

	LifeScience Logistics		
Title:	Control of Records		
Number:	SOP 1101	Boy Date:	08-Sep-2023
Rev. Level:	029	Rev. Date:	00-3ep-2023





LifeScience Logistics			
Title:	Control of Records		
Number:	SOP 1101	Boy Date:	00 Can 2022
Rev. Level:	029	Rev. Date:	08-Sep-2023

10.0 TRAINING RECORD

Training Date		Type of Training	
	☐ Read and Understand — Self Training	☐ Read and Exhibit Competency – Trainer Led with Module/Assessment when applicable	☐ Instructor Led — Trainer Led with Module/Assessment when applicable

Procedure Name or Description of Training	Procedure Number	Revision Level

Trainee: Signature and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on procedure listed above and confirm all listed employees completed training as defined.

Document Training Number / Training Session	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)

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Title:	Deviation/CAP	A - RX	
Number:	SOP 1351	Rev. Date:	29 APR 2021
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1.0 PURPOSE

The purpose of this procedure is to define minimum requirements for reporting internal and external deviations, including client/customer complaints, and conducting an investigation to reach the root cause and determine the required corrective and preventive actions with due dates.

2.0 SCOPE

Government deviations and CAPAs are out of scope. See SOP 1300, Deviation/CAPA – GSA.

Stockpile deviations and CAPAs are out of scope. See SOP 1352, Deviation/CAPA – Stockpile.

Commercial deviations and CAPAs are out of scope. See SOP 1350, Deviation/CAPA – Commercial.

All deviations are considered unforeseen and unintentional. When human error is part of the root cause, the process is investigated for correction and improvement.

Sabotage, falsification of records and intentional harm to LSL resources is out of scope and is handled by the Disciplinary Policy and/or law enforcement as appropriate.

3.0 REFERENCES

21 CFR 211 Current Good Manufacturing Practices for Finished Pharmaceuticals 21 CFR 820 Quality Systems Regulations ISO 13485 Medical Devices — Quality Management Systems SOP 1031 Vendor Qualification SOP 1101 Control of Records SOP 1103 Good Documentation Practices SOP 1300 Deviation/CAPA — GSA SOP 1350 Deviation/CAPA — Commercial SOP 1352 Deviation/CAPA — Stockpile SOP 1500 External Audits and Inspections
ISO 13485 Medical Devices — Quality Management Systems SOP 1031 Vendor Qualification SOP 1101 Control of Records SOP 1103 Good Documentation Practices SOP 1300 Deviation/CAPA – GSA SOP 1350 Deviation/CAPA – Commercial SOP 1352 Deviation/CAPA – Stockpile SOP 1500 External Audits and Inspections
SOP 1031 Vendor Qualification SOP 1101 Control of Records SOP 1103 Good Documentation Practices SOP 1300 Deviation/CAPA – GSA SOP 1350 Deviation/CAPA – Commercial SOP 1352 Deviation/CAPA – Stockpile SOP 1500 External Audits and Inspections
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SOP 1350 Deviation/CAPA – Commercial SOP 1352 Deviation/CAPA – Stockpile SOP 1500 External Audits and Inspections
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14/1 COO OC
WI 600.06 Prescription Drug Hold and Release
WI 600.07 Prescription Drug Initial Sampling and Laboratory Testing
WI 600.19.01 Deviation Report – RX
WI 600.19.02 Deviation Report e-Log – RX
WI 600.19.03 CAPA Report e-Log – RX
WI 600.19.04
WI 600.19.05 Deviation/CAPA Extension Request – RX

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4.0 **DEFINITIONS**

DEFINITIONS	
CAPA Client Code	Corrective and Preventive Action – A systematic approach that includes actions needed to correct [correction], avoid recurrence [corrective action], and eliminate the cause of potential nonconforming product and other quality problems [preventive actions]. Unique number assigned to clients for anonymity.
Commitment	
Correction	A single corrective action with a due date.
Correction	Action to eliminate a detected nonconformity. Corrections are typically a one-time fixes. A correction is an immediate solution, also known as containment action.
Corrective Action	Action to eliminate the causes of a detected nonconformity or other undesirable situation. The action should eliminate the recurrence of the issue.
Deviation	Datum or results outside of an expected range; an unfulfilled requirement. Also known as nonconformity.
Effectiveness Check	Documented process to verify that a Corrective Action and Preventive Action was effective and accomplished the objective that was intended.
Fishbone diagram	Root cause analysis tool shaped like a fish skeleton; also known as Cause-and-Effect or Ishikawa diagram
Investigation	Thorough, timely, unbiased, well-documented, and scientifically sound process used to discover the root causes of the problem.
Isolated Event	The type of reported event has never happened before, not person or facility-specific.
Metrics	Quantitative measurements that are collected, recorded, and analyzed to determine whether quality system goals and objectives have been met or exceeded or failed to meet requirements.
Monitor	Observe and check over a period of time; to maintain regular close observation over a process.
Objective Evidence	Data that show or prove that something exists or is true. Objective evidence can be collected by means of observations, measurements, tests or other suitable methods.
Preventive Action	Action to eliminate the cause of a potential nonconformity or other undesirable potential situation in order to prevent occurrence.
Problem Statement	Description of what happened vs. what should have happened, the date the event occurred and was discovered as well as reported, where it happened, How it was discovered, who discovered it, and time of day discovered, as applicable.
Quality	The degree to which a set of inherent characteristics fulfills requirements. A measure of a product's or service's ability to satisfy the client or customer's stated or implied needs.

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Quality System	Formalized business practices that define management responsibilities for organizational structure, processes, procedures, and resources needed to fulfill service requirements, customer satisfaction and continuous improvement.
Root Cause	A gap in a process input or supporting business system that is, at least partly, responsible for the incident. It is the basic reason why causal factors occur and/or persist.
Root Cause Analysis	Analysis necessary to determine the original or true root cause of a system, product, or process nonconformity. This effort extends beyond the effects of a problem to discover its most fundamental cause.
SharePoint	A web-based collaborative platform LSL uses for electronically filing and storing records. https://lslog.sharepoint.com/SitePages/Home.aspx

5.0 ABBREVIATIONS/ACRONYMS

	7.10.10.11.11.0
CAPA	Corrective and Preventive Action
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
CQCU	Corporate Quality Control Unit
DEA	Drug Enforcement Administration
DEV	Deviation
EC	Effectiveness Check
ISM	Inventory Status Modification
LSL	LifeScience Logistics
QA	Quality Assurance
SISPQ	Safety, Identity, Strength, Purity, and Quality
SOP	Standard Operating Procedure
WI	Work Instruction

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6.0 RESPONSIBILITY

CQCU/Functional	Maintain this procedure in accordance with the LSL document and data
Owner	control system.
	Ensure training requirements by position are updated in the Quality
	Management System to align with tasks listed in each document's revision.
	Approve documents to meet the purpose of the procedure and meet
	current revision guidelines.
	Determine Risk Level, impact assessment and response due dates.
	Upon successful completion, approve all Deviation and CAPA Reports.
	Track aging of Deviation and CAPA Reports.
	Follow up with assignee to ensure progress of Deviation and CAPA
	Reports.
Department	Review and approve all departmental Deviation and CAPA Reports.
Management	Disseminate Deviation and CAPA data to direct reports.
Users	Understand and perform this procedure as described, including any
	procedures included by reference.
	Promptly report any problems or deviations from the procedure to your
	Supervisor or designee.

