

California Transparency in Supply Chains Act Disclosure

Introduction

As a global corporation with manufacturing facilities around the world, Corning Incorporated (“Corning”) takes seriously its role in combatting slavery and human trafficking in its supply chains. To support this and other supplier-related compliance efforts, Corning created its Supplier Code of Conduct (the “Supplier Code”), which, among other things, addresses humane labor conditions and clearly states that “forced, bonded or indentured labor or involuntary prison labor is not to be used.” Corning’s Supplier Code applies to companies (“Suppliers”) that do business with Corning and its affiliates and requires that Suppliers and their employees comply with the Supplier Code in all aspects of their operations that relate to their business with Corning.

Corning relies upon a vast network of Suppliers. In keeping with Corning’s Values and Corning’s Corporate Citizenship responsibilities, we invest considerable energy into selecting Suppliers who meet our standards and as noted above, we require that they adhere to our Supplier Code, or in rare instances, their own equivalent code of conduct. In this way, Corning ensures that our Suppliers’ operations are conducted with respect for the laws of the regions they serve.

Our Supplier Code expressly prohibits the use of slavery or other involuntary labor:

Forced, bonded or indentured labor or involuntary prison labor is not to be used. All work will be voluntary, and workers should be free to leave upon reasonable notice. There is to be no inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment. Child labor is not to be used. Workweeks are not to exceed the maximum set by local law.

In the event of a violation of Corning’s Supplier Code, Corning reserves the right to either terminate its relationship with the Supplier or to work with the Supplier to implement corrective action to remedy the non-conformance.

Verification

While Corning does not include specific steps in its Supplier verification processes related to the risks of human trafficking and slavery, Corning does use a variety of internal methods to verify its Suppliers generally, including: site audits and visits; Supplier certifications regarding eligibility for government contracts; and Supplier report cards. Corning also provides its employees with tools for conducting Supplier risk/value assessments covering a number of categories, including, human rights abuses. In addition, as a condition of contract, Corning requires Suppliers to comply with applicable laws and regulations.

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Audits

As appropriate, Corning audits Suppliers through the Corning Supplier Management Program. These audits cover a variety of areas and include visits to Suppliers' facilities, but do not specifically target a Supplier's compliance with company standards for preventing human trafficking and slavery in supply chains. However, if such information or other violation of Corning's Supplier Code were identified during an audit, it would be appropriately noted and the relationship with the Supplier would be terminated or remedial action by the Supplier would be required. Given the vast number of suppliers selling to Corning, and limited amounts sold by some of them, Corning does not audit every single Supplier. Also, given the nature of Corning's business and the high quality of our Suppliers, we do not typically utilize unannounced audits or third parties to audit suppliers.

Certification

In its contracts Corning requires Suppliers to comply with applicable laws and regulations, which would include laws related to human rights and working conditions. Further, as noted above, Corning's Supplier Code states that Suppliers may not use forced, bonded or indentured labor. However, Corning does not require Suppliers to expressly certify compliance with laws regarding human trafficking or slavery applicable in the country or countries in which they are doing business.

Internal Accountability

In addition to having our Suppliers follow the Supplier Code, we also require our employees to follow an Employee Code of Conduct (the "Employee Code") which governs the legal and ethical aspects of their behavior as Corning employees. The Employee Code describes how we behave in accordance with Corning's Values and requires that employees abide by laws and regulations applicable to their work, including laws regarding workplace practices and safety.

Violation of the Employee Code can result in disciplinary action, which may include termination. Violations can be anonymously reported to Corning's Code of Conduct Line, which is available worldwide, 24 hours a day via either a toll free call or the intranet.

Training

All employees are required to complete training related to the Employee Code. Management personnel within Corning are also required to complete an annual certification attesting that they know and understand the requirements of Corning's Employee Code.

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Corning trains its supply management personnel regarding best practices for dealing with Suppliers, including the Supplier Code, what it means, and how it applies to Suppliers. Corning does not provide specific training to its employees or Suppliers regarding human trafficking or slavery.

Further information on Corning's commitment to corporate social responsibility is provided on our [Values](#) and [Corporate Citizenship](#) web pages.