Corning Incorporated
Whistleblower Policy

Mission Statement

Corning Incorporated and its subsidiaries (collectively, “Corning”) are committed to high standards of business conduct. In line with this commitment, employees and others have the right to raise, in good faith, concerns about improper business conduct without fear of retaliation in any form.

Corning’s Compliance Council is adopting this Policy to ensure (a) that employees of Corning and other relevant external stakeholders have a confidential and, if so desired, anonymous means by which to submit good faith concerns about improper business conduct, without fear of retaliation, and (b) that every submission is properly investigated and responded to in a timely manner.

No Retaliation

Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct or against anyone participating in an investigation into such concerns will not be tolerated. Additionally, no employee shall be adversely affected because the employee refuses to carry out an instruction that would constitute fraud, or would be a violation of federal or state laws or Corning’s Code of Conduct. Corning does not retaliate, and has not retaliated, against employees or others who have brought forward concerns and/or participated in compliance investigations in good faith.

Confidentiality

Corning will protect the confidentiality of the concern raised and the identity of the reporting person. Such information shall be shared only on a "need-to-know" basis with those individuals investigating or responding to the concern, consistent with the need to conduct an adequate review and to prepare an adequate response.

Reporting Mechanisms

Corning employees or others who are or become aware of (a) suspected misconduct, illegal activities, fraud or abuse relating to the company's accounting, internal accounting controls or auditing matters, (b) possible violations of federal or state securities laws or regulations, (c) possible violations of other federal or state laws, such as the U.S. Foreign Corrupt Practices Act, or (d) possible violations of Corning’s Code of Conduct, should report such matters as follows (each, a “Report”):

- Discuss any issues or report any perceived wrongdoing to your supervisor.
- Talk with your human resources leader or any other manager.
- Contact the Law Department at (607) 974-0000 and ask to speak to a lawyer about the Code of Conduct.
- Contact the Finance Division at (607) 974-8242 and ask to speak to the Corporate Controller or Treasurer about the Code of Conduct.
- Contact Corning’s Code of Conduct Line at (888) 296-8173 or at www.ethicspoint.com. These services can be used to make an anonymous report and are available on a 24/7 basis. An outside organization provides these services and your report cannot be traced back to you unless you choose to identify yourself.

Corning Restricted
Employees involved in corporate financial reporting must promptly report concerns about violations of the securities laws to Corning’s General Counsel at (607)974-8500 or to the Corporate Controller or Treasurer at (607)974-8242. If those officers fail to act and investigate a claim of a material violation of the securities laws, write to “Chairman of the Audit Committee of Board of Directors” or “Lead Director of Board of Directors” at the following address:

   c/o Company Secretary  
   Corning Incorporated  
   MP-HQ-E2-10  
   One Riverfront Plaza  
   Corning, New York 14831

Screening

Upon receipt of a Report, the Chief Compliance Officer shall review the Report and shall determine if the investigation of such Report is warranted in accordance with the company’s written Investigation Protocol. Under this screening process, Reports shall be referred for investigation and reported to the Code of Conduct management oversight group\(^1\) unless the Report involves only routine human resources or employment matters.

Investigations; Roles and Responsibilities

Upon referral of a Report, the appointed Investigative Liaison shall review the Report, determine the appropriate method of investigating the matters raised in the Report, and conduct the investigation in accordance with the instructions contained in Corning’s Investigation Protocol. Depending upon the subject matter of the Report, the Investigative Liaison will typically be from Corning’s Human Resources Department, Law Department, Global Security Department, or Finance Department. Depending on the nature of the allegations and issues involved, the Investigative Liaison may escalate the investigation to the Chief Compliance Officer, who may in turn escalate to other senior officials or external resources as determined in the Chief Compliance Officer’s discretion.

In addition to the above steps, the Chief Compliance Officer will have the responsibility to report all instances or allegations of inappropriate behavior by management concerning questions of compliance with securities laws, or related inquiries, promptly to the chairperson of the Audit Committee of Corning’s Board of Directors, with a copy to the Corporate Controller and to the Assistant Controller, Accounting, Compliance and Reporting.

Responses

After the completion of an investigation, if the findings of the Investigative Liaison indicate that the Report has validity, the Chief Compliance Officer, in accordance with appropriate Human Resources representatives, management for the employee in question, and the General Counsel, as appropriate, will determine the appropriate actions required to remedy any past or existing misconduct, fraud, abuse or illegal activities and to prevent the occurrence of such misconduct, fraud, abuse or illegal activities in the future.

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1 This group consists of the Chief Compliance Officer, the General Counsel, the Corporate Treasurer, the Corporate Controller, and the Assistant Controller, Accounting, Compliance and Reporting.

Corning Restricted
Corning’s aim is to provide effective remedy where we determine that we have caused or contributed to adverse human rights impacts in our value chain and to use our leverage to encourage our suppliers and partners to provide remedy where we find impacts directly linked to our business operations, goods, or services. In all such cases our intent is to ensure timely remedy for victims of adverse human rights impacts and changes to applicable systems and procedures to avoid similar impacts in the future.

Our mechanisms do not obstruct access to other remedy channels or procedures, including state-based judicial or non-judicial mechanisms or other available mechanisms for persons who make allegations of adverse human rights impacts. Where appropriate, we will collaborate with organizations and other companies to help prevent, mitigate, and remedy adverse human rights impacts. We will cooperate with state-based nonjudicial grievance mechanism complaints that may be brought against Corning and work reasonably to resolve such matters.

The Chief Compliance Officer will also discuss the findings as necessary with the General Counsel to determine whether public disclosure (e.g., to external individuals and/or communities) or disclosure to governmental agencies and/or reporting to the full Board of Directors is necessary or appropriate. Although timing will vary depending on the complexity of the Report, Corning will strive to complete all investigations within 90 days. The complainant will be notified of the outcome of the investigation to the extent possible.

**Periodic Reports**

Corning’s Chief Compliance Officer shall periodically provide reports to the Audit Committee of the Board of Directors and to the company’s external auditor concerning any Reports received by the company and actions taken by the company in response to such Reports.

**False Reports**

Employees or others who knowingly raise a misleading or false concern, or raise a concern without a reasonable belief as to its truth or accuracy, will not be protected by this Policy and may be subject to discipline, including termination of employment.

**Securities Laws**

The procedures set forth in this Policy help ensure Corning’s compliance with Section 10(A)(m)(4) of the Securities Exchange Act of 1934, as added by Section 301 of the Sarbanes-Oxley Act of 2002, which requires the establishment of procedures for (a) the receipt, retention and treatment of complaints received by a public company regarding accounting, internal accounting controls or auditing matters, and (b) the confidential, anonymous submission by employees of public companies regarding questionable accounting or auditing matters.