



CORNING

# Our Company, Our Code, Our Commitment

*The Corning Code of Conduct*

ENTER



# Living Our Values

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## Our Story Starts Here

At the outset, there were railroad signal lenses and glass light bulbs. Then, over the years, we ushered in PYREX® glass and silicones and ceramics and LCD displays. Our products have supported spacecraft builds, communications networks, and laboratory discoveries. And now, present-day solutions are transforming the optical communications, mobile electronics, display, automotive, and life sciences industries.



In weaving together this collection of innovative designs, there has been a common – and unbreakable – thread: our people, and their commitment to trailblazing with integrity.

Our Code of Conduct embodies that commitment.

It's a resource that helps us continue doing business the way we have always done it: fairly, honestly, and ethically. It helps us comply with the laws and regulations in the countries where we do business, and it provides guidance on how to navigate everyday business challenges.

It also connects our seven Values with our everyday responsibilities as employees – and caretakers – of Corning.

I encourage you to read our Code and turn to it for help anytime you're facing a difficult situation. It may not have the answer to every question, but it will point you to people and resources who do. Remember, every action you take builds upon our legacy, honoring the generations of industry-leading innovators who came before us and paving the way for those who follow.

Wendell P. Weeks  
Chairman and Chief Executive Officer

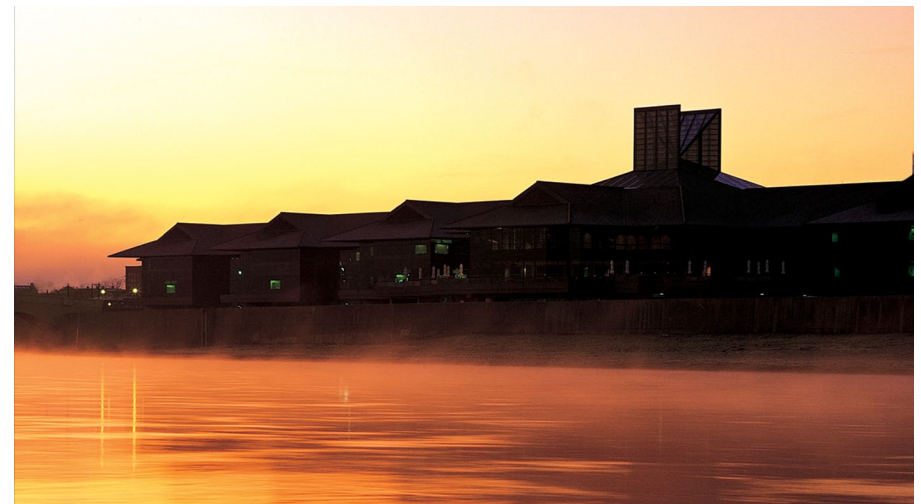
### Our Purpose ...

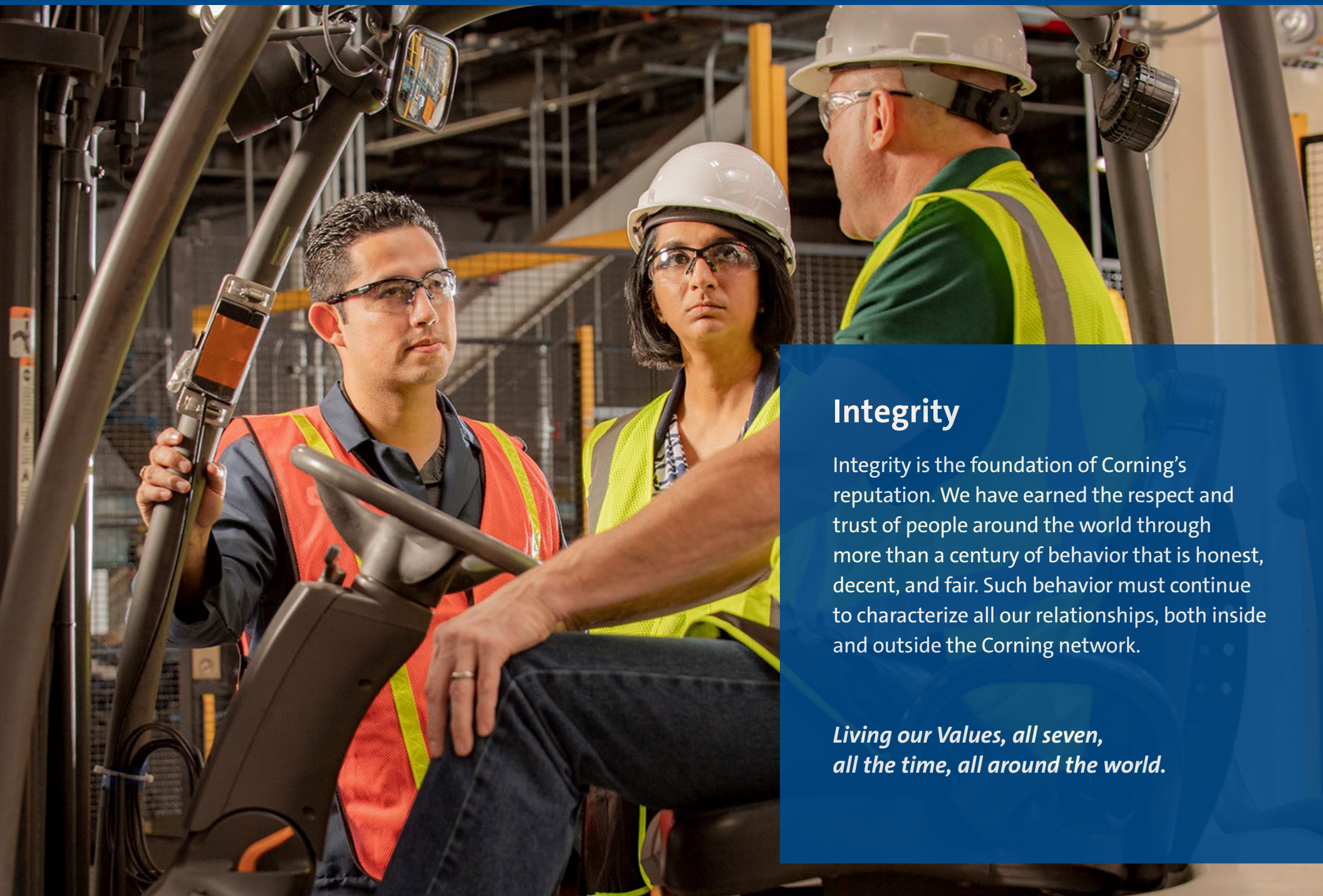
Is to deliver superior, long-range economic benefits to our customers, our employees, our shareholders, and the communities in which we operate.



We accomplish this by living our Values in an operating environment that enables corporate and personal growth.

Corning is an evolving network of wholly owned and jointly owned businesses. Our success is due to our shared Values, a core competence in science and technology, and an unending spirit of innovation in all aspects of our corporate life.





## Integrity

Integrity is the foundation of Corning's reputation. We have earned the respect and trust of people around the world through more than a century of behavior that is honest, decent, and fair. Such behavior must continue to characterize all our relationships, both inside and outside the Corning network.

*Living our Values, all seven,  
all the time, all around the world.*



## Following Our Code

Together, we've built a company and a workplace culture we are deeply proud of. That pride is reflected in what we make and how we make it, as well as in the long-term relationships we've forged with customers, with business partners, and with one another.



As we continue to develop ground-breaking products for the next 170 years and beyond, our Code is our anchor, reminding us to always conduct business the right way and make decisions that reflect who we are and what we stand for as a company.

### Who Must Follow the Code?

All Corning employees, including executives, officers, and members of our Board of Directors, are required to read, understand, and follow our Code. The Code applies to Corning and all of its majority-owned subsidiaries around the world (referred to throughout the Code as “Corning”).

