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Item 5 of the provisional agenda

**Consideration of the content, promulgation, and adoption of codes of conduct for scientists**

## **Codes of Conduct Relevant to the Life Sciences or Biotechnology Which Do Not Refer to Biological and Toxin Weapons**

Background Paper prepared by the Secretariat<sup>1</sup>

### **INTRODUCTION**

1. This paper covers codes of conduct (and similar concepts such as declarations and constitutions of societies) that might be considered relevant to the life sciences and related areas, but which do not make specific or implied reference to biological and toxin weapons. The set of codes which *do not* mention something is obviously an open-ended one, and those described here have been chosen to give an indicative sampling of the types of codes which perhaps *could* include a reference to biological and toxin weapons. The inclusion of any such code in this paper does not imply any criticism or recommendation on the part of the Secretariat: the intention is merely to illustrate the range of possibilities which States Parties might wish to consider.

### **INTERGOVERNMENTAL AND INTERNATIONAL ORGANIZATIONS**

2. These codes are typically aimed at a range of actors, including governments, national regulators, corporations, and individual scientists, farmers and other workers. They deal with items (e.g. pesticides) that could potentially involve, or be diverted to, biological weapons.

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<sup>1/</sup> This background paper has been prepared at the request of the Chairman. The contents of the paper are intended to be indicative rather than exhaustive, and to provide an overview and starting point for States Parties who may wish to conduct further research. Comments, additions and corrections from States Parties are welcome.

United Nations and Specialised Agencies

**Food and Agriculture Organization**

*International Code of Conduct on the Distribution and Use of Pesticides*

3. This is the worldwide guidance document on pesticide management for all public and private entities engaged in, or associated with, the distribution and use of pesticides. It was adopted for the first time in 1985 by the Twenty-fifth Session of the FAO Conference. The Code is designed to provide standards of conduct and to serve as a point of reference in relation to sound pesticide management practices, in particular for government authorities and the pesticide industry.

[http://www.fao.org/WAICENT/FAOINFO/AGRICULT/AGP/AGPP/Pesticid/Code/PM\\_Code.htm](http://www.fao.org/WAICENT/FAOINFO/AGRICULT/AGP/AGPP/Pesticid/Code/PM_Code.htm)

*Code of Conduct for the Import and Release of Exotic Biological Control Agents*

4. The objectives of the Code are to:

- (i) *facilitate the safe import, export and release of exotic biological control agents by introducing procedures of an internationally acceptable level for all public and private entities involved, particularly where national legislation to regulate their use does not exist or is inadequate.*
- (ii) *describe the shared responsibility of the many segments of society involved and the need for cooperation between importing and exporting countries so that:*
- (iii) *benefits to be derived are achieved without significant adverse effects,*
- (iv) *practices which ensure efficient and safe use while minimizing health and environmental concerns due to improper handling or use are promoted.*
- (v) *standards are described that:*
  - *encourage responsible and generally accepted trade practices,*
  - *assist countries to design regulations to control the suitability and quality of imported exotic biological control agents and to address the safe handling, assessment and use of such products,*
  - *promote the safe use of biological control agents for the improvement of agriculture, and human, animal and plant health,*
  - *allow all those involved in the import or release of exotic biological control agents to determine if, in the context of the International Plant Protection Convention and other relevant conventions and legislation, their proposed actions and the actions of others constitute acceptable practices.*

[http://www.fao.org/documents/show\\_cdr.asp?url\\_file=/docrep/x5585E/x5585e0i.htm](http://www.fao.org/documents/show_cdr.asp?url_file=/docrep/x5585E/x5585e0i.htm)

**United Nations Industrial Development Organization***Voluntary Code of Conduct for the Release of Organisms Into the Environment*