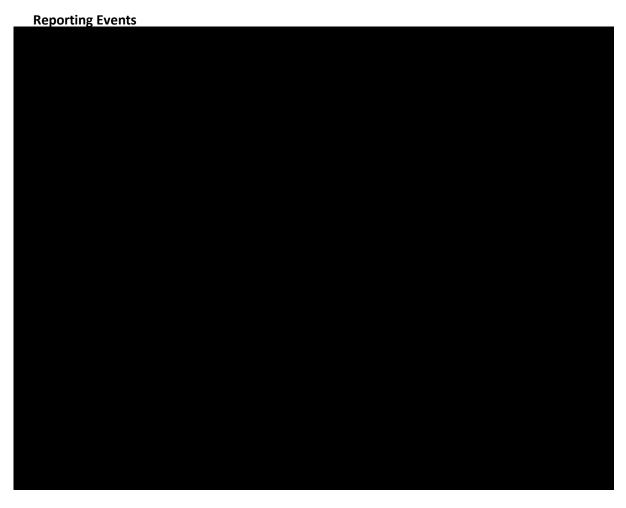
7.0 PROCEDURE



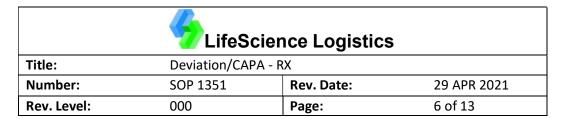
Discovering Unexpected Events

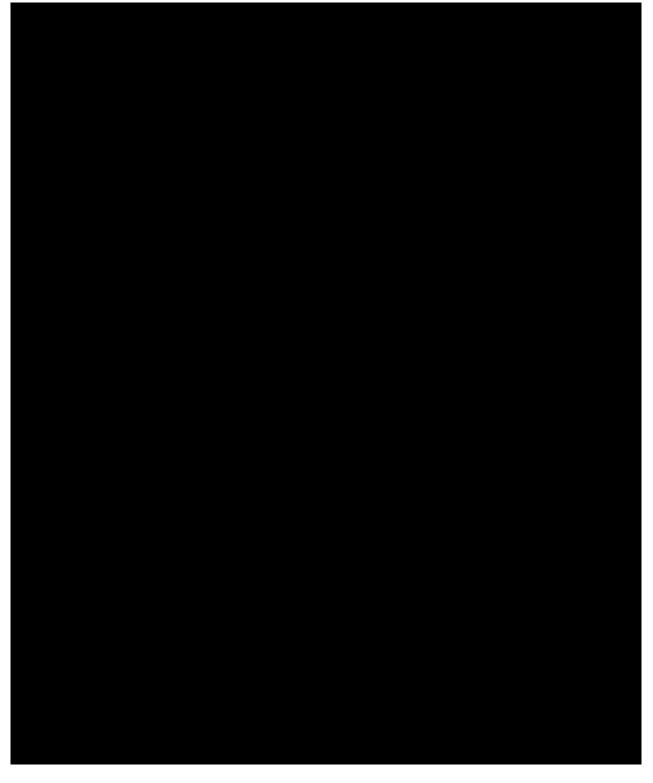
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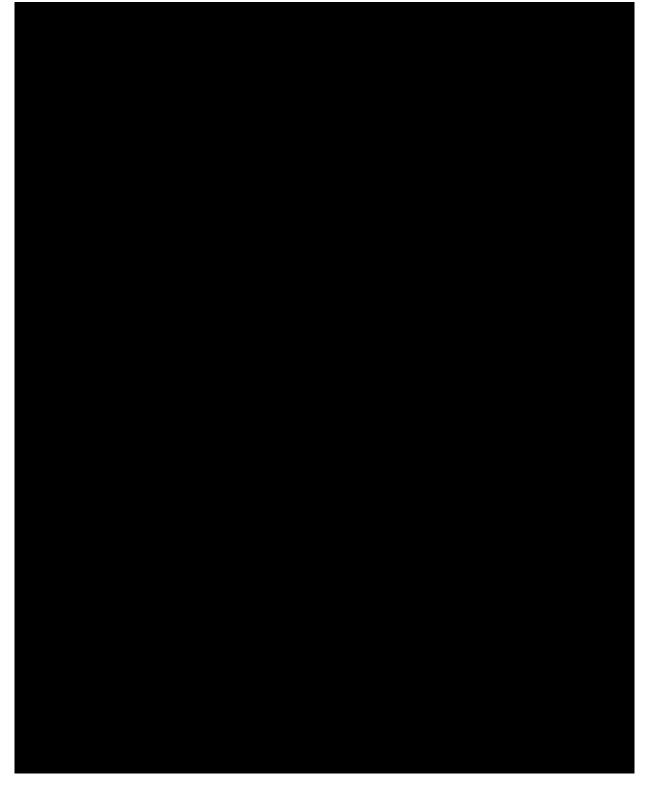


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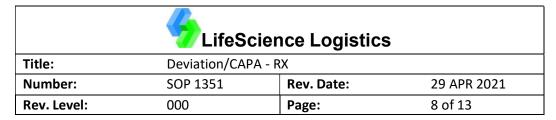




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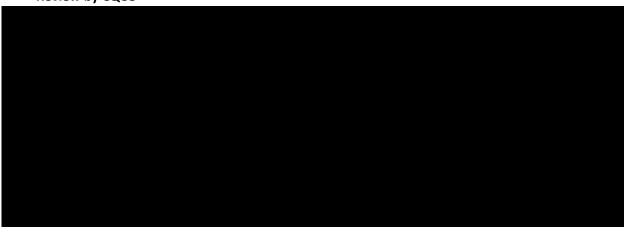


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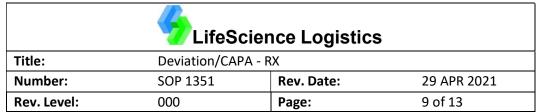




Review by CQCU

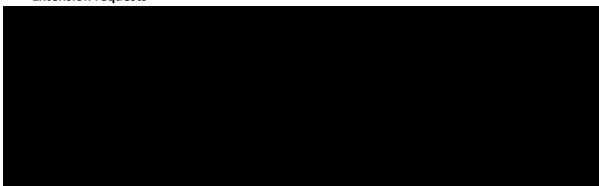


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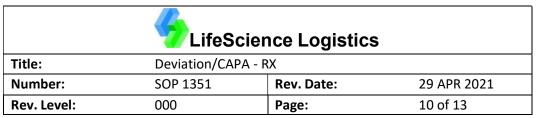


Extension requests



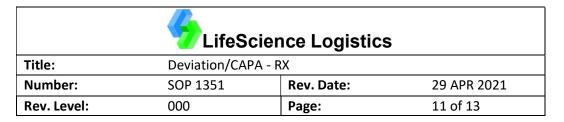
Deviation or CAPA Report Log (Completed by CQCU)







Deviation or CAPA Report Revision by CQCU



8.0 **ADDITIONAL INFORMATION**





8.3 Occurrence (general guidelines over a 6 month review):



8.4 **Probability of Detection:**



8.5 **Risk Levels:**



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Control of Records

Confidentiality Statement

8.7 All LifeScience Logistics documents are confidential and proprietary. Consent must be obtained from the CEO/Principal and/or Director of Quality and Regulatory Affairs prior to reproduction or transmission in any form.

9.0 REVISION HISTORY

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10.0 TRAINING RECORD

Training Date	Type of Training		
	☐ Self-Training – Level 2	☐ Trainer Led – Level 3	☐ Trainer Led – Level 4
		with optional Module	with Module

Trainee: Initial and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Signature	Department	Date
	<u> </u>	

Trainer: Signature below indicates you have presented training on the procedure listed to the employees listed above.

Training Event Number	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)

	LifeSc	ience Logistics	6
Title:	Response to Ca	rgo Thefts	
Number:	SOP 1601	Rev. Date:	08 JUL 2020
Rev. Level:	005	Page:	1 of 4

1.0 PURPOSE

The purpose of this procedure is to define the process of LifeScience Logistics' response when a cargo theft involving an FDA-regulated product has occurred.

2.0 SCOPE

This procedure applies to all products shipped by LSL from any of their warehouse facilities.

Warehouse thefts of FDA regulated products are out of scope of this procedure.

For warehouse thefts see SOP 2002, Handling, Storage, Packaging and Distribution.

3.0 REFERENCES

SOP 1003	Recalls, Removals, and Corrections
SOP 1101	Control of Records
SOP 2002	Handling, Storage, Packaging and Distribution
WI 200.06	DEA Theft or Loss

4.0 **DEFINITIONS**

Cargo Theft	FDA considers cargo thefts to include tractor-trailer and warehouse
	thefts of FDA-regulated products, such as prescription drugs, OTC drug
	products, infant formula, or medical devices which may pose a threat
	to the public health or a risk to the legitimate supply chain.

5.0 ABBREVIATIONS

CEO	Chief Executive Officer
CQCU	Corporate Quality Control Unit
FDA	Food & Drug Administration
LSL	LifeScience Logistics
OCI	FDA Office of Criminal Investigation
OTC	Over The Counter
QA	Quality Assurance
SOP	Standard Operating Procedure
WI	Work Instruction

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6.0 RESPONSIBILITY

CQCU	Maintain this procedure in accordance with the LSL document and
	data control system.
Functional Owner / Operations	Ensure training requirements by position are updated in MQ1 to align with tasks listed in each document's revision. Approve documents to meet purpose of procedure and meet current revision guidelines.
Users	Understand and perform this procedure as described, including any procedures included by reference. Promptly reports any problems or deviations from procedure to your Supervisor or designee.