Consultants, contractors, agents, suppliers, vendors, temporary employees (“business partners”) who serve as an extension of Corning are also expected to follow the spirit of our Values and our Code, as well as our [Supplier Code of Conduct](#) and all applicable contractual provisions.

### Honoring Our Commitment

Our Code represents a shared promise to protect our company from unethical and illegal conduct. It's not enough for us to grow in the years ahead; we must grow with integrity. For that reason, actions that don't align with our Values, our Code, our policies, or applicable laws and regulations can result in disciplinary action – up to and including termination of employment. In some cases, there can even be civil or criminal consequences for the person involved and for Corning.

### Our Code Helps Us:



*Innovate with integrity and understand what's expected of each of us.*



*Tap into resources who can answer questions and guide us through ethical dilemmas.*



*Make good decisions, even in challenging workplace situations.*

Can't find what you're looking for? Check [here](#) for help.

## Understanding Our Responsibilities

We hold ourselves to high standards. We know that each of us – regardless of role or job location – represents Corning and its rich legacy.

Every Corning employee has a responsibility to:

- Live our Values – all seven, all the time, all around the world.
- Know and follow our Code, our policies, and all applicable laws and regulations.
- Complete all required employee training and ask questions about anything that's unclear.
- Share concerns about anything unethical or illegal, and cooperate with any related investigations.

Supervisors have additional responsibilities:

- Lead by example. Demonstrate – in both decisions and actions – a commitment to our Values and our Code.
- Promote the kind of workplace that values diversity, mutual respect, and open communication.
- Listen and take prompt action to address employee concerns, escalating through appropriate channels when necessary.
- Never retaliate – or allow retaliation by others – against anyone who raises a concern in good faith or participates in an investigation.



### ***What If There's a Conflict?***

*Corning is committed to following the laws and regulations of all the countries in which we operate. If any provision of our Code conflicts with a local law or requirement, we seek guidance from the [Law Department](#).*





## Making Good Choices

Making the right decision is always important, but it's not always easy. Taking shortcuts, making compromises, or looking the other way when we suspect unethical behavior is not the culture at Corning. We do the right thing, and if we encounter a situation where the right thing is not clear, we ask for help.

### *Facing a Difficult Decision? Ask Yourself:*



*Is it legal?*



*Is it aligned with our Values?*



*Would I feel comfortable if my decision or my actions were made public?*



*Would I feel comfortable if senior management and others at Corning knew about it?*



If the answer to all of these questions is “yes,” the decision to move forward is probably OK, but if the answer to any question is “no” or “I’m not sure,” ask – and keep asking until you get an answer.





## Speaking Up, Listening Up

Part of preserving our reputation as a company that operates with integrity is taking action when something isn't right. Each of us has a duty to come forward anytime we see or suspect a violation of our Code, our policies, or the law.

### *There Are Many Resources To Assist.*

The best place to start is with your supervisor – they are often in the best position to understand and address the issue. If you're not comfortable speaking with your supervisor, or you've spoken with them and no action has been taken, you may contact:

- **Your human resources leader or any other manager**
- **The Law Department: 607-974-0000**  
or [CngCompCo@corning.com](mailto:CngCompCo@corning.com)
- **The Control Division: 607-974-8242** Ask to speak to the Corporate Controller or Treasurer about the Code of Conduct
- **Corning's Code of Conduct Line: 888-296-8173**  
or [www.ethicspoint.com](http://www.ethicspoint.com) Available 24/7 and Anonymous

For reports of accounting, auditing, or financial issues, Corning's Law and Security departments will be involved in the investigation. They will alert the Audit Committee of Corning's Board of Directors and the Board of Directors, as appropriate.

All alleged violations will be investigated by individuals designated by Corning's Chief Compliance Officer, as guided by Corning's Core Compliance Council (with leaders from Corporate Finance, the Law Department, and Human Resources)

and appropriate action will be taken. Findings are reported periodically to the Corning Compliance Council, the Risk Council, and the Audit Committee of Corning's Board of Directors.

### About Corning's Code of Conduct Line

Information provided through the [Code of Conduct Line](#) will be documented in detail by a third-party interview specialist (if you report via phone) or through use of a web form (if you report online) and forwarded to Corning for investigation and follow-up. Translators are available via phone, and online reports can be made in the local language. Anyone who reports may choose to remain anonymous, except where prohibited by local law.

### Retaliation Is Not Tolerated at Corning

Regardless of the reporting method, Corning will investigate reports thoroughly and disclose only to those who need to know in order to resolve the issue.

We know it takes courage to come forward and share a concern. That's why we prohibit retaliation against anyone who makes a good-faith report or assists in an investigation into misconduct.

Reporting "in good faith" means making a genuine attempt to provide honest information, even if it later proves to be unsubstantiated or mistaken. Remember, an issue cannot be addressed unless it is brought to someone's attention.

If you believe that someone is retaliating against you or others for reporting a Code of Conduct concern, or participating in a Code of Conduct investigation, you should report that retaliation using any of the options described in this Code.





## The Individual

We know that in the end, the commitment and contribution of all our employees will determine our success. Corning believes in the fundamental dignity of the individual. Our network consists of a rich mixture of people of diverse nationality, race, gender, and opinion, and this diversity will continue to be a source of our strength. We value the unique ability of each individual to contribute, and we intend that every employee shall have the opportunity to participate fully, to grow professionally, and to develop to his or her highest potential.

*Living our Values, all seven,  
all the time, all around the world.*

## Celebrating Diversity, Equity, and Inclusion

*Our shared commitment to a diverse workplace began more than 50 years ago. We knew then what we know now: A diverse, equitable, and inclusive workplace requires more than a policy – it requires putting policy into practice and building meaningful networks, partnerships, and programs that allow each of us, at every level of Corning, to thrive.*

**We value every individual.** Listening to – and respecting – the diverse views of others drives our innovation, helping us to build better products and a better Corning. As a company, and as individuals, we honor each other’s experiences, backgrounds, and perspectives taking care to never let personal biases influence our decision-making.

**We make employment decisions fairly.** In our recruiting, hiring, pay, and promotion practices, decisions are made on the basis of a person’s abilities, skills, and performance. We also make sure we’re aligned with Corning’s business needs and all ethical and legal standards. The goal is for every employee to have the opportunity to contribute and reach their full potential.

### Our Diversity Initiative

*To learn more about where we’ve been and where we’re going, please visit our [Global Diversity, Equity & Inclusion Resources](#).*



## Diversity will continue to be a source of our strength

**Discrimination is not tolerated here.** Each of us has a responsibility to support Corning’s promise of equal opportunity and non-discrimination. If you see, suspect, or experience behavior that goes against that promise, [share your concern](#).

### Consider This

**Q** You’ve received some emails from a coworker containing jokes about a certain nationality. The jokes weren’t directed at you. In fact, they weren’t directed at anyone in particular, but they made you very uncomfortable. What should you do?

**A** Even though not directed at a particular individual, this type of behavior undermines our Values and erodes the inclusive culture we have all worked hard to create. You should first discuss your concerns with your coworker and ask them to stop sending these kinds of emails. If they won’t, or if you are uncomfortable talking to them directly, report your concerns to your supervisor or human resources leader.



### Want to Know More?

[Policy Prohibiting Harassment \(US\)](#)

[Policy Prohibiting Harassment \(International\)](#)



## Promoting Respect

*There is no limit to what we can accomplish when we feel comfortable in our jobs, supported and respected by our colleagues. We work together to create the kind of environment where all people feel empowered to innovate, collaborate, and do great things. That kind of environment has absolutely no room for acts of harassment, bullying, or abusive conduct.*

**We promote positive, productive working relationships.** Every interaction we have – whether with coworkers, business partners, or customers – should reflect civility and respect. Our company has a zero-tolerance policy that prohibits harassment or improper treatment, whether at a company location, a company-sponsored social event, or any activity where employees represent Corning.