5. The objective of the code is to:

- (i) *outline the general principles governing standards of practice for all parties involved in the introduction of organisms or their products/metabolites to the environment. Some sections of the code may also be applicable to other phases of research and development;*
- (ii) *encourage and assist the establishment of appropriate national regulatory frameworks, particularly where no adequate infrastructure presently exists;*
- (iii) *ensure that appropriate national authorities and institutions, distributors and users are informed or have access to information, thereby facilitating the safe use and handling of biotechnology products;*
- (iv) *encourage international governmental and non- governmental institutions, including funding organizations that provide incentives for the use of new biotechnology for development purposes, to require researchers or producers to follow the principles set out in this document;*
- (v) *stimulate the development of mechanisms for co-operation and consultation between governments to ensure safe research, development, use including environmental application, compliance with international transport laws, and movement in commerce of the products of biotechnology;*
- (vi) *assist countries to ensure the safety of research, development, use and introduction by providing mechanisms to obtain consultation and advice as needed;*
- (vii) *stimulate the development of mechanisms for obtaining and disseminating information in a timely and efficient manner.*

*The document addresses the shared responsibility of many sectors of society, including individual governments, regional, supranational and international organizations, scientific researchers, institutions and societies, trade associations, industries including manufacturers, formulators and distributors, users, and non-governmental organizations such as environmental groups, consumers and trade unions, and funding institutions.*

*The document is designed to help industries, organizations, and scientists seeking to facilitate, develop and apply biotechnology for social and economic improvement to be aware that their judgements and actions involving GMOs, if taken with adequate review and notification, will ensure public health and environmental safety and thereby promote, and not jeopardize, the long-term development of the technology.*

[http://binas.unido.org/binas/show.php?id=7&type=html&table=international\\_sources&dir=regulations](http://binas.unido.org/binas/show.php?id=7&type=html&table=international_sources&dir=regulations)

### Other Intergovernmental Organizations

#### **World Organisation for Animal Health (OIE)**

##### *Terrestrial Animal Health Code*

6. The aim of the *Terrestrial Animal Health Code* is to assure the sanitary safety of international trade in terrestrial animals and their products. This is achieved through the detailing of health measures to be used by the veterinary authorities of importing and exporting countries to avoid the transfer of agents pathogenic for animals or humans, while avoiding unjustified sanitary barriers.

[http://www.oie.int/eng/normes/mcode/en\\_sommaire.htm](http://www.oie.int/eng/normes/mcode/en_sommaire.htm)

##### *Aquatic Animal Health Code*

(similar to the terrestrial code, but for aquatics)

[http://www.oie.int/eng/normes/fcode/A\\_summry.htm](http://www.oie.int/eng/normes/fcode/A_summry.htm)

### **PROFESSIONAL ORGANISATIONS, ASSOCIATIONS, BODIES AND INSTITUTIONS**

#### International and Regional Academies and Federations

7. International and regional academies of science tend not to have codes of conduct as such, but do have statements of objectives, mission statements, statutes or constitutions which include ethical elements. Some have committees dedicated to ethical issues, and have issued declarations or statements which could be interpreted as being similar in effect to codes of conduct. None of those identified references biological and toxin weapons specifically.

#### **International Council for Science (ICSU)**

8. The ICSU is the global umbrella organisation for national and international academies of science. It states its “mission” as follows:

*In order to strengthen international science for the benefit of society, ICSU mobilizes the knowledge and resources of the international science community to:*

- (i) *Identify and address major issues of importance to science and society.*
- (ii) *Facilitate interaction amongst scientists across all disciplines and from all countries.*
- (iii) *Promote the participation of all scientists—regardless of race, citizenship, language, political stance, or gender—in the international scientific endeavour.*
- (iv) *Provide independent, authoritative advice to stimulate constructive dialogue between the scientific community and governments, civil society, and the private sector.*

[http://www.icsu.org/5\\_abouticsu/INTRO\\_IntroMiss\\_1.html](http://www.icsu.org/5_abouticsu/INTRO_IntroMiss_1.html)

9. Until 2002, the ICSU had a Standing Committee on Responsibility and Ethics in Science (SCRES). Following discussion at the World Conference on Science in Budapest in 1999, the Executive Board of ICSU asked the SCRES to carry out an analysis of ethical standards from various sources across the World, with the aim of identifying areas of commonality. After consultation with ICSU members and other organisations with an interest in this area, SCRES identified a sample of 115 different ethical codes (see [http://www.icsu.org/2\\_resourcecentre/RESOURCE\\_list\\_base.php4?rub=7](http://www.icsu.org/2_resourcecentre/RESOURCE_list_base.php4?rub=7)). However, the SCRES was disbanded in 2002, and further work on ethics seems to have been passed to COMEST (see the UNESCO entry in BWC/MSP/2005/MX/INF.1).