	LifeScie	nce Logistics	
Title:	Response to Cargo	Thefts	
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8.0 ADDITIONAL INFORMATION Control of Records

Confidentiality Statement

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9.0 REVISION HISTORY

	LifeScie	nce Logistics	
Title:	Response to Cargo	Thefts	
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10.0 TRAINING RECORD

Training Date	Type of Training		
	☐ Self-Training – Level 2	☐ Trainer Led – Level 3	☐ Trainer Led – Level 4
		with optional Module	with Module

Trainee: Initial and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on the procedure listed to the employees listed above.

Training Event Number	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)

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Title:	Handling, Stora	age, Packaging & Distri	bution
Number:	SOP 2002	Rev. Date:	02 JUN 2021
Rev. Level:	010	Page:	1 of 7

1.0 PURPOSE

The purpose of this procedure is to define the steps Life Science Logistics uses to control the handling, storage, packaging and distribution for Client product. This includes awareness and ability to identify suspicious or criminal activity.

2.0 SCOPE

Tracing specific lots, batches, or serial numbers for product is out of scope. See SOP 2301, Identification and Traceability.

Response to Cargo Theft is out of scope. See SOP 1601, Response to Cargo Thefts.

Client-specific requirements supersede this SOP.

3.0 REFERENCES

21 CFR 211Current Good Manufacturing Practices for Finished Pharmaceuticals21 CFR 820Quality System RegulationsDSCSA Section 205National Standards for Third-Party Logistics Providers Uniform National PolicyISO 13485Medical Devices – Quality Management SystemsSOP 1101Control of RecordsSOP 1300Deviation/CAPA – GSASOP 1350Deviation/CAPA – CommercialSOP 1351Deviation/CAPA – RXSOP 1352Deviation/CAPA – StockpileSOP 1601Response to Cargo TheftsSOP 2002.01First 30 Days: Handling, Storage, Packaging and Distribution Module – INCSOP 2301Identification and TraceabilitySOP 4004Client/Customer Feedback – CommercialWI 100.25Physical InventoryWI 200.06DEA Theft or LossWI 300.22SNS Order PickWI 300.23SNS Order ShippingWI 400.04Commercial Pick Pack and ShipWI 500.05Stockpile Order PickWI 500.05Stockpile Order ShippingWI 600.10Prescription Drug Pick/Pack/Ship		
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National Policy ISO 13485 Medical Devices – Quality Management Systems SOP 1101 Control of Records SOP 1300 Deviation/CAPA – GSA SOP 1350 Deviation/CAPA – Commercial SOP 1351 Deviation/CAPA – RX SOP 1352 Deviation/CAPA – Stockpile SOP 1601 Response to Cargo Thefts SOP 2002.01 First 30 Days: Handling, Storage, Packaging and Distribution Module – INC SOP 2301 Identification and Traceability SOP 4004 Client/Customer Feedback – Commercial WI 100.25 Physical Inventory WI 200.06 DEA Theft or Loss WI 300.22 SNS Order Pick WI 300.23 SNS Order Shipping WI 400.04 Commercial Pick Pack and Ship WI 500.05 Stockpile Order Shipping	21 CFR 820	Quality System Regulations
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WI 500.04 Stockpile Order Pick WI 500.05 Stockpile Order Shipping	WI 300.23	SNS Order Shipping
WI 500.05 Stockpile Order Shipping	WI 400.04	Commercial Pick Pack and Ship
	WI 500.04	Stockpile Order Pick
WI 600.10 Prescription Drug Pick/Pack/Ship	WI 500.05	Stockpile Order Shipping
	WI 600.10	Prescription Drug Pick/Pack/Ship

4.0 **DEFINITIONS**

Directed Put-Away	WMS directs where newly received product should be stored.
Illegitimate Product	Credible evidence shows that the product is potentially counterfeit,
	diverted, or stolen, intentionally adulterated such that the product
	would result in serious health consequences to humans, subject of a

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	fraudulent transaction, or appears otherwise unfit for distribution.		
Item Number	LSL reference number for a given product, which is used on Tags. This		
	could be an NDC, UPC or other unique reference for identification.		
	Also, one item number stored in different units of measure may have		
	unique item numbers.		
Mixed Pallet	A pallet that contains two or more different products or one product		
	with multiple lot numbers.		
Pack-out spec	Client specific written specification for shipment of Client product.		
	This may or may not include cold packs, frozen gel packs, etc.		
Packaging materials	Per 21 CFR 211.130 Packaging and Labeling – these are controlled by		
	LSL's Client. This includes Tamper-evident packaging per 21 CFR		
	211.132		
Packing materials	Packing materials are not the product's primary (bottle) or secondary		
	packaging materials (shelf-unit with lot and expiry date) but are		
	bubble-wrap, Packing list, dunnage and/or corrugated shipping boxes.		
Partial Case	A case that contains less product than a full case.		
Product	Prescription and non-prescription drugs, devices, kits or other		
	merchandise and its containers, labels and packaging		
Returns	Returned Goods		
RF Gun	Hand-held bar code readers that work via radio frequency		
Suspect Product	Reason to believe that the product is potentially counterfeit, diverted,		
	or stolen, intentionally adulterated such that the product would result		
	in serious health consequences to humans, subject of a fraudulent		
	transaction, or appears otherwise unfit for distribution.		
Tag	Physical sticker and WMS unique identifier with both barcodes and		
	human readable numbers.		

5.0 ABBREVIATIONS/ACRONYMS

CAPA	Corrective and Preventive Action
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
CQCU	Corporate Quality Control Unit
DEA	Drug Enforcement Administration
DSCSA	Drug Supply Chain Security Act
FDA	Food and Drug Administration
FEFO	First Expired – First Out
LSL	LifeScience Logistics
NDC	National Drug Code
OPS	LSL Operations
QA	Quality Assurance
RF	Radio Frequency
SNS	Strategic National Stockpile
SOP	Standard Operating Procedure

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UPC	Universal Product Code
WI	Work Instruction
WMS	Warehouse Management System

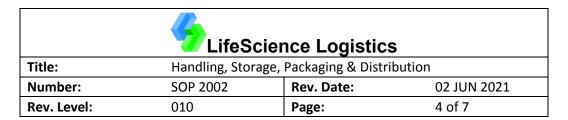
6.0 RESPONSIBILITY

CQCU	Maintain this procedure in accordance with the LSL document and data control system.
Functional Owner	Ensure training requirements by position are updated in MQ1 to align with tasks listed in each document's revision. Approve documents to meet the purpose of the procedure and meet current revision guidelines.
Users	Understand and perform this procedure as described, including any procedures included by reference. Promptly report any problems or deviations from the procedure to your Supervisor or designee.

7.0 PROCEDURE

+ Handling Suspicion of Criminal Activity, Product Losses or Thefts

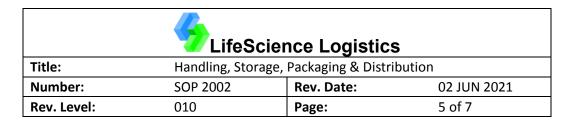


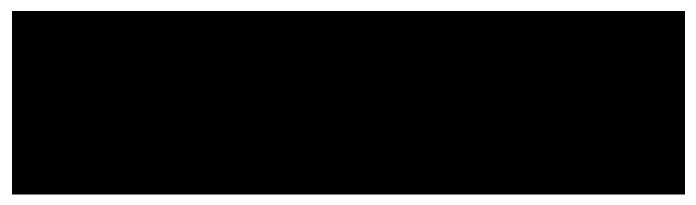




+ Client Product Storage







Distribution



Packaging



LifeScience Logistics			
Title:	: Handling, Storage, Packaging & Distribution		
Number: SOP 2002 Rev. Date: 02 JUN 2021			
Rev. Level:	010	Page:	6 of 7



+ Handling of Quarantine Product



8.0 **ADDITIONAL INFORMATION Control of Records**

Confidentiality Statement

8.2 All LifeScience Logistics documents are confidential and proprietary. Consent must be obtained from the CEO/Principal and/or Director of Quality and Regulatory Affairs prior to reproduction or transmission in any form.

9.0 **REVISION HISTORY**



LifeScience Logistics				
Title:	e: Handling, Storage, Packaging & Distribution			
Number:	Number: SOP 2002 Rev. Date: 02 JUN 2021			
Rev. Level:	010	Page:	7 of 7	

10.0 TRAINING RECORD

Training Date	Type of Training		
	☐ Self-Training – Level 2	☐ Trainer Led – Level 3 with optional Module	☐ Trainer Led – Level 4 with Module

Trainee: Initial and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on the procedure listed to the employees listed above.

