

Effective March 22, 2019,

## **Introduction**

### **Supplier Code of Conduct**

This Code applies to people and companies (collectively, "Suppliers") that do business with Corning Incorporated and/or its affiliates (collectively, "Corning") and shall be updated annually. Suppliers will comply with this Code in all aspects of their operations that relate to their business with Corning. Suppliers shall also ensure that their employees comply with this Code and Corning's [Human Rights Policy](#) in all of their activities related to Supplier's business with Corning. Suppliers are also responsible for ensuring that their own subcontractors and suppliers comply with the standards contained herein. Corning monitors its suppliers to ensure compliance with this Code.

Supplier can submit any questions or report any violation or grievance to Corning's confidential and anonymous Code of Conduct Line 24 hours per day, 7 days per week, at U.S. (country code 1) number (888) 296-8173 or at [www.ethicspoint.com](http://www.ethicspoint.com).

### **Labor**

Corning's Supplier Code of Conduct embraces the key principles of the International Labour Organization's (ILO) eight fundamental conventions, which cover subjects that are considered by the ILO as fundamental principles and rights at work. These conventions are:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29)
4. Abolition of Forced Labour Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

In accordance with the ILO fundamental conventions, and as set forth more fully below, Suppliers shall commit to uphold human rights of workers and treat workers with dignity and respect. This commitment applies to all workers including temporary, migrant, student, contract, direct employees or any other worker.

Corning is aware the use of recruitment and labor agencies increases the risk of forced labor. All labor agents acting on behalf of Corning and its suppliers must have a clear policy that adheres to this Code. Labor agents acting on behalf of Corning must conduct due diligence with employment and recruitment agencies and sub-agents in relevant countries of operation to ensure compliance to Corning's Supplier Code of Conduct.

#### **1. Freely Chosen Employment**

Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor. All work will be

voluntary, and workers should be free to leave work or terminate employment upon reasonable notice. Prohibited actions include transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. In the hiring process, Suppliers should provide workers with a written employment agreement in their native language that contains a description of terms and conditions of employment. No changes or substitutions to this agreement should be allowed unless these changes are to meet local law or provide equal/better terms. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers should not be required to pay employers' or agents' recruitment fees or other related fees for employment. If such fees are found then these fees should be repaid to the worker.

## 2. Young Workers

Suppliers shall not use child labor. "Child" in this section means any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 shall not perform work that is likely to jeopardize their health and safety, including night shifts and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same age rate as other entry-level workers performing equal or similar tasks.

## 3. Working Hours

Workweeks are not to exceed the maximum working hours and shall include the minimum breaks and rest periods set by local law.

## 4. Working and Living Conditions

Working, and living (if applicable), conditions must meet, at a minimum, standards set by local law. Workers must not face any undue health or safety risks from working or living conditions. The foregoing requirements shall be applicable to any lodging provided to workers as part of or in connection with their employment.

## 5. Humane Treatment

Suppliers shall not subject or threaten workers to any inhumane treatment, including any sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Supplier shall clearly define and communicate disciplinary policies and procedures in support of these requirements to its workers.

## 6. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Supplier shall ensure that all workers are paid equally for work of equal value, without regard to their sex. Supplier shall not make deductions from wages as a disciplinary measure. Workers shall be informed of all deductions from their pay. Supplier shall establish measures to eliminate health and safety concerns that are especially prevalent among women workers (for example, physical security and sexual harassment).

## 7. Non-Discrimination

Supplier shall be committed to a workforce free of harassment and unlawful discrimination. Supplier shall not engage in or permit discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity, disability, pregnancy, religion, political affiliation, or marital status in its workforce, including but not limited to in hiring and employment practices such as promotions, rewards, and access to training. Supplier shall ensure equal opportunities throughout all levels of employment. There shall be no discrimination or retaliation against workers, including migrant workers, who raise grievances in good faith.

## 8. Freedom of Association

In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representative shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

## Ethics

Suppliers shall uphold the highest ethical standards in order to meet social responsibilities and achieve success in the marketplace.

### 1. Business Integrity

Supplier shall maintain the highest standards of integrity in all interactions with Corning. Any and all forms of corruption, extortion and embezzlement are strictly prohibited. Supplier shall not take unfair advantage of Corning or anyone else through abuse of privileged or proprietary information, misrepresentation of material facts or any other unfair or dishonest practices. Any violation of this standard may result in immediate termination and legal actions.

### 2. No Improper Advantage; Gifts

Bribes or other means of obtaining undue or improper advantage shall not be offered or accepted by Supplier. Supplier shall not offer any Corning employee any gifts, payments, fees, services, discounts, valued privileges or other favors where these would, or might appear to, improperly influence the employee in performing his or her duties for Corning. Corning employees can be offered common courtesies normally associated with accepted business practices, so long as these are offered openly and not in a form that could be construed as a bribe, payoff or secret compensation. Except where another Corning policy may provide for stricter limits, individual gifts from Suppliers may not exceed \$100.00 USD per gift in value, and the total value of all gifts in a calendar year that may be accepted from a single Supplier may not exceed \$100.00 USD. Regardless of value, items deemed not acceptable include gifts or raffles or tickets to sporting events, discounts on personal purchases, gift certificates, payment for travel, or other expensive gifts. Business lunches or dinners are acceptable if not excessive and if Corning and the Supplier take turns paying for such events. In all cases, the use of bribes, secret compensation (including monetary gifts or their equivalent) or kickbacks is improper and may result in immediate termination and legal actions.

