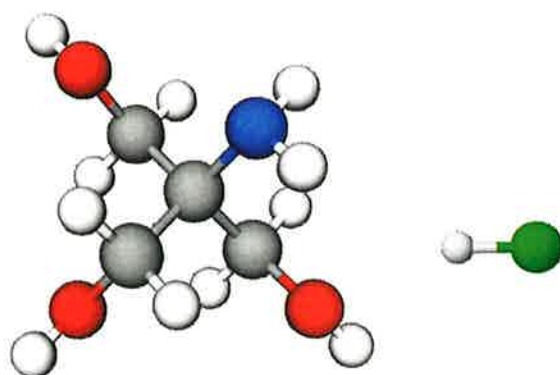




TRIS HYDROCHLORIDE



BIO EXCIPIENT GRADE REGULATORY PACKET

Signature/Date:

Cassie Baun

7/10/20

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SECTION 1 – TRIS HYDROCHLORIDE BIO EXCIPIENT GRADE

1.1 General Product Information

1.1.1 Product Name:

Tris Hydrochloride

1.1.2 Product Code:

TH3202, TH3203, TH3220, TH3250, TH3251, TH3252, TH3253, TH3254, TH3255,
TH3256

1.1.3 Scope:

This regulatory packet will provide the quality and regulatory information regarding the manufacturing, testing, packaging, storage, release, shipping and handling of Bio Excipient Grade Tris Hydrochloride manufactured by and at the BioSpectra, Stroudsburg, PA facility.

1.1.4 Molecular Formula:

$\text{NH}_2\text{C}(\text{CH}_2\text{OH})_3 \text{HCl}$

1.1.5 Molecular Weight:

157.60 g/mol

1.2 Manufacturing, Packaging, Release Site and Supplier Information

1.2.1 General Information:

BioSpectra manufactures Tris Hydrochloride in its Stroudsburg, PA facility. Tris Hydrochloride is manufactured, packaged, stored, tested and released at BioSpectra's Stroudsburg, PA facility.

1.2.2 Manufacturing:

The manufacturing of Tris Hydrochloride is performed at BioSpectra's Stroudsburg, PA facility and is conducted in a dedicated processing area using only dedicated equipment.

1.2.3 Packaging:

The packaging of Tris Hydrochloride may occur in the following BioSpectra sites:
BioSpectra Stroudsburg, PA Facility: 1474 Rockdale Lane, Stroudsburg, PA 18360
BioSpectra Bangor, PA Facility: 100 Majestic Way, Bangor, PA 18013

1.2.4 Testing for Release:

Testing and release of Tris Hydrochloride may be performed at:
BioSpectra Stroudsburg, PA Facility: 1474 Rockdale Lane, Stroudsburg, PA 18360
BioSpectra Bangor PA, Facility: 100 Majestic Way, Bangor, PA 18013



1.2.5 GMP Compliance Statement:

Bio Excipient Grade Tris Hydrochloride is suitable for use as an excipient. It is manufactured in accordance with the ICH Q7 Good Manufacturing Practice Guide. This grade of Tris Hydrochloride is not suitable to be used as an Active Pharmaceutical Ingredient, Drug Product or Household Item.

1.3 Physico-chemical Information

1.3.1 CAS Number:

CAS# 1185-53-1

1.3.2 Origin:

The origin of Tris Hydrochloride is through synthetic chemical manufacturing using approved raw materials, which are further purified in accordance with ICH Q7 guidelines. Only raw materials of synthetic origin are used in the synthesis and purification of Tris Hydrochloride.