Training Event Number	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)

	LifeScie	nce Logistics	
Title:	Prescription Drug Pharmacovigilance		
Number:	SOP 7004	Rev. Date:	13 MAY 2021
Rev. Level:	000	Page:	1 of 10

1.0 PURPOSE

The purpose of this procedure is to define the reporting processes used for the Pharmacovigilance – Post Marketing Reporting at LSL Prescription Drug Program facilities.

2.0 SCOPE

This procedure applies to LSL's reporting of Post Marketing Product Events received and managed by the vendor.

This procedure does not apply to customer financial complaints, shipping complaints or customers' inquiries.

This procedure does not apply to product complaints regarding product warehoused at Commercial facilities.

3.0 REFERENCES

21 CFR 211	Current Good Manufacturing Practices for Finished Pharmaceuticals	
21 CFR 251	Section 804 Importation Program	
21 CFR 820	Quality Systems Regulations	
21CFR 310	New Drugs	
ICH E2B	Data Elements for Transmission on Individual Case Safety Reports	
SOP 1800	Training and Qualification	
SOP 1101	Control of Records	
SOP 1100	Document Control	
SOP 1351	Deviation/CAPA – RX	
WI 600.24.01	Prescription Drug Product Complaint Log	
WI 600.24.02	Prescription Drug Product Complaint Report	

4.0 DEFINITIONS

Adverse Event	An undesirable experience associated with the use of a medical product in a patient.
Individual Case	Document used for the reporting of suspected adverse reactions to a
Safety Report	medicinal product that occur in a specific patient at a specific point of time.
ICH E2B	Electronic transmission of individual case safety reports.
MedWatch Form 3500A	Form used for reporting Adverse Events to FDA
Periodic Adverse	Safety reports submitted to the USFDA to update and evaluate a
Drug Experience	medicine's global data and provide information about the drug's
Reports	safety.
PV-Works	SafetyCall's Pharmacovigilance system.

LifeScience Logistics			
Title:	Prescription Drug Pharmacovigilance		
Number:	Number: SOP 7004 Rev. Date: 13 MAY 2021		
Rev. Level:	000	Page:	2 of 10

5.0 ABBREVIATIONS/ACRONYMS

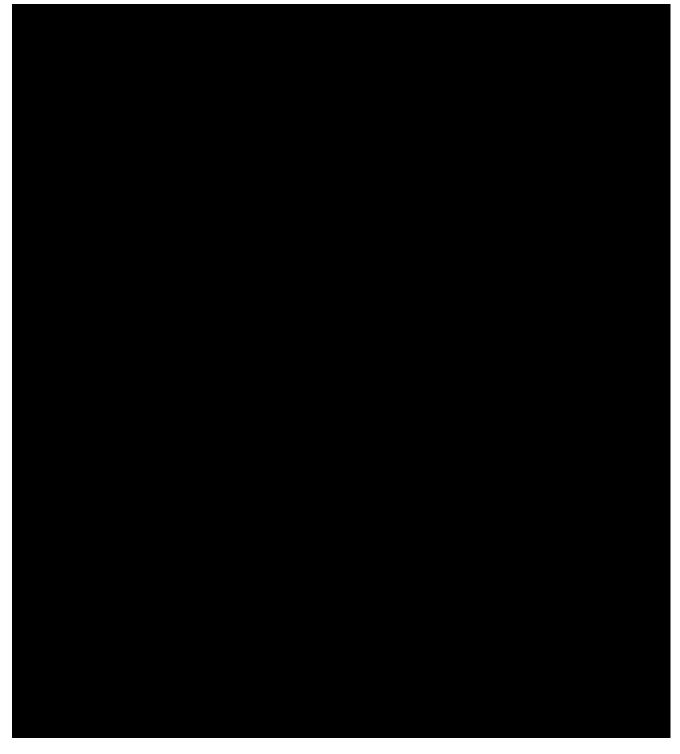
ADR	Adverse Drug Reaction	
ANDA	Abbreviated New Drug Application	
CCDS	Company Core Data Sheet	
CEO	Chief Executive Officer	
CFR	Code of Federal Regulations	
CIOMS I	Council for International Organizations of Medical Sciences common	
	adverse experience reporting form	
CMP	Complaint	
CQCU	Corporate Quality Control Unit	
eCTD	Electronic Common Technical Document	
EMA	European Medicines Agency	
ESG	Electronic Submissions Gateway	
FDA	Food and Drug Administration	
ICH	International Council for Harmonization of Technical Requirements for	
	Pharmaceuticals for Human Use	
ICSR	Individual Case Study Report	
LSL	LifeScience Logistics	
MedDRA	Medical Dictionaries for Regulatory Activities	
NDA	New Drug Application	
PADER	Periodic Adverse Drug Experience Report	
PharmD	Doctor of Pharmacy	
QA	Quality Assurance	
RN	Registered Nurse	
SOP	Standard Operating Procedure	
WI	Work Instruction	

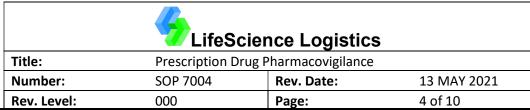
6.0 RESPONSIBILITY

CQCU	Maintain this procedure in accordance with the LSL document and data control system. Overseeing the client responsible for managing LSL product complaints. Managing the reports received from the client.
SafetyCall	Service Provider/Vendor responsible for the notification of any serious
International	or significant events to LSL.

LifeScience Logistics			
Title:	Prescription Drug Pharmacovigilance		
Number:	mber: SOP 7004 Rev. Date : 13 MAY 2021		
Rev. Level:	000	Page:	3 of 10

7.0 PROCEDURE







Complaint Notification and Investigation

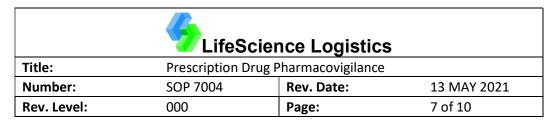


LifeScience Logistics			
Title:	Prescription Drug Pharmacovigilance		
Number: SOP 7004 Rev. Date: 13 MAY 2021			13 MAY 2021
Rev. Level:	000	Page:	5 of 10



LifeScience Logistics			
Title:	Prescription Drug Pharmacovigilance		
Number: SOP 7004 Rev. Date: 13 MAY 2021			13 MAY 2021
Rev. Level:	000	Page:	6 of 10

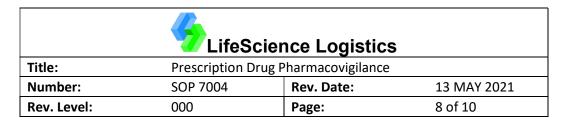




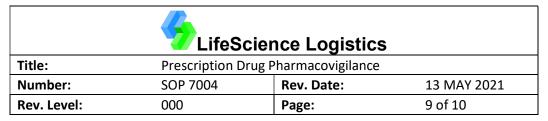


Periodic Adverse Drug Experience Reports

Product Complaints Reported Directly to LSL









8.0 ADDITIONAL INFORMATION Control of Records

Confidentiality Statement

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9.0 REVISION HISTORY

LifeScience Logistics			
Title:	Prescription Drug Pharmacovigilance		
Number:	Number: SOP 7004 Rev. Date: 13 MAY 2021		
Rev. Level:	000	Page:	10 of 10

10.0 TRAINING RECORD

Training Date	Type of Training		
	☐ Self-Training – Level 2	☐ Trainer Led – Level 3 with optional Module	☐ Trainer Led – Level 4 with Module

Trainee: Initial and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on the procedure listed to the employees listed above.

Training Event Number	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)	



Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Administrative

Effective Date: TBD

Page **1** of **11**

Issued by: Quality Assurance
Note: Controlled Copies are identified in SOP footer.

Prepared by:	Name:	Signature/Date:	
		Refer to QT-9 QMS	
Reviewed by:	Name:	Signature/Date:	
		Refer to QT-9 QMS	
Approved by:	Name:	Signature/Date	
		Refer to QT-9 QMS	

1.0 Purpose

To describe a procedure for the management of receipt of prescription drug products and communications related to the FDA's Section 804 Importation Program (SIP) that are received at/by Methapharm Inc. (Methapharm).

