

# **Corning Incorporated**

## **2022 Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains**

(Published in Compliance with the California Transparency in Supply Chain and United Kingdom Modern Slavery Acts)

**May 2022**

## Introduction

Corning Incorporated<sup>1</sup> is committed to treating everyone in our business and supply chains with dignity and respect. We take seriously our role in combatting slavery and human trafficking in our supply chains and we work to ensure the well-being of the people who help make our products and supply materials to our supply chains.

The **California Transparency in Supply Chains Act of 2010** requires certain companies to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale. The **U.K. Modern Slavery Act of 2015** requires certain commercial organizations to prepare and publish a slavery and human trafficking statement for the financial year describing the steps, if any, the organization has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.

This **2022 Statement on Efforts to Combat Human Trafficking and Slavery in our Supply Chains** reflects Corning's progress during 2021, covering its January 1 – December 31 fiscal year, and ongoing efforts, to combat and prevent human trafficking, slavery, and forced, compulsory, or involuntary labor in our supply chains. This Statement is intended to fulfill the requirements of both the California and U.K. Acts, specified above. More information about Corning's extensive Supply Chain Social Responsibility requirements and practices can be found on our website at <https://www.corning.com/worldwide/en/sustainability/processes/supply-chain-social-responsibility.html>.

## Corning's Supplier Code of Conduct and Commitment to the Prevention of Human Trafficking

As a global corporation with manufacturing facilities around the world, Corning relies on a vast network of suppliers. To support Corning's supplier-related compliance efforts, Corning created its [Supplier Code of Conduct](#) (the "Supplier Code"), available in thirteen languages, which, among other things,

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<sup>1</sup> The term "Corning" used in this Statement refers collectively to Corning Incorporated and its subsidiaries, including Corning Limited.

addresses humane labor conditions and clearly states that **“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.”** Corning’s Supplier Code is built upon and incorporates the key aspects of the Responsible Business Alliance (“RBA”)<sup>2</sup> Code of Conduct, including those related to freely chosen employment, young workers, working hours, humane treatment, wages and benefits, non-discrimination, and freedom of association. Corning’s Supplier Code applies to companies that do business with Corning (“Suppliers”) 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’s Supplier Code also embraces the key principles of the International Labor Organization’s (ILO) eight fundamental conventions, which cover subjects that are considered by the ILO as fundamental principles and rights at work. Particularly relevant to this disclosure, the ILO fundamental conventions include:

- Forced Labor Convention, 1930 (No. 29)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Worst Forms of Child Labor Convention, 1999 (No. 182)

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, and cascade the requirements to their supply chains. In this way, Corning ensures that our Suppliers’ operations are conducted with respect for the laws of the regions they serve.

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<sup>2</sup> In 2020 Corning became a full member of the Responsible Minerals Initiative.

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

**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.**

In order to address the risks of involuntary labor arising from unethical hiring practices, our Supplier Code requires that workers be provided a written employment contract in their native language. We also prohibit the payment of recruitment fees or other similar fees in connection with employment. Suppliers are required to repay any such fees to workers in the event they are found. Our Supplier Code also prohibits the withholding of identification documents that might prevent an employee from leaving a job, stating that “(e)mployers and agents and sub-agents’, 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.”

As stated in Corning’s Supplier Code, Suppliers and their employees are encouraged to use Corning’s anonymous, third-party reporting service to report any concerns related to issues covered by the Supplier Code, including concerns related to human trafficking or slavery. This service is available 24 hours a day, seven days a week, either by telephone or via the internet.

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 nonconformance, depending on its nature and severity.

## **Verification**

In addition to the deployment of the Supplier Code as described above, Corning takes steps to evaluate, assess, and verify risks of slavery and human trafficking in our supply chains through our Supplier onboarding and ongoing management processes.

In 2015, Corning launched a program to migrate Supplier onboarding from multiple platforms to a single standard global process and repository which includes approval of all new Suppliers by Corning Supply Management professionals. This process of centralization has decreased total new Suppliers enrolled by Corning and increased oversight on new Suppliers. Corning continues to implement new processes to enable early detection and consistency of checks to reduce risk prior to potential Suppliers entering our supply chains. For example, Corning recently added 42 corporate social responsibility questions to its supplier onboarding process and is also assessing all new suppliers via the third-party tool Risk Methods.

