

Effective April 3, 2025

Supplier Code of Conduct

This Code applies to people and companies (collectively, "Suppliers") that supply goods or services to Corning Incorporated and/or its affiliates (collectively, "Corning") and shall be updated annually. Suppliers (as well as their respective employees, subcontractors, and suppliers) are expected to comply with this Code and [Corning's Human Rights Policy](#) consistent with their contractual obligations to Corning. Suppliers are required to include provisions equivalent to Corning's Supplier Code of Conduct and Human Rights Policy in their supply chain agreements and to flow down the same requirements throughout their supply chains. When there is a difference between a local law and our Supplier Code of Conduct, we seek to apply the higher standard. In compliance with applicable law, Corning monitors its Suppliers to ensure compliance with this Code.

Suppliers and other relevant external stakeholders 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. International dialing instructions can be found by [clicking here](#). Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated. Suppliers are required to provide the reporting and grievance channels to all workers during the hiring process and within worker onboarding. Corning's reporting and grievance channel phone number and website should also be clearly posted for worker use at supplier facilities.

Labor

Corning's Supplier Code of Conduct adheres to 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 Organize Convention, 1948 (No. 87)
2. Right to Organize 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 as generally understood by the international community. This commitment applies to all workers including temporary, migrant, student, contract, direct employees, or any other worker. Suppliers shall also respect the rights of vulnerable groups particularly relevant to the industry, including, for example, women, migrants, and children, in accordance with the ILO fundamental conventions.

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. Worker employment contracts must be signed directly with the Supplier and their sub-contracted supplier, and workers must be employed and managed directly by Suppliers and their sub-contracted supplier. Suppliers and their sub-contracted supplier must provide a copy of this Code of Conduct to workers during the hiring process, in the workers' native language.

1. Freely Chosen Employment

Suppliers shall not use forced, bonded (including debt bondage) or indentured labor or involuntary prison labor or exploitative prison labor, slavery, or trafficking of persons. All work will be voluntary, and workers should be free to leave work or terminate employment upon reasonable notice, which shall be clearly stated in workers' contracts. Suppliers shall maintain documentation on all workers leaving their employment in order to properly document their employment. Prohibited actions include transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary, and 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 including, if applicable, workers' dormitories or living quarters. As part of the hiring process, Suppliers are required to provide workers, including migrants, with a written employment agreement, between the worker and the supplier, in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or changes allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. Employers and agents and subagents', if any, 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. In this case, at no time should workers be denied access to their documents. Workers should not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, then these fees should be repaid to the worker.

2. Young Workers

Suppliers shall not use child labor in any stage of manufacturing or otherwise. "Child" 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. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Suppliers shall verify age of young workers to ensure age is above that of minimum employment. 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. If child labor is identified, assistance/remediation is provided.

3. Working Hours

It is understood that studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Accordingly, a work week must not exceed 60 hours per week, including overtime, except in emergency or unusual situations. A standard work week (one without overtime) must not exceed 48 hours. All overtime must be voluntary. Emergency or unusual Situations, for purposes of this Code, are situations that are unpredictable events that require overtime in excess of expectations. Such events cannot be planned or foreseen. In no event shall hours per work week exceed the maximum set by applicable law. Working hours shall include the minimum breaks and rest periods set by law. Workers shall be allowed at least one day off every seven days.

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 violence, gender-based violence, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. 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. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Supplier shall ensure that all workers are paid equally for work of equal value, without regard to their sex. Workers shall be informed of all deductions from their pay. In addition, suppliers are expected to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family. Where wages do not meet basic needs and provide some discretionary income, suppliers are expected to take appropriate actions that seek to progressively realize a level of compensation that does.