2.0 Scope

- 2.1 This procedure applies to the receipt of incoming prescription drug products (hereinafter referred to as 'Goods' received at Methapharm for subsequent export under the FDA's Section 804 Importation Program (SIP).
- 2.2 This procedure applies to Methapharm employees who receive information requests from Regulatory Agencies (federal or state), US Importer representatives or distributor representatives related to prescription drug products supplied by Methapharm under FDA's Section 804 Importation Program (SIP).

3.0 Responsibility

It is the responsibility of Department Management to ensure that the employees performing activities with respect to FDA's Section 804 Importation Program (SIP) are trained on this procedure and follow this SOP as applicable.

4.0 References and Related SOPs

- -QS-015 Deviations and Non-conformances
- -Section 804(b) through (h) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) (21 U.S.C. 384(b) through (h))
- -US FDA Importation of Prescription Drugs Final Rule Questions and Answers Guidance for Industry (Small Entity Compliance Guide), May 2022



Title:

Effective Date: TBD

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Page 2 of 11

5.0 Forms/Attachments

AD-206-1 – Stock Receipt – SIP Product

6.0 Definitions

- 6.1 <u>Regulatory Agency</u>: An independent governmental body (state or federal) established by legislative act in order to set standards in a specific field of activity, or operations, in the private sector of the economy and then to enforce those standards (i.e. US FDA, Health Canada).
- 6.2 <u>SSI</u>: A unique alphanumeric number of up to 20 characters that is affixed by Methapharm to each shipper case of product that is sold to a US Importer.

7.0 Procedure

7.1 Receiving Goods at Methapharm



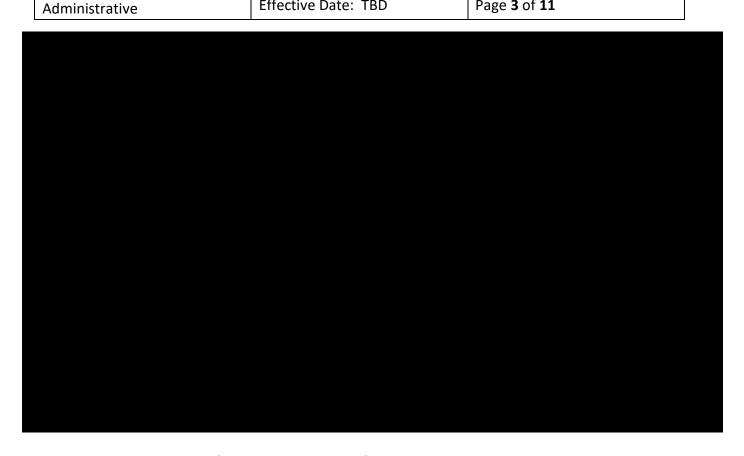


Title: **Management of SIP Products** Section: Operations

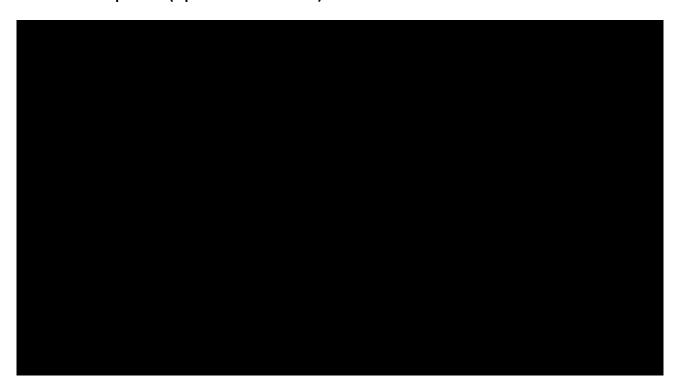
SOP Number: AD-206.003

Effective Date: TBD

Page **3** of **11**



7.1.2 Inspection (Operations Personnel)





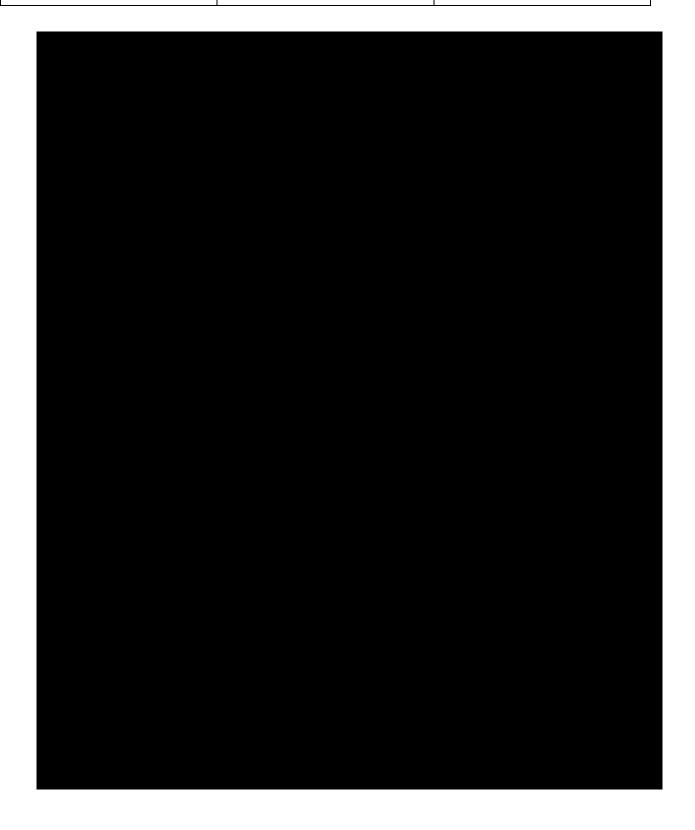
Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Effective Date: TBD Page 4 of 11





Section: Operations

SOP Number: AD-206.003

Effective Date: TBD

Page **5** of **11**



7.1.3 QA Verification (Methapharm QA)





Title:

Management of SIP Products

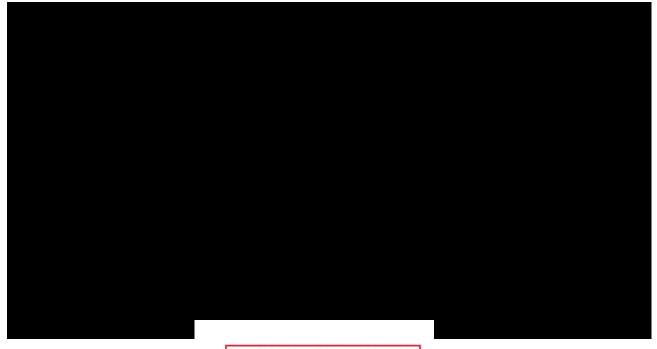
SOP Number: AD-206.003

Section: Operations

Effective Date: TBD Page **6** of **11**



7.1.5 Movement of Goods (Operations Department)





Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Effective Date: TBD Page **7** of **11**





Title:

Management of SIP Products

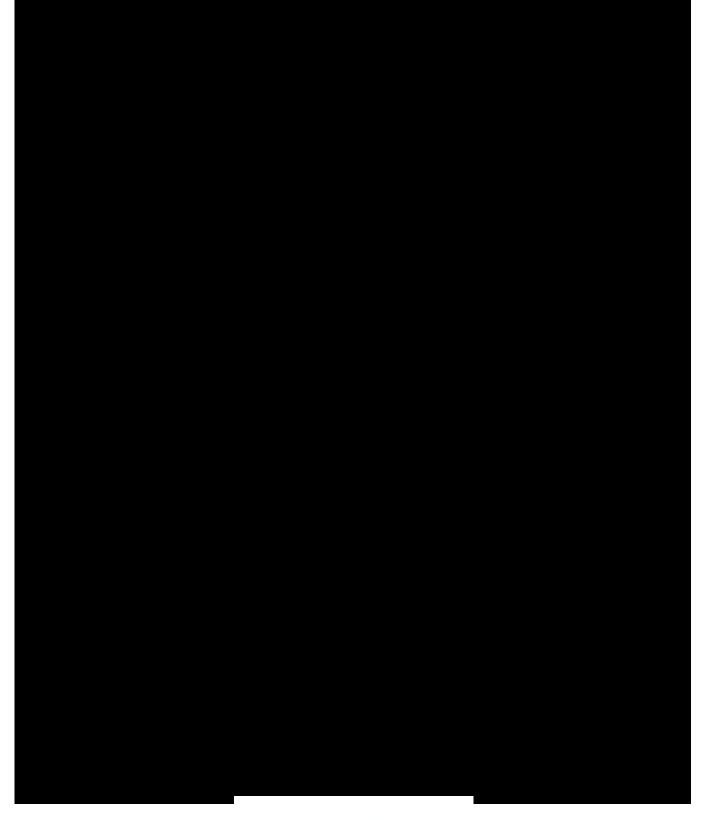
Section: Operations

SOP Number: AD-206.003

Effective Date: TBD

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7.2 Investigating and Handling Suspect and Illegitimate Product





Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Effective Date: TBD

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Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Administrative

Effective Date: TBD

Page **10** of **11**

7.3 Recall

7.4 Information Requests



8.0 Records



Title:

Management of SIP Products

Section: Operations

SOP Number: AD-206.003

Administrative

Effective Date: TBD

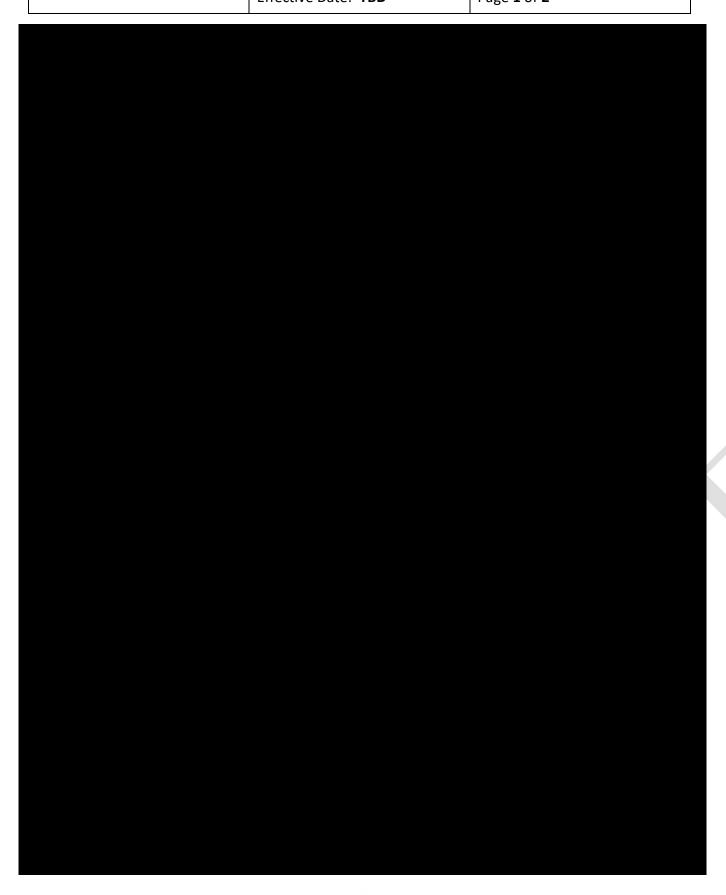
Page **11** of **11**

9.0 Revision History



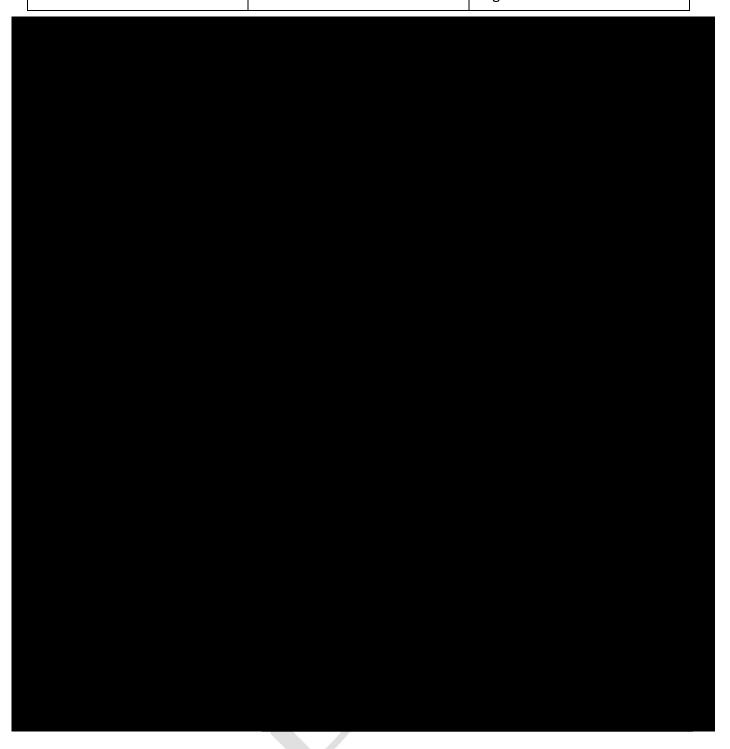


Title: Stock Receipt – SIP Product	Form AD-206-1.003	
Effective Date: TBD	Page 1 of 2	





Title: Stock Receipt – SIP Product	Form AD-206-1.003	
Effective Date: TBD	Page 2 of 2	



LifeScience Logistics				
Title: Prescription Drug Procurement				
Number:	ber: WI 600.01 Rev. Date : 13 MAY 2021			
Rev. Level:	000	Page:	1 of 11	

1.0 PURPOSE

This procedure details the process for procuring new SIP products for sale by LifeScience Logistics.

2.0 SCOPE

This procedure applies to all LSL Wholesaler locations participating in the Section 804 Importation Program purchasing the imported prescription drugs from the foreign seller.

3.0 REFERENCES

21 CFR 211	Current Good Manufacturing Practices for Finished Pharmaceuticals		
21 CFR 820	Quality Systems Regulations		
21 CFR 251	Section 804 Importation Program		
21 CFR 205	State Licensing for Wholesale Prescription Drug Distributors		
21 CFR 207	Registration of Producers of Drugs and Listing of Drugs in Commercial		
	Distribution		
21 CFR 251	Section 804 Importation Program		
SOP 1031	Vendor Qualification		
SOP 1101	Control of Records		
SOP 1502	Vendor Quality Auditing		
SOP 7002	Import/Export – RX		
WI 600.05	Prescription Drug Receiving		

4.0 **DEFINITIONS**

	Prescription Drug	A drug that is prescribe by a doctor, bought at a pharmacy, and	
regulated by the FDA through the New Drug Application (NDA) of		regulated by the FDA through the New Drug Application (NDA) or	
Abbreviated New Drug Application process.		Abbreviated New Drug Application process.	

5.0 ABBREVIATIONS/ACRONYMS

ANDA	Abbreviated New Drug Application
API	Active Pharmaceutical Ingredient
CEO	Chief Executive Officer
CFR	Code of Federal Regulation
CQCU	Corporate Quality Control Unit
DIN Drug Identification Number	
FDA	Food and Drug Administration
HPFB	Health Products and Food Branch (Health Canada)
LSL	LifeScience Logistics
NDA	New Drug Application
NDC National Drug Code	
QA Quality Assurance	
SIP	Section 804 Importation Program

LifeScience Logistics				
Title:	Title: Prescription Drug Procurement			
Number:	ber: WI 600.01 Rev. Date : 13 MAY 2021			
Rev. Level:	000	Page:	2 of 11	

SOP	Standard Operating Procedure	
WI Work Instruction		

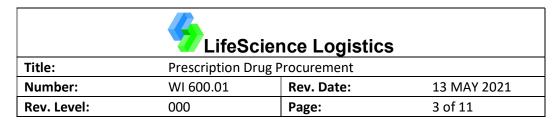
6.0 RESPONSIBILITY

CQCU	Maintain this procedure in accordance with the LSL document and		
	data control system.		
Functional Owner	Ensure training requirements by position are updated in MQ1 to align		
	with tasks listed in each document's revision.		
	Approve documents to meet the purpose of the procedure and me		
	current revision guidelines.		
Users	Understand and perform this procedure as described, including any		
	procedures included by reference.		
	Promptly reports any problems or deviations from the procedure to		
	your Supervisor or designee.		

