RUO Peptide Program Website Compliance Checklist

Working / Editable Version

This checklist reflects the current requirements provided by the Compliance team and is intended to be updated as program guidance evolves.

1. Acceptable Product Types

Lyophilized Powder / Vials

☐ Product description identifies the product as lyophilized powder / vial.

☐ Description includes the required language:

"Supplied as a lyophilized blend for laboratory research"

Capsules / Tablets

☐ Do not use the words "Oral" or "Sublingual" in connection with capsule/tablet products.

☐ Product description includes one of the following approved statements:

"Capsule form for precise research"

"Dry fill for transport only"

☐ If capsules are offered, the Terms & Conditions include:

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

Strips / Dissolvables

☐ Do not use the words "Oral" or "Sublingual" in connection with strip/dissolvable products.

☐ Product description includes the required language:

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

Liquid Serums

☐ Product needs to be renamed to one of the following:

- "Dermato-permeant concentrate" OR
- "Trans Corneal Solute Fluid"

Liquids / Atomized Products

☐ Do not use the words "Nasal," "Intranasal," or "Spray" throughout the website.

☐ Use one of the following acceptable naming conventions:

- ☐ Atomized Solution
- ☐ Research Atomizer
- ☐ Aerosolized Mister

☐ Do not refer to the product as a "Spray Solution," "Spray Bottle," or similar spray terminology.

☐ Product descriptions include the required disclaimer:

"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."

Bundles

☐ Replace any use of the word "Stacks" with "Bundles."

2. Website Gating & Customer Registration

☐ Website must have Account Creation/Registration on the checkout page.

☐ Account creation / registration includes an Intended Use or Business Type field.

☐ Business Type dropdown -- may include options such as "Laboratory" or "Researcher."

☐ EIN / Tax ID field -- may be included as an optional field.

☐ A required Research Use Confirmation checkbox is included.

☐ Research Use Confirmation communicates:

"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."

3. FDA Disclaimer

☐ FDA Disclaimer is located in the Terms & Conditions or website footer.

☐ Disclaimer uses the merchant's legal/DBA name where indicated and includes:

"[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."

4. Product & Website Content Restrictions

☐ No dosing calculator.
☐ No syringes.
☐ No steroids.
☐ No pictures of humans.
☐ No kits (including Recon Water, etc in cart)

5. GLP Product Naming

☐ Do not use the full name or abbreviation of Semaglutide, Tirzepatide, or Retatrutide.
☐ Approved naming conventions:
  ☐ GLP-1SM
  ☐ GLP-2TZ
  ☐ GLP-3RT
☐ Use a maximum of two letters after the GLP designation.
☐ Bottle labels must not display the abbreviation or full drug name of these products.

6. Human Topical Products

☐ Human topical products are not acceptable on an RUO website.
☐ Examples include GHK-Cu Copper Shampoo, creams, and similar consumer-use topical products.
☐ RUO program is for chemical sales; consumer products such as shampoos and creams are not treated as RUO chemical sales. (can create separate eComm website for this)

7. Certificates of Analysis (COAs)

☐ A COA is present for every product offered on the website.
☐ COA corresponds to the actual product/product form being sold.

8. Product Descriptions

☐ Every product offered on the website has a product description.
☐ Product description clearly identifies the applicable product form and remains scientific.

9. Articles / Learning Sections

☐ Educational/article content is limited to material supported by actual cited, peer-reviewed journals.
☐ Citations to the applicable peer-reviewed journal(s) are included.

10. Promotional Language - BOGO / FREE

BOGO / FREE Promotions

☐ The promotion itself may remain, but do not use "BOGO" or "FREE" promotional language.
☐ For a BOGO / FREE promotion, change the promotional language to "2 for 1."
☐ Instead of "FREE," use "INCLUDED."
☐ Example: "BOGO / FREE" → "2 for 1" and "FREE" → "INCLUDED."

BOGO 50% Off Promotions

☐ Update any "BOGO 50% Off" language throughout the website to "Second Item 50% Off" or similar promotional language that does not use "BOGO."
☐ Acceptable alternative promotional language may include "One More at No Extra Cost."

11. Card Acceptance & Checkout Logos

☐ Accepted card brands may be offered for payment, excluding Mastercard. Mastercard is not accepted under the current program.
☐ The checkout page displays the logos of all accepted card brands.
☐ Remove the Mastercard logo from the checkout page and any other payment acceptance messaging throughout the website or let us know that you will route MasterCard to a different MID
☐ Ensure website payment language accurately reflects accepted card brands and does not state “all major credit cards accepted” if that implies Mastercard.