Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note KnowTheChain has already undertaken a review of your website. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

**INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING**

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

**INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY**

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

**INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY**
3.1 the names and addresses of first-tier suppliers;

3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

We have reported all legitimate smelter or refiner information included in the CMRTs we received on Appendix A to this report: https://d18rn0p25nwr6d.cloudfront.net/CIK-0000024741/eaac22f6-3e2e-4fb2-bcc3-e6a926fad0b9.pdf.

The names and locations of below-first-tier smelters have been provided on Appendix A.

3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

The sourcing countries (“countries of origin”) of four raw materials—tin, tantalum, tungsten, and gold—at high risk of forced labour have been provided on Appendix A and Appendix B to our 2021 Conflict Minerals Report.

Link: https://d18rn0p25nwr6d.cloudfront.net/CIK-0000024741/eaac22f6-3e2e-4fb2-bcc3-e6a926fad0b9.pdf

**INDICATOR 4: RISK ASSESSMENT**

4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

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.


To supplement our risk assessments, we also engage directly with key stakeholders, including the Responsible Minerals Initiative (RMI) and the Initiative for Responsible Mining Assurance (IRMA), to
gather input on forced labour risks in our supply chain. These engagements have been instrumental in helping us understand where they may be specific hotspots for forced labour risks and where our industry may be prioritizing efforts or advancing solutions to mitigate these risks.

4.2 details on forced labour risks identified in different tiers of its supply chains; and

To prioritize our due diligence efforts, we regularly conduct suppliers mapping exercises to identify within our vast and complex supply chain, which can be up to 6 layers deep in some areas, may be at greatest risk. These mapping exercises are based on four criteria – supplier reputation, material risk, country risk, and sustainability compliance – and covers our entire direct and indirect supply chains, including our contract manufacturers.


Through these supplier risk mapping exercises, we have identified potential forced labour risks in our first-tier supply chain, which consists of contract manufacturers. These risks are particularly significant in China and Southeast Asia, where many of our contract manufacturing suppliers operate.

To identify risks further upstream, we work directly with our first-tier suppliers to gather information about whether the components and materials they are supplying to Corning could contain minerals (e.g., 3TG) that may be coming from conflict affected and high-risk areas—and, as a consequence, could be linked to certain human rights risks, such as forced labour risks. As outlined in our 2021 Conflict Minerals Report, we have identified and reported potential countries of origin that could be tied to specific Corning products. We have concluded that potential forced labour risks may exist in some of these countries of origin, such as the Democratic Republic of the Congo and neighbouring countries.

Link: https://d18rn0p25nwr6d.cloudfront.net/CIK-0000024741/eaac22f6-3e2e-4fb2-bcc3-e6a926fad0b9.pdf

4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

We work directly with our key stakeholders, including the Responsible Minerals Initiative (RMI) and the Initiative for Responsible Mining Assurance (IRMA), to address risks that we have identified further upstream. Through our engagement with these stakeholders, we have pursued specific initiatives to advance systemic solutions that aim to improve our visibility into forced labour risks and use our collective industry leverage to enforce regulations at the governmental level.

**INDICATOR 5: DATA ON SUPPLY CHAIN RISKS**

5.1 the percentage or number of supply chain workers who are women;

5.2 the percentage or number of supply chain workers who are migrant workers’ and
5.3 the percentage or number of supply chain workers that are being paid a living wage.

**INDICATOR 6: PURCHASING PRACTICES**

6.1 commits to responsible buying practices in its contracts with suppliers;

Corning conducts responsible and sustainable procurement practices to encourage good labour practices and reduce the risk of human trafficking and forced labour with the supply chain. For example:

- 97% of small disadvantaged suppliers are paid in 60 days or less
- Average length of contracts is two years
- Only 15% of all orders are changed after an order is placed


These responsible and sustainable procurement practices are outlined in our contracts with first-tier suppliers.

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

To mitigate adverse human rights impacts on workers in the supply chain, we implement several responsible purchasing practices, including paying first-tier suppliers, particularly small, disadvantaged suppliers, within 60 days and minimizing changes in orders once they are placed.


With our first-tier suppliers, particularly small, disadvantaged suppliers, we implement fair terms of payment that are aligned with country or regional standards and expectations. Fair terms of payment can help our suppliers better plan and forecast their needs, including labour costs, more accurately and effectively. Minimizing changes in orders once we place them also helps our suppliers build financial and operational resilience, which can help mitigate negative impacts on workers.

There are occasions when we may need to exit a supplier relationship, such as when a supplier does not meet our quality standards or Supplier Code of Conduct. Whatever the reason, we strive to exit all relationships as responsibly as possible, keeping in my mind how an exit that is not planned in dialogue with the supplier could negatively impact workers.

We also aim to limit the length of contracts to ensure we have periodic opportunities to re-evaluate our relationships with our suppliers and set new contracts that build on previous terms, including terms related to social and environmental responsibility.

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.
7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle"); See response for 7.2 for evidence of implementation of our supplier code, which includes our expectation that workers should not be required to pay recruitment fees or related costs.

