Zanin	Refer to QT-9 QMS
Approved by:	Name:	Signature/Date:
Director, QA	Nina Kazarians	Refer to QT-9 QMS

1.0 Purpose

To provide a procedure for the receipt of incoming Goods by Methapharm Inc. (Methapharm).

2.0 Scope

2.1 This procedure applies to the receipt of incoming goods including, but not limited to active pharmaceutical ingredients (API), drug products, medical devices, and packaging components by Methapharm (hereinafter referred to collectively as 'Goods').

Note: Packaging components include any labels, cartons, boxes (both coded or non-coded), for use in the packaging of a finished drug product, medical device, or natural health product. Packaging components do not include regular shipping boxes.

Note: This SOP does not apply to packaging components received at and released by Methapharm's Contracting Manufacturing Organization(s) (CMO).

3.0 Responsibility

- 3.1 It is the responsibility of Methapharm Operations Personnel involved with ordering and/or receiving Goods to follow this procedure.
- 3.2 Methapharm QA is responsible for reviewing documentation and determining disposition of Goods.

4.0 References and Related SOPs

QS-014 – QA Review and Disposition of Raw Materials and Finished Goods

QS-015 – Deviations and Non-conformances

QS-020 - Record Control and Retention



Title: Receiving Goods

Section: Operations

SOP Number: QS-013.007

Standard Operating Procedure

Effective Date: OCT 20, 2023

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QS-021 - Retain Samples

Section 804(b) through (h) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) (21 U.S.C.384(b) through (h))

5.0 Forms/Attachments

Form QS-013-1 - Stock Receipt - 3PL/CMO

Form QS-013-2 - Methacholine Chloride API Receipt Summary

Form QS-013-3 – Medical Device or Other Bulk Receipt Summary

Form QS-013-4 – Stock Receipt - Methapharm

Form QS-013-5 - Evaluation Questionnaire

6.0 Definitions

- 6.1 <u>Contract Manufacturer</u>: Also called Contract Manufacturing Organization (CMO). An organization that performs the operations of receipt of materials, production, packaging/repackaging, labeling/relabeling, quality control, release, and/or storage of a drug product for Methapharm.
- 6.2 <u>Drug Identification Number (DIN)</u>: A computer-generated eight-digit number assigned by Health Canada to a drug product prior to being marketed in Canada. It uniquely identifies all drug products sold in a dosage form in Canada and is located on the label of prescription and over-the-counter drug products that have been evaluated and authorized for sale in Canada. A DIN uniquely identifies the following product characteristics: manufacturer; product name; active ingredient(s); strength(s) of active ingredient(s); pharmaceutical form; route of administration.
- 6.3 Expiry Date: In the case of a drug in dosage form, the earlier of the following dates, expressed at minimum as a year and month (a) the date up to and including which a drug or device maintains its labelled potency, purity and physical characteristics, and (b) the date, after which the manufacturer recommends that the drug or device not be used. In the case of an API, whichever of the following dates is applicable, expressed at a minimum as a year and month (a) the re-test date, or (b) the date after which the manufacturer recommends that the API not be used.
- 6.4 <u>Lot or Batch</u>: A quantity of any drug in dosage form, a raw material, device, or a packaging material, homogeneous within specified limits, constituting all or part of a single batch and identified by a distinctive lot number that appears on the label of the finished product.



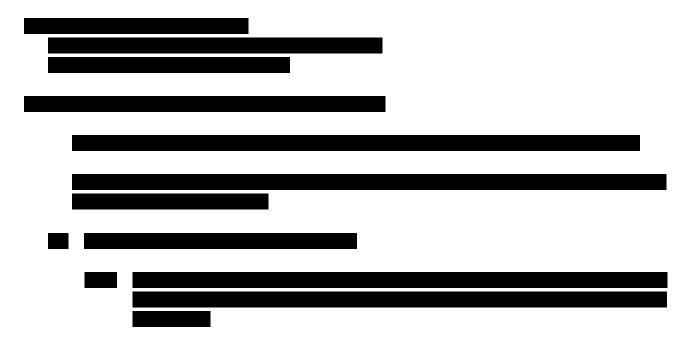
Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