1.3.3 Synonyms:

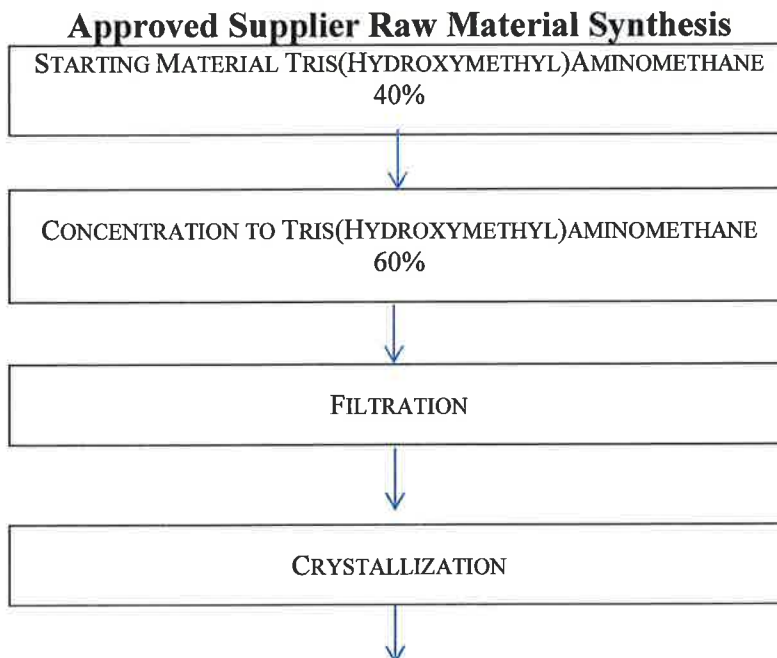
2-Amino-2-(Hydroxymethyl)-1,3-Propanediol Hydrochloride
Tris (Hydroxymethyl)Aminomethane Hydrochloride

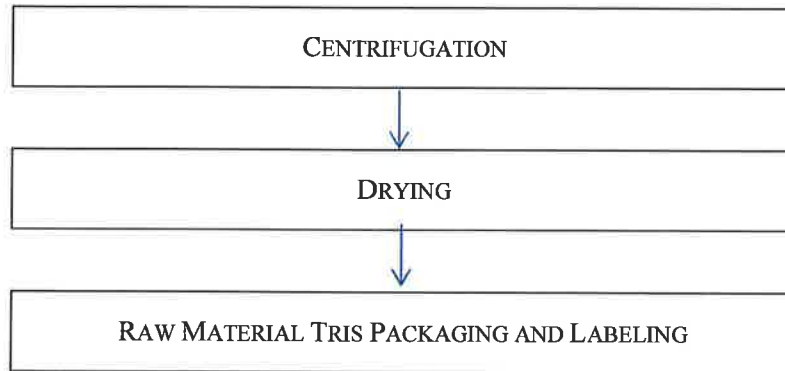
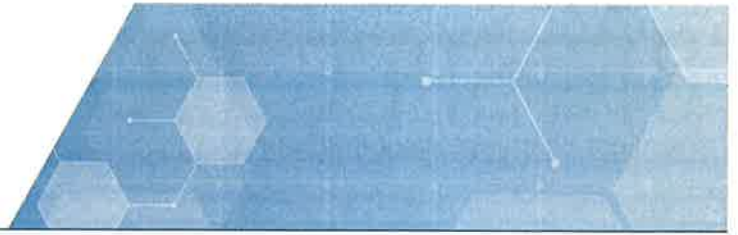
1.3.4 Morphological Form:

