

# FISCAL ACCOUNTABILITY IS A PRIORITY.

As a public company, it is of critical importance that we earn the trust of our customers, investors, and our employees.

At Sigma-Aldrich, honest and ethical business conduct is a cornerstone of our One Company values. Our Business Conduct Policy provides a foundation for good judgment when faced with choices of ethics and conduct. Under our "One Company" philosophy, this policy is applicable to all Sigma-Aldrich locations worldwide. All employees in positions of authority to commit or expend Company assets or in possession of confidential Company information, are required to submit an annual questionnaire indicating their compliance with the policy.

The Management Team bears the overall responsibility for promoting integrity throughout the organization, with responsibilities to stakeholders both inside and outside of the Company. The Management Team has an important role both to adhere to these principles themselves and also to ensure that a culture exists throughout the company as a whole that ensures the fair and timely reporting of the Company's financial results.

The Management Team is bound to:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships, disclose any such existing relationships to the Audit Committee of the Board of Directors and obtain the approval of the Audit Committee prior to entering into such relationships.
- Provide information that is accurate, complete, objective, relevant, timely and understandable to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the Security Exchange Commission and in other public communications made by the Company.
- Comply with applicable laws, rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies in all material respects.
- Promptly report to the Corporate Governance Committee of the Board of Directors any conduct that the individual believes to be a violation of law or business ethics or of any provision of this Code, including any transaction or relationship that reasonably could be expected to give rise to such a conflict.

## WHO WE ARE

Sigma-Aldrich plays a critical role in advancing life science and high technology research and manufacturing globally. Our products and kits are used in scientific and genomic research, biotechnology, and pharmaceutical development and the diagnosis of disease, and as key components in pharmaceutical and other high technology manufacturing.

*Michael F. Kanan*  
Vice-President and Corporate Controller