Effective Date: **OCT 20, 2023** Page **3** of **13**

- 6.5 <u>Lot or Batch Number</u>: A distinctive combination of letters, or numbers, or both, from which the history of the manufacturing, packaging, labelling and distribution of a unit, lot or batch of finished drugs or devices can be determined.
- 6.6 <u>Re-test Date</u>: The date when a material should be re-examined to ensure that it is still suitable for use.
- 6.7 <u>Re-test Period</u>: The period of time during which a drug substance can be considered to remain within the specifications and therefore acceptable for use in the fabrication of a given drug product, provided that it has been stored under defined conditions; after this period, the batch is re-tested for compliance with specifications and then used immediately.
- 6.8 <u>Serial Number</u>: A unique combination of letters or numbers, or both, assigned for identification of a single unit.
- 6.9 <u>Third Party Logistics Provider (3PL)</u>: A third party company used for incoming receipt of goods, warehousing, distribution of goods and other fulfilment services on behalf of Methapharm.
- 6.10 <u>Quarantine</u>: Effective restriction of the availability of material or product for use (physically or by system), until released by the Quality Department.

7.0 Procedure

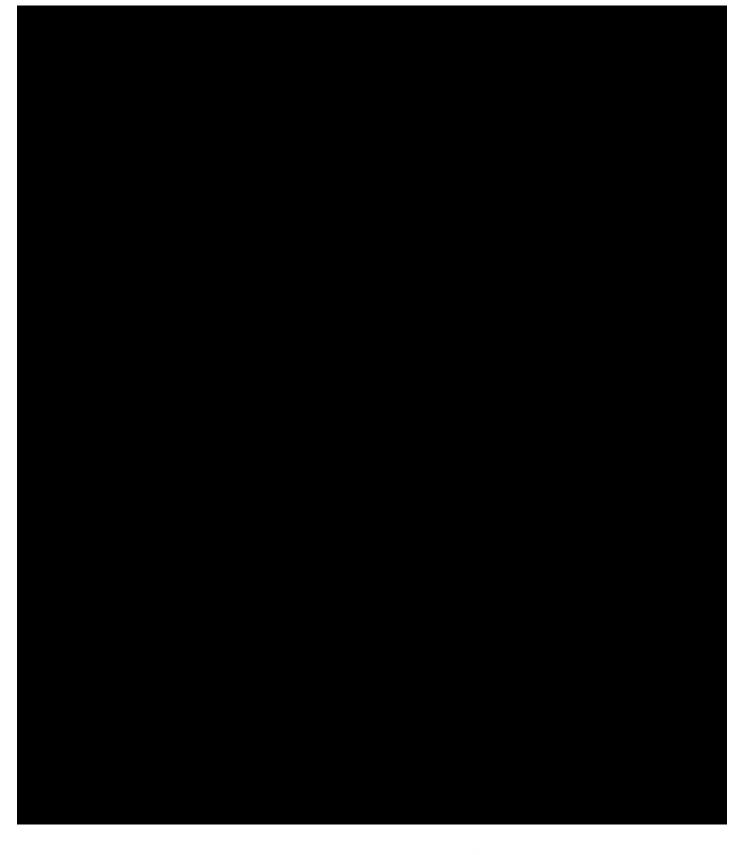




Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

Effective Date: OCT 20, 2023 Page 4 of 13





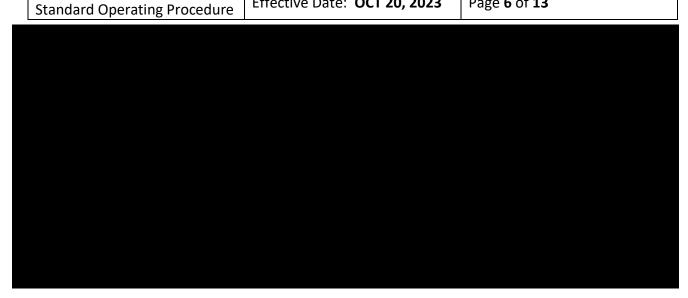
Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