White / Crystals

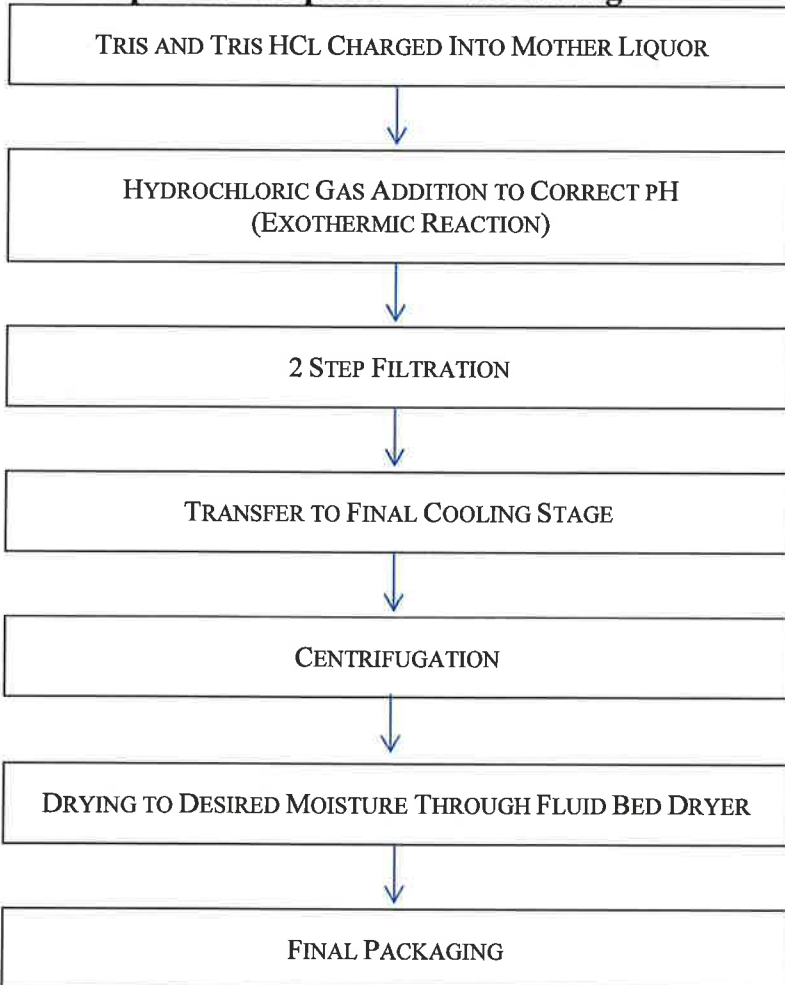
1.3.5 Manufacturing Process:

The manufacturing process for Tris Hydrochloride, Bio Excipient Grade is performed as follows:





BioSpectra Excipient Manufacturing Process





1.3.6 Specifications:

Available upon request.

1.4 Regulatory Information

1.4.1 Compendial Compliance:

Not Applicable

1.4.2 Master File:

Drug Master File (DMF) is currently available for this grade of product.
EDQM Certificate of Suitability is currently not available for this product

1.4.3 REACH:

REACH certification is current.

1.4.4 BSE/TSE Statement:

Tris Hydrochloride is a synthetic chemical and has been evaluated for the source of the raw materials used in its production through the Supplier Approval Program. BioSpectra can state that BSE/TSE is not a concern based on this evaluation.

1.4.5 Allergens/Hypersensitivities:

Tris Hydrochloride manufactured by BioSpectra and its raw materials are not manufactured with or using any of the following substances: Cereals containing gluten (i.e., wheat, rye, barley, oats, spelt, kamut or their hybridized strains) and products thereof. Crustaceans and products thereof. Eggs and products thereof. Fish and products thereof. Peanuts and products thereof. Soybeans and products thereof. Milk and products thereof (including lactose). Nuts i.e., Almond (*Amygdalus communis* L.), Hazelnut (*Corylus avellana*), Walnut (*Juglans regia*), Cashew (*Anacardium occidentale*), Pecan nut (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nut (*Bertholletia excelsa*), Pistachio nut (*Pistacia vera*), Macadamia nut and Queensland nut (*Macadamia ternifolia*) and products thereof. Celery and products thereof. Mustard and products thereof. Sesame seeds and products thereof. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre expressed as SO₂. BioSpectra has evaluated the Raw Material Supply through the Supplier Approval Program.

1.4.6 GMO Information:

Tris Hydrochloride is a synthetic chemical and has been evaluated for the source of the raw materials used in its production through the Supplier Approval Program. BioSpectra can state that genetic modification is not a concern based on this evaluation.

1.4.7 Residual Solvents:

BioSpectra can state based on the manufacturing process and the controlled handling, storage, and analysis of this product, the Tris Hydrochloride manufactured by BioSpectra complies with the requirements and specifications listed in the current USP method <467> Tables 1, 2, 3, or 4.

1.4.8 Melamine Statement:

BioSpectra can state that the Tris Hydrochloride, manufactured by BioSpectra is Melamine free; Specification 0.15 ppm. In addition, BioSpectra has evaluated the Raw Material Supply through



the Supplier Approval Program and can state the Raw Materials are not expected to contain melamine based on this evaluation.