### **InterAcademy Panel on International Issues (IAP)**

10. IAP is a global network of the world's science academies, launched in 1993. Its primary goal is "to help member academies work together to advise citizens and public officials on the scientific aspects of critical global issues". IAP issues "statements" on major topics of scientific and political interest, which to date have not included biological weapons or other security and disarmament issues, but have included the following: population growth (1994), urban development (1996), sustainability (2000), human reproductive cloning (2003), science education (2003), health of mothers and children (2003), scientific capacity building (2003), science and the media (2003), and access to scientific information (2003).

<http://www4.nationalacademies.org/IAP/IAPHome.nsf/>

### **Association of Academies of Sciences in Asia**

11. The Association of Academies of Sciences in Asia (AASA) is "a non-profit international organization of the Asian and Australasian region, comprising eighteen academies with science and technology interests. The main objectives of AASA are to provide a forum for scientists and technologists to discuss and provide advice on issues related to science and technology, research and development, and the application of technology for national development."

12. In article 3 of its constitution, the ASAA further elaborates its objectives by stating that in carrying out its activities it will:

- (i) *develop cooperation in the domain of science and technology and create a network of interdisciplinary and international contacts among academies in Asia and Australasia,*
- (ii) *provide advice on the role of science and technology in the national innovation systems of member countries,*
- (iii) *help initiate and conduct studies and research on scientific and technological issues, and their economic and social implications, relevant to national development agenda of member countries,*
- (iv) *facilitate cooperation in the commercialization of the results of research,*
- (v) *facilitate exchange of scientists and information among the AASA countries in cooperation with international scientific organizations,*

- (vi) *hold symposia, workshops and roundtable meetings on specific issues in science and technology of the AASA countries,*
- (vii) *provide opinions, proposals and recommendations on scientific and technological issues to international scientific organizations, and*
- (viii) *carry out other activities relevant to the objectives of the AASA.*

<http://www.aasa-net.org/intro/cons.asp>

### **ALLEA (European Federation of National Academies of Sciences and Humanities)**

13. ALLEA is a federation of 48 academies of sciences and humanities in 38 European countries. According to its website, the mission of ALLEA is to seek to

- (i) *promote the exchange of information and experience between Academies*
- (ii) *offer European science and society advice from its Member Academies, and*
- (iii) *strives for excellence in science and scholarship, high ethical standards and independence from political, commercial and ideological interests.*

14. ALLEA has a Standing Committee on Science and Ethics which “is concerned with a wide range of problems, 'internal' (within the scientific community) and 'external' (relations between science and society)”. As well as reporting to the ALLEA General Assemblies and contributing to the ALLEA Yearbooks, the Standing Committee also produces occasional outreach publications. Some of the issues recently addressed include: scientific integrity and misconduct, research on embryos, quantitative evaluation of research, ethical aspects of risk, education in ethics, and fair-play within the European space.