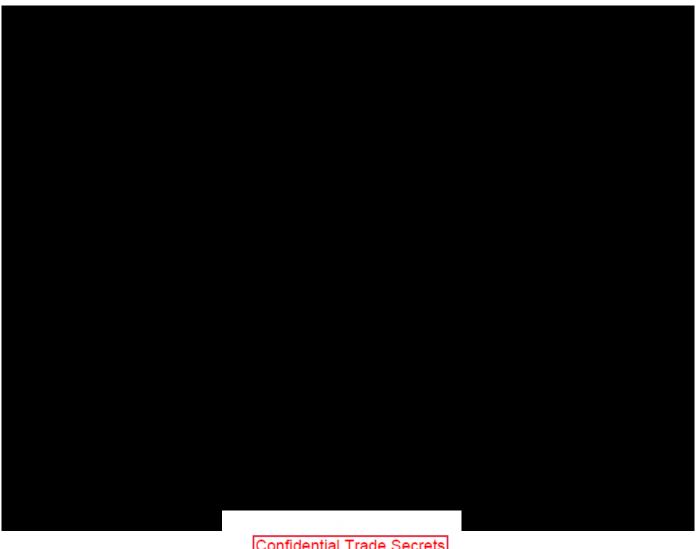
Effective Date: **OCT 20, 2023** Page **5** of **13**







Part 2: Receiving Goods at Methapharm





Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

Effective Date: OCT 20, 2023 Page 7 of 13



7.3 Inspection (Operations Personnel)





Section: Operations Title: **Receiving Goods**

SOP Number: QS-013.007

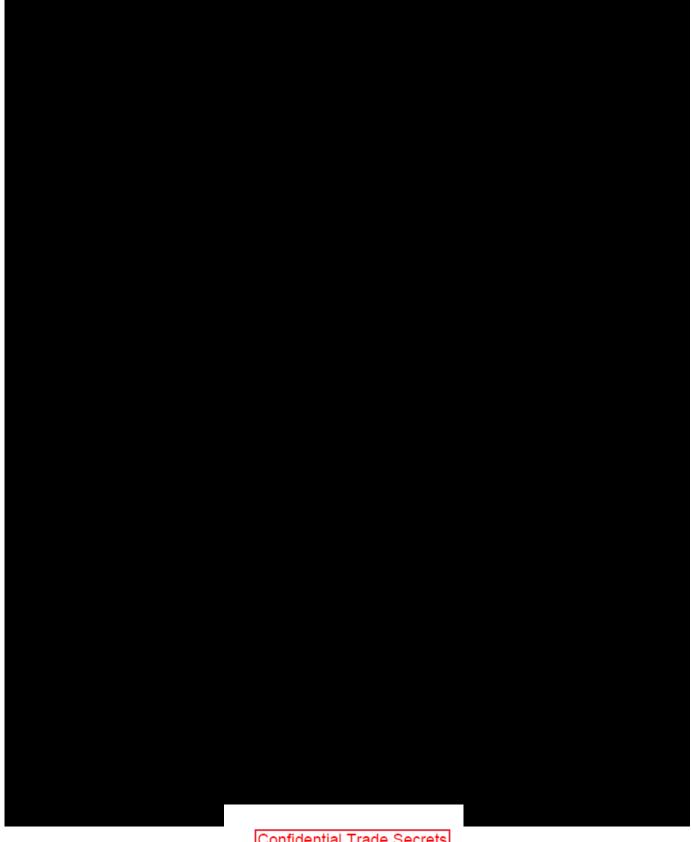
Effective Date: OCT 20, 2023 Page **8** of **13**