7.0 PROCEDURE



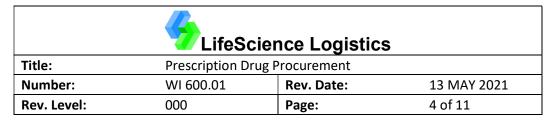
SIP Proposal

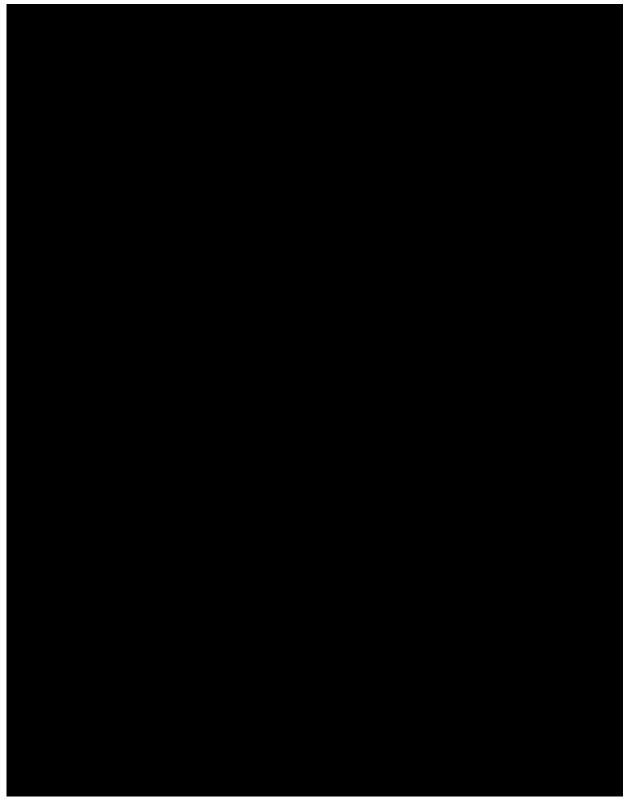


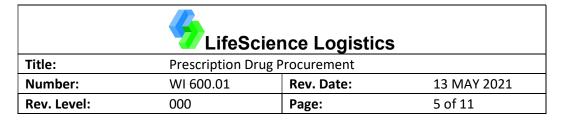


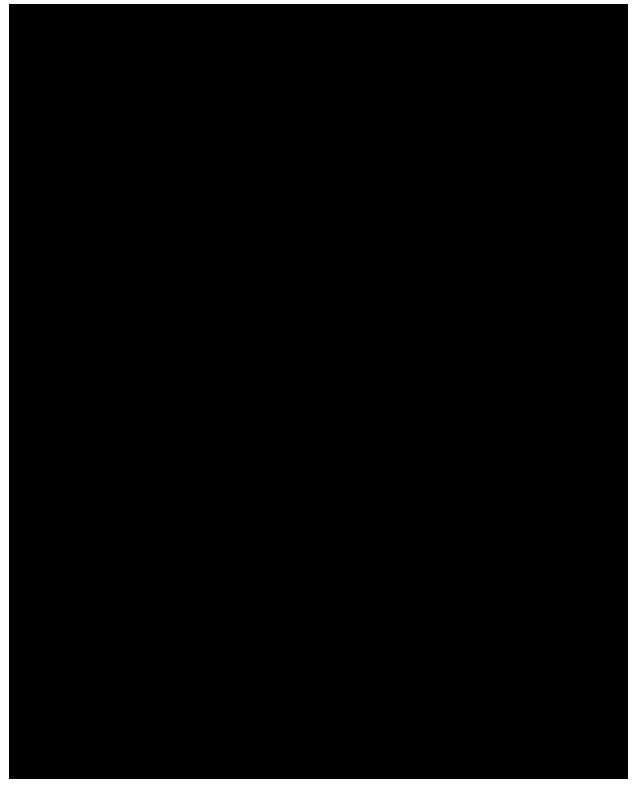
Importation Plan



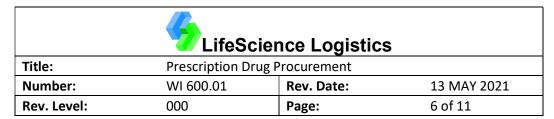








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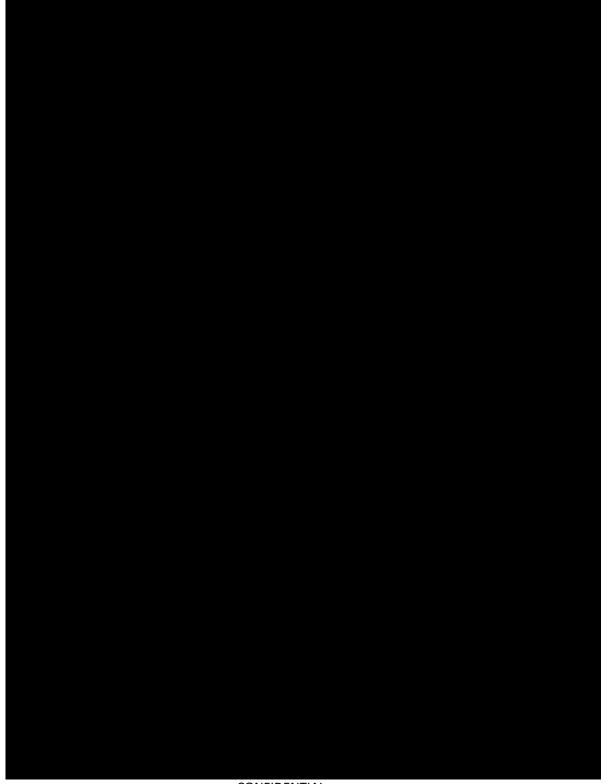




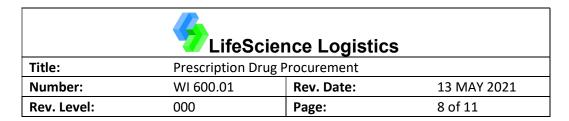
Pre-Import Request



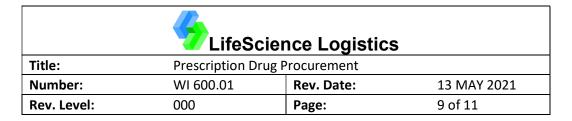
LifeScience Logistics			
Title:	Prescription Drug Procurement		
Number:	WI 600.01 Rev. Date : 13 MAY 2021		
Rev. Level:	000	Page:	7 of 11



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	LifeScie	nce Logistics	
Title:	Prescription Drug Procurement		
Number:	WI 600.01	Rev. Date:	13 MAY 2021
Rev. Level:	000	Page:	10 of 11

8.0 ADDITIONAL INFORMATION Control of Records

Confidentiality Statement

8.2 All LifeScience Logistics documents are confidential and proprietary. Consent must be obtained from the CEO/Principal and/or Director of Quality and Regulatory Affairs prior to reproduction or transmission in any form.



	LifeScie	nce Logistics	
Title:	Prescription Drug Procurement		
Number:	WI 600.01	Rev. Date:	13 MAY 2021
Rev. Level:	000	Page:	11 of 11

10.0 TRAINING RECORD

Training Date	Type of Training		
	☐ Self-Training – Level 2	☐ Trainer Led – Level 3 with optional Module	☐ Trainer Led – Level 4 with Module

Trainee: Initial and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on the procedure listed to the employees listed above.

Training Event Number	Trainer Printed Name (N/A if Self-Training)	Trainer Signature (N/A if Self-Training)

	4	LifeScier	nce Logistics
Title:	Prescription Drug DS0	CSA Track/Trac	е
Number:	WI 600.03	Dav. Data.	20 O+ 22
Rev. Level:	002	Rev. Date:	20-Oct-23

1.0 PURPOSE

The purpose of this document is to outline the Prescription Drug tracking and tracing processes at Life Science Logistics to fulfill the regulatory requirements of the Drug Supply Chain Security Act (DSCSA) for Third-Party Logistics Providers.

2.0 SCOPE

This procedure applies to all LSL facilities and vendors who are responsible for shipping, receiving, repackaging, and serialization of drug product received from Contract Manufacturing Organizations for commercial sale.

3.0 REFERENCES

21 CFR 211	Current Good Manufacturing Practices for Finished Pharmaceuticals
H.R. 3204 (21	Drug Supply Chain Security Act
U.S.C. 301)	
SOP 1800	Training and Qualification
SOP 1101	Control of Records
SOP 1100	Document Control
WI 600.05	Prescription Drug Receiving
WI 600.06	Prescription Drug Hold and Release
WI 600.07	Prescription Drug Initial Sampling and Laboratory Testing
WI 600.08	Prescription Drug Relabeling Requirements and Process
WI 600.10	Prescription Drug Pick/Pack/Ship
WI 600.15	Prescription Drug Inventory Management

4.0 **DEFINITIONS**

Axway Data Repository	Serialization Information Management System
Canadian product information	Product information provided by the Foreign Seller
Decommission	Formal process to remove or deactivate. For example, remove original data or deactivate current systems.
Product Data (2D Barcode)	A set of information that includes a standardized graphic that includes, in both human-readable form and on a machine-readable data carrier, the standardized numerical identifier, lot number, and expiration date of the product.