<http://www.allea.org/index.html>

### **International Union of Biochemistry and Molecular Biology (IUBMB)**

15. According to its statutes, the “mission” of the IUBMB is *to foster and support the growth and advancement of biochemistry and molecular biology as the foundation from which the biomolecular sciences derive their basic ideas and techniques in the service of mankind. This it does throughout the world with particular concern for areas where biochemistry is less well developed, by promoting international cooperation and high standards in research, discussion, application and publication, and through international standardization of methods, nomenclature and symbols, in biochemistry and molecular biology. The IUBMB promotes the norms, values, standards and ethics of science and the free and unhampered movement of scientists of all nations interested in participation in activities related to biochemistry and molecular biology.*

[http://www.iubmb.org/Standing\\_Orders/Statutes\\_and\\_Bylaws/Statutes\\_Bylaws\\_2000.pdf](http://www.iubmb.org/Standing_Orders/Statutes_and_Bylaws/Statutes_Bylaws_2000.pdf)

### **National Academies of Science and Professional Associations**

16. Like their international and regional counterparts (of which they are generally members), national academies of science and professional associations seem rarely to have codes of conduct as such, but often have statutes, constitutions, by-laws or “principles” containing ethical elements,

and which may function in some circumstances as codes of conduct. They may also issue statements or declarations. In many cases, there are references to abiding by relevant laws and regulations. When these references are general, they could be taken to include the national BWC implementation laws of the country concerned. Sometimes, however, specific laws and regulations are quoted. For example, the Australian Academy of Science has a “statement on ethics”, which states that the Academy “adheres to the principles outlined” in various Australian standards for biological and medical research and for the treatment of animals.

<http://www.science.org.au/reports/ethics.htm>

17. A slightly different approach is that of the Academy of Sciences of the Czech Republic, which has a “science policy”, the main goal of which is to “provide guidelines for development of disciplines, both in the basic areas of natural, technical and social sciences, and in the various sub-areas, to encourage development of newly emerging research fields and to ensure sustained support for long-term projects”.

<http://www.cas.cz/en/Documents/principles.html>

18. The Constitution of the Academy of Science of South Africa, as well as setting out the objectives of the Academy (see below), also requires members to subscribe, on joining, to the following “Obligation”:

*I hereby promise to promote the well-being of South Africa through scientific thought and activity and generally to further the objectives of the Academy of Science of South Africa as far as this lies within my power. I shall also observe the Constitution and Standing Orders of the Academy for as long as I remain a Member thereof.*

19. Furthermore, Chapter 4 of the Constitution envisages the possibility of a member being expelled for “conduct considered to bring the Academy into to disrepute”. There is no further detail, however, on what might constitute such conduct, although presumably breach of South African laws relating to implementation of the BWC would be covered.

20. The objectives of the South African Academy, as set out in the Constitution, are as follows:

*The key objective of the Academy is to promote and apply scientific thinking in the service of society. To this end, the Academy shall*

- (i) use the common ground of scientific knowledge and activity to remove barriers between people and obstacles to full development of their intellectual capacity;*
- (ii) endeavour in every possible way to inspire, promote and recognise excellence in scientific and technical practice;*
- (iii) investigate and publicly report on various matters, in its own discretion or at the request of government or organisations in civil society, in order to promote and apply scientific thinking in the service of society;*
- (iv) promote science education and a culture of science in the population at large*
- (v) maintain strict independence while consulting other organisations and individuals in the widest manner possible;*

- (vi) *endeavour to establish and develop close relations with scientific organisations in South Africa and with similar academies in other countries; and*
- (vii) *take any other action that it may consider as necessary towards the attainment of its key objective.*

[http://www.assaf.co.za/assaf\\_con.html](http://www.assaf.co.za/assaf_con.html)

21. The Royal Society of New Zealand has an explicit Code of Ethics, the summary version of which is as follows:

#### *SUMMARY CODE OF PROFESSIONAL STANDARDS AND ETHICS*

##### *PROFESSIONALISM*

*Members must always act with integrity and professionalism and work within their level of competence.*

##### *HONESTY*

*Members must conduct themselves honestly at all times and fairly represent their abilities and their findings.*

##### *STANDARDS*

*Members must always endeavour to conform to the requirements of all relevant statutes, regulations and the Codes of Ethics of their professional associations and must seek and obtain all necessary consents and approvals before beginning a project.*

##### *COLLEAGUES*

*Members must treat their colleagues fairly, reviewing their work without bias and appropriately acknowledging their contributions to science and technology.*