1.5 Miscellaneous Product Information

1.5.1 Description of Batch:

The Tris Hydrochloride process is a batch process where each batch yields approximately 1 kg up to 3000 kg.

1.5.2 Lot/batch numbering system:

The lot numbering system at BioSpectra employs the following format: 6 alphanumeric digits followed by a hyphen, 3 numerical digits followed by a hyphen, and finally 4 numerical digits. A sample lot number would appear as:

TH3220-001-0620

The first two digits are alpha digits which indicate the material manufactured, where TH represents Tris Hydrochloride. The third digit is a numeric digit which indicates the compliance of the material where 3 represents ICH Q7 compliant Excipient. The fourth digit is a numeric digit which indicates the phase of the material where 2 represents crystal/powder. The fifth and sixth digits are two numeric digits which indicate the set of specifications for the material where 20 is reserved for the customer. The seventh, eighth and ninth digits are numeric digits representing the sequential batch manufactured. The tenth and eleventh digits are two numeric digits which represent the month of manufacture. The twelfth and thirteenth digits are two numeric digits which represent the year of manufacture.

1.5.3 Expiration date and/or recommended re-evaluation interval:

The current recommended retest date for Tris Hydrochloride is two years from the date of manufacture based on current available stability data in accordance with the Stability Testing Program.

1.5.4 Storage and shipping conditions:

Store in a cool, dry, well-ventilated area away from incompatible substances.

1.5.5 Packaging:

Packaging information is available through the following: <https://Biospectra.us/packaging>



SECTION 2 - SITE QUALITY OVERVIEW

2.1 Facility Overview

2.1.1 Scope:

Site Name: BioSpectra Stroudsburg, PA Facility
Address: 1474 Rockdale Lane, Stroudsburg, PA 18360
Excipient Covered by this Datasheet: Tris Hydrochloride

2.1.2 Customer Audit Policy:

The Bio Excipient Grade Tris Hydrochloride allows for customer audits as required by the customer. Access to the raw material supply chain is also available. Each customer audit provides a general overview of processing information and facility operations.

2.1.3 Site Details:

General Site Information

BioSpectra was founded in 1994 and was officially incorporated in the State of Pennsylvania in 1995. The first BioSpectra manufacturing facility was opened in Sciota, PA in March of 1996. This facility was created for the cGMP manufacturing of Biological Buffers.

BioSpectra opened the Stroudsburg, PA facility in December of 2000. Between 2000 and 2003, BioSpectra moved its processes from the Sciota, PA facility to its Stroudsburg, PA facility. This site is registered with the US Food and Drug Administration. The processes were initially validated in the Stroudsburg facility throughout 2000 and 2003 and revalidated in accordance with BioSpectra's approved Manufacturing Process Validation Master Plan. The manufacturing operations at this site operate 24 hours per day 7 days per week.

BioSpectra purchased the Bangor, PA facility in December of 2012. This facility develops new processes, conducts research and development, and manufactures Active Pharmaceutical Ingredients, Excipients, and Life Science Intermediates, as well as Custom Buffers and Blends. This site is registered with the US Food and Drug Administration. The manufacturing operations at this site operate 24 hours per day 7 days per week.

Facility Size and Composition

The BioSpectra Bangor facility is approximately 150,000 square feet in size and is comprised of various Zones. Each Zone represents a particular geographical portion of the facility. Any one zone may include multiple operational areas, which include manufacturing, packaging, storage or further processing areas. The map of the facility contains details of each zone including the materials of construction of the equipment used in each zone of the facility.

There are five processing rooms, two packaging rooms, and six drying rooms within BioSpectra's Stroudsburg, PA 25,000 square foot facility. The warehouse consists of 8,000 square feet of space with a push-back racking system that is capable of storing over 500,000 kg of material. The Quality Control Laboratory consists of 800 square feet of space.



