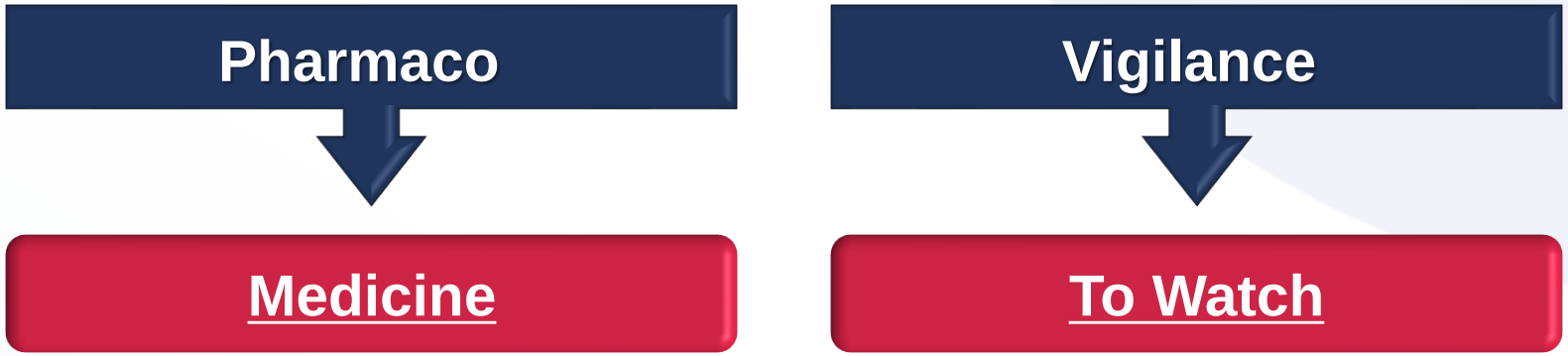
Basics of Safety Reporting, Product Complaint Reporting, and Global Product Security

PHILIPPINES V9.0 March 2024

What is Pharmacovigilance?

- Definition



The science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other drug-related problems (WHO, 2002)

Why is Pharmacovigilance (PV) Important?

To protect patients

To meet regulatory requirements

To establish the company product safety profile

To provide the most accurate information on the product safety profile to Health Care Providers (HCPs) for proper use

To protect the business from any associated legal issues

Global PV Regulatory Requirements

Global Regulatory Authorities require market authorization holders to report safety information on their products.

This includes human prescription and nonprescription medicinal products, vaccines, biologics, medical devices, and combination products, which combine a device and medicinal product, and dietary supplements.

Risks of Non-Compliance:

- Compromised patient safety
- Legal action, including criminal indictment and imprisonment
- Clinical hold
- Market/industry restriction

What is Safety Information?

- Information from any source containing one or more of the following concepts:
  - Adverse Events
  - Special Situations
  - Device Vigilance Information
  - Off-label use*

*For US Colleagues: The collection of “off label use” (as defined in the Global Definitions Glossary) is required in territories outside of the United States. In the United States information regarding off-label use is not solicited.

What is an Adverse Event (AE)?

Any untoward medicinal occurrence in a patient or clinical study subject administered a medicinal product and which does not necessarily have a causal relationship with this treatment.

An adverse event can therefore be any unfavorable or unintended:

- sign (e.g. abnormal laboratory finding),
- symptom, or
- disease temporally associated with the use of a medicinal product, whether or not it is considered causally related to the medicinal product.

What is a Special Situation?

Situations related to the use of an Otsuka product which may or may not be associated with an adverse event, such as:

- Maternal (pregnancy and breastfeeding) or paternal (via semen) exposure;
- Exposure during breastfeeding;
- Overdose/Incorrect dosage, misuse, abuse (e.g. patient sharing products);
- Medication errors (e.g. patient took wrong dose);
- Lack of therapeutic efficacy (e.g. the product doesn't work);
- Occupational exposure (e.g.: nurse administering the product is exposed);
- Cases of suspected transmission of infectious agents;
- Use of suspected or confirmed falsified product(s) or quality defect of the product(s);
- Withdrawal reactions;
- Accidental exposure (e.g.: child takes parent's product);
- Drug-drug/drug-food interactions;
- Unintentional use of product in a non-approved population (e.g.: pediatric or geriatric population);
- Disease progression/exacerbation of existing disease

What is Device Vigilance Information and Off-Label Use?

Device Vigilance Information is a death or serious injury that was or may have been attributed to a medical device component of an Otsuka product, or that a medical device component was or may have been a factor in a death or serious injury, including events occurring as a result of:

- ❑ Failure,
- ❑ Malfunction,
- ❑ Improper or inadequate design,
- ❑ Manufacture,
- ❑ Labeling or instructions for use, or
- ❑ User error

Off-label Use* refers to situations where a product is intentionally used for a medical purpose not in accordance with the authorized product information. Off-label use also includes the intentional use in non-authorized population categories not indicated in the label.

*For US Colleagues: The collection of “off label use” (as defined in the Global Definitions Glossary) is required in territories outside of the United States. In the United States information regarding off-label use is not solicited.

What is a Product Quality Complaint (PQC)?

Any written, electronic, or oral communication provided by a healthcare professional, consumer, clinical study subject, medical representative, regulatory agency, partner or other third party that alleges deficiencies related to the identity, quality, durability, reliability, safety, effectiveness, or performance of a Pharmaceutical Drug Product or Medical Device or Drug/Device combination product or a falsified, tampered or diverted product after it is released for distribution.

What is Global Product Security (GPS)?

Global Product Security (GPS) refers to securing the safety and integrity of Otsuka Products.

