I. PURPOSE

This Standard Operating Procedure (SOP) describes the procedure of immediate interaction between PharmExpert LLC (Pharmex) and Marketing Authorization Holder (MAH) when receiving from Regulatory Authority (RA) regulatory decisions about recall and restrictions for the medicinal product (MP).

II. SCOPE

This procedure shall apply to Pharmex's staff who can get regulatory decisions about recall and restrictions for the MP.

III. RESPONSIBILITIES

Role	Responsibility
Pharmex's any employee who may receive regulatory decisions about recall and restrictions for the MPs	• Immediately informing Director/HPVD/SPVS
Head of Pharmacovigilance Department (HPVD) **Senior Pharmacovigilance Specialist (SPVS)**	• Informing MAH's QPPV • Performing causality assessment, sending results to MAH's QPPV • Storage of the documents
MAH's Qualified Person responsible for pharmacovigilance (MAH's QPPV)	• Verifying causality assessment • Preparing analytical summary and recommendation for action • Participating in the recall/restrictions process
Quality Assurance Manager (QAM)	• Compliance monitoring

IV. DEFINITIONS

Abbreviations used in the text are spelled out on its first mention.

Causality assessment – a method used for estimating the strength of relationship between drug(s) exposure and occurrence of adverse reaction(s).

For terms and definitions refer to the SOP-QA-003 «Pharmacovigilance Glossary».

V. PROCEDURE

A. General Specification

RAs shall take all appropriate steps to ensure that the supply of the MP is prohibited and the MP withdrawn from the market, if the view is taken that:

- the MP is harmful;
- it lacks therapeutic efficacy;
- the risk-benefit balance is not favorable;
- its qualitative and quantitative composition is not as declared;
- the controls on the MP and/or on the ingredients and the controls at an intermediate stage of the manufacturing process have not been carried out;
- if some other requirement or obligation relating to the grant of the manufacturing authorization has not been fulfilled.

MAH as responsible side for safety and efficacy of MPs in authorized country is obligated to follow RA's decisions about recall and restrictions.

The RA may limit the prohibition to supply the MP, or its withdrawal from the market, to those batches which are the subject of dispute.

The RA may, for a MP for which the supply has been prohibited or which has been withdrawn from the market, in exceptional circumstances during a transitional period allow the supply of the MP to patients who are already being treated with the MP.

B. Process

1. Informing the Stakeholders

a) When Pharmex's any employee receives information or notification letter from the RAs of the countries of activity about regulatory decision of recall and restrictions for the MP, he/she shall immediately inform the Director/HPVD/SPVS, not later than **2 hours.**

b) HPVD/SPVS shall inform MAH's QPPV about the regulatory decisions of recall and restrictions for the MP via email or phone call within **24 hours** providing necessary documents.

2. Causality Assessment

a) HPVD/SPVS shall perform causality assessment according to the SOP-PV-003 «Case Assessment» and send the results to MAH's QPPV within 1 business day.

b) MAH's QPPV shall verify the results within 5 hours.

c) In case of rejection/comments, HPVD/SPVS shall revise the results.

d) MAH's QPPV shall prepare within 1 business day:

- Analytical summary
- Recommendation for action