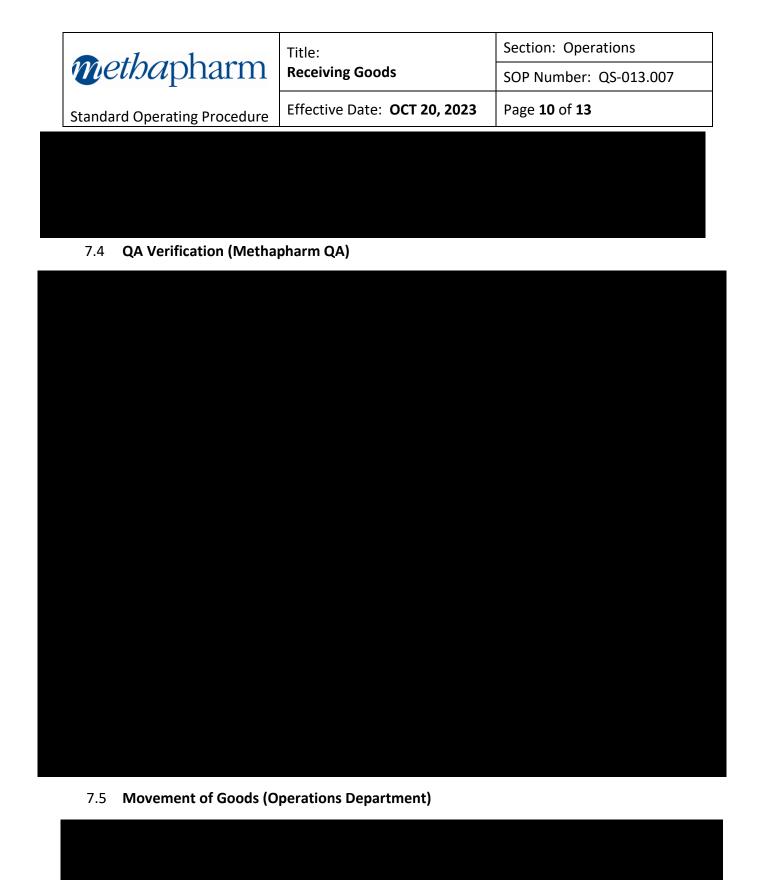


Section: Operations Title: **Receiving Goods**

SOP Number: QS-013.007

Effective Date: OCT 20, 2023 Page **9** of **13**







Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

Effective Date: **OCT 20, 2023** Page **11** of **13**



8.0 Records

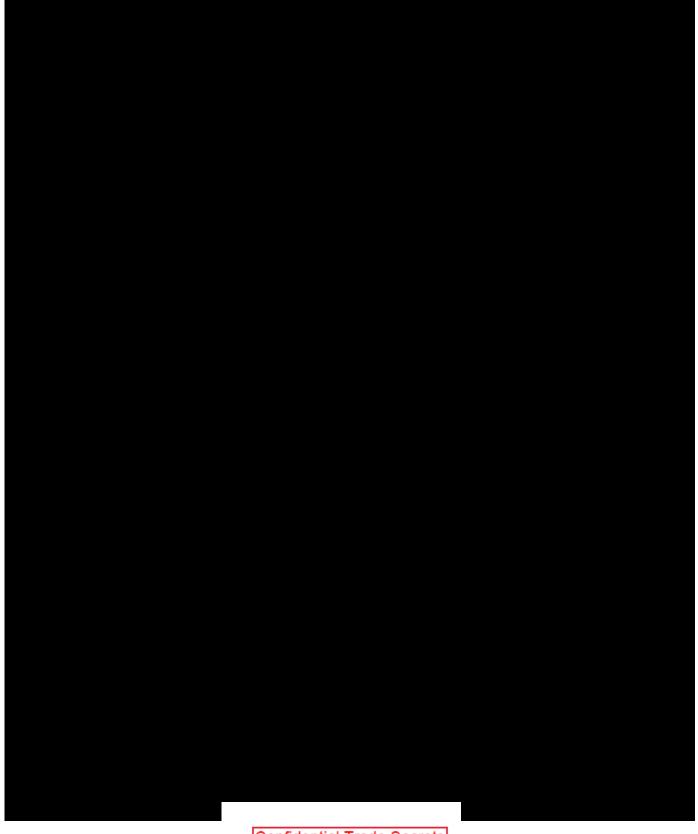




Title: Section: Operations

Receiving Goods SOP Number: QS-013.007

Effective Date: **OCT 20, 2023** Page **12** of **13**





Title: Section: Operations

