

Schering-Plough

Animal Research Care and Use Policy

(Revised December 20, 2006)

Schering-Plough is a leading research-based pharmaceutical company dedicated to discovering and developing new therapies and treatments to save the lives and improve the health of people and animals.

1. Commitment to Alternatives. As part of its research mission, Schering-Plough is committed to identifying, developing and using alternatives that replace laboratory animal testing whenever possible. Schering-Plough uses non-animal research models for preclinical research and makes *in vitro* testing systems – experiments on cells, tissues or other substances separate from living organisms – an important part of its discovery program.

Much of Schering-Plough's biological research is performed through *in vitro* methods. Non-animal research models for preclinical research, including the development of cell culture models and the application of molecular biology techniques, have made it possible to collect meaningful data without relying solely on animal experiments. With respect to efforts to develop non-animal testing technology, Schering-Plough provides direct and indirect financial support to organizations that research and develop non-animal alternatives, including the Laboratory of *In Vitro* Toxicology at Stern College for Women, Yeshiva University.

2. Standards When Animals Are Used. Animals, however, serve a unique role in providing data on the effects and complex relationships of new ingredients and compounds on various organ systems and, at present, remain essential to evaluating potential new medicines and assuring human safety. When animal testing cannot be replaced with an alternative, Schering-Plough is committed to reducing the numbers of animals used and to continually

refining and improving its processes for caring for the animals as further described in the remained of this Policy.

When animals are required to obtain the safety and efficacy data needed to develop new pharmaceuticals, Schering-Plough adheres to the highest standards of humane and responsible animal care set forth by both government and private agencies and is committed to continuing refinement and improvement of those processes.

Schering-Plough complies with the Animal Welfare Act and other regulations governing the humane care and use of animals involved in testing. The United States Department of Agriculture (USDA) conducts unannounced inspections, at least annually, of all animal research facilities subject to USDA regulations. In addition, the majority of animal research at Schering-Plough is undertaken in facilities that are accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC). AAALAC is an independent, nonprofit, voluntary organization that reviews and inspects animal research programs and facilities for compliance with guidelines published by the National Research Council.

In accordance with USDA Animal Welfare Act, the NRC "Guide for the Care and Use of Laboratory Animals and other regulations, proposed activities involving the use of animals are reviewed by the Institutional Animal Care and Use Committee (IACUC). Each IACUC must include a veterinarian and one non-Company employee (non-affiliated member). Schering-Plough's IACUCs oversee all aspects of the proper care and use of animals throughout the Company and review, at least twice a year, each facility's animal care program. Specifically, the IACUCs review proposed research activities involving animals to ensure that their use is necessary, no appropriate alternatives are available, and, that the correct species and minimum

number are used. Literature searches are conducted to ensure that the research does not duplicate previously conducted research. Further, the IACUC ensures that all procedures avoid or minimize discomfort, distress and pain to the animals and that improvements to the animal care programs, facilities and personnel training are evaluated and implemented when possible. Proposed research projects are reviewed and approved by an IACUC before work begins. Laboratory animal veterinarians and veterinary technical staff are specifically trained and experienced in the species used, and regularly attend continuing education focused on improving the lives of laboratory animals and searching for alternatives or refinements. The veterinary staff oversee husbandry and medical care and provide species - appropriate enrichment. Some examples of enrichment include exercise and grooming for dogs; toys, puzzles and television for primates; chewing materials and bedding for rodents; and paired or group housing whenever feasible.

While animals will continue to be necessary to understand ailments afflicting humans and animals into the foreseeable future, Schering-Plough is firmly committed to the responsible use of animal testing, where necessary, and to ensuring that all animals involved in research receive the highest quality care and attention.

3. Vendors. Vendors and contractors are required to comply with applicable regulations regarding the care and use of animals. In addition, regular vendors and contractors are AAALAC-accredited, and if they conduct animal research, have IACUC committees in place. Where practicable, Schering-Plough selects vendors who will agree to comply with this Policy in carrying out Schering-Plough research, or who have a similar policy in place.

4. Continual Re-Evaluation. As part of the required Leader Behaviors, all Schering-Plough employees perform benchmarking and strive to continuously improve. In relation to the

standards and commitments in this Policy, Schering-Plough interacts with other pharmaceutical companies, governmental officials and pharmaceutical industry associations, as well as groups dedicated to the welfare of animals through socially responsible means. This interaction helps Schering-Plough to ensure that a broad range of perspectives and all relevant information are considered on a regular basis, which in turn facilitates continual improvements in identifying alternatives to animal testing, as well as improvements to the practices employed regarding animals that are used in our work.