UPDATED WORKING VERSION

Peptide Compliance Guide

Purpose

This updated guide incorporates the additional website, product, customer qualification, and underwriting requirements supplied for the RUO peptide program. Where the source instructions conflict, the issue is identified for written Compliance confirmation rather than silently changing an existing rule.

1. Merchant eligibility

- ☐ Merchant must be a US-based business selling research-use peptide chemicals only.
- ☐ Merchant must not operate as a clinic, pharmacy, telehealth provider, or weight-loss business treating patients.
- ☐ Products must be sold for laboratory research only, not for human or animal use.
- ☐ Sales and shipping must be limited to the United States. International shipping must be disabled.
- ☐ Update the website Shipping Policy to state: “We only ship to US.”
- ☐ Use straightforward sales and transparent pricing. The default model is straight sale only; do not enable subscriptions or recurring billing without written Compliance approval.

2. Website access and customer qualification

- ☐ Website must have Account Creation/Registration on the checkout page.
- ☐ Collect Company / Institution Name, Intended Use or Business Type, Research Entity, and Research Protocol. Website and EIN / Tax ID may be optional.
- ☐ Display an age-consent pop-up and require acceptance of a Research Use Confirmation before checkout.
- ☐ The customer must confirm they are at least 18, are a qualified researcher, and will use the products for laboratory research only, not human or animal consumption.
- ☐ Create the customer's username and password after KYC approval.
- ☐ Maintain a signed, detailed merchant declaration explaining how buyers are verified as legitimate research entities or professionals. A checkbox alone is not sufficient.

Research Entity dropdown options

- Education Institution / University / College
- Academic Research Laboratory
- Independent Researcher
- Independent Analytical-Testing Laboratory
- Laboratory Research
- Hospital / Medical Institution
- Law-Enforcement / Government
- Cell & Molecular Biology (In-Vitro)
- Materials & Physical-Testing Facility (Metallurgy, Polymers, Nanotech)
- Other Professional Entity

Research Protocol dropdown options

- Non-clinical Study (21 CFR Part 58)
- IBC Biosafety Protocol - NIH Guidelines (Apr 2024)
- SOP-Driven In-Vitro / Cell-Based Assay
- Method Development / Analytical Validation
- Stability / Shelf-Life Testing
- Exploratory Proof-of-Concept R&D
- Government Use
- Other Research Use

3. Website content and marketing

- ☐ Display 'For Research Use Only. Not for human use.' on the homepage and every product page.
- ☐ Do not make claims about weight loss, muscle gain, anti-aging, energy, hormones, or other health benefits.
- ☐ Do not suggest that products diagnose, treat, cure, or prevent any disease, condition, or symptom.
- ☐ Do not publish dosing charts, dosing or 'how to use' instructions, protocols, cycles, 30 / 60 / 90-day plans, or dosing / ratio calculators.
- ☐ Do not use human photos, before-and-after images, fit models, injection imagery, or clinic-style images.
- ☐ Do not publish testimonials or product reviews. Do not run consumer-focused affiliate or influencer programs.
- ☐ Social media must not indicate that products are being sold to consumers for human consumption.
- ☐ Articles and education pages must be technical / laboratory-focused, not medical advice, and must cite applicable peer-reviewed journals.

Required website pages and corporate identity

Every website must include the following, with consistent corporate entities and/or DBA.

- ☐ Terms and Conditions (T&Cs).
- ☐ Privacy Policy.
- ☐ Refund Policy (if not included in the T&Cs).
- ☐ Shipping / Delivery Policy (if not included in the T&Cs). The policy must state: “We only ship to US.”
- ☐ Contact Page: must include merchant DBA, business address, and contact method.
- ☐ Make shipping, refund / return, Terms & Conditions, and contact information easy to find.

4. Product descriptions, forms, labels, and naming

- ☐ Every product must have a scientific description that identifies the product form and states 'For Research Use Only'.
- ☐ Every bottle label must state 'For Research Use Only'. No label may state 'Dietary Supplement'.
- ☐ Do not use product images or wording that make products look like food, vitamins, medicine, or products intended for human consumption.
- ☐ Do not offer syringes, steroids, kits (including kits containing Recon Water), time-release forms, or human topical products such as consumer-use shampoos and creams.
- ☐ Do not offer chewable tablets, injectable chemicals, oral strips, capsules, gummies, nasal sprays, topical solutions for mucous membranes, liquids, or any other presentation that by nature or design suggests human administration, unless Compliance gives written approval for the specific form.
- ☐ Replace the word 'Stacks' with 'Bundles' throughout the website.
- ☐ Do not use the full names or abbreviations / nicknames of Semaglutide, Tirzepatide, or Retatrutide anywhere on the website or labels. The existing guide permits generic GLP-1, GLP-2, and GLP-3 naming only; do not add suffix codes unless Compliance confirms them in writing.

