

Effective August 6, 2020

## **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 (as well as their respective employees, subcontractors, and suppliers) are expected to comply with this Code and Corning's [Human Rights Policy](#) in order to comply 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. 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](http://www.ethicspoint.com). Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated.

## **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 (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. Prohibited actions include transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. As part of 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 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. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. 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. 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.

## 3. Working Hours

A work week must not exceed 60 hours per week, including overtime, except in emergency or unusual situations. Emergency or Unusual Situations: 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 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. 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. Supplier shall not make deductions from wages as a disciplinary measure. Workers shall be informed of all deductions from their pay.

## 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, 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 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. In addition, workers or potential workers should not be subjected to medical 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 right 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 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. Suppliers shall have a zero-tolerance policy that strictly prohibits any and all forms of 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 shall not 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, 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

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 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.

[Supplier Download Library](#).

## 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 the [Supplier Download Library](#).

## 10. 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.

## 11. Responsible Minerals Sourcing

Suppliers shall have a policy to assure 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 should include but also go beyond the regulated "conflict minerals" (tantalum, tin, tungsten and gold) and cobalt to include the responsible sourcing of all minerals in conflict-affected and high-risk areas (CAHRAs). 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) are to be identified and assessed, and controlled through proper design,

engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout) and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate 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 condition with high hazards, 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, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

## 3. Occupational Injury and Illness

Supplier 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 reclassify 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.

## 4. Industrial Hygiene

Supplier shall identify, evaluate and control worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled 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. Protective programs shall include educational materials about the risks associated with these 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. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

## **Environmental**

Supplier shall minimize its adverse effects on the community, environment and natural resources are minimized 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 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. Hazardous Substances

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

### 3. 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.

### 4. Wastes and Emissions

Suppliers shall monitor, control and treat wastes and emissions generated from operations, industrial processes and sanitation facilities as required by applicable laws and standards, prior to discharge or disposal.

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.