### 3. Charitable Contributions

Corning's business choices of its Suppliers are based solely upon bid prices, quality and ability and availability to do the work and previous Supplier performance in servicing Corning's needs. These choices are not influenced by a Supplier's giving or not giving to any particular charity. Corning does not solicit charitable donations from other companies or suppliers. Corning employees are prohibited from requesting that Suppliers make charitable donations by implying that such donations may affect their business or future with Corning. Supplier shall refuse any such requests for donations. Supplier can submit any questions or reports regarding such requests for donations to Corning's confidential and anonymous Code of Conduct Line 24 hours per day, 7 days per week, at U.S. (country code 1) number (888) 296-8173 or at [www.ethicspoint.com](http://www.ethicspoint.com).

### 4. Other Conflicts of Interest

Corning employees and their immediate family members (including spouse, domestic partner, parents, children, brothers, sisters and spouses of these individuals, any other person not listed residing in the employees' household) may not serve as officers, directors, employees, agents or consultants of a Supplier, except with the consent of the applicable Corning business manager and Corning's General Counsel or designee. If such a relationship exists between Supplier and any Corning employee or family member, and it has not already been disclosed to Corning and may cause an actual or perceived conflict of interest, Supplier shall disclose that relationship to Corning's Code of Conduct Line at (888) 296-8173 or at [www.ethicspoint.com](http://www.ethicspoint.com).

#### 5. Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. The privacy of data regarding Supplier and Corning employees will be respected in accordance with applicable laws.

#### 6. Intellectual Property

Intellectual property rights are to be respected. Supplier shall maintain procedures that reasonably ensure that Corning confidential information will not be improperly used or disclosed.

#### 7. Fair Competition

Supplier shall comply with antitrust laws applicable to its business activities. Accordingly, with regard to any business with Corning, Supplier shall not: enter into any agreement, understanding or plan (written or oral) with any of its competitors with regard to price, terms or conditions of sale, production, distribution, territories or customers; or exchange or discuss with any of its competitors pricing, marketing plans, manufacturing costs or other competitive information. Suppliers that violate these laws face immediate termination and legal prosecution.

#### 8. Privacy

Suppliers shall be responsible for ensuring the reasonable protection of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulations in connection with the collection, storage, processing, transmission, and sharing of personal information.

#### 9. Information Security

Suppliers accessing any of Corning's information systems, electronic data and anything that presents data security risks shall comply with Corning Supplier Information Security requirements found at [link to download library]

## Health & Safety

Suppliers shall minimize the incidence of work-related injury and illness to help achieve a safe and healthy work environment, enhancing the quality of products and services, consistency of productions, worker retention and morale. Suppliers recognize that ongoing worker input and education is essential to identifying and solving health and safety issues.

### 1. Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicle, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns. Supplier, at its operations, will identify potential emergency situations and implement emergency plans and response procedures.

### 2. Occupational Injury and Illness

Supplier shall put in place procedures and systems to manage, track and report occupational injury and illness, in accordance with applicable laws and standards.

### 3. Industrial Hygiene

Supplier shall identify, evaluate and control worker exposure to hazardous chemical, biological and physical agents. When these hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

### 4. Physically Demanding Work

Worker exposure to physically demanding tasks is to be identified, evaluated and controlled in accordance with applicable laws.

### 5. Machine Safeguarding

Supplier shall provide and properly maintain physical guards, interlocks and barriers for hazards in machinery used by workers.

## **Environmental**

Supplier shall minimize its adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. Suppliers recognize that environmental responsibility is integral to world class products and services.

### **1. Environmental Permits, Regulations and Standards**

All required environmental permits and registrations shall be obtained, maintained and kept current and their operational and reporting requirements shall be followed. Chemicals and other materials posing a hazard if released to the environment shall be identified and managed in accordance with applicable laws and standards related to their safe handling, movement, storage, recycling or reuse and disposal. Wastes and emissions generated from operations, industrial processes and sanitation facilities shall be monitored, controlled and treated as required by applicable laws and standards, prior to discharge or disposal.

### **2. Product Content Restrictions**

In transferring any goods to Corning, Supplier shall ensure that such goods comply with all applicable laws and regulations, including those related either to restrictions of specific substances or to labeling for recycling and disposal.

### **3. Responsible Sourcing of Materials**

Suppliers shall have a policy to reasonably assure that conflict minerals (e.g., tantalum, tin, tungsten and gold) in products manufactured by or for the Supplier do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or any adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

The Supplier Code of Conduct (the “Code”), found at <http://www.corning.com/worldwide/en/sustainability/processes/supply-chain-social-responsibility/supplier-responsibility/supplier-code-of-conduct.html> sets out basic requirements for doing business with Corning. All Suppliers doing business with Corning hereby acknowledge these requirements and agree to comply with the Code as amended from time to time.

The Code is written in the English language, and may be available in multiple other languages. In the event of a conflict between the English language version of the Code and any translation, the English language version shall prevail.