##### *COMMUNITY*

*Members have a duty to respect the values of communities which may be affected by their work, to respect the natural environment in which those communities are situated and to heed their responsibility to act in accordance with the Treaty of Waitangi.*

##### *PEOPLE*

*Members have a duty to protect the well being and privacy of individuals. They must ensure that the involvement of people as participants in research is always fully justified.*

##### *FUNDERS AND PURCHASERS OF RESEARCH*

*When members undertake work for employers or other purchasers the interests of these clients normally take priority over other interests but always within the limits imposed by law, by this Code, by accepted ethical standards and by the public interest.*

##### *ANIMALS*

*Members have a duty to respect and promote the welfare of all animals with which they are involved in their work.*



ENVIRONMENT

*Members have a duty to protect the natural environment and to minimise any adverse impact their work may have.*

EDUCATION & COMMUNICATION

*Members are expected to continue the development of their skills and knowledge throughout their professional life and, when and where appropriate, to communicate their knowledge to the public. In communicating with the public members must endeavour to ensure that their statements are correct and endeavour to avoid distortion arising from misleading simplification or extrapolation.*

OTHER AREAS OF CONCERN

*Members must be aware that the above Summary of the Code is not exhaustive and that they must act ethically in all circumstances whether specifically mentioned by the Code or not.*

[http://www.rsnz.org/directory/code\\_ethics.php](http://www.rsnz.org/directory/code_ethics.php)

22. The American Society for Biochemistry and Molecular Biology (ASBMB) also has a Code of Ethics, which includes sections on “obligations to the public” and “obligations to other investigators”. The introduction and section on obligations to the public are as follows:

*Code of Ethics (1998)*

*Members of the ASBMB are engaged in the quest for knowledge in biochemical and molecular biological sciences with the ultimate goal of advancing human welfare. Underlying this quest is the fundamental principle of trust. The ASBMB encourages its members to engage in the responsible practice of research required for such trust by fulfilling the following obligations.*

*In fulfilling obligations to the public, it is expected that:*

- (i) investigators will promote and follow practices that enhance the public interest or well-being;*
- (ii) investigators will use funds appropriately in the pursuit of their research;*
- (iii) investigators will follow government and institutional requirements regulating research such as those ensuring the welfare of human subjects, the comfort and humane treatment of animal subjects and the protection of the environment;*
- (iv) investigators will report research findings resulting from public funding in a full, open, and timely fashion to the scientific community; and*
- (v) investigators will share unique propagative materials developed through publicly-funded research with other scientists in a reasonable fashion.*

<http://www.asbmb.org/asbmb/site.nsf/Sub/CodeofEthics>

23. The Institute of Biology in the UK has both a Code of Conduct and a Guide on Ethical Practice which bind all of its members.

24. The Code of Conduct makes specific reference to a duty derived from a declaration required by the Institute's bylaws, namely to:

- (i) *Observe the provision of the Charter and Bylaws of the Institute and any regulations made under them;*
- (ii) *Conduct themselves honourably in the practice of their profession;*
- (iii) *Maintain the highest standards of competence and integrity especially in carrying out any statutory duties relevant to a particular appointment or area of employment;*
- (iv) *Have regard at all times to public interest; and*
- (v) *Further the interests of and maintain the dignity and reputation of the Institute*

25. It also enshrines five fundamental principles, which binds the conduct of members at all times:

- (i) *A member should behave with integrity in all professional and business relationships. Integrity implies not only honesty but also fair dealing and openness.*
- (ii) *A member should strive for objectivity in all professional and business judgments. Objectivity is the state of mind, which has regard to all considerations relevant to the task in hand, and no other.*
- (iii) *A member should not knowingly accept or perform work which he or she is not competent to undertake unless he obtains such advice and assistance as will enable him competently to carry out the work.*
- (iv) *A member should carry out his or her professional work with due skill, care, diligence and expedition with proper regard for the health and safety, technical and professional standards expected of a member.*
- (v) *A member should conduct himself with courtesy and consideration towards all with whom he comes into contact during the course of performing his work.*