**We don't tolerate disrespectful behavior.** Regardless of the job we do or where we do it, we should watch for inappropriate behavior, take action to minimize potential problems when we can, and [report](#) them when we can't.



### Want to Know More?

[Policy Prohibiting Harassment \(US\)](#)

[Policy Prohibiting Harassment \(International\)](#)

## What Is Harassment?

It's any action that intimidates, insults, offends, or ridicules someone on the basis of their race, color, gender, age, religion, national origin, sexual orientation, gender identity or expression, disability, or veteran status. It ...



*Can take many forms – verbal, visual, or physical*



*Can be sexual in nature and directed at the same or opposite sex*



*Includes demeaning jokes, slurs, and name-calling*



*Doesn't have to be intentional to be considered a violation of our policies*

## Ensuring a Safe Corning

*Our people drive our progress, so keeping everyone safe, secure, and injury-free at work is paramount. A safe workplace isn't the job of just one person or one department. At Corning, we understand that ensuring each other's safety and well-being is a responsibility we all share.*

**We put safety first.** We know and follow all applicable health and safety laws, regulations, policies, and procedures everywhere we operate. We complete all required safety training and wear personal protective equipment, when required. We stay alert for hazards and [report](#) any condition that could pose a risk to ourselves or to others in the workplace.

**We don't work under the influence of alcohol or illegal drugs.** We believe in being at our best at all times – substance abuse can not only compromise our own safety and performance, but the safety and performance of our colleagues.

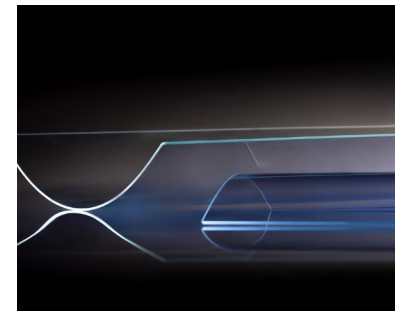
**We observe good physical security practices.** We're careful about badging in and out of facilities, and we stay alert, reporting any strangers or suspicious activity. Our company prohibits weapons in our facilities – any threats or violent behavior should be reported immediately.

■■■■ *Every employee shall have the opportunity to develop to his or her highest potential*

### Consider This

**Q** Your supervisor asks you to use some equipment that you've not yet been trained to operate. You've seen others use it, and it seems fairly simple – should you go ahead as directed?

**A** No. Let your supervisor know that you haven't been trained on the equipment. Your supervisor can assign the task to someone else and make sure you get the necessary training to assist in the future.



### Want to Know More?

[Corning HR Policy Library](#)

[Corning Global Security Policy & Document Library](#)

[Corning Global Safety Intranet Site](#)





## Quality

Total Quality is the guiding principle of Corning's business life. It requires each of us, individually and in teams, to understand, anticipate, and surpass the expectations of our customers. Total Quality demands continuous improvement in all our processes, products, and services. Our success depends on our ability to learn from experience, to embrace change, and to achieve the full involvement of all our employees.

*Living our Values, all seven, all the time, all around the world.*

## Serving Our Customers

*For 170 years we've been an innovator in materials science. We've built a reputation as a company that can be trusted to consistently deliver high-quality, high-performance products. We work every day to preserve that trust because we're not just transforming industries, we're transforming lives.*

**We deal fairly.** We know that the success of our company rests on building relationships and maintaining our customers' respect. We're responsible in our marketing and advertising, providing truthful information about the features and availability of our products. We don't make claims we can't substantiate or promises we can't keep.

**We honor our commitments.** Quality is one of our Values and embedded in our culture. We meet our contractual obligations and meet or exceed our own internal standards, as well as the quality requirements set by industry, laws, and government regulations.



**Want to Know More?**  
[Corning Global Quality Policies and Standards](#)

### Our Product Quality Architecture Initiative

To learn more about how we “design in” quality at Corning, please visit the *Ideas and Insights* page on our [website](#).



■ ■ ■ *Understand, anticipate, and surpass the expectations of our customers*



## Contracting With Our Government Customers

*We recognize that conducting business with the government is complex and heavily regulated to ensure that public policy objectives are met, and taxpayers receive the best value on goods and services. As a company that participates in the government contracting process, we work to be a good, responsible partner.*

**We promote procurement integrity.** We know, understand, and comply with the laws and regulations that apply to our government contracts. We compete fairly and ethically, and abide with laws designed to promote full and open competition.

**We are good partners.** We protect classified information from unauthorized disclosure, comply with government security requirements, and safeguard any government property (including material, equipment, special tooling, or test equipment) that is entrusted to us.

**We are cautious with gifts and business courtesies.** The rules for what we may offer to – or accept from – government officials are very strict. We don't offer anything of value (or allow others to offer anything on our behalf) without receiving approval in advance from the [Law Department](#).



### Want to Know More?

[Corning Law Department: Government Contracts Policies & Guidance](#)

### Live Our Values

Employees involved with our government contracts are required to complete regular training and should be familiar with appropriate government regulations, including:

- The Procurement Integrity Act
- The Anti-Kickback Act
- The Byrd Amendment
- Defective pricing regulations

Any questions that arise regarding our government contracts should be directed to our [Government Contracts Compliance Group](#).



## Strengthening Our Supply Chain

*Good, solid relationships with suppliers and other third-party business partners are key to growing our business. We believe these relationships must be based on mutual trust and respect, where each party is committed to meeting its obligations and operating at the highest standards of business integrity.*

**We source responsibly.** We exercise due diligence in the selection process and base our sourcing decisions on objective criteria such as quality, price, experience, and delivery record. We don't let supplier charitable donations, [conflicts of interest](#) or [gift-giving](#) affect or impact our decision-making.

**We monitor performance.** We understand that we can be held responsible for the actions of those working for us or on our behalf. So, once a contract is in place, we communicate with our partners about our [expectations](#), ensure compliance with our requirements and require our partners to [report](#) any conduct that could put our people, our products, or our reputation at risk.

**Our due diligence extends to every link in our supply chain.** We work closely with suppliers of raw materials, parts, and components and communicate our expectation that suppliers and vendors (and their suppliers and vendors) will comply with laws aimed at ensuring their operations and supply chains are free of any modern slavery or other human rights abuses, including the sourcing of conflict-free minerals.

### Consider This

**Q** A consultant working on your project submits an invoice seeking reimbursement for some very vague payments made in cash. Should you find out more before approving?

**A** Yes. We need to better understand these payments. Contact the consultant for more information and ask for supporting documentation to substantiate these payments. If they can't provide details, or if the information they provide suggests something improper, don't approve the invoice. Instead, report your concerns to your supervisor or other resource described in this Code.



### Want to Know More?

[Corning Global Buying Policy and Related Policies](#)

### Our Sustainability Initiatives

*To learn more about our commitment to corporate social responsibility and sustainability, please visit our Sustainability page on our [website](#).*



## Conducting Business Around the Globe

*We are a U.S.-based company conducting business in locations around the world. We understand the obligation to know and follow the requirements associated with that privilege. We comply with the trade laws, regulations, and restrictions associated with the countries in which we do business, and we expect those in our supply chain to do likewise.*

**We import and export responsibly.** We obtain any required licenses or other government approvals before exporting, re-exporting, or importing our products, services, or technical data. Anyone at Corning whose work directly involves international trade or transfer across borders has a responsibility to provide accurate descriptions, classifications, and documentation, as required, to comply with all relevant Corning policies and procedures, and to complete assigned training on these subjects.

