Supplier Code of Conduct
The advancement of science around the world depends on scientists’ ability to access the tools they need in a timely and cost-efficient manner. Sigma-Aldrich is committed to meeting our customers’ needs and helping to advance science globally.

All of the countries where Sigma-Aldrich operates present a different set of legal and cultural requirements. Sigma-Aldrich also defines and complies with a set of base requirements across all of our markets. These requirements are expectations that drive both how we do business and what we expect from our supply chain partners. These requirements form a Supplier Code of Conduct (“the Code”) that is based on internationally accepted labor standards and provides a clear expectation and basis for evaluation. The Code also serves as the foundation for our Global Citizenship program and helps promote an environmentally conscious supply chain of the highest standard.

As a part of our Global Citizenship Initiative (GC1015), Sigma-Aldrich will be implementing this Supplier Code of Conduct in phases over the next four years, with full implementation expected beginning in 2015.

Please contact GlobalCitizenship@sial.com with any questions.

1. COMPLIANCE WITH LAWS
2. LABOR STANDARDS
3. ENVIRONMENT
4. HEALTH AND SAFETY
5. ETHICS AND REGULATORY COMPLIANCE
6. FISCAL RESPONSIBILITY
7. MONITORING AND ENFORCEMENT
Compliance with Laws

Suppliers providing products or services to Sigma-Aldrich shall operate in full compliance with the laws of their respective countries and with other applicable laws, rules and regulations. Suppliers shall operate in full compliance with laws relating to labor, worker health and safety, and environmental regulations. To ensure compliance with the Code, Suppliers shall allow Sigma-Aldrich and/or any of our representatives or agents access to their facilities and to all relevant records upon advance notice.
Labor Standards

CHILD LABOR
Suppliers shall employ only workers who meet the applicable minimum legal age requirement and avoid child labor. The term “child” refers to any person under the age of 15 (or 14 according to the applicable local laws), any person under the minimum age for completion of compulsory education or any person under the minimum age for employment in any particular country. Suppliers shall maintain official documentation verifying each worker’s date of birth. Employees under the age of 18 should not perform hazardous work. Suppliers shall comply with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.

FORCED LABOR
Forced, bonded or indentured labor, or involuntary prison labor shall not be utilized by Suppliers.

NON-DISCRIMINATION
Suppliers shall employ workers on the basis of the ability to do the job, not on the basis of personal characteristics or beliefs. No employee may be unfairly disadvantaged, favored, or excluded on the basis of race, ethnicity, color, nationality, religion, gender, age, marital status, maternity or parental status, disability, physical characteristics, sexual orientation, union membership or political affiliation. Suppliers shall ensure a harassment-free environment.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING
To the extent permitted by local law, Suppliers shall allow their employees to join associations of their own choosing. Suppliers shall not interfere with workers who wish to lawfully and peacefully associate, organize or bargain collectively.

HUMANE TREATMENT
Suppliers shall treat all workers with respect and dignity. Suppliers shall not use corporal punishment or any other form of physical or psychological coercion, sexual harassment, sexual abuse, verbal abuse or the threat of any such treatment.

WORKING HOURS AND COMPENSATION
Suppliers shall set working hours in compliance with all applicable laws. Compensation paid to employees shall comply with applicable national wage laws and ensure an adequate standard of living. Suppliers shall pay employees in a timely manner.
Environment

Suppliers shall comply with all applicable environmental laws and regulations and are encouraged to exceed those minimums whenever possible. Where Supplier’s requirements are less stringent than those of Sigma-Aldrich, Suppliers are encouraged to meet the standards outlined in Sigma-Aldrich’s Environmental Health and Safety Policy available at http://www.sigmaaldrich.com.

WASTE AND EMISSIONS

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any of these activities which have the potential to adversely impact human or environmental health shall be appropriately managed, measured, controlled and treated prior to release of any substance into the environment. Suppliers shall have systems in place to prevent or mitigate accidental spills and/or releases into the environment.

RESOURCE CONSERVATION AND CLIMATE PROTECTION

Suppliers are expected to use natural resources (e.g., water, sources of energy and raw materials) in an economical way. Negative impacts on the environment and climate should be minimized or eliminated at their source or through practices such as the modification of production, maintenance and facility processes, materials substitution, conservation, recycling and material reutilization. Suppliers should engage in the development of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

Health & Safety

Suppliers shall provide employees a safe and healthy working environment. Suppliers shall provide employees procedures and training on occupational health and safety, injury and illness reporting systems, medical treatment and/or compensation for ill/injured workers resulting from working for the Supplier, machine safeguarding, and clean and safe facilities.
Ethics

BUSINESS INTEGRITY
Suppliers shall not engage in or permit any form of corruption, extortion or embezzlement. Suppliers shall not offer bribes or other unlawful incentives to anyone. Suppliers are expected not to give or offer Sigma-Aldrich employees gifts beyond a nominal value or any other personal benefit.

FAIR COMPETITION
Suppliers shall conduct business in line with fair competition and in accordance with all applicable laws concerning fair competition.

PRIVACY & INTELLECTUAL PROPERTY
Suppliers shall appropriately use confidential information and protect all employees’ and business partners’ privacy and valid intellectual property rights.

IDENTIFICATION OF CONCERNS
Suppliers shall provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers shall investigate such reports and take corrective action if needed. Suppliers shall not retaliate against or harass any employee making a good faith report.

CONFLICT MINERALS
Suppliers shall not provide any tantalum, tin, tungsten or gold mined in Angola, Burundi, the Central African Republic, Democratic Republic of the Congo, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia that contribute to armed conflict or human rights abuses. Upon request, Suppliers shall provide country of origin information for these minerals.

CRITICAL RAW MATERIALS
Upon request, Suppliers shall provide country of origin information for raw materials used in the manufacture of regulated and commercial products for the Life Sciences and Hitech market in order that Sigma-Aldrich can conduct due diligence on the raw materials’ source and chain of custody.

Fiscal Responsibility
Suppliers shall keep accurate and complete financial and operational records as well as maintain a system of effective internal controls. Suppliers shall comply with insider trading laws.
Monitoring & Enforcement

In order to do business with Sigma-Aldrich, Suppliers shall abide by the Code and all applicable laws. Suppliers should ensure their organization, as well as any sub-contractors producing products for Sigma-Aldrich, is in compliance with this Code.

If Sigma-Aldrich determines that any Supplier has violated the Code, Sigma-Aldrich may, at our discretion, terminate the business relationship and/or require the Supplier implement corrective actions. If corrective actions are advised but not taken, Sigma-Aldrich may terminate current orders and may suspend placement of future orders.

Sigma-Aldrich encourages Suppliers to define and implement policies for social accountability and to establish their own internal compliance management systems.