POLICY ON CHANGE MANAGEMENT

INTRODUCTION:

This document provides the policy for change management which assures continual state of control and provides a high degree of assurance that there are no unintended consequences of change.

SCOPE:

This policy applies to changes related to product, process, equipment, instrument, document, system and facility within and Associated units.

POLICY DETAILS:

- ♦ A formal procedure shall be in place for change management.
- ♦ All GxP related changes shall follow change management process. The potential impact of the proposed change shall be assessed.
- Changes shall be categorised depending on the nature and extent of change. Only approved change proposal shall be implemented.
- Implementation of change shall be identified with the appropriate effective/ implementation date. Change control shall be monitored for close out.
- Change control documents along with supportive documents shall be retained as per defined procedure. Where an electronic system is used, it shall be appropriately qualified.
- Post implementation review shall be done to confirm the change objectives were achieved.

AMENDMENT AND WAIVER:

The company reserves the right to amend, alter and/or terminate this policy at any time.

DEFINITION:

GXP: The underlying international pharmaceutical requirements, such as those set forth in the US FD&C Act, US PHS Act, FDA regulations, EU Directives, Japanese regulations, or other applicable national legislation or regulations under which a company operates. These include but are not limited to:

- ➤ Good Manufacturing Practice (GMP) (Pharmaceutical, including API)
- Good Clinical Practice (GCP)
- Good Laboratory Practice (GLP)
- Good Distribution Practice (GDP)
- ➢ Good Quality Practice (GQP)
- Good Pharmacovigilance Practice
- Medical Device Regulations
- Prescription Drug Marketing Act (PDMA)

ABBREVIATIONS:

API : Active Pharmaceutical Ingredient

EU : European Union

FDA : Food and Drug Administration.

GxP : Good X Practices where x stands for manufacturing, laboratory,

clinical, distribution

GMP : Good Manufacturing Practice.

ICH : The International Conference on Harmonisation of Technical

Requirements for Registration of Pharmaceuticals for Human Use.

US PHS : United States Public Health Service.

WHO TRS : World Health Organization Technical Report Series.

REFERENCES:

ICHQ10 : Guidance for Industry, Pharmaceutical Quality System Health Canada GMP Guidelines

Orange Guide

WHO TRS 908 : Specifications for pharmaceutical preparations