**We are subject to international sanctions and trade control laws.** We don't conduct business with countries that are subject to United States (or other applicable) trade embargoes or economic sanctions, except where permitted by law. And we don't participate in boycotts that are not sanctioned by the United States. Any requests to participate in a boycott or communicate about Corning's position on a boycott must be directed to the [Law Department](#).

**We ask for clarity.** Sometimes, laws, regulations, customs, or local practices of more than one country may govern a particular transaction. If there appears to be a conflict or any question about what's required, we seek help from the Law Department.



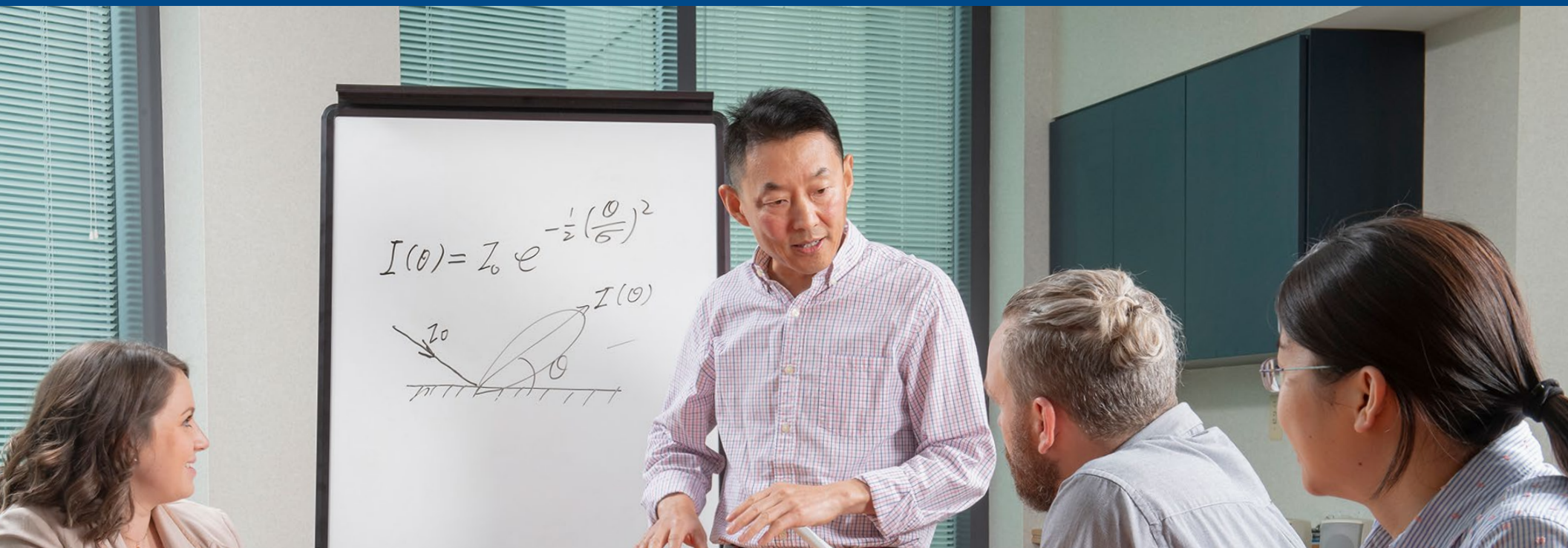
### Want to Know More?

[Corning Law Department: Export Compliance Guidance](#)

[Corning Export Compliance Handbook](#)







## Leadership

Corning is a leader, not a follower. Our history and our culture impel us to seek a leadership role in our markets, our multiple technologies, our manufacturing processes, our management practices, and our financial performance. The goods and services we produce are never merely ordinary and must always be truly useful.

*Living our Values, all seven, all the time, all around the world.*

## Accurate Recordkeeping

*Our ability to make good business decisions and continue growing and innovating depends on good recordkeeping. Clear, accurate books and records also help us meet our obligations as a public company and maintain the trust of everyone with whom we do business. It's important to remember that each of us, at every level of Corning, maintains "records."*

**We strive for transparency.** Accurate records are critical company assets. We follow all internal processes, policies, and generally accepted accounting principles to ensure our records accurately reflect our business operations and transactions. We provide any supporting documentation, where required, and cooperate fully with any audits or investigations.

### ***A "record" can be paper or electronic and may include ...***

- Time cards, benefit claims, and expense reports
- Contracts, invoices, and purchase orders
- Quality and safety data
- Production reports
- Emails, electronic calendars, and voicemail messages
- Regulatory filings with government agencies



### **We meet our obligations.**

Anyone at Corning whose work directly involves financial disclosures to the government or regulatory authorities has a responsibility to provide full, fair, accurate, timely, and understandable

information and comply with all related laws and regulations, including the corporate governance laws, rules, and regulations established by the state and federal government and the New York Stock Exchange, where Corning's common stock is listed and publicly traded.



**We follow our records retention policies.** We rely on the systems and controls we have in place to properly manage and dispose of records throughout their life cycle. If we have records that are subject to an audit or legal proceeding, we follow retention guidelines provided to us by the [Law Department](#). We take care never to dispose of information that may be relevant to a Legal Hold until notified to do so.

**We watch for red flags.** We work to combat money laundering and other financial crimes by speaking up about any suspicious requests or transactions, for example, large cash payments or unusual fund transfers or payment terms.



## What Is Financial Integrity?

It's an organization-wide commitment to good stewardship of our resources, meeting our financial obligations, making sure that the financial picture we present to others is accurate, and using our funds responsibly, to further our mission. That means ...



*Being careful – assigning costs to the proper accounting period and the proper account or department*



*Knowing the limits of our authority – never signing documents or committing funds unless we're authorized by Corning to do so*



*Creating a clear and complete record – never falsifying or mischaracterizing a transaction or creating “off-the-books” accounts*



*Watching for, and [reporting](#), fraud, dishonesty, or other suspicious activities*



### Want to Know More?

[Corning Finance Policies, Procedures & Forms](#)

[Corning Corporate Records Management Policy](#)



## Competing Fairly

*We believe in a thriving marketplace – the kind of environment where companies are driven to innovate and improve their products, and customers reap the benefits. We comply with antitrust laws and don't fear healthy competition; we let the features, the merits, and the quality of our products drive our success.*

**We outperform our competition fairly and honestly.** We comply with antitrust and competition laws in the countries where we operate and avoid conduct that might even suggest a violation of these laws. We are careful to avoid competitively sensitive topics and won't enter into any agreements – formally or informally – that could improperly limit competition. We expect that employees responsible for Corning's conduct or practices in these areas should be generally familiar with the principles of antitrust laws and should talk with the [Law Department](#) regarding any questions.

**We gather competitive information lawfully and ethically.** We look to public sources (such as newspapers, industry surveys, and public-facing internet sites) to size up the competition and never use deception or illegal means, such as trespassing, buying information, or theft, to gain an unfair advantage. We're transparent about who we are and who we work for.