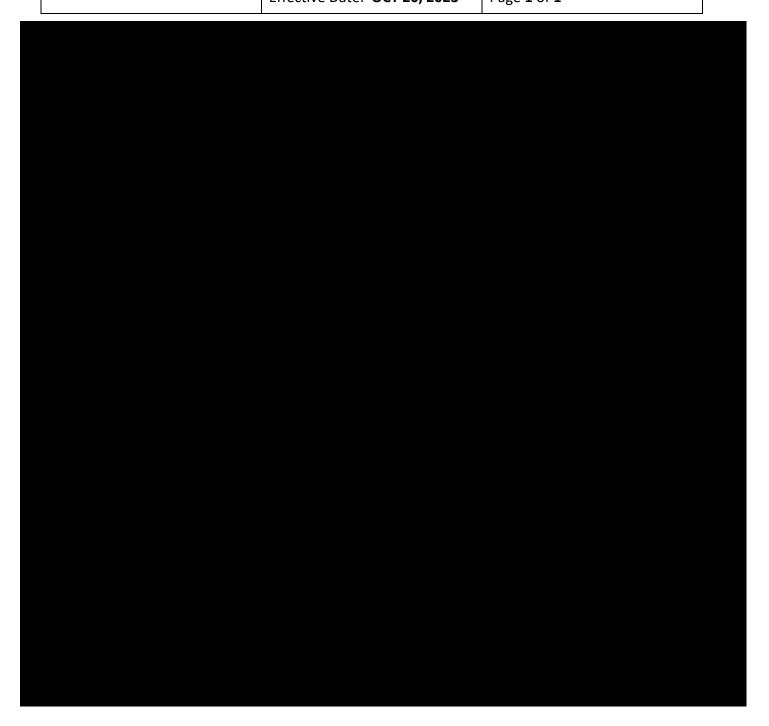
Receiving Goods SOP Number: QS-013.007

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Title: Stock Receipt – 3PL/CMO	Form QS-013-1.007	
Effective Date: OCT 20, 2023	Page 1 of 1	





Title: Methacholine Chloride API Receipt Summary	Form QS-013-2.007	
Effective Date: OCT 20, 2023	Page 1 of 1	

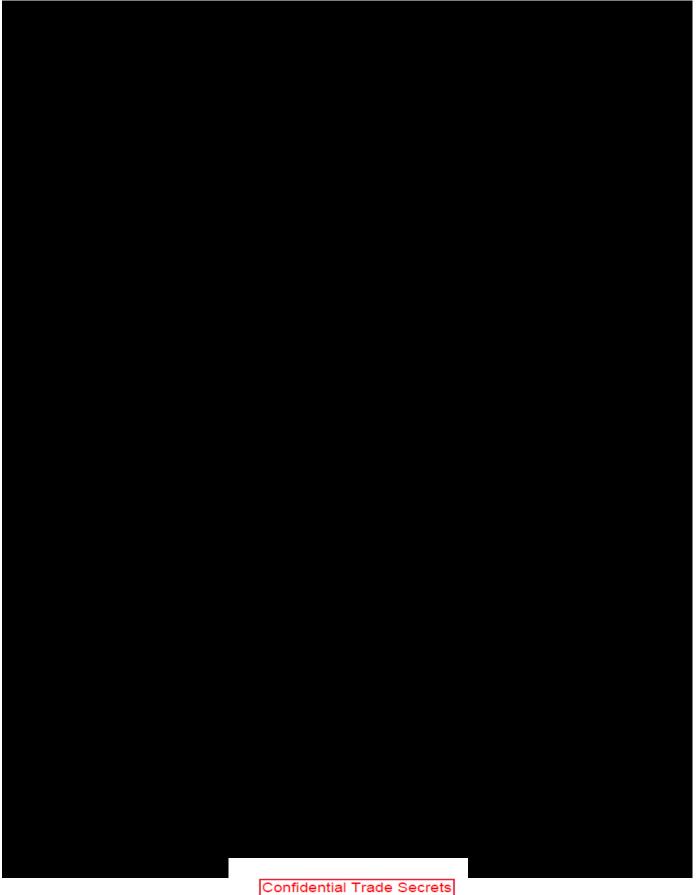


Title: Medical Device or Other Bulk Receipt Summary	Form QS-013-3.007	
Effective Date: OCT 20, 2023	Page 1 of 1	