Site Activities Conducted

The activities conducted at the BioSpectra Stroudsburg, PA Facility include the following:

- Chemical Manufacturing
- Multicompendial Testing
- Wet Chemistry Analysis
- Spectroscopy: UV/VIS, IR
- Karl Fischer Titrations
- Melting Point Determination
- Residue on Ignition
- Titrations

2.1.4 Primary applications of products produced at this site:

At the Stroudsburg, PA facility, Bio Excipient Grade Tris Hydrochloride is manufactured in accordance with ICH Q7 Guidance Documents and IPEC guidelines and is intended to be used as an excipient for further manufacturing.

2.1.5 Facility production of antibiotics, steroids, or hormone products:

There is no production of antibiotics, steroids or hormones conducted at any BioSpectra facility.

2.1.6 Product Release:

Products manufactured by BioSpectra are tested to ensure each batch conforms to assigned specifications. Quality Control performs all analytical testing of each batch of product. Quality Assurance reviews all batch documentation for release. All packaged and prepared materials are inspected before final shipment.

2.1.7 Service Providers:

Service Providers are approved and qualified in accordance with BioSpectra's Service Provider Approval Program. This includes completion of appropriate questionnaires and verification of quality, capabilities and performance via audits and inspections.

2.2 Compliance Evidence

2.2.1 ISO Registration and ISO Certification:

BioSpectra Facilities are not registered with ISO.

2.2.2 General GMP Statement:

BioSpectra's quality system is called the Quality System V. This system is designed to state and define the compliance standard to which all BioSpectra operations are held. The BioSpectra Quality System V was derived from the interpretations of ICH Q7 Good Manufacturing Practice Guidance Document for Active Pharmaceutical Ingredients and the Joint IPEC-PQG Good Manufacturing Practice Guide for Pharmaceutical Excipients. All personnel are GMP trained on a scheduled frequency which ensures their awareness and understanding of cGMP guidelines. The facility is inspected on a scheduled frequency to verify continuous compliance in accordance with BioSpectra's Quality System V. Specific manufacturing processes conducted at BioSpectra's facilities are validated and revalidated in accordance with BioSpectra's approved



Manufacturing Process Validation Master Plan. All products available from BioSpectra are available with distinct Key Compliance Attributes.

BioSpectra manufactures and processes Chemical Reagents, Life Science Intermediates, Excipients and Active Pharmaceutical Ingredients. The manufacturing of BioSpectra products includes a validation of the processes, qualification of the utilities and equipment and identifying compliance attributes according to the regulatory needs of the product or process. BioSpectra also performs various other processing or handling of products. This includes blending, particle manipulation, custom solutions or packaging.

2.2.3 Other certifications or external audit programs:

BioSpectra has been audited by third party auditors in support of supply chain management. Further information is available through BioSpectra's Regulatory Department.

2.3 ICH Q7 GMP Compliance Details

BioSpectra manufactures Bio Excipient grade products in accordance with the ICH Q7 Guidance Document.

2.3.1 Quality Management Systems-Excipient Quality Systems:

General Requirements

- BioSpectra has created and implemented the Quality System V, which provides the necessary requirements for all aspects in the manufacture, testing and release of all BioSpectra products.
- Senior Management Review is conducted quarterly to review all investigations, internal and external audits, as well as corrective actions and preventative actions.
- BioSpectra's quality policies ensure that all operations conducted at BioSpectra are performed in accordance with ICH Q7 Guidance Documents.
- All responsibilities of the Quality Unit are clearly defined.
- Bio Excipient Grade products are manufactured in accordance with BioSpectra's Manufacturing Process Validation Master Plan. All utilities, equipment and processes are qualified for use in the processing of a Bio Excipient Product.

Documentation Requirements

- Documentation rules and standards are defined by BioSpectra's Document Creation and Revision Plan, as well as the Record Storage, Retention and Control Procedures. Documentation entry requirements and rules are defined in the Documentation Entry and Error Correction Procedure.

Change Control

- BioSpectra's Change Control system is defined by the Change Control SOP. Any changes are detailed in the change control program and must be approved by Quality, Management and any department responsible for the change. Customer notification of any changes are provided in the mutually agreed upon timeframe.