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 and expression, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status in its workforce, including but not limited to in hiring and employment practices such as wages, promotions, rewards, and access to training. Supplier shall ensure equal opportunities throughout all levels of employment and shall establish measures to eliminate health and safety

concerns that are especially prevalent among women workers (for example, physical security and sexual harassment). There shall be no discrimination or retaliation against workers, including migrant workers, who raise grievances in good faith. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. Further, Corning does not tolerate offensive, harassing, or discriminatory logos, icons, or symbols (including the Confederate Flag) and bans such items from public display in all Corning workspaces and parking lots. "Public display" includes, but is not limited to, clothing, mugs, posters, flags, towels, tattoos, toolboxes, bumper stickers, hats, facial masks, and vanity license plates. Anyone who violates this policy will be instructed to cover or remove the article or item from Corning's premises immediately.

8. Freedom of Association

Suppliers shall respect the rights of all workers to form and join trade unions, or not to form or join, of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the rights 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. Suppliers will ensure workplace environments enables workers to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association.

Ethics and Security

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. Suppliers shall have a zero-tolerance policy that strictly prohibits any and all forms of bribery, corruption, extortion, and embezzlement. 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 are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws. 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, gifts of cash or cash equivalents, such as gift cards, are prohibited. 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 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

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.

5. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Suppliers' business books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. 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; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded. Supplier shall maintain procedures that reasonably ensure that Corning confidential information will not be improperly used or disclosed.

7. Fair Business, Advertising and Competition

Competition Standards of fair business, advertising, and competition are to be upheld.

Supplier shall comply with all 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 commit to protecting the reasonable privacy expectations of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with all applicable privacy laws and regulations in connection with the processing of personal information. Reference the [Privacy Notice for Suppliers | Corning](#).

9. Information and Cybersecurity

All Suppliers shall take all appropriate measures to combat cybersecurity attacks both with respect to their own systems and with any connection to Corning's information systems or data. This includes implementing controls and processes to safeguard the Corning information under the Supplier or their subcontractor's control. Suppliers are required to immediately report to Corning any data or systems compromise that occurs and include their remediation plans and otherwise comply with the [Corning Cybersecurity Risk Management Requirements for Suppliers](#) and the [GSM IS Supplier Training](#).

10. Artificial Intelligence

To the extent Suppliers make use of Artificial Intelligence ("AI") in conducting business with Corning, Corning requires Suppliers to make responsible use of AI in their operations, ensuring that ethical considerations are prioritized, and that AI systems are used to enhance productivity while adhering to Corning's values. In addition, Suppliers are required to comply with all applicable laws and regulations governing or related to the use of AI, including, but not limited to the EU AI Act, NIST AI RMF, ISO 42001 and data privacy laws. Corning requires Suppliers to be transparent with respect to their use of AI and must provide clear information to Corning on how AI is used, what data is collected, how it is processed and how/where it is stored. No Corning data may be input to Supplier's AI systems without express written consent from Corning, particularly in instances where Supplier desires to train, ground, fine-tune, or utilize any other method of integration of Corning data and Corning retains all rights in its data including any intellectual property rights in any output derived from Corning's data. Further, Corning expects Suppliers to develop and establish a solid and reliable AI governance framework consisting of processes, methods, controls and supporting tools to drive greater confidence and transparency in the end-to-end lifecycle of AI. Corning encourages Suppliers to perform risk assessments regarding the use of AI including the need to maintain human oversight of AI systems, particularly in critical decision-making processes, and the processing of sensitivity of data. This helps ensure accountability and mitigate risks associated with automated decisions. Additionally, Corning requires Suppliers to have obtained all the necessary intellectual property rights, whether through licenses or otherwise, to provide any AI the Supplier uses in conducting business with Corning.

11. Protection of Identity and Non-Retaliation programs

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

12. Responsible Minerals Sourcing

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody to ensure minerals in their supply chains originating from conflict-affected and high-risk areas (CAHRAs) do not directly or indirectly finance or benefit armed violence or contribute to human rights abuses. The scope of such policies and due diligence shall include the regulated “conflict minerals” (tantalum, tin, tungsten, and gold); cobalt; and any other minerals sourced from conflict-affected and high-risk areas (CAHRAs) and within the supply chain for products or materials supplied to Corning. Suppliers shall have a due diligence framework that is in alignment with The Organization for Economic Co-Operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ([link](#)). Suppliers shall make their responsible minerals sourcing policy and due diligence measures available to customers upon request. Suppliers shall also extend these expectations to their own suppliers.