Title: Stock Receipt - Methapharm	Form QS-013-4.007	
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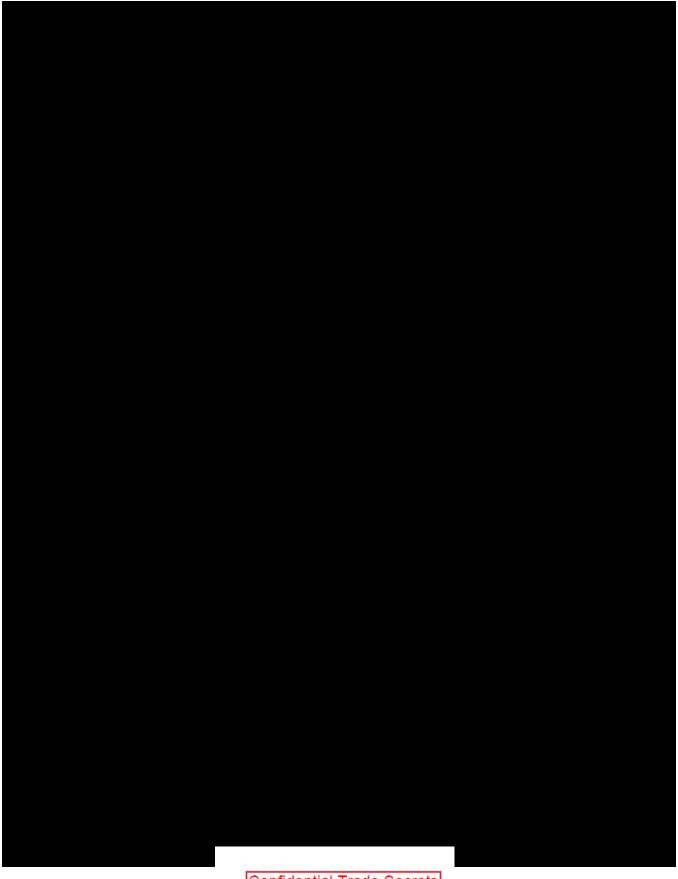




Title: Stock Receipt - Methapharm	Form QS-013-4.007	
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Title: Evaluation Questionnaire	Form QS-013-5.007	
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Prepared by:	Signature:	Date:
QA Associate Wark Juman	MM	11-Aug-2021
Reviewed by:	Signature:	Date:
Department Management	mobbatt	aug 11. 2021
Approved by:	Signature:	Date:
QA Management	thouate	aug 11.2021

1.0 Purpose

To describe the procedure for reporting of quality incidents, non-conformances and deviations, collectively referred to as 'Deviations', at Methapharm Inc. (Methapharm).

2.0 Scope

- 2.1 This procedure applies to the documentation and assessment of quality incidents, non-conformances and deviations, collectively referred to as 'Deviations' for Methapharm processes and products through Good Manufacturing Practices (GMP) and/or Good Pharmacovigilance Practices (GVP) activities.
- 2.2 This procedure does not apply to administrative or pre-marketed activities.

3.0 Responsibility

- 3.1 It is the responsibility of all employees involved in GMP and/or GVP activities to:
 - Report and/or document deviations and non-compliance/non-conformance of GMP/GVP activity to approved procedures and product quality.
 - Notify their Department Manager and Quality Assurance (QA) immediately (within one (1) business day) upon discovery of a deviation.
 - o Initiate a Deviation Report Form immediately (within one (1) business day) upon discovery of a deviation.
 - Provide support with the investigation, as required.
 - Complete assigned action items to address the deviation, correct and/or prevent a recurrence.
 - Submit supporting documentation for assigned action items to QA for closure.



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3.2 It is the responsibility of Department Managers to:

- Provide Subject Matter Expert (SME) input and assist with the investigation in a timely manner.
- Ensure that actions items assigned to your department are completed by assigned due date.

3.3 It is the responsibility of Quality Assurance to:

- Assign a Deviation Report Number and assist the investigation to ensure timely completion of the deviation.
- Appoint an investigator from the affected department, if required, to investigate the deviation.
- Track the status of the investigation to ensure deviation is completed by required due date.
- Track the status of assigned action items to ensure they are closed by assigned due date.

3.4 It is the responsibility of QA Management to:

- o Manage the deviation system at Methapharm.
- Determine product disposition, if applicable.
- o Review and approve Deviation Reports.
- Perform trend analysis.

4.0 References and Related SOPs

QS-001 – Standard Operating Procedures

QS-002 – Training Program

QS-017 - Complaint Handling

QS-020 - Record Control and Retention

QS-029 - Corrective Action and Preventive Action (CAPA) Program

QS-043 – Quality Risk Management

5.0 Forms/Attachments

Form QS-015-1 – Deviation Report Form

Form QS-015-2 – Planned Deviation Report Form

Form QS-015-3 – Evaluation Questionnaire

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6.0 Definitions

6.1 <u>Corrective Action / Preventive Actions (CAPA)</u>:

- Corrective Action: Action taken to eliminate the root cause(s) of a detected issue, problem or non-conformance. Corrective action is typically taken to immediately resolve the deviation or issue.
- Preventive Action: Action taken to prevent reoccurrence. Preventive actions are typically designed to prevent the issue, problem, non-conformance from reoccurring.
- Required Action: An action that is an outcome of a process change (i.e., Change Control Form, Planned Deviation). These actions may not necessarily be the results of identified problems or non-conformances but have nevertheless been identified as a required deliverable. Refer to SOP QS-029 Corrective Action and Preventive Action (CAPA) Program for further details.
- 6.2 <u>Deviation</u>: Also called an unplanned deviation. Any unexpected event, error, out-of-specification (OOS) or atypical result, unexpected trend or non-conformance, which is not consistent with established Methapharm GMP and/or GVP documents or regulatory requirements. A non-conformance is also considered a deviation as per this SOP. Non-conformances can be a malfunction or error associated with written procedures or specifications including those pertaining to premises, equipment, sanitation and testing that may have an impact on the Safety, Integrity, Strength, Purity and/or Quality (SISPQ) of a drug product, Active Pharmaceutical Products (API), medical device or Good Manufacturing Practices (GMP) facility. While carrying out day-to-day activities, there is a probability of unplanned deviations (unforeseen deviations) occurring. Such unexpected events may be related to procedures, processes, systems, equipment, etc.
- 6.3 <u>Planned Deviation</u>: Any deliberate or intentional non-conformance or deviation Planned prior to the execution of an activity, which is to be undertaken following documented, justifiable and approved rationale.
- 6.4 Quality Incidents: Any incident that may have occurred which can have potential impact on the Safety, Integrity, Strength, Purity and/or Quality (SISPQ) of a Product.
- 6.5 Root Cause: An identified reason for the presence of an issue, defect or problem. The root cause addresses the "Why" of the issue, defect, or problem that has occurred.



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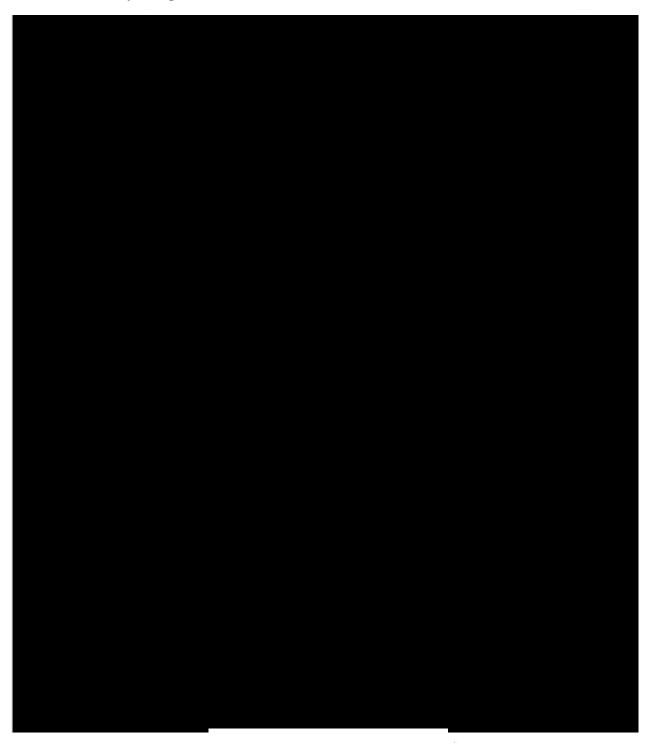
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7.0 Procedure

7.1 **Deviation Reporting – Deviations**



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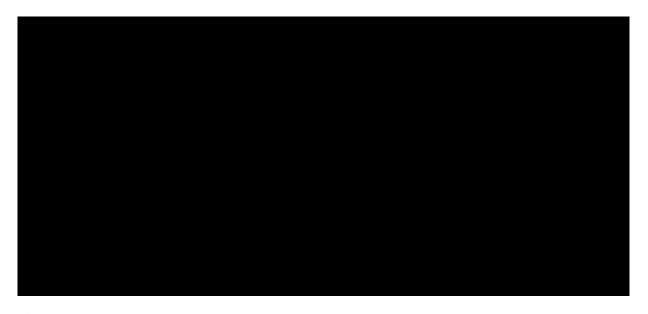
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7.2 Initial QA Review and Assessment





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7.3 Investigation





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7.4 QA Risk Assessment





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7.5 Corrective and Preventive Actions