■■■■ *Our history and our culture impel us to seek a leadership role in our markets*

### Live Our Values

Violations of antitrust and competition laws are serious. We strictly avoid conversations with competitors about:

- Pricing
- Dividing territories, markets, or customers
- Interfering with a competitive bidding process
- Preventing another company from entering the market
- Refusing to deal with a customer or supplier
- Restricting production, sales, or output



### Want to Know More?

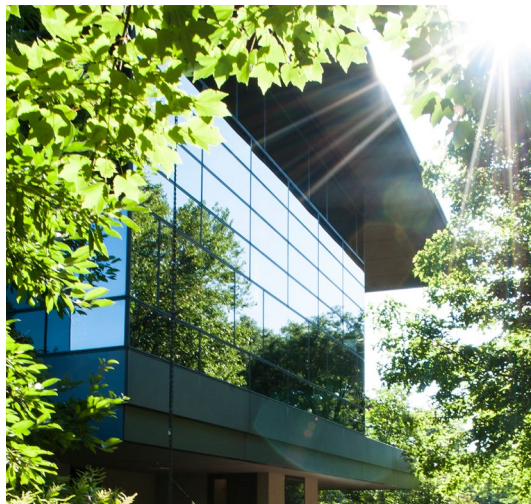
[Corning Law Department: Antitrust Guidance and Policies](#)

## Preventing Bribery and Corruption

*We've built a long track record of doing business legally and ethically. We recognize that one improper act – even if unintentional – can tarnish this rich legacy. That's why we take a zero-tolerance approach to acts of corruption. We don't give bribes, accept bribes, or allow others to offer, pay, solicit, or receive bribes on our behalf.*

**We recognize a bribe when we see one.** A bribe is anything of value offered to influence a business decision or win (or hold on to) business. It can take the form of a gift, a favor, a kickback, a vacation, a donation, or even a job offer – anything offered in exchange for an improper business advantage violates our policies and the law.

**We keep it simple.** Laws can vary from country to country, and some laws make a distinction between bribing someone in the private sector and someone in the public sector – we don't bribe anyone any time for any reason. We also send a clear message about our anti-corruption stance to third parties conducting business on our behalf.



**We are careful about what we give and receive.** We ensure that anything given or received complies with our [policies](#) and is properly documented in our books and records. By doing so, we avoid the appearance of anything improper and preserve the trust of our customers and business partners.

### Consider This

**Q** You've been waiting for some time for some required government approvals to finalize a project, and a third-party company located in that country offers its services to help obtain the needed approvals quickly. Should you be concerned?

**A** Maybe. It may be OK to hire a third party to help with the process, but before engaging them, you would need to conduct the necessary due diligence, obtain any approvals required, and make sure the third party understands and complies with our anti-bribery policy. Remember, our company can be held responsible for any acts of bribery offered on our behalf.



### Want to Know More?

[Corning Law Department: Anti-Corruption Guidance and Policy](#)

[Corning Finance Policies, Procedures & Forms](#)



## Preventing Insider Trading

*We protect material, nonpublic (“inside”) information about our company and the companies with which we do business. We understand that trading based on inside information (or tipping others so they may trade on it) is called insider trading and is not only a breach of trust but a violation of the law.*

**We understand the definition of inside information.** Inside information is information about Corning (or another publicly traded company) that isn’t known by the public but, if it were, might influence someone to buy, sell, or hold securities (often stock). In the course of a business day, we may learn of inside information – using that information to gain an advantage is both unfair and illegal.

**We don’t tip.** Passing along inside information to others, like friends and family, so they may trade on that information, is also unfair and illegal.

**We respect trading windows.** Some employees at Corning are subject to blackout periods or trading restrictions and must know and follow the rules before trading.

### **Examples of “inside information” include nonpublic information about ...**

- The gain or loss of a large customer or supplier
- Financial results or forecasts
- Changes to the executive management team
- Litigation or pending lawsuits
- Potential mergers or acquisitions



**We follow the law.** We comply with all state, federal, and applicable non-U.S. securities and insider trading laws and require that all employees do so as well. There are no exceptions. The use of confidential information or nonpublic information – whether about Corning or another company – in securities transactions violates the law and subjects an employee to disciplinary action and potential civil and criminal legal prosecution.

### Consider This

**Q** During a meeting on a project, a vendor mentions that research is underway at their company on some new, proprietary software. No information is publicly available right now. Based on what your vendor said, the new software is probably not something that Corning will leverage, but you predict it will be a game-changer for other companies. Is it OK to buy stock in the vendor before the product launch?

**A** No. Your vendor should not have disclosed (“tipped”) this information to you. Trading on this tip, before information about the software is publicly disclosed could violate insider trading laws.



### **Want to Know More?**

[Corning Insider Trading Guidance and Policy](#)

## Performance

Providing Corning shareholders a superior long-term return on their investment is a business imperative. This requires that we allocate our resources to ensure profitable growth, maintain an effective balance between today and tomorrow, deliver what we promise, and tie our own rewards directly to our performance.

*Living our Values, all seven,  
all the time, all around the world.*





## Caring for Our Physical and Electronic Assets

*Our people are our greatest asset, but our physical and electronic assets are the resources our people use to make our business thrive. From the factory floor to the executive suite, we rely on a wide range of physical and electronic assets and understand the critical importance of protecting them from loss, damage, waste, misuse, and abuse.*

**We protect what's ours.** We understand that company assets are provided to us for company business. We use them responsibly and in accordance with our policies – never for our own personal gain. We do not use Corning computers, software, and voice messaging or other communications for improper, offensive, derogatory, defamatory, obscene, sexually explicit, destructive, or other inappropriate purposes. And we never borrow, lend, give away, or dispose of company assets unless we have approval from Corning to do so. We are each responsible for safeguarding the Corning devices that have been issued to us and reporting lost, stolen, or damaged devices.

**We limit our personal use.** Occasional, personal use of assets like phones, computers, and email is permitted, as long as it doesn't violate the law or our policies, or interfere with our work. Anything created on Corning's systems is company property and, where permitted, may be monitored by the company – there should be no expectation of privacy when using our systems, except where specifically required by law.

■■■■ *We allocate our resources to ensure profitable growth*

### Examples of “company assets” include ...

- Machinery, tools, and equipment
- Raw materials and inventory
- Facilities, furnishings, and office supplies
- Computers, hardware, and software
- Computer networks, databases, voicemail, and internet access
- Company vehicles



**We practice a security mindset at Corning.** We believe in good cyber hygiene and build security into everything we do. We are aware of and vigilant about threats in the environment. If we see suspicious activity of any kind, we report it to the Cyber Hotline at +1-607-974-2778 or by emailing [ITSecurity@corning.com](mailto:ITSecurity@corning.com).



### Want to Know More?

[Corning IT Acceptable Use Policy](#)

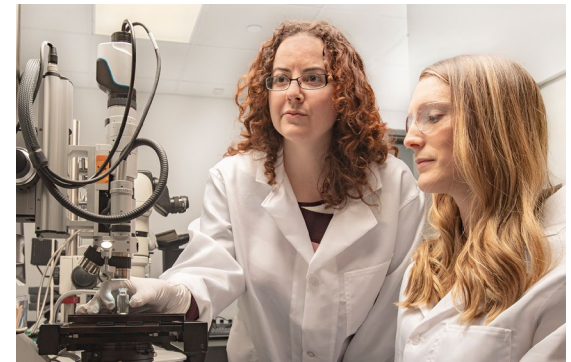
[Corning Global Security Policy & Document Library](#)

## Protecting Confidential Information and Intellectual Property

*Information – about what we make, how we make it, and how we sell it – drives our competitive advantage in the marketplace. Like our physical and electronic assets, we recognize the need to also be good managers of our information assets, using them responsibly and protecting them from unauthorized disclosure.*

**We keep confidential information confidential.** We understand that all **non-public information** we learn in our roles at Corning, whether written or spoken, is considered confidential. We ensure that we properly classify and label documents and files, following all internal policies and procedures regarding saving and sharing such information. We share confidential information with only those who are both authorized to access it and need the information to carry out their job responsibilities. We are careful with conversations in public spaces (such as elevators, restaurants, public

transportation, etc.) and in virtual spaces (such as social media, generative AI/ ML platforms, and unauthorized cloud storage applications) to ensure confidentiality of Corning information.

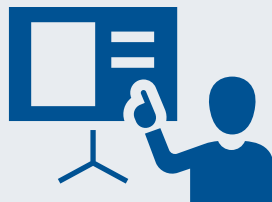


**We closely guard our innovations.** We protect our intellectual property (IP) – the technology, processes, and know-how that make us who we are. We share it only with those who have a legitimate business need for the information (and anyone outside of our company must also have a signed non-disclosure agreement in place). Corning owns any work product conceived while working with us, to the extent permitted by law.