26. The guide on ethical practice is “to assist members to deal with the demands of their working lives and to cope with ethical problems”. It details a variety of ways in which the code affects the day-to-day work of its members and provides guidance as to how best it can be implemented. Areas covered include:

- (i) *Institute Members as Professionals*
- (ii) *Institute Members and Employment*
- (iii) *Trade Union Membership and Industrial Action*
- (iv) *As Self Employed Members*
- (v) *As Members in Education*
- (vi) *Institute Members as Consultants*
- (vii) *Institute Members in Society*
- (viii) *Serving the Public Interest*
- (ix) *Members and Legislation*
- (x) *Impact on the Environment*
- (xi) *Media Reporting Publications, Lectures and Contributions to Electronic Media*

<http://www.iob.org/downloads/CoC.pdf>

## COMMERCIAL AND INDUSTRIAL BODIES

### International, Regional and National Federations and Associations

27. While many international, regional and national biotechnology federations and associations have codes of conduct which include specific mention of biological weapons (see BWC/MSP/2005/MX/INF.1), this appears not to be the case for the pharmaceutical research and manufacturing sector. At the global level, this industry is represented by the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA). This organization does have a “Code of Pharmaceutical Marketing Practices” (see [http://www.ifpma.org/News/news\\_market.aspx](http://www.ifpma.org/News/news_market.aspx)), to which its member organisations subscribe, but this code is concerned with the ethical conduct of marketing and promotional activities, rather than with scientific ones.

28. IFPMA and its member organisations (as well as individual corporations) also carry out “corporate social responsibility” (CSR) activities. These may be philanthropic in nature, but may also involve undertakings on corporate conduct in the areas of environment, fair labour practices, and human rights. For example, the Organisation of Pharmaceutical Producers of India (OPPI) “identifies itself with the country’s national objectives in health and encourages its members to make substantial contributions to social concerns and actively promotes Corporate Social Responsibility (CSR). It also co-ordinates its Members’ efforts in national calamities like epidemics, floods, earthquakes and cyclone” (see <http://www.indiaoppi.com/about.htm>). There do not at present appear to be any CSR activities relating to biological weapons issues, although the Pharmaceutical Research and Manufacturers of America (PhRMA) has been involved in preparing responses to bioterrorism, chiefly relating to vaccine availability (see <http://www.phrma.org/issues/bioterrorism/>).

### Individual Corporations

29. Individual corporations in the pharmaceutical industry generally do have comprehensive codes of conduct, covering a wide range of ethical aspects of research and commerce, but none has a specific reference to biological weapons. Bayer’s Program for Legal Compliance and Corporate Responsibility does, however, mention the Chemical Weapons Convention and export controls, as well as genetic engineering:

#### *7. Compliance with the law of nations and international trade law*

*No employee, especially if working in research or development, shall, on his/her own or together with others, carry out research or manufacture substances where such activity is contrary to the Chemical Weapons Convention. No Bayer employee shall knowingly participate in the development of substances or systems which he/she must reasonably assume to be subject to export control laws and at risk of being exported to other countries without official approval. No employee shall utilize knowledge gained during his or her work for Bayer for such a purpose or offer such knowledge to third parties.*

8. ...*Genetic engineering must be used in awareness of our responsibility for human safety and the protection of the environment and in compliance with all applicable legal regulations.*

[http://www.bayer.com/about\\_bayer/corporate\\_compliance/page1134.htm](http://www.bayer.com/about_bayer/corporate_compliance/page1134.htm)

30. Most other examples, by contrast, have only general references to respecting relevant laws. The Business Principles of Akzo Nobel – Organon state, for example:

*We will conduct our activities in a socially responsible manner. In this respect we observe the laws of the countries in which we operate, support fundamental human rights in line with the legitimate role of business and give proper regard to health, safety and the environment consistent with our commitment to contribute to sustainable development.*