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7.6 Summary and Conclusion





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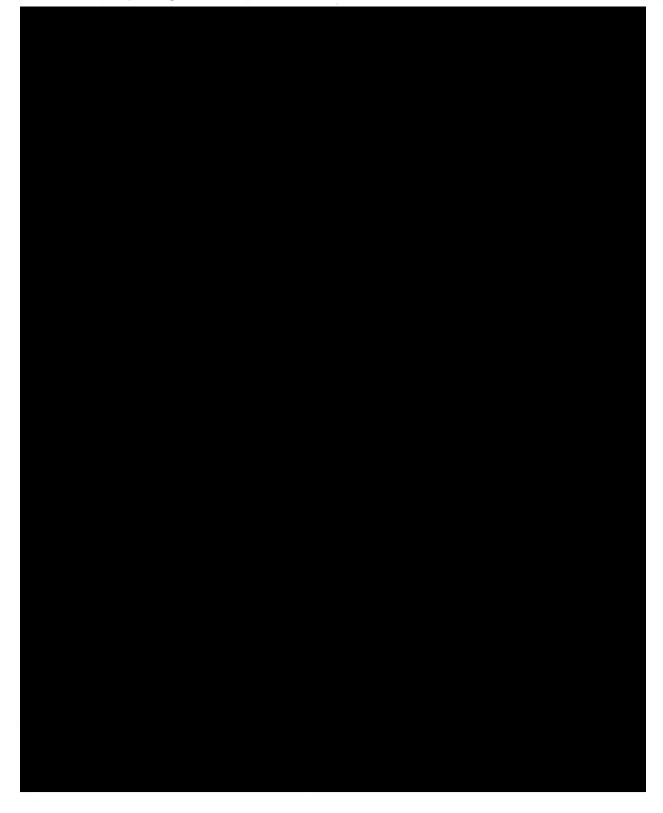
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7.7 Deviation Reporting – Planned Deviations





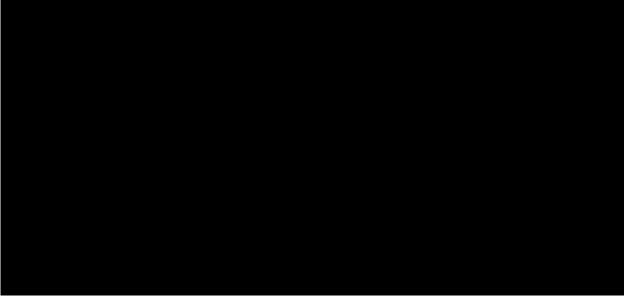
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7.8 Assigning Deviation and Planned Deviation Numbers



7.9 Updates, Cancellation and Extension Requests



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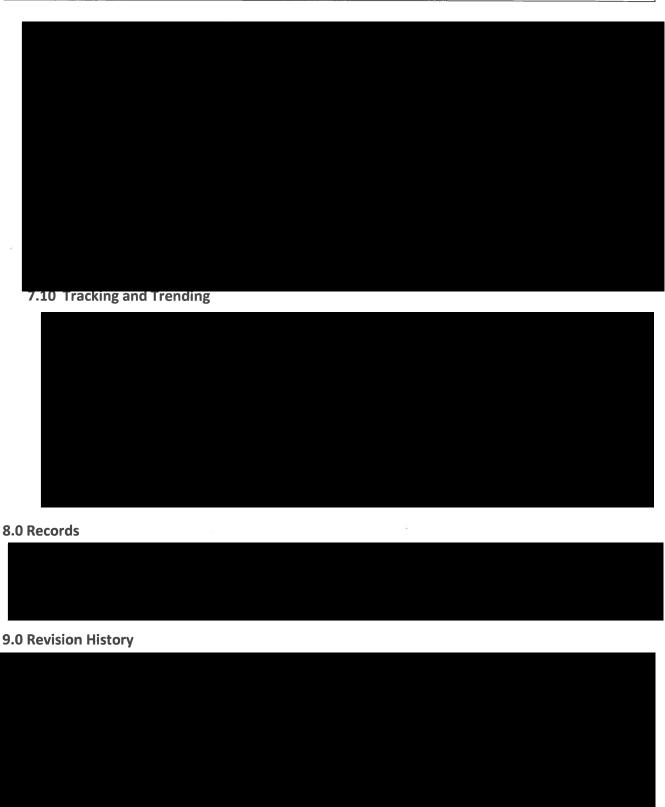
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