**We honor our commitments.** Our obligation to protect confidential information and IP continues in perpetuity, even if an employee should leave the company. Our obligation also extends to information shared with us by customers, suppliers, business partners, and other companies with which we do business. We do not use copyrighted materials without permission, and we follow Corning guidelines in terms of our use of IP owned by others.

### Examples of “confidential information” include ...

- Product research, specifications, and designs
- Business plans, marketing plans, customer lists, and supplier lists
- Financial forecasts and pricing data
- Trademarks, trade secrets, copyrights, and patents
- [Personal data of employees, customers, and business partners](#)



### Want to Know More?

[Corning IT Information Security Intranet Site](#)

[Corning Law Department: Intellectual Property Intranet Site](#)

[Corning Artificial Intelligence and Machine Learning Policy](#)

[CorningGPT Acceptable Use Policy](#)

## What Is Cybersecurity?

It's the set of actions we take to protect our systems, networks, and programs from digital attacks. This is a collective effort that requires each of us to be vigilant and use our keen ability to sense when something isn't right to ensure we don't expose Corning to risk. Practicing good cyber hygiene is one way we protect our information assets. It starts with following Digital & IT policies and includes:



*Fiercely protecting usernames and passwords – never sharing them with anyone*



*Using only software that has been properly licensed – never copying or “pirating”*



*Safeguarding against phishing scams and other attempts to uncover confidential information by reporting all suspicious emails*



*Paying attention to Corning's Cyber Notification System, especially Cyber Alerts indicating active threats that require immediate action*





## Communicating Responsibly

*Everything we say about our company has an impact on our reputation and our brand. That's why we have designated people to speak on our behalf – they can ensure that the information disseminated to the world about Corning and our products is clear, consistent, and accurate.*

**We rely on company spokespersons.** Only employees who have been specifically designated by Corporate Communications may speak on behalf of the company. This applies across all media formats, including television, print, social media, and any other external media source. All requests for information should be referred to Corporate Communications and you should not speak for or on behalf of Corning unless you are told that you are authorized to do so.

### Who to Contact:

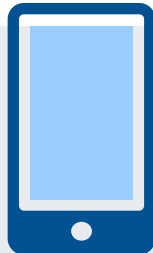
Always direct questions to one of the points of contact listed below. It's the best way to make sure we speak with one voice. For more information, see the internal contacts and sites listed below:

Media inquiries, contact [Corporate Communications](#).

Analyst or investor inquiries, contact [Finance - Investor Relations](#).

Inquiries from government regulators or matters related to legal proceedings, contact the [Law Department](#).

Invitations to speak or present on behalf of Corning, contact [Corporate Communications](#).



**We use social media wisely.** In our online activity, we don't disclose [confidential information](#) or post anything about our coworkers, customers, or business partners that would be [harassing](#) or [discriminatory](#). We make it clear that any information we post reflects our own personal views, and not those of Corning, and we act in accordance with Corning's [Social Media Policy](#).



### Consider This

**Q** You just received an email from a local reporter who is asking you to comment on a rumor circulating about our company.

**A** Although you may be tempted to set the record straight, it's best to let the reporter know that you're not authorized to speak on behalf of Corning and then politely direct them to [Corporate Communications](#).



### Want to Know More?

[Corning Corporate Communications Center](#)

[Corning Social Media Guidelines](#)

[Press Release & Media Resources](#)



## Independence

Corning cherishes – and will defend – its corporate freedom. That independence is our historic foundation. It fosters the innovation and initiative that has made our company great, and will continue to provide inspiration and energy to all parts of our network in the future.

*Living our Values, all seven, all the time, all around the world.*



## Avoiding Conflicts of Interest

*Our Value of Independence means preserving our innovative spirit and always doing what's best for Corning. It also means knowing and honoring the line between our work lives and our personal lives, never letting outside activities and relationships improperly affect the decisions we make as employees of Corning.*



**We stay alert.** Although conflicts can take many different forms, there are some situations where conflicts more frequently arise. We work to recognize – and avoid – these situations. We know that appearances matter; even a situation that *suggests* a conflict is problematic because it can erode the trust that others place in us.

**We disclose both potential and actual conflicts.** We are proactive in reporting all potential conflicts to our supervisor, human resources leader, the [Law Department](#) or the [Corning Code of Conduct Line](#), knowing that many conflicts can be resolved if disclosed and addressed early.

### Consider This

**Q** Your spouse's company is bidding on a contract with Corning, but the work is in a different department than yours, one where you don't have any decision-making authority. Do you need to disclose this?

**A** Yes. Even though you might not have direct control over the outcome of the bid, the fact that your spouse has connections to the company might give the appearance of a conflict. It's best to disclose it and be transparent about the situation.

### Examples of situations where conflicts of interest often happen ...



- Starting a business (or a second job at a company) that competes, does business, or wants to do business with Corning
- You or a close family member having a financial relationship with a Corning supplier, customer, or competitor
- Having supervisory responsibilities for someone who's a friend or family member
- Taking for yourself an opportunity that you discover through your work at Corning
- Using Corning assets or information for your personal benefit or the benefit of a family member
- Serving as a director, advisory member, or officer on a board that interferes with your obligations to Corning



### Want to Know More?

[Corning Law Department: Conflicts of Interest Policy and Guidance](#)

■■■■ Independence is our historic foundation



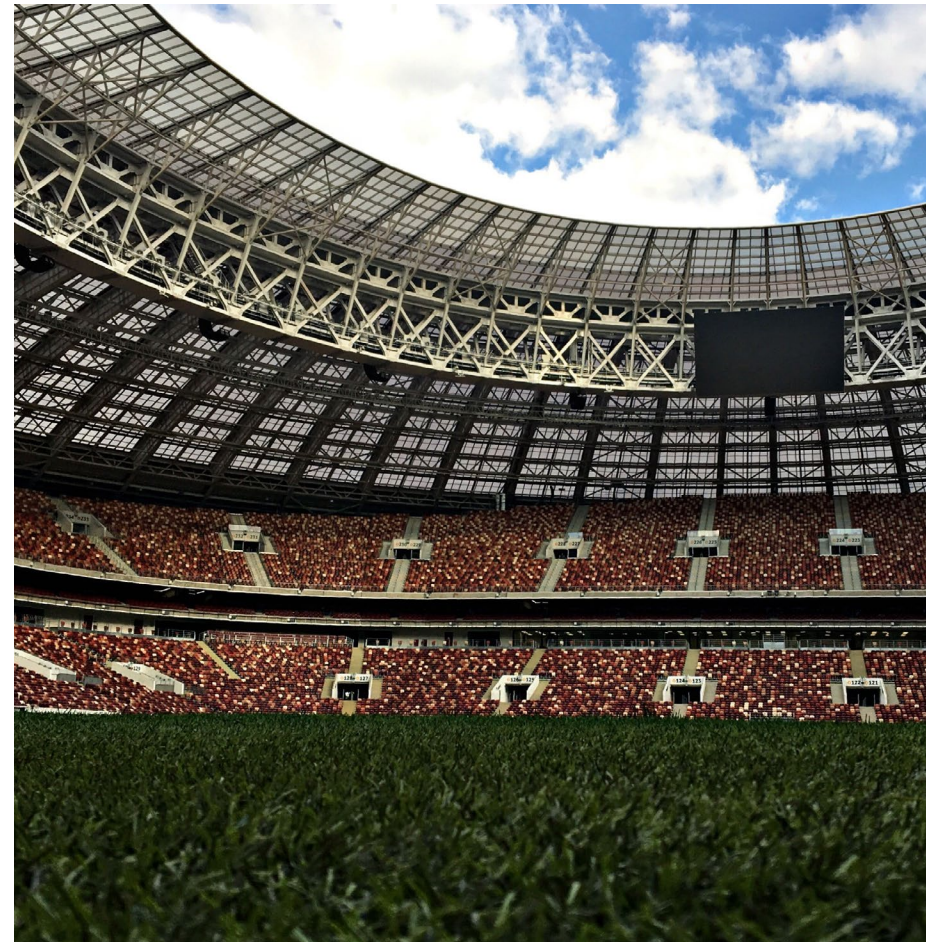
## Following Our Gifts and Entertainment Guidelines

