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| Discovery Labs | |

| STANDARD OPERATING PROCEDURE | | | | |
|------------------------------|-------------------|-------------------|------------|--|
| SOP No.: | SOP-QA-033-01 | Effective Date: | 01.01.2018 | |
| Supersedes: | SOP-QA-033-00 | Next Review Date: | 31.12.2020 | |
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1.0 PURPOSE:

To lay down the procedure for establish the Corrective Action and Preventive Action during Out of Specification results, Deviations, Complaints, Returned goods, Product recall and other investigation.

2.0 SCOPE:

This procedure is applicable to all departments at Discovery Laboratories (P) Ltd.

3.0 RESPONSIBILITY:

- 3.1 HODs / Designee of respective departments are responsible for below activities;
 - To carry out the investigation to establish the root cause and CAPA.
 - To ensure timely execution and review of CAPA in their areas
 - Impart training on the revised procedures to the concerned personnel
- 3.2 Head-QA / Designee
 - To verify the established CAPA for appropriateness
 - To ensure CAPA follow-up for implementation followed by the closure of the CAPA

4.0 DEFINITIONS:

- 4.1 **Corrective Action:** Action taken to eliminate the causes of Non-conformities, in order to prevent recurrence.
- 4.2 **Preventive Action:** Action taken to eliminate the causes of a potential Non-conformities, in order to prevent their occurrence.

5.0 PROCEDURE:

- 5.1 Corrective Action and Preventive Action shall be concluded based on the investigation.
- 5.2 Head-QA / Designee shall review and verify the proposed CAPA by the initiating department and decide action required to remedy the situation.
- 5.3 Corrective Action and Preventive Action shall be established for below circumstances;
 - 5.3.1 Whenever a material fails to meet the specification (OOS)

| | Prepared by | Reviewed by | Approved by |
|-------------|-------------------|-------------------|--------------------|
| Sign & Date | | | |
| Name | Y. Samatha | G. Swapna | Ch. Mahendar Reddy |
| Department | Quality Assurance | Quality Assurance | Quality Assurance |



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- 5.3.2 Whenever a deviation takes place
- 5.3.3 Whenever a Complaint received
- 5.3.4 Whenever a Retuned goods received
- 5.3.5 Whenever a Product recall received
- 5.3.6 Any other appropriate action against investigation
- 5.4 Corrective Action is a term that encompasses the process of product failures, Complaints and other non-conformances. This includes;
 - 5.4.1 Review and define the failure or non-conformance
 - 5.4.2 Find the cause for failure or non-conformance
 - 5.4.3 Develop an action plan to correct the problem and prevent recurrence
 - 5.4.4 Implement the action plan
 - 5.4.5 Evaluate the effectiveness of the Corrective Action
- 5.5 Preventive Action is a process for detecting potential failures or potential nonconformances and prevents their occurrence. This includes;
 - 5.5.1 Identify the failure or non-conformance
 - 5.5.2 Find the cause of the potential failure / non-conformance
 - 5.5.3 Develop a plan to prevent their occurrence
 - 5.5.4 Implement the action plan
 - 5.5.5 Evaluate the actions taken and the effectiveness in preventing the potential failure / non-conformance
- 5.6 Concern department person shall raise the request to QA for the CAPA form with brief details of failure / non-conformity.
- 5.7 QA personnel shall issue the Corrective Action and Preventive Action (CAPA) form (QA033-FM004) allotting CAPA number and same shall be logged in the Corrective Action and Preventive Action Record (QA033-FM133).

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|-------------|-------------------|-------------------|--------------------|
| Sign & Date | | | |
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- 5.8 As a result of proposed CAPA in the existing system, any change in the Manufacturing process, procedures or documents shall be addressed through Change Control procedure.
- 5.9 Head Initiating department / Designee shall be responsible for implementation of proposed CAPA to ensure recommended changes have been completed, appropriate trainings to the concerned personnel and finally fulfillment of CAPA objective.
- 5.10 Head QA / Designee shall be responsible for review of effectiveness of proposed CAPA.
- 5.11 Upon satisfactory implementation of the CAPA by the Initiator department, QA Department shall close the report after verification of the results / effectiveness of the actions.
- 5.12 CAPA should be closed within 60 days otherwise justified.

5.13 CAPA Numbering System:

QA personnel shall assign the number and issue the CAPA form (QA033-FM004) to concern department by assigning the CAPA number as follows;

CAPA/YYNNN

Where

CAPA: Corrective Action and Preventive Action

YY : Represents last two digits of the Calendar Year

NNN: Represents the Serial number starts from 001 for the Calendar Year.

Ex: CAPA/17001, Indicates first CAPA initiated in the year 2017

6.0 FORMATS/ ANNEXURE(S):

6.1 Corrective Action and Preventive Action Record : QA033- FM004

6.2 Corrective Action and Preventive Action (CAPA) Form : QA033-FM133

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|-------------|-------------------|-------------------|--------------------|
| Sign & Date | | | |
| Name | Y. Samatha | G. Swapna | Ch. Mahendar Reddy |
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| Revision No. | Effective Date | Details of Revision | Ref. CCF No. |
|-----------------|----------------|---|---------------|
| 00 | 20.02.2017 | The procedure divided from" Deviation-Corrective Action And | QA-CRF-014/16 |
| | | Preventive Action". | |
| 01 | 01.01.2018 | SOP format changed make to inline with SOP-QA-01-05 | CCF/GEN/ |
| | | | 17037 |

| | Prepared by | Reviewed by | Approved by |
|-------------|-------------------|-------------------|--------------------|
| Sign & Date | | | |
| Name | Y. Samatha | G. Swapna | Ch. Mahendar Reddy |
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