

<b>Department: Distribution Operations</b>	<b>SOP #:040</b>
<b>Title: Suspicious Order Monitoring/Order Monitoring System</b>	

## Scope

This directives contained in this SOP apply to all Anda and Anda Pharmaceutical employees that have or may have contact or involvement in the activities associated with Compliance and Distribution. This is to include, but not be limited to:

- \* Distribution Operations
- \* Compliance

## 1.0 Purpose

To document the procedures involved in reviewing Held and/or Suspicious Orders.

## 2.0 Procedure

### 2.1 System Formula:

1. Add quantity purchased over last 12 months for all customers.
2. Add the number of total customer months purchased that do not equal 0
3. Divide the quantity purchased by the total customer months.
4. Multiply the quantity by a factor of 3.
5. If customer order quantity exceeds this number order is to be held for review.

2.2 Review all held orders and determine the reason for additional product ordered. The following are release reasons for held orders

1. Increased supply to new or existing customer/patient
2. Increased supply to new facility
3. Consistent with customer order pattern and/or within CS increase granted
4. Increasing stock due to promotion or pricing change
5. First time order of product
6. Consistent with customer class order pattern
7. Administration release. Customer call not required.
8. Released unchanged with DEA concurrence



Anda, Inc  
Anda Pharmaceuticals, Inc

## STANDARD OPERATING PROCEDURE

3.3 Orders that exceed the above criteria and cannot be released with an appropriate reason listed above will be reported to the local DEA office for the applicable distribution center.

### 3.0 Revision History

**\*SOP will be reviewed annually, each February, by management\***

Effective Date	Version	Author	Change Description
TBD	001	Michael Cochrane	Original Issue - TBD

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