2.3.2 Management Responsibility:

- Management of BioSpectra reviews operations on a daily basis.
- Management reviews and assesses the adequacy and efficiency of the Quality System. This is conducted through Senior Management reviews, which review



CAPAs, Customer Complaints, Discrepancies, Lab Investigations, Internal Audits, External Audits and Batch Failures.

- Management provides necessary objectives for appropriate planning of operations, for continuous development and growth.

2.3.3 Resource Management:

Provision of Resources

- Management develops and assigns the necessary resources to ensure all operations at BioSpectra are performed efficiently.

Human Resources

- Each employee engaged in the manufacturing, processing, packing, testing or holding of a BioSpectra product has the education, training and experience, or any combination thereof, to enable that person to perform his or her assigned functions. BioSpectra provides training to all employees in the particular operations specific to that employee's job description, BioSpectra's Safety Program and cGMPs. Qualified individuals perform cGMP training on a continual basis and with sufficient frequency to ensure that each BioSpectra employee remains familiar with cGMPs. BioSpectra is a non-union facility.

Infrastructure (Facilities and Equipment)

- Facility utilities and equipment are qualified to perform as intended and are maintained in accordance with BioSpectra's Preventative Maintenance Program.

Work Environment

- In order to protect the product, the operator, and visitors, BioSpectra requires hairnets, beard nets (where applicable), uniforms, safety glasses or goggles, disposable laboratory coats and/or sleeves (where applicable) and safety shoes to be worn in all manufacturing areas. (Visitors may be exempt from the requirement of safety shoes). Production area cleaning is performed and documented at the conclusion of each batch. Periodic cleaning of a process is performed, verified, and documented every 10 manufactured batches. The samples must meet designated rinse requirements to ensure that all equipment used in the manufacture of BioSpectra products remains free of contamination and to ensure production of the purest product is available.

2.3.4 Product Realization:

Design and Development

- All processes at BioSpectra are developed, qualified and validated for intended use. Multi-use equipment is cleaned in accordance with BioSpectra's approved Process Cleaning Validation Master Plan.

Purchasing

- BioSpectra purchases all controlled items only from BioSpectra's Approved Supplier List.

Production and Service Provision

- The manufacturing of BioSpectra products includes a validation of the processes, qualification of the utilities and equipment and identifying compliance attributes according to the regulatory needs of the product or process.



Control of Measuring and Monitoring Devices

- BioSpectra has an extensive Calibration and Preventative Maintenance Program for the equipment and measuring devices utilized in manufacturing as well as the Quality Control Laboratory. All QC test methods are validated or verified according to ICH, USP <1225> and USP <1226> guidelines.

2.3.5 Measurement, Analysis and Improvement:

General

- BioSpectra provides complete testing of Bio Excipient Grade products in each phase of manufacturing from raw materials to finished goods. The Stability Testing Program and Impurity Profiles are also maintained for each product. The QC Laboratory has Multi-Compendial testing capabilities and uses state-of-the-art calibrated equipment to ensure accurate testing. All testing is reviewed by QC and reviewed by QA during Certificate of Analysis issuance. All batch records are reviewed by the Quality Assurance department before release and shipment of product.

Monitoring and Measurements

- BioSpectra handles all customer complaints in accordance with BioSpectra's Written and Verbal Complaint procedure. Customer Complaints are evaluated for each product annually as a part of the Annual Product Review and reported to Senior Management quarterly.
- BioSpectra conducts Internal Audits in accordance with the Internal Audit SOP. Internal Auditors may not audit areas of their own work.
- Critical Process Parameters, Critical Quality Attributes, OOS and Process Deviations are evaluated during the Annual Product Reviews.
- Analytical Methods used for Tris Hydrochloride analysis are validated or verified in accordance with USP <1225> and <1226> and other ICH Guidance Documents.
- All data for testing is recorded directly into permanently bound, sequentially numbered laboratory notebooks or data cards using permanent ink. All sample identification information is recorded on sample labels, as well as in the laboratory notebooks or data cards.
- All electronic printouts of raw data are retained by BioSpectra for a minimum of five years.
- Each analysis performed is signed and dated by the Analyst performing the analysis.
- There are detailed Laboratory procedures regarding the execution of analytical methods and the preparation of solutions.
- USP Primary Reference Standards may be used when available.
- Finished Good Testing for Bio Excipient Grade material is performed on every lot of finished product manufactured prior to release. Testing is reviewed by Quality Control or a qualified designee and reviewed by Quality Assurance prior to the release of material.
- OOS results are documented and investigated. All re-tests and re-samples must be justified prior to execution.
- All Raw Material and Finished Good Samples are retained for five years. Initially, approximately three hundred grams of sample is retained, which is enough to complete Finished Good analysis twice.