*Offering a gift, attending an event, picking up the check for a meal – these are actions that can promote goodwill, but when an offer is extravagant or extended too often, it can send the wrong message. Corning has gifts and entertainment policies that define what is appropriate, and we follow them, to ensure we don't invite even the appearance of something improper.*

**We know what's expected of us.** Before offering or accepting anything of value, we consult our policies, determine what's permitted and obtain all necessary approvals in advance. If an offer (a gift, payment, fee, service, discount privilege, or favor) is something we couldn't claim for reimbursement on our own expense reports, it's not permitted. Gifts of cash or cash equivalents are never appropriate or acceptable, unless specifically authorized in a Corning policy.

**We know the rules are different for government officials.** What we may offer to – and accept from – those in the private sector does not apply to those in the public sector. Unless specifically authorized by Corning policy, do not offer anything of any value to a government official without obtaining approval in advance from the [Law Department](#).

**We know when to say, “no.”** We politely refuse any gift or invitation that exceeds nominal value or seems inconsistent with our policies. If you encounter a situation where you cannot gracefully decline a gift, accept it, but immediately notify the Law Department so they may provide guidance on how to donate, distribute, or dispose of it.



## What Is Appropriate?

In general, for individuals in the private – not public – sector:



*Gifts should be of nominal value, never take the form of cash (or a cash equivalent, like a gift card) and offered infrequently*



*Entertainment (seminars, exhibits, trade shows, meetings, presentations, social events, sporting events, meals) should be reasonable, offered infrequently, serve a legitimate business purpose, and be approved by your supervisor in advance*



*Gifts and entertainment should **always** comply with the policies of both the giver and receiver and **never** be solicited*

*Gifts from suppliers and vendors must be in compliance with the [Corning Supplier Gifts and Entertainment Policy](#)*



*No offer – regardless of value – should be extended with the intent to improperly influence a business decision*



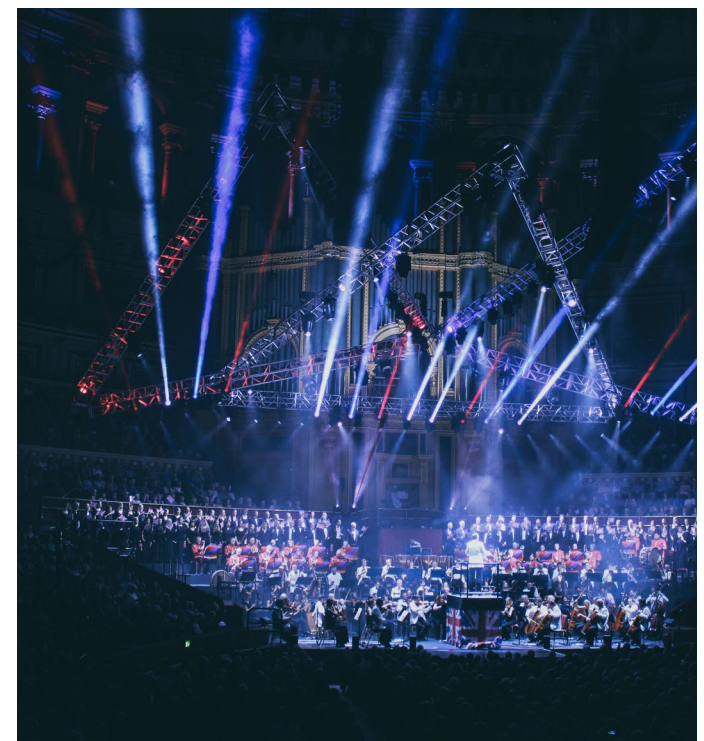
## Want to Know More?

[Corning Law Department: Anti-Corruption Guidance](#)

[Corning Gifts, Entertainment, and Factory Inspection Policies](#)

[Corning Supplier Gifts and Entertainment Policy](#)

[Corning Corporate Travel Guidelines](#)



## Preserving Privacy

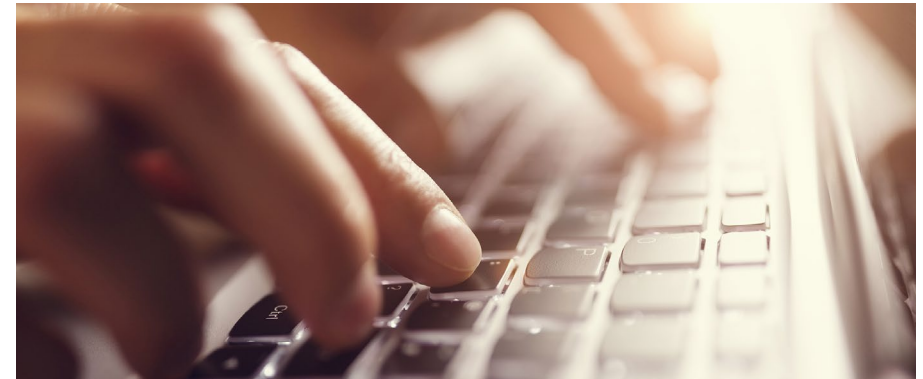
*We live in a time of vast information-sharing, but there is some information that should never be widely shared. We believe an individual's private information should be honored, respected, and protected. We have policies and procedures in place to safeguard the personal data of our coworkers, customers, and business partners.*

**We follow privacy and data protection laws.** We collect, access, use, and share personal data in accordance with all applicable data privacy laws, regulations, and Corning policies. We make sure we don't disclose personal information to anyone, either internally or externally, unless they have a legitimate business need for the information. If we're not sure if information is considered "personal data," we treat it as though it is.

**Our customers entrust us with their data.** If we suspect that privacy has been breached and personal information has been disclosed – whether intentionally or accidentally – we report it immediately to [privacy@corning.com](mailto:privacy@corning.com).

### Examples of personal data include an individual's ...

- Address, email, or IP address
- Phone number
- Employee identification number
- Pay or performance information
- Credit card number
- Banking or payroll information



### Consider This

**Q** You receive an email from a coworker that wasn't meant for you, which contains a list of employee names and salary information. You don't want to get anyone in trouble, but you know this is personal data that was inadvertently sent to the wrong person. What should you do?

**A** You should not read it or share it with anyone else. Let the sender know that the email was not sent to the intended recipient and delete the email. You should also report the incident to your supervisor and [privacy@corning.com](mailto:privacy@corning.com) so that any remedial action can be taken, if necessary, and the sender can be coached on their duty to protect the confidentiality of personal data.



### Want to Know More?

[Corning Data Privacy Guidance, Notices and Policies](#)





## Innovation

Corning leads primarily by technical innovation and shares a deep belief in the power of technology. The company has a history of great contributions in science and technology, and it is this same spirit of innovation that has enabled us to create new products and new markets, to introduce new forms of corporate organization, and to seek new levels of employee participation. We embrace the opportunities inherent in change, and we are confident of our ability to help shape the future.

