**Document approval**

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|  | **Name** | **Date** | **Signature** |
| **Author’s designation**  **Managing Director Tradelaw** |  |  |  |
| **Reviewer’s designation**  **Chief Operating Officer** |  |  |  |
| **Approver’s designation**  **Managing Director Tradelaw** |  |  |  |

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# Purpose

The purpose of this Standard Operating Procedure (SOP) is to provide guidance on how to handle Deviations and Nonconformities at Grau Pharma GmbH.

# Scope

This SOP is valid at Grau Pharma GmbH for the whole Organization. The respective training shall be given in accordance with **SOP-10 Training Management***.*

# Responsibilities

Responsible for the content of this SOP is Managing Director Tradelaw.

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| **Role** | **Definition/Task** |
| Quality Organization | * Responsible for this SOP and management of Deviation and Nonconformity Management process * Registers all submitted Deviation and Nonconformity Notifications * Overseeing the investigation, as appropriate * Ensuring appropriate actions are taken (e.g., putting product under quarantine) * Ensuring an appropriate Root Cause analysis, as appropriate * Determines investigators who will take part in particular investigation |
| Managing Director Tradelaw | * Approves Deviation and Nonconformity Investigation Report. |
| Department Heads / Team Leads | * Oversee their working areas and to work with Quality Organization to resolve Deviations and Nonconformities through timely and evidence-based investigation, evaluation, segregation, disposition of all affected product. * Initiate the Deviation and Nonconformity Notification (Originator role). * Review Deviation Reports. |
| Investigators | * Perform Deviation or Nonconformance investigation, analyze probable Root Cause, review investigation related data, propose CAPA measures to escalate Deviation or Nonconformance, prepare Deviation and Nonconformity Investigation Report. |
| Observer | * Notifies their Line Manager regarding occurred Deviation or Nonconformity. * Provides all information related to Deviation or Nonconformity. |
| Originator | * Notifies Quality Organization about occurred Deviation or Nonconformity. * Submits Deviation and Nonconformity Notification to Quality Organization. |

# Definitions, terms, and abbreviations

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| --- | --- |
| **Term/abbreviation** | **Definition at Grau Pharma GmbH** |
| Critical Deviations or Nonconformities | Serious Deviation or Nonconformity with potential implications on the product or process integrity that cannot be contained within Grau Pharma GmbH. |
| Discovery Date | The date Grau Pharma GmbH becomes aware of a Deviation or Nonconformity. |
| DNRN | Assigned Deviation / Nonconformity Reference Number |
| Major Deviations or Nonconformities | Process or product impact may occur, but the Deviation or Nonconformity can be controlled, and issues can be resolved within Grau Pharma GmbH. |
| Minor Deviations or Nonconformities | Deviations or Nonconformities from existing procedures or expectations, without serious impact on product, process, integrity, health, or safety (e.g., documentation errors like ink color or insufficient usage of ALCOA principles of data integrity. |
| Observer | Person observing any unexpected Deviation or Nonconformity from an existing process or requirement. |

# Workflow

## General

The Deviation or Nonconformity reporting process establishes a mechanism for Departments and individuals to report, correct, track/trend, and escalate Deviations or Nonconformities that occur within Grau Pharma GmbH.

Each Department is responsible for ensuring appropriate handling of Deviation process flow.  
Deviation and Nonconformity Management process flow is described on ***Figure 1.***

***Figure 1:*** ***Deviation and Nonconformity Management Process***

Examples of Deviations and Nonconformities are given in [***Table 1***](#_bookmark7).

***Table 1: Examples of Deviations***

|  |  |
| --- | --- |
| **Functional Area / Department** | **Examples of Deviations** |
| Labelling / Packaging | * Wrong product label or missing labels * No original or damaged tamper seals |
| Transportation | * Temperature ranges not within specification * No dataloggers |
| Documentation | * Missing records (e.g., training, batch, test records) * Failure to follow Good Documentation Practice |
| Facility | * Heating ventilation and conditioning system error * Temperature excursion * Pest control abnormalities |

## Discovery and Notification

Observer informs the Line Manager of any Deviation or Nonconformity discovered. All discovered unexpected events or results shall be reported to the Line Manager immediately on the day of discovery.