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. Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicle, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which include eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout) and ongoing health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working conditions with high hazards, to remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers. 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. Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, and worker training and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities, contact information for emergency

responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3. Occupational Injury and Illness

Suppliers shall put in place procedures and systems to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work. Participants shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

4. Industrial Hygiene

Suppliers shall identify, evaluate, and control worker exposure to chemical, biological, and physical agents according to the hierarchy of controls. Potential hazards are to be eliminated, controlled, and/or reduced through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well maintained, personal protective equipment free of charge. Participants shall provide workers with safe and healthy working environments, which shall be maintained by protective programs shall be ongoing and include educational materials about the risks associated with these hazards. Participants shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

5. Physically Demanding Work

Worker exposure to physically demanding tasks including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled in accordance with applicable laws.

6. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Supplier shall provide and properly maintain physical guards, interlocks, and barriers for hazards in machinery used by workers.

7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by Supplier, or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility

or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

Environmental

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

1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.

2. Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labeled, and managed in accordance with applicable laws and standards to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Hazardous waste data shall be tracked and documented.

4. Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

6. Materials Restrictions

Suppliers are to adhere to all applicable laws and regulations and customer requirements regarding prohibition or restrictions of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8. Energy Consumption and Greenhouse Gas Emissions

Suppliers are to disclose complete and accurate information regarding their sustainability practices including Scope 1, 2, and 3 GHG emissions data via CDP or an alternative mutually agreed upon method in accordance with leading industry practices (e.g., GHG Protocol) no less frequently than every year. Suppliers are to establish, achieve, and report against an absolute corporate-wide greenhouse gas reduction goal that is aligned with the latest climate science. Progress against the greenhouse gas reduction goal is to be publicly reported annually. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions together with their sustainability practices. Specific additional requirements for data disclosure, third party emissions verification, reduction targets, and achievement of planned reductions may be set forth in supplier contracts or other written communication with Corning.

Management Systems

Corning holds its Suppliers accountable to implement and maintain (as applicable) management systems that enable compliance with laws to identify, mitigate, and monitor operational risks to sustainability regulations.

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations, and customer requirements related to the Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.

1. Company Commitment

Suppliers shall establish statements affirming their commitment to meeting high standards for environmental and social responsibility, ethical conduct, and continuous improvement that is endorsed by executive management. Statements shall be made public and in a language workers can understand.

2. Management Accountability and Responsibility

Suppliers shall identify company representative(s) with authority to be responsible for ensuring implementation and annual review of the management systems and associated programs. The designated employee(s) will report to the executive management on the status of the management systems. This management system(s) will include the process to identify, monitor, and understand applicable laws and related customer requirements.

3. Risk Assessment and Risk Management

Suppliers shall establish and maintain a process to identify the legal compliance, environmental, health and safety,¹ labor practices, and ethics risks, including the risks of severe human rights and environmental impacts, associated with their operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to minimize the identified risks and ensure regulatory compliance.

4. Improvement Objectives

Suppliers shall establish written performance objectives, targets, and implementation plans including a periodic assessment of their performance in achieving those objectives.

5. Training and Communication

Suppliers shall establish and maintain training programs for managers and workers to meet applicable legal and regulatory requirements.

Suppliers shall have a process for communicating clear and accurate information about their performance to their policies to workers and sub-tier suppliers.

6. Worker / Stakeholder Engagement and Access to Remedy

Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code in order to foster continuous improvement. Workers shall be given a safe environment to provide grievances and feedback without fear of reprisal or retaliation.

7. Audits and Assessments

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code, and any customer contractual requirements related to social and environmental responsibility.

8. Corrective Action Process

Suppliers shall have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

9. Documentation and Records

Suppliers shall maintain appropriate documents and records to ensure regulatory compliance.

10. Supplier Responsibility

Suppliers shall establish a process to communicate these Code requirements to their suppliers and to monitor supplier compliance to the Code.

¹ Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant / facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen / cafeteria and worker housing / dormitories.