In addition, Corning Supply Management professionals conduct internal assessments of strategic and high-risk Suppliers based upon industry standards and the Corning quality framework. The frequency and scope of these assessments are based upon Supplier importance and business priorities. Corning uses a consolidated, consistent template for these assessments, which in 2019, was expanded to include additional corporate social responsibility questions in alignment with RBA standards. In 2019, 100% of Corning's most strategic Suppliers were evaluated through this assessment process. In 2020, Corning completed assessments on more than 800 Suppliers. As detailed in Corning's Sustainability Report, available [here](#), in 2021, Corning completed 610 Supplier performance assessments and screened more than 9,000 Suppliers by Risk Methods, including 100 new Suppliers and 200 Tier 2 Suppliers.

## **Supplier Audits and Oversight Practices**

All of Corning's Suppliers must agree to act in accordance with the principles and requirements of our Supplier Code, which includes Corning's right to audit. A key component of our Supplier Relationship Management process is to conduct on-site audits, as circumstances (particularly related to the ongoing

COVID pandemic) permit. In 2021, we completed 14 contract manufacturer audits, with no material findings of non-compliance related to our Supplier Code of Conduct.

Additionally, Corning has a comprehensive audit program for its highest risk strategic Suppliers, including a specific focus on contract manufacturers, where Corning has determined the risk of human trafficking in its supply chains to be the highest, given the nature of such operations. Corning has developed a matrix to identify high risk countries which is based upon (i) the Amfori 6 factors (<https://www.amfori.org/resource/countries-risk-classification>) and (ii) a third-party tool, Risk Methods, a supply risk profile / rating solution, which utilizes 49 risk indicators to identify potential risks. Assessments are conducted by well-respected third-party auditors and aligned with industry standards, including RBA principles, with reassessments to follow on a two-year cycle thereafter. Based on results, improvement plans for mitigation and training are developed, and follow-ups are scheduled. Insufficient remediation may result in contract termination.

In 2017, Corning implemented an ongoing, in depth third-party audit process beginning with 100% of our highest-risk Suppliers, and remediation of findings from these audits continued through 2018. We expanded these audits in 2019 to encompass a portion of our medium-risk Suppliers. As noted above, in 2020, Corning's ability to expand these on-site audits was impacted by the COVID pandemic, with only 14 completed; however, they are planned to expand in 2022 to 20 Suppliers. In 2020, Corning also launched an initiative, described below, regarding certification of Suppliers in its minerals supply chains.

As part of Corning's efforts to ensure the responsible sourcing of materials, in 2022 Corning expanded its previous Conflict Minerals Policy to be a broader "Responsible Minerals Policy," covering all minerals from all conflict affected and high-risk areas of our supply chains. Under this policy, Corning requires our Suppliers to comply with our requests to provide complete and accurate information about minerals supplied to Corning, and to perform further due diligence as required about the source of any minerals in their products which are provided to us to ensure alignment throughout the supply chain. Failure to provide this information to Corning when requested may result in termination as a Corning Supplier.

We also require our Suppliers to extend these expectations to their own Suppliers. Suppliers are required to include provisions equivalent to Corning's Supplier Code of Conduct, which include a commitment to responsible minerals sourcing and prohibition of forced labor in their supply chain agreements, and to flow down the same requirements throughout their supply chains.

By the end of 2021, Corning received and confirmed recognized certifications of social responsibility from 65% of its high-risk suppliers. Corning is committed to continuing to work with its high-risk suppliers to ensure 100% have received these certifications by 2025.

For more information see Corning's [Responsible Minerals Policy](#).

### **Internal Accountability**

Corning maintains a robust internal compliance program intended to ensure a culture of ethics and compliance among Corning's workforce. This program includes regular compliance training, communications to employees, resources on the Corning intranet site, annual certifications, and other multiple means of reporting compliance practices.