<http://www.akzonobel.com/corporategovernance/principles.asp>

31. Similarly, the Code of Conduct of Novartis International states:

*Each employee is expected to be familiar with the law as it applies to his or her job; management is expected to provide necessary instruction and advice. For example, Novartis is strongly committed to non-discriminatory and fair labour standards, to protecting the environment and to ensuring the health and safety of its employees. Novartis expects its employees to comply with all laws designed to protect health, safety and the environment, to obtain all required permits and to operate its facilities in strict accordance with the relevant laws.*

[http://www.novartis.com/downloads/code\\_of\\_conduct.pdf](http://www.novartis.com/downloads/code_of_conduct.pdf)

32. The AstraZeneca Code of Conduct adds the idea of compliance with industry practices and codes of practice, as well as with laws:

*AstraZeneca Companies, and their employees, must comply with the laws of all countries in which they operate, with appropriate international and national industry codes of practice and with the high ethical standards specified by AstraZeneca. It is the responsibility of all employees to ensure, by taking advice where appropriate, that they are fully aware of all relevant laws, regulations, practices and codes of practice, particularly as they relate to their job.*

[http://www.astrazeneca.com/sites/7/imagebank/typeArticleparam11110/COC\\_2003.pdf](http://www.astrazeneca.com/sites/7/imagebank/typeArticleparam11110/COC_2003.pdf)

33. In addition, there are three areas of typical codes of conduct of pharmaceutical corporations that might be of relevance, or serve as models, when considering how biological weapons issues might be included in codes of conduct. These are provisions on money laundering, on environmental protection, and on the use or misuse of company equipment and assets.

34. The Summary of Pfizer Policies on Business Conduct includes the following provision on money laundering:

*Money Laundering Prevention*

*Money laundering occurs when criminals try to “clean” the proceeds of their crimes to hide them or to make those proceeds appear legitimate. Pfizer is committed to complying fully with all anti-money laundering laws throughout the world. Employees must protect Pfizer’s integrity and reputation by helping to detect possible money laundering activities. These activities are often intricate and difficult to discover. Learn to watch for warning signs of money laundering, which may include a customer who is reluctant to provide complete information or who requests to make payments in cash. If you believe you have encountered a warning sign, notify your supervisor and contact the Corporate Compliance Group immediately.*

[http://www.pfizer.com/download/investors/corporate/business\\_conduct\\_policies\\_summary\\_2003.pdf#page=1](http://www.pfizer.com/download/investors/corporate/business_conduct_policies_summary_2003.pdf#page=1)

35. Schering-Plough’s Corporate Governance Guidelines and Standards of Global Business Practices contains environmental provisions that could serve as an analogue for provisions on biological weapons:

*Protecting the Environment*

*Schering-Plough is committed to high standards of environmental performance. It is the policy of the company to minimize adverse environmental impacts from company activities, products and services by using processes, practices, material and products that avoid, reduce or control pollution. This means:*

- (i) We comply with applicable laws, regulations and other requirements designed to protect the environment.*
- (ii) We promote the responsible and efficient use of energy and natural resources and other sustainable business practices within the company.*
- (iii) We work in an environmentally responsible manner.*
- (iv) You should notify your immediate supervisor, your local environmental representative, or Global Safety and Environmental Affairs of situations that are potentially damaging to the environment.*

<http://phx.corporate-ir.net/phoenix.zhtml?c=89839&p=irol-govhighlights>

36. Similarly, the provision on “protection and proper use of assets” in the Code of Business Conduct and Ethics of Schering AG is clearly mainly aimed at commercial considerations and avoiding financial loss, but is also relevant to the possible misuse of assets for criminal or terrorist purposes:

### *9. Protection and Proper Use of Assets*

*Collectively, employees have a responsibility for safeguarding and making proper and efficient use of Schering's property. Each employee also has an obligation to protect Schering's property from loss, damage, misuse, theft, embezzlement or destruction.*

[http://www.schering.de/scripts/en/10\\_about/ethic/standard/index.php](http://www.schering.de/scripts/en/10_about/ethic/standard/index.php)

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