*Living our Values, all seven,  
all the time, all around the world.*

## Supporting Human Rights

*We support efforts in the United States and around the world to protect human rights and conduct business in a way that respects the dignity of all people. Our commitment to human rights means caring for those in our own operations, but it also extends to those in our global supply chain and in the communities where our products are sold and used.*

**We honor and follow Corning's Human Rights Policy.** Building upon our Values and our Code of Conduct, Corning has stated its commitment to protecting and honoring the human rights of all of our employees in our [Human Rights Policy](#). Corning believes in the fundamental dignity of the Individual, which is one of our Values. The very foundation of this Value is respect for the rights, freedoms, and standards of treatment to which all people are entitled – human rights.

**We combat human trafficking and slavery in our supply chains.** We publish an [annual statement](#) that outlines the steps our company takes to ensure slavery and human trafficking is not taking place in any part of our business, including any link in our supply chain.



**We communicate our expectations.** As a global company, we rely on a vast network of suppliers and require that they meet the standards set in our [Supplier Code of Conduct](#). We comply with the employment laws of the countries in which we do business and expect our business partners to do the same. We do not knowingly conduct business with any individual or company that participates in human rights abuses.



### Want to Know More?

Please visit the Sustainability pages on our [website](#).



## Being a Good Steward of Our Planet

*We are committed to operating in an environmentally responsible manner and promoting both clean-air and clean-energy solutions. We set ambitious goals, develop strategies and practices across our operations, measure the effectiveness of our environmental management programs, and work to support healthier communities.*

**We protect and preserve.** We have an environmental policy in place that outlines our commitment to environmentally responsible practices – to reduce emissions, water, and energy and water consumption. We are actively developing, implementing, and enhancing sustainable business practices and energy-efficient technologies.

**We honor our obligations.** As a company, we comply with – and often exceed – all applicable environmental, health, and safety laws and regulations, everywhere we operate. As employees, we do our part to reuse, reduce, and recycle, to conserve water, energy, and paper, and to safely dispose of waste. We make sure we know and follow any environmental requirements that apply to our jobs, complete any required training, and immediately report any situation that could pose a risk to the environment.

### Our Environmental Stewardship Initiative

To learn more about our environmental goals and what we're doing to support a clean future, please visit our [Sustainability resources](#).



### Want to Know More?

[Corning Environmental Policy](#)

[Corning Global Environment & Sustainability Guidance and Information](#)

■ ■ ■ ■ We are confident of our ability to help shape the future

## Making a Difference

*As a company, we have a role to play that extends beyond our corporate walls and beyond breakthrough technologies and products. We are passionate about building up the communities where we live, work, and play. We engage responsibly in a variety of programs and initiatives aimed at making the world a better place.*

**We make a difference, on a corporate level.** Corporate responsibility is part of the Corning culture. As a company, we contribute funds, time, and talent to support both company-wide community programs and local causes. Employees are encouraged – but not required – to participate in these initiatives in whatever way feels appropriate to them. As a corporate citizen, Corning will also, from time to time, take a stand on public issues, particularly those that affect our interests and those of our employees, stockholders, customers, or suppliers. We do not make any financial contributions, directly or indirectly, to any political party or candidate, without the approval of Global Government Affairs or the [Law Department](#), and we report all contributions as required by law. We also have an employee-operated organization known as COREPAC, which operates independently of Corning and provides PAC-eligible employees an opportunity to amplify Corning’s voice in the political arena by supporting candidates.

### ***Our Community Service Initiative***

*To learn more about how we give back to communities each year, please visit our Community Service page on our [website](#).*



### **Consider This**

**Q** You’re taking part in a fundraising activity for a local nonprofit – as a manager, should you send an email out to your direct-report employees asking them to sponsor you?

**A** No. Corning celebrates your personal involvement in charitable and political activities on a volunteer basis, but using your time at work or Corning systems to solicit sponsors would be inappropriate, and we never apply direct or indirect pressure on another employee to contribute to or support our personal activities. If you have coworkers who are also friends from whom you wish to seek contributions, you should do that using your own personal email and outside of company time.





**We make a difference, on a personal level.** Corning also encourages employees to participate in political and charitable activities on a personal level. Volunteering time and talents, speaking out on public issues, becoming active in local, state, and national organizations – as employees, we are free to pursue any activities or affiliations we are passionate about. But we make it clear that our personal views and actions do not represent those of Corning. We do not endorse candidates for elected government office on behalf of Corning, and we never use company funds, time, or the Corning name without prior authorization and approval. We also do not provide or use Corning supplier lists for charitable solicitations or solicit charitable donations from other companies or suppliers. We decline honoraria (fees paid for speaking, participating in workshops, or seminars) or similar payments based on our work at Corning. We may, however, accept honoraria or similar payments when participation is based on our work or interests outside of Corning.



**Want to Know More?**

[Corning Corporate Compliance Intranet Site](#)

■ ■ ■ *We embrace the opportunities inherent in change*





## Policy References and Helpful Resources

[Anti-Corruption Guidance and Policy](#)

[Antitrust Guidance and Policies](#)

[Artificial Intelligence and Machine Learning Policy](#)

[Conflicts of Interest Policy and Guidance](#)

[CorningGPT Acceptable Use Policy](#)

[Corporate Communications Center](#)

[Corporate Compliance Intranet Site](#)

[Corporate Travel Guidelines](#)

[Data Privacy Guidance, Notices and Policies](#)

[Environmental Policy](#)

[Export Compliance Guidance](#)

[Finance Policies, Procedures & Forms](#)

[Gifts, Entertainment, and Factory Inspection Policies](#)

[Global Buying Policy and Related Policies](#)

[Global Diversity, Equity & Inclusion Resources](#)

[Global Environment & Sustainability Guidance and Information](#)

[Global Quality Policies and Standards](#)

[Global Safety Intranet Site](#)

[Global Security Policy & Document Library](#)

[Government Contracts Policies & Guidance](#)

[HR Policy Library](#)

[Human Rights Policy](#)

[Insider Trading Guidance and Policy](#)

[Intellectual Property Intranet Site](#)

[IT Acceptable Use Policy](#)

[IT Information Security Intranet Site](#)

[Policy Prohibiting Harassment \(International\)](#)

[Policy Prohibiting Harassment \(US\)](#)

[Press Release & Media Resources](#)

[Records Management Policy](#)

[Social Media Guidelines](#)

[Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains](#)

[Supplier Code of Conduct](#)

[Supplier Gifts and Entertainment Policy](#)

[Sustainability Resources](#)

Function:	Find more information and resources at:
Human Resources	<a href="http://cw.corning.com/sites/HR/">http://cw.corning.com/sites/HR/</a>
Corporate Compliance Office	<a href="http://cw.corning.com/sites/Law/Pages/Compliance/Compliance.aspx">http://cw.corning.com/sites/Law/Pages/Compliance/Compliance.aspx</a>
Code of Conduct Line	<a href="http://www.ethicspoint.com">www.ethicspoint.com</a>
The Law Department	<a href="http://cw.corning.com/sites/Law/Pages/home.aspx">http://cw.corning.com/sites/Law/Pages/home.aspx</a>
The Finance Department	<a href="http://cw.corning.com/sites/Finance/">http://cw.corning.com/sites/Finance/</a>
Corporate Communications	<a href="http://cw.corning.com/sites/CorpComm">http://cw.corning.com/sites/CorpComm</a>



## Making a Commitment

Thank you for the time you've taken to read our Code and for the commitment you've made to uphold it. Working together, we're preserving our heritage, celebrating our spirit of innovation, and building the Corning of tomorrow. Each of us has a responsibility to keep our Company growing with integrity.

Do your part by following all applicable laws and regulations, and company policies. Read, understand, and follow our Code of Conduct and participate in all required ethics and compliance training. Finally, and most importantly, keep our Values – all seven, all the time, all around the world – at the center of every action you take on behalf of Corning.

December 2021