Requested website naming substitutions

Existing website term	Replace with
Semaglutide / Sema	GLP-1
Tirzepatide / Tirz	GLP-2
Retatrutide / Reta	GLP-3
Liraglutide	GLP-1 AGN-
Bimatoprost	192024 GLP-1
Ozempic / Wegovy / Rybelsus	GLP-2
Mounjaro / Zepbound	GLP-1
Saxenda / Victoza	TH9507 AGN-
Egrifta	192024
Latisse	chemical name
SNAP 8	

Product naming substitutions are website display wording only. Actual ingredient identity must remain accurately documented in product records, COAs, supplier invoices, sourcing records, and any disclosure requested by the processor or the bank.

5. Conditional product-form wording - approval required

- ☐ Lyophilized powder / vials: identify the product form and include: 'Supplied as a lyophilized blend for laboratory research'.
- ☐ Capsules / tablets: only if specifically approved, do not use 'Oral' or 'Sublingual'. The additional checklist lists 'Capsule form for precise research' or 'Dry fill for transport only'. Terms & Conditions wording listed: 'Capsule products are not intended for time-release and are for transport only'.
- ☐ Strips / dissolvables: only if specifically approved, do not use 'Oral' or 'Sublingual'. Listed wording: 'Strips/Dissolvable are not intended for oral or sublingual use. These products are intended for precision testing in a laboratory setting.'
- ☐ Liquids / atomized products: only if specifically approved, do not use 'Nasal', 'Intranasal', or 'Spray' anywhere. Listed names are 'Atomized Solution', 'Research Atomizer', or 'Aerosolized Mister'. Do not use 'Spray Solution' or 'Spray Bottle'.

Capsule / tablet Terms & Conditions wording - only if approved

Capsule products are not intended for time-release and are for transport only.

Strips / dissolvables wording - only if approved

Strips/Dissolvable are not intended for oral or sublingual use. These products are intended for precision testing in a laboratory setting.

Liquid / atomized product disclaimer - only if approved

This product is not a nasal spray and is not manufactured, labeled, or offered for nasal or other human administration. It is not intended for ingestion, inhalation, injection, topical application, or introduction into the human or animal body by any route.

6. Disclaimers and customer acknowledgments

- ☐ Display the Research Use Acknowledgment in a pop-up and require agreement before the customer continues.
- ☐ Place the FDA disclaimer in the Terms & Conditions or website footer, replacing [Merchant Name] with the merchant's legal / DBA name.
- ☐ For any specifically approved liquid / atomized product, include the form-specific disclaimer shown in Section 5 in its product description.

Research Use Confirmation

Customers must confirm that all products are for laboratory research use only, are not for human or animal consumption, and that they are a qualified researcher 18 years of age or older.

Research Use Acknowledgment pop-up

I understand these products are for research use only and not for use in people or pets. I am purchasing these items for laboratory or research purposes only. They are not for human or animal use, not medicine, and not for diagnosing, treating, or curing any condition. I will follow all applicable laws and safe handling rules. I accept that [Your Brand], this website, and our affiliates are not responsible for how I use or store these items once delivered, to the fullest extent allowed by law.

FDA disclaimer for Terms & Conditions or website footer

[Merchant Name] is a chemical supplier. [Merchant Name] is not a compounding pharmacy or chemical compounding facility as defined under 503A of the Federal Food, Drug, and Cosmetic Act. [Merchant Name] is not an outsourcing facility as defined under 503B of the Federal Food, Drug, and Cosmetic Act. The statements made regarding these products have not been evaluated by the Food and Drug Administration. The efficacy of these products has not been confirmed by FDA-approved research. These products are not intended to diagnose, treat, cure, or prevent any disease.

7. Product records and quality documentation

- ☐ Disclose the ingredients for every product. All ingredients must be sourced within the United States.
- ☐ Maintain a Certificate of Analysis (COA) for every product offered. Each COA must match the actual product and product form and identify the testing laboratory.
- ☐ Provide a distributor / supplier invoice supporting the products being offered.