	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCS	SA Track/Trac	e
Number:	WI 600.03	Davi Datas	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23

Product Information	Product Information provided by LifeScience Logistics
Serialization	Application of a unique identifier assigned randomly or sequentially to an item intended to provide a singular reference to a specific product or product package. The serial identifier may be composed of numbers or an alphanumeric character string of fixed or variable length.
SSI	Section 804 Serial Identifier. A unique alphanumeric serial number of up to 20 characters that is assigned and placed on or affixed by the Foreign Seller to each package and homogenous case of the product that the Foreign Seller intends to sell to an Importer. For purposes of the SSI, "package" means the smallest individual saleable unit of product for distribution that is intended by the Foreign Seller for sale to an Importer located in the United States, and "individual saleable unit" means the smallest container of product sold by the Foreign Seller to the Importer.
Transaction Record	Refers to the FDA DSCSA requirement to capture drug product and supply network information at each change of ownership. Includes the Transaction History, Transaction Information and Statement as defined in DSCSA.

5.0 ABBREVIATIONS/ACRONYMS

BOL	Bill of Lading
СМО	Contract Manufacturing Organization
CQCU	Corporate Quality Control Unit
DSCSA	Drug Supply Chain Security Act
LSL	Life Science Logistics
QA	Quality Assurance
SDS	Safety Data Sheet
SOP	Standard Operating Procedure
WI	Work Instruction

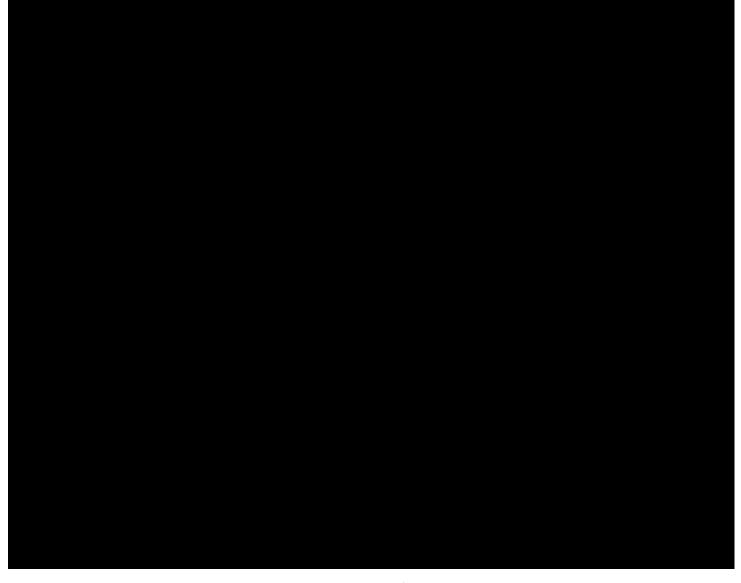
6.0 RESPONSIBILITY

CQCU	Maintain this procedure in accordance with the LSL document and data
	control system.
	Manages the quarantine, testing and release of the drug product.
	Maintains quality and security according to DSCSA.

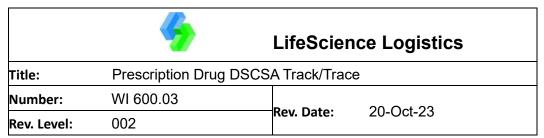
	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Davi Datas	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23

Foreign Seller	Provides drug product for wholesale to LSL for distribution according DSCSA.
Shipping and Receiving	Provides documentation in preparation of shipping and receiving product according to Life Science Logistics procedures.
Vendor/Re-labeler	Responsible for the reserialization and relabeling of the product according to DSCSA and Life Science Logistics requirements.

7.0 SERIALIZATION OF DRUG PRODUCT



Page **3** of **10**





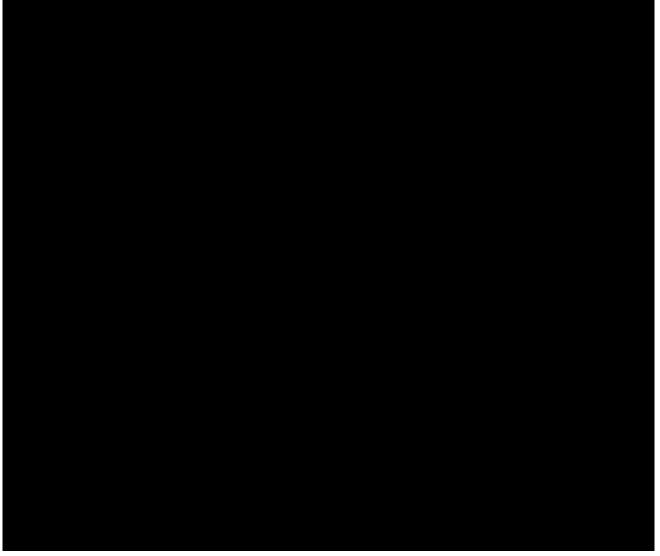
Receiving Drug Product from the Foreign Seller



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Page **4** of **10**

	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Davi Datas	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23



Vendor Re-labelling



	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Davi Datas	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23

Re-labelled and Reserialized Product

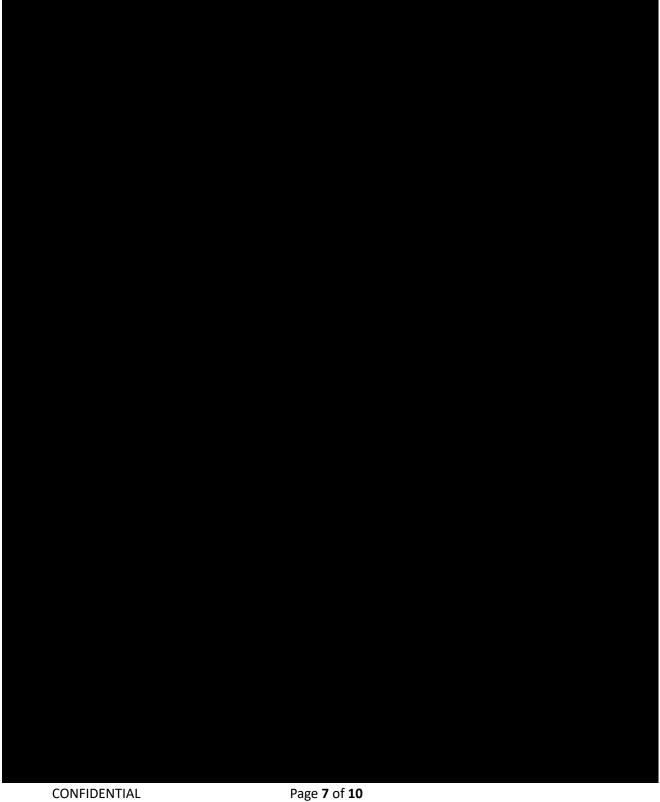


DSCSA Verification Requirements



Page **6** of **10**

	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Dav. Data.	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23



	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Davi Datas	20 Oct 22
Rev. Level:	002	Rev. Date:	20-Oct-23



8.0 ADDITIONAL INFORMATION Control of Records



Confidentiality Statement

All Life Science Logistics documents are confidential and proprietary. Consent must be obtained from LSL CEO or Quality Leadership Management prior to reproduction or transmission in any form.

9.0 REVISION HISTORY

10.0 TRAINING RECORD

Training Date	Type of Training
---------------	------------------

	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	5 5 1	20-Oct-23
Rev. Level:	002	Rev. Date:	

☐ Read and Understand — Self Training	☐ Read and Exhibit Competency – Trainer Led with Module/Assessment when applicable	☐ Instructor Led — Trainer Led with Module/Assessment when applicable

Procedure Name or Description of Training	Procedure Number	Revision Level

Trainee: Signature and date indicates you have trained and understand this procedure and all associated documents as well as the training module/material listed above.

Trainee Printed Name	Trainee Signature	Department	Date

Trainer: Signature below indicates you have presented training on procedure listed above and confirm all listed employees completed training as defined.

Document Training	Trainer Printed Name (N/A	Trainer Signature (N/A
Number / Training Session	if Self-Training)	if Self-Training)

	4	LifeScier	nce Logistics
Title:	Prescription Drug DSCSA Track/Trace		
Number:	WI 600.03	Rev. Date:	20-Oct-23
Rev. Level:	002		