- Impurity and Degradation Profiles are completed on the product during validation and during each subsequent validation.
- Stability of Tris Hydrochloride is determined in Accordance with ICH Q1A.

Control of Nonconforming Product

- Materials that do not conform to specifications are isolated in quarantine and an OOS investigation as well as a deviation investigation, as applicable, is performed to determine the root cause of the nonconformance. Material is completely tested prior to shipment and shipments are not released by Quality until all investigations are concluded with a final disposition statement of the product.
- Material may be reprocessed one time, where applicable, as this is included as part of the process validation.
- Additional reworking may be conducted after a risk analysis is completed and Temporary Operating Instructions are issued. TOI must be approved by QA, QC and Production. Any material that is reworked must be placed into the BioSpectra Stability Program.
- Excipients that are returned to BioSpectra are evaluated by Quality for any risk to the production process and if the material is deemed acceptable it is tested and used as raw material.

Analysis of Data

- All Critical Quality Attributes and measurable Critical Process Parameters are evaluated statistically during the Annual Product Review. Results and trends of the Annual Product Review are reported to Senior Management annually.

Improvement

- OOS and Deviation Investigations, Internal and External Audit Reports and Customer Complaints are reviewed during the Annual Product Reviews in addition to the Senior Management Reviews. CAPAs are presented at the conclusion of the investigation reports and the audit responses.



SECTION 3 - SITE AND SUPPLY CHAIN SECURITY OVERVIEW

3.1 Scope

3.1.1 BioSpectra Stroudsburg, PA Facility: 1474 Rockdale Lane, Stroudsburg, PA 18360

3.1.2 Tris Hydrochloride is the only Excipient covered by this Regulatory Datasheet.

3.2 Supply Chain Security

3.2.1 Evaluation of Carriers

- All non-BioSpectra-owned carriers utilized by BioSpectra are approved through mutual agreement with customers or as requested by the customer.

3.2.2 Tamper Evident Packaging

- BioSpectra packaging may be sealed using an approved sequentially numbered and traced BioSpectra seal. The seals provide evidence of tampering.
- Seals may be issued by the Director of Manufacturing or trained designee and traceability of each seal may be evident with a seal accountability form as well as the sequential numbering.
- Tamper Evidence may be apparent using the BioSpectra sequentially numbered seals.

3.2.3 Environmental Controls are not applicable for the supply chain security of Tris Hydrochloride in its current container closure system.

3.2.4 Qualification of distributors is performed as necessary based on customer requests and expectations.

3.2.5 Qualification of forwarders/brokers is not applicable for Tris Hydrochloride.

3.2.6 Qualification of intermediate storage locations is not applicable for Tris Hydrochloride.

3.2.7 Repacking and relabeling activities are not applicable for Tris Hydrochloride once it is shipped from a BioSpectra facility.

3.3 Safety and Environmental Information

3.3.1 BioSpectra's Health and Safety Program is comprised of a number of controlled policies aimed at protecting employees, the surrounding community, the environment, and the customers BioSpectra serves. These policies have been developed using regulatory guidelines and industry regulations.

3.3.2 BioSpectra is not currently registered to ISO 14001, OHSAS 18001, or Responsible Care.

3.3.3 BioSpectra has created an Emergency Action Plan to provide all BioSpectra employees with the appropriate procedure to safely and effectively respond to or safely evacuate from an emergency situation at either BioSpectra facility. This plan provides information for the appropriate response to be used in the event of a fire, medical, chemical spill/release, security threat or weather-related emergency.



SECTION 4 – CONTACT INFORMATION

<https://www.biospectra.us/about-us/commercial-marketing-team>