Corning's internal culture of ethics and compliance is based upon [Corning's Values](#) and [Corning's Code of Conduct](#), which govern the legal and ethical aspects of employee behavior. Corning also has published a [Human Rights Policy](#) setting forth our support and respect for human rights. The Corning Code of Conduct 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. Through the Code of Conduct, Corning seeks to promote honest and ethical conduct, deter wrongdoing, in compliance with the applicable laws and regulations. The Code of Conduct is available in twelve languages and employees are required to complete training regarding the Code of Conduct.

Violations of the Corning Code of Conduct can result in disciplinary action, which may include termination. Suspected violations can be anonymously reported to Corning's Code of Conduct hotline, which is available worldwide, 24 hours a day, 7 days a week via a toll-free call or the internet. Information

about reporting violations or concerns are made available to all employees through the Code itself, on Corning's intranet site, and via posters printed in local languages at Corning sites around the world.

Corning has a Compliance Council made up of senior leaders from Law, Finance and Human Resources who meet regularly to provide guidance and oversight for the Corporate Compliance Program. Periodic reporting is also provided to the Audit Committee of Corning's Board of Directors, which retain oversight authority for Corning's Compliance Program, as well as the Corporate Responsibility and Sustainability Committee of the Board.

## **Training**

All employees are required to complete training related to Corning's Code of Conduct. This training ensures that employees are familiar with the areas covered by Corning's Code, including ethical and legal obligations toward the protection of human rights. Corning's trainings also ensure employees know how to report concerns, through Corning's anonymous third- party hotline if desired. Corning maintains a strong commitment to preventing retaliation against those who report compliance concerns as set forth in Corning's [Whistleblower Policy](#).

In addition, management personnel within Corning are also required to complete an annual certification attesting that they know and understand the requirements of Corning's Code of Conduct.

In 2019, awareness training was provided to all members of Corning's Global Supply Chain Management team, from senior leadership to supply chain personnel. This training, which focused on human trafficking, forced labor, and modern slavery, as well as the detrimental effects of each, was designed to provide our leadership with the knowledge and skills to promote human rights compliance throughout our supply chain network. In addition, Corning's Global Supply Management and Supply Chain organizations are educated on Supply Chain Social Responsibility issues such as human trafficking, forced labor, modern slavery, transparency, child labor and human rights to build awareness and ensure that Corning's supply chains reflect our Values and respect for human rights. Supply Chain Social Responsibility training has been integrated into employee learning plans and



provided to new employee during the onboarding process.

In 2020, Corning launched Corporate Social Responsibility Training for its contract manufacturers, and in 2021 Corning launched Human Rights Training for our strategic suppliers, with more than 300 suppliers trained during that year. Corning intends to expand this initiative into 2022, providing our supply chains with human rights training. These trainings are intended to reinforce our Supplier Code of Conduct and to ensure Corning's supply chains reflect our Values and respect for human rights. Additionally, high-risk Suppliers are currently being trained on these subjects as part of our Third-Party Audit Program.

Moreover, Corning routinely trains its Supply Management personnel regarding best practices for working with Suppliers, as outlined in the Supplier Code, and this training is also a component of the onboarding process for new employees.

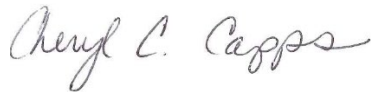
### **Certification**

Corning's Suppliers are required to operate in full compliance with all applicable laws and regulations, and they must agree to and comply with the standards of Corning's Supplier Code. By agreeing to comply with our Supplier Code, Corning's Suppliers are obligated to meet these higher standards.

Corning is committed to maintaining higher standards of social responsibility and continues to work toward combating human trafficking and slavery and all forms of inhumane practices in its supply chains. For more information on Corning's commitment to corporate social responsibility, see our [Values](#) and [Corporate Sustainability](#) web pages.

## Signatures

### On behalf of Corning Incorporated:



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Cheryl C. Capps  
Senior Vice President & Chief Supply  
Chain Officer Corning Incorporated  
May 6, 2022

### On behalf of Corning Limited:

In accordance with the U.K. Modern Slavery Act 2015 and guidance thereunder, this 2022 Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains has been approved by the directors of Corning Limited on May 23, 2022 signed by the undersigned director for and on behalf of Corning Limited to the extent that this Statement relates to the activities of that entity.



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Steve Candler  
Director  
Corning Limited  
May 23, 2022