RPACT Third Party and Supplier Management Policy

RPACT GbR

POL-RPACT-006

Version 1.0.0

Contents

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Policy ID	POL-RPACT-006
Title	RPACT Third Party and Supplier Management Policy
Description	This policy defines how RPACT GbR manages third-party and supplier relationships, including the establishment of formal agreements and the enforcement of regulatory and client-specific compliance obligations.
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1 Purpose

This policy defines how RPACT GbR manages third-party and supplier relationships, including the establishment of formal agreements and the enforcement of regulatory and client-specific compliance obligations.

2 Scope

This policy applies to all external individuals and organizations who provide services or access to systems, software, or information on behalf of RPACT GbR, particularly in relation to regulated software development or services involving client information.

3 Company Context

As of the effective date, RPACT operates as a small partnership of independent experts and does not rely on external vendors for critical IT or software development services.
Any collaboration with external contributors is done under formal agreements (e.g., Non-Disclosure Agreements, consulting contracts), and only with trusted professionals.

This policy is future-oriented and ensures readiness for structured third-party onboarding as the company grows.

4 Policy

4.1 Formal Agreements

- Any third party or supplier involved in service delivery or system access must operate under a formal written agreement.
- Agreements must define the scope of work, confidentiality obligations, ownership of deliverables, and responsibilities for compliance with regulatory requirements and client policies.
- For individual collaborators, this may take the form of an NDA or freelance service agreement.

4.2 Regulatory and Policy Compliance

- Third parties are required to adhere to all applicable regulatory requirements relevant to their work scope.
- Where client-specific policies apply (e.g., GxP, data privacy, information security), these are to be communicated to the third party and acknowledged in writing.

4.3 Information Protection

- All third parties must be informed of their responsibility to protect confidential information, including any client data they may access.

- RPACT ensures that information is only shared on a need-to-know basis, using secure, access-controlled environments.

4.4 Risk-Based Management and Periodic Evaluation

- RPACT applies proportional oversight based on the criticality of the third party's role.

- All suppliers or collaborators involved in GxP-related work, security-relevant functions, or infrastructure components are subject to evaluation prior to engagement.

- The depth and frequency of evaluations are based on risk:

Risk Level	Example Scenarios	Review Frequency
High Risk	External IT services or infrastructure tools	At least annually
Moderate Risk	Contract developers for internal tools	Every 1–2 years
Low Risk	Limited-scope contributors under NDA	Every 2–3 years

- For high-risk suppliers, the evaluation includes the design and effectiveness of their internal controls and compliance mechanisms (e.g., relevant to Sarbanes-Oxley Act (SOX) if applicable).

- Evaluations may include review of documentation (e.g., SOC 2 reports), performance history, and alignment with internal quality standard and regulatory expectations.

- External vendors (if introduced in the future) will be subject to formal onboarding and periodic review.
- As of the effective date of this policy, RPACT does not engage any suppliers that fall under the high-risk category as defined above. This policy will be updated accordingly should that change in the future.

5 Review of Policy

This policy is reviewed annually or upon any change to the third-party landscape or regulatory environment.

Approved by:

Dr. Friedrich Pahlke
Prof. Dr. Gernot Wassmer

Date: *2025-03-31*