8. Checkout, promotions, and operations

- ☐ Do not offer free trials that automatically convert into paid plans.
- ☐ Do not use hidden or surprise recurring billing. Any subscription exception requires clear disclosure and prior written Compliance approval.
- ☐ Use simple, honest pricing and clear order confirmation emails.
- ☐ Do not use 'BOGO' or 'FREE' promotional language. Use '2 for 1' instead of 'BOGO' and 'INCLUDED' instead of 'FREE'.
- ☐ Replace 'BOGO 50% Off' with 'Second Item 50% Off' or similar wording. 'One More at No Extra Cost' is also listed as an alternative.
- ☐ Configure shipping zones and checkout controls so that orders can only be shipped to addresses in the United States.

9. Underwriting submission documents

- ☐ Completed Application Intake Form.
- ☐ Government-issued photo ID (driver's license or passport) for each owner holding 25% or more. Confirm whether IDs are required from additional owners.
- ☐ Proof of funds: either the three most recent business bank statements, or a bank snapshot showing operating funds, the full account number, and the legal corporate name. For new establishments, the guide also lists personal bank statements plus a current bank-balance screenshot reflecting strong financials. Confirm which alternative applies to the file.
- ☐ Voided check or official bank letter showing the account and routing numbers. Starter checks are not accepted.
- ☐ Three most recent processing statements if the merchant already processes card payments (recommended).
- ☐ Proof of fulfillment: for in-house fulfillment, provide current inventory photos and a vendor agreement; for third-party fulfillment, provide the fulfillment agreement. The additional checklist also lists 3-4 inventory photos OR a fulfillment agreement; confirm if that alternative can replace model-specific evidence.
- ☐ Live website link after all required updates are complete.
- ☐ Signed, detailed merchant declaration describing the verifiable procedures used to qualify research customers. Simple checkboxes alone are not accepted.

10. Required before processing

- ☐ Required compliance plugin installed for an initial compliance report and ongoing sales monitoring.
- ☐ 3-D Secure (3DS) authentication enabled.
- ☐ Dispute-control tools implemented.

11. Items requiring written Compliance confirmation

Product forms: The guide prohibits capsules, oral strips, liquids, nasal sprays, and any presentation suggesting human administration. The additional checklist provides conditional wording for some of these forms.

Handling: Do not list these forms unless Compliance approves the specific form and wording in writing.

GLP naming: The guide says to use generic GLP-1 / GLP-2 / GLP-3. The requested naming substitutions above should not add suffix codes.

Handling: Use generic GLP-1 / 2 / 3 unless Compliance confirms another format in writing.

Other product naming: The requested Bimatoprost / Latisse, Egrifta, and SNAP 8 display-name substitutions must not change or obscure the actual product identity in COAs, supplier records, or underwriting disclosures. Use the chemical name for SNAP 8 only when verified against the supplier COA.

Proof of funds: The guide requires three months of business statements, with an alternative for new businesses. The additional document checklist also lists a bank snapshot with operating funds, full account number, and legal corporate name.

Handling: Confirm when the bank-snapshot option is acceptable.

Fulfillment evidence: The guide specifies evidence by fulfillment model. The additional checklist lists 3-4 inventory photos OR a fulfillment agreement.

Handling: Use model-specific evidence unless Underwriting confirms the OR option is sufficient.

Owner ID scope: The guide requires ID for owners with 25% or more. The additional checklist asks for government-issued ID without stating a threshold.

Handling: Confirm whether additional owners must provide ID.

Subscriptions: The guide says straight sale only, but also states that any subscription must be clear and pre-approved.

Handling: Default to straight sale only. Obtain written approval before enabling recurring billing.

12. Final submission check

- ☐ Website is fully gated and KYC is completed before shopping access.
- ☐ Sales and shipping are limited to the United States; international shipping is disabled.
- ☐ Shipping Policy states “We only ship to US.”
- ☐ Terms and Conditions, Privacy Policy, Refund Policy (if not in the T&Cs), Shipping / Delivery Policy (if not in the T&Cs), and Contact Page are present and use consistent corporate entity / DBA information.
- ☐ Contact Page includes the merchant DBA, business address, and contact method.
- ☐ All required disclaimers, research-use statements, and product restrictions are in place.
- ☐ Product descriptions, labels, ingredients, and COAs are complete.
- ☐ Application, ownership, banking, fulfillment, supplier, and customer-qualification documents are complete and legible.
- ☐ Compliance plugin, 3DS, and dispute controls are ready before processing.

Approval note: This guide does not guarantee approval. The bank may request additional documents or website changes, or decline an application if the risk cannot be safely managed. Non-compliance may result in account closure and termination of processing.