I. PURPOSE

This Standard Operating Procedure (SOP) describes the procedure for the ensuring that the Qualified Person responsible for Pharmacovigilance (QPPV) is able to fulfill the Pharmacovigilance (PV) tasks and responsibilities in accordance with the Good Pharmacovigilance Practices (GVP).

II. SCOPE

This procedure shall apply to PV systems outsourced to PharmExpert LLC (Pharmex) by Marketing Authorization Holders (MAH) in line with the Safety Agreements.

This SOP is applicable to Pharmex's personnel appointed on role of QPPV.

III. RESPONSIBILITIES

Role	Responsibility
Pharmex/MAH	• Appointment of QPPV
Pharmex's personnel appointed as QPPV	• Fully adhere to this SOP
SPVS (Senior PV Specialist)/PVS (PV Specialist)	• Preparation and submission of Notification letter
Quality Assurance Manager (QAM)	• Compliance monitoring

IV. DEFINITIONS

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

Pharmex's personnel – staff of Pharmex and outsourced Local Contact Persons responsible for PV (LCPPV) in the countries of responsibility.

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

V. PROCEDURE

A. General specification

1. MAH's Responsibility

As part of the PV system, the MAH shall have permanently and continuously at its disposal an appropriately QPPV. The duties of the QPPV shall be defined in a job description. The hierarchical relationship of the

QPPV shall be defined in an organizational chart together with those of other managerial and supervisory staff.

Each PV system can have only one QPPV. A QPPV may be employed by more than one MAH, for a shared or for separate PV systems or may fulfil the role of QPPV for more than one PV system of the same MAH, provided that the QPPV is able to fulfil all obligations.

MAH shall give to QPPV sufficient authority in PV system to influence the performance of the quality system, to promote, maintain and improve compliance with the legal requirements.

2. QPPV's Roles and Responsibilities

a) The QPPV shall be available at all time when needed and be at the MAH's disposal continuously.

b) The QPPV should ensure that during his/her absence has back-up person accessible through the QPPV's contact details.

c) In the case of the QPPV absence for a long period all concerned parties should be informed about it by e-mail/telephone in advance.

d) The QPPV shall be responsible for:

- the establishment/maintenance of the MAH's Pharmacovigilance System Master File;
- having oversight over the functioning of the PV system in all relevant aspects including quality management system (e.g. SOP, contractual arrangements, database operations, compliance data regarding quality, completeness and timeliness of expedited reporting and submission of periodic safety update reports, audit reports and training of personnel in relation to PV);
- participation in the development and approval of Risk Management Plans (RMP);
- participation in the development and approval of Periodic Safety Update Reports;
- the QPPV shall act as a 24/7 single point of contact for the Regulatory Authorities (RA) on all matters relating to the product safety and quality of the marketed products including PV inspections;
- the QPPV should be aware of the validation status of the adverse reaction database if applicable, including any failures that occurred during validation and the corrective actions that have been taken to address the failures. The QPPV should also be informed of significant changes that are made to the database (e.g. changes that could have an impact on PV activities;
- review and approval of protocols of any Post-Authorization Safety Studies or pursuant to a RMP, as well as maintaining awareness of any Post-Authorization Safety Studies requested by a RA, including the results of such studies;
- meeting commitments, fully and promptly responding to any requests from RA, including provision of correct and complete information.
- conducting regular audits of the PV system;
- assisting in preparing regulatory actions in response to emerging safety concerns: changes in the prescribing information, urgent safety restrictions and communication to patients and healthcare professionals; and
- the QPPV may delegate specific tasks, under supervision, to appropriately qualified and trained Pharmex's personnel for example, acting as safety experts for certain products, provided that the