

SIGMA-ALDRICH BIOETHICS POLICY

Supporting quality and inspiring research underpins what we do at Sigma-Aldrich. For more than 80 years, our products have been used to discover breakthroughs in science and improve the quality of life. As science and technology transforms in the 21st century, we continue to be committed to high ethical research standards, not only in our research and development division, but throughout the Company.

STEM CELL POLICY

SCOPE

Sigma-Aldrich's stem cell policy ("Stem Cell Policy") applies to all employees and to those parties with whom Sigma-Aldrich contracts ("Third Parties") who are involved in the activities described in this Stem Cell Policy. This Stem Cell Policy describes the way that Sigma-Aldrich supports and conducts human stem cell research and activities related thereto.

PURPOSE

This Stem Cell Policy provides guidelines on Sigma-Aldrich's use of stem cells and ensures that all stem cell research by Sigma-Aldrich is conducted in an ethical, transparent and scientifically responsible manner that meets regulatory requirements and fulfills our high standards for quality. The Stem Cell Policy is intended to enable Third Parties to make the best decisions possible with respect to Sigma-Aldrich's products and services.

RESPONSIBILITIES

All Sigma-Aldrich scientists and researchers using, or otherwise working with, human stem cells are responsible for understanding and abiding by this Stem Cell Policy. In addition, given the high level of scientific sophistication of Third Parties, we expect that such Third Parties are up-to-date with respect to the on-going conversation around stem cells and capable of making informed decisions regarding their own stem cell usage.

GUIDELINES

Sigma-Aldrich recognizes that stem cell research may have vast possibilities to benefit people affected by a wide range of debilitating or life threatening conditions. We are committed to bring our skill and knowledge to develop new products and technologies needed to enable the scientific community to make future discoveries that will benefit mankind. Sigma-Aldrich employees must conduct research in an ethical and scientifically responsible manner that complies with the strictest of guidelines set forth in any of the following: U.S. Federal guidelines, the guidelines of the NIH and, as Sigma-Aldrich expands its collaborations globally, in each country in accordance with its laws. The Stem Cell Policy may change over time with changes in the laws and/or guidelines at the discretion of Sigma-Aldrich and in accordance with such changes.

Sigma-Aldrich offers products for researchers working with stem cells, specifically cell culture media. All stem cells lines used by Sigma-Aldrich must be listed on the NIH approved list or obtained pursuant to NIH guidelines, as applicable.

Sigma-Aldrich does not market stem cells to the general public. In addition, Sigma-Aldrich is continuously monitoring the on-going conversations around stem cell usage and will act upon any relevant, scientifically based findings as appropriate. We will fulfill all regulatory and legal requirements relating to the use of stem cells for research.

GENETICALLY MODIFIED ORGANISM (GMO) POLICY

SCOPE

Sigma-Aldrich's genetically modified organism (GMO) policy ("GMO Policy") applies to all employees and to those parties with whom Sigma-Aldrich contracts ("Third Parties") who are involved in the activities described in this GMO Policy. This GMO Policy provides guidelines on the Company's labeling and use of GMOs.

PURPOSE

This GMO Policy provides guidelines on Sigma-Aldrich's use of GMOs and ensures that all use of GMOs by Sigma-Aldrich is conducted in an ethical, transparent and scientifically responsible manner that meets regulatory requirements and fulfills our high standards for quality. The GMO Policy is intended to enable Third Parties to make the best decisions possible with respect to Sigma-Aldrich's products and services.

RESPONSIBILITIES

All Sigma-Aldrich scientists and researchers using, or otherwise working with, GMOs are responsible for understanding and abiding by this GMO Policy. In addition, given the high level of scientific sophistication of Third Parties, we expect that such Third Parties are up-to-date with respect to the on-going conversation around GMOs and capable of making informed decisions regarding their own GMO usage.

GUIDELINES

A small proportion of Sigma-Aldrich products may be manufactured from materials that are originally derived from sources which have been genetically modified. We believe that the use of these materials has no direct detrimental effect on the safety and use of our products.

Sigma-Aldrich does not market GMOs to the general public. In addition, Sigma-Aldrich is continuously monitoring the on-going conversations around GMO usage and will act upon any relevant, scientifically based findings as appropriate. We will fulfill all regulatory and legal requirements relating to the use of GMO derived materials for research, including any labeling requirements of raw materials which could be derived from crops that have been genetically modified.

APPENDICES

- Executive Order 13505, entitled "Removing Barriers to Responsible Scientific Research Involving Stem Cells"
- National Institutes of Health Guidelines on Human Stem Cell Research, effective July 7, 2009

Appendices are provided for reference purposes only. All employees must comply with applicable guidelines, as may apply based on the current state of the law and federal guidelines.