Line Manager verifies all available data and records related to the event. If there are sufficient grounds Line Manager (Originator) notifies Quality Organization about the event and submits appropriate records **not later than end of next working day** according to **Deviation and Nonconformity Notification Form**. Observer records all witnesses of the incident for the purpose of further investigation.

All appropriate Corrections shall be taken immediately. All appropriate segregation measures shall be taken for Nonconforming Product immediately according to respective procedures.

At a minimum, the following events result in generation of **a Deviation and Nonconformity Notification record:**

* + - * Failure of a critical control point
      * Nonconforming Product made available for distribution

Quality Organization representative shall verify completeness of **Deviation and Nonconformity Notification record**, register it and assign DNRN.

## Investigation

Quality Organization registers submitted **Deviation and Nonconformity Notification record**, assigns DNRN and initiates Deviation or Nonconformity investigation. Quality Organization determines and assigns Investigators who will take part in the particular investigation. Investigators may represent different Departments depending on the area of investigation and their SME’s expertise areas.

If Product Conformity is in question, Quality Organization ensures that all involved Products are segregated (placed in quarantine) until the following steps occur:

* + - * Investigation is completed to determine Conformance/Nonconformity of Product.
      * Final decision is made regarding product disposition and the decision is approved.
      * Quarantine and return to saleable stock status are documented on the **Deviation and Nonconformity Investigation Report**.

### Major and Critical Deviations or Nonconformities

The following investigation shall be done if the Deviation or Nonconformity is classified as Major or Critical:

* + - * Perform comprehensive document review and conduct interviews with Observers.
      * Assess other potential impacted processes or products.
      * Perform a Risk Assessment according to **SOP-09 Quality Risk Management**.
      * Perform Trends assessment and historical record verification for reoccurring issues.

Establish Root Cause by using **Quality Investigation and Assessment Tools Appendix**. Usual Root Causes are poor procedures, training, other systemic errors, etc. "Human Error /Personnel failure" as potential Root Cause may be suspected only in exceptions.

In case of closure timelines exceeding on critical Deviations, escalate to Leadership Team.

### Minor Deviations or Nonconformities

For Minor Deviations or Nonconformities a minimal investigation and appropriate Corrections are required.

## Reporting and Closure

Investigators record the progress of the Investigation and its results in the **Deviation and Nonconformity Investigation Report**. Investigators propose and initiate appropriate suitable CAPA measures for at least Major and Critical Deviations or Nonconformities according to **SOP-07 CAPA Management**.  
The final disposition of Nonconforming Product shall be clearly stated in the **Deviation and Nonconformity Investigation Report.**

Departments/Heads or Team/Leads review the **Deviation and Nonconformity Investigation Report** than Managing Director Tradelaw approves the **Deviation and Nonconformity Investigation Report**.

Deviation or Nonconformity Closure is expected within thirty (30) days.

### Escalation

If necessary, Investigators can escalate any Deviations or Nonconformities by informing Department Heads /Team Leads, for example:

* + - * unfavorable trends (e.g., multiple Minor Deviations / Quality Defects on the same issue),
      * Minor Deviation or Nonconformity or group of similar Minor Deviations or Nonconformities.

## Documentation

Quality Organization keeps all approved **Deviation and Nonconformity Notifications, Deviation and Nonconformity Investigation Reports**. Quality Organization timely compiles and updates **Deviation and Nonconformity Tracker.**

The following Deviations and Nonconformities numbering principle applies:

**DNRN/YY/NN**, where **YY** means the year, **NN** means the serial subsequent number (begins with 01 annually).

## Deviations and Nonconformities Metrics

Quality Organization reports Deviation and Nonconformity Management metrics and trends to Grau Pharma GmbH Leadership Team as part of the Management Review process in accordance with **SOP-04 Management Review.**

# Applicable documents

MD-01 Quality Manual

SOP-01 Documentation Management

SOP-10 Training Management

SOP-07 CAPA Management

SOP-04 Management Review

SOP-09 Quality Risk Management

# Appendices

The following appendices are integral part of this SOP: Appendix Deviation and Nonconformity Notification Form

Appendix Deviation and Nonconformity Investigation Report Form

Appendix Quality Investigation and Assessment Tools Appendix

Appendix Deviation and Nonconformity Tracker Form

# Document revision history

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| --- | --- | --- | --- |
| **Version** | **Valid from** | **Description of the revision** | **Reason for the revision** |
| 1 | See header | Document created | QMS implementation |