Potential Product Security Incidents include:

- Manufacture and distribution of counterfeit/falsified Otsuka products
- Illegal purchase, sale and/or distribution of Otsuka products or items claiming to be Otsuka products
- Other pharmaceutical crimes affecting Otsuka products (diversion, product tampering, smuggling, theft)
- Product tampering
  - Intentional modification of a product after it has been manufactured in order to make it harmful to consumers
- Diversion
  - When a genuine pharmaceutical product that is approved and intended for sale in one market is intercepted and offered for sale in a different market

Reporting potential Global Product Security issues

If something doesn't look right, it probably isn't

Immediately notify and provide all available details and/or circumstances of the potential incident and report to your supervisor, if you become aware of a potential GPS incident in the marketplace or company's supply chain.

Contact the appropriate GPS representative listed on Contact Information slide.

Identifying Potential Safety Information in a Medical Inquiry

A medical inquiry is an unsolicited request for information on Otsuka products that are used to treat human diseases or conditions.

This includes, but is not limited to:

- Product information
- Technical questions such as storage, stability, preparation, handling and dosage
- Information about off label use
- Safety aspects of a product
- Information about on-going clinical trials

Identifying Potential Safety Information in a Medical Inquiry

A medical inquiry is often accompanied with safety information or product quality information that Medical Information needs to identify and report as per guidelines.

This information can sometimes be difficult to identify. If information is not clear, attempt to clarify with the reporter at the time of contact.

Ask the clarifying questions

- Why?
- When?
- What?

Report Within 24 Hours

- Clock for reporting to Otsuka starts on the Date of First Receipt (DFR) when the first Otsuka personnel and those working on behalf of Otsuka ***are first notified or become aware of Safety Information, Product Quality Complaints or product security issues***, regardless of whether received in person, or via telephone, e-mail or fax**.**
- **As part of their reporting responsibility, Otsuka personnel and those working on behalf of Otsuka are responsible for:**
  - ✓ *Forwarding information to the appropriate Otsuka local PV, PQC or GPS representative* ***within 24* hours*** *of initial awareness*
  - ✓ *Being the eyes and ears for Otsuka*

* Within 24 hours, not to exceed 72 hours in the event of a weekend or holiday.

If You Hear Something, Say Something

- Collect as much information as possible from the reporter related to the safety information
  - **Description of event**
  - **Patient information**
  - **Otsuka product name (brand or generic)**
  - **Primary reporter contact information**

Even if you are unable to collect all 4 points …

WHEN IN DOUBT: REPORT IT!

- Report all information as verbatim and in the language reported (on the local reporting form as applicable) within 24* hours to the PV representative listed on the Contact Information slide.
- The responsible PV representative will ensure all reported safety information is provided to Global PV.

* Within 24 hours, not to exceed 72 hours in the event of a weekend or holiday.

Summary

Congratulations! You should now be able to:

- ❑ Identify safety information including Adverse Events, and Product Quality Complaints
- ❑ Report safety information including Adverse Events, and Product Quality Complaints to Otsuka within 24* hours.
- ❑ Identify and report potential Global Product Security issues to Otsuka within 24* hours.

Please refer to the Otsuka Global Definitions Glossary on the Otsuka Document Portal.

* Within 24 hours, not to exceed 72 hours in the event of a weekend or holiday.

Where to report Safety Information, Product Complaints and Global Product Security

If you are informed about any issue related to any Otsuka product, you have an obligation to report that information immediately, or within 24* hours, to one of the following contacts:

OPPI Local Safety Report Form

Adverse Events	Product Quality Complaints	Global Product Security
oppi-pv@otsuka.com.ph	oppi-pqc@otsuka.com.ph	askglobalproductsecurity@otsuka-us.com
+632-8844-9266 +632-8888-6774 +63999-886-9910	+632-8844-9266 +632-8888-6774	
+632-8811-2279	+632-8811-2279	

Remember: When you create a memo, which is a source document, send it to your Local PV representative.

* Within 24 hours, not to exceed 72 hours in the event of a weekend or holiday.

Revision History

Version	Date	Description of Changes
1.0	September 2017	• Baseline Factory Version-not delivered
2.0	November 2017	• Front page updated and footer added to clarify the version, date and the target of the slide • Your Responsibility slide updated for clarity • What is a Product Quality Complaint (PQC) slide updated to reflect new regulatory definition
3.0	September 2018	• Reference slide removed • Corrected one of the headings of Pharmacovigilance Contact Information from Safety Information to Adverse Events
4.0	August 2019	• Updated deck title to include Product Complaint Reporting • Removed reference to "Factory" aligning as one Basic of PV, safety information reporting and product complaint reporting • Removed the following slides for simplification: Purpose and Scope, Learning Objectives, Risk of Regulatory Compliance, Safety Reporting Process, What is Medical Device Vigilance, Reporting Sources and all back up slides for Regional LSM use • Updated Safety Information definition to align with Global Glossary v15.0 • Updated Hear Something, Say Something to include reporting if a memo is taken.
5.0	January 2020	• Change involving the definition of Safety Information
6.0	April 2021	• Slide 6 removed. • Removal of (Annex IV ICH E2A Guideline reference) • Updated PQC definition
7.0	March 2022	• Consolidated the US and Non-US deck to 1 harmonized deck • Removed knowledge checks to be added in the quiz • Incorporation of Global Product Security and Medical Information content • Slide re-organization for ease of use
8.0	March 2023	• Inclusion of allowance for reporting up to 72 hours in the event of a weekend or holiday. • Slide 7, Special situation definition updated to include "such as" • Slide 9, updated PQC definition to align with Global Definitions Glossary • Slide 14, updated reporting of PQC and GPS • Slide 16, updated Global Definitions Glossary comment • Slide 18, added reminder regarding a memo
9.0	Jan2024	• Template update • Slide 5 and 8 updated to "Global Definitions Glossary"