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

Once onboarded, we continue to use sustainability and human rights as key criteria to track and monitor supplier performance and determine whether direct engagement, including on-site audits, may be needed to validate conformance with our standards and expectations. Directly engaging and working with suppliers, especially priority suppliers that we identify as higher risk, enables us to determine whether they are meeting the expectations outlined in our Supplier Code of Conduct, from verifying suppliers’ nonconformance or performance on specific topics, such as forced labour, child labour, freedom of association, health and safety, working hours, wages, and non-discrimination, to ensuring they are implementing socially responsible businesses practices, such as verifying the age of their workers, ensuring recruitment fees are not being paid by workers, and preventing instances of retaining workers’ personal documents that may restrict their freedom of movement. We use highly experienced, third-party Responsible Business Alliance (RBA)-approved monitoring organizations, such as Intertek, to independently monitor, audit, and investigate actual and potential nonconformances. Audits typically include direct interviews with a sample size of workers, which is based on the Responsible Business Alliance’s recommended standard, calculated as the square root of the total number of workers (e.g., minimum 30 workers must be interviewed for a 900-person workforce) and must be no fewer than 20 workers in all instances. Key documents, such as wage slips, overtime documents, health and safety documents, and social security allowance documents, are also thoroughly reviewed to understand and verify conformance to our standards. Based on audit results, corrective action plans are developed and additional follow-ups with suppliers are scheduled. In the event we determine remediation to be insufficient, we may terminate our contract with the supplier.


7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

In 2021, concerns were raised via Corning’s grievance mechanism related to living conditions and payment of fees for Filipino workers at a Corning plant in Taiwan.

In responses to these complaints, Corning instituted several detailed review processes, including (1) a third-party audit of the dorms provided by a broker under contract with Corning; (2) an internal
review of the roles, responsibilities, and conditions for Corning’s foreign workers; and (3) an external review by a third party of Corning’s foreign worker program in Taiwan.

The third-party audit of the living facility conditions identified a short list of findings, including improvements to management systems and minor dorm safety improvements, which were promptly addressed by the broker with oversight from Corning. The external and internal reviews led to several improvement areas being identified, which likewise have been implemented. One of those areas was the reimbursement of recruitment and other certain fees paid by the foreign workers contrary to RBA guidance. **Corning has reimbursed these fees to existing foreign workers per RBA guidance and is in the process of notifying and reimbursing former foreign workers, again in line with RBA guidance.** Corning is also monitoring the situation through increased oversight of the broker and communications with the foreign workers to avoid any similar future issues.

This is a positive example of the use of Corning’s grievance mechanism to raise concerns and to ensure appropriate action is taken. This is also an example of Corning acting to ensure its Supplier Code of Conduct is being followed and taking action to require the reimbursement of fees contrary to RBA guidance when identified.

Link: Page 3, 

The supply chains workers—i.e., the Filipino workers at our Corning plant in Taiwan—represented in this spotlight case were hired through a third-party recruitment agency. This third-party recruitment agency is a direct supplier of Corning and, as with all recruitment agencies we may work with, is required to meet our Supplier Code of Conduct.

In general, on recruitment fees and risks related to worker documents being withheld, we take immediate steps to investigate and successfully address such issues when they arise. Specifically, we enlist our third-party audit partners to appropriately engage the workers that have been affected to determine an appropriate course of action and ensure identification documents are returned and recruitment fees are repaid. We also take lessons from these instances to continuously improve Corning’s standards and approaches to responsible recruitment, including updating our Supplier Code of Conduct, training our own employees on responsible recruitment, and applying key lessons across our supply chain.


**INDICATOR 8: RESPONSIBLE RECRUITMENT**

8.1 discloses information on the recruitment agencies used by its suppliers; and

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).
We particularly recognize that the use of recruitment and labour agencies increases the risk of forced labour. Therefore, in addition to ensuring compliance with our Supplier Code of Conduct, we are making progress towards requiring recruitment and labour agencies to take our human rights training, which covers our expectations on the prevention of work-related fees (e.g., recruitment fees) paid by workers and retaining personal documents that may restrict workers’ freedom of movement.


INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

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.


Furthermore, we expect our suppliers to include provisions in their supply chain agreements with their suppliers to provide formal grievance mechanisms for their workers. By raising this expectation with our suppliers, workers below our first-tier supply chain are expected to have access to grievance mechanisms. Worker below our first-tier supply chain may also access Corning’s confidential and anonymous Code of Conduct third-party reporting mechanism.

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

In calendar year 2021, 62 cases raising human rights issues, in whole or in part, were filed, addressed, and/or resolved. Additional information on our procedures and results can be found in the Code of Conduct, Whistleblower Policy, and Corning’s Code of Conduct Reporting Data.
Of the 62 cases raised via Corning’s grievance mechanism alleging human rights issues in 2021, only 1 was related to the supply chain.

10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.

We may receive feedback from our stakeholders to help us track and monitor the performance and effectiveness of our Code of Conduct hotline.

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

Once onboarded, we continue to use sustainability and human rights as key criteria to track and monitor supplier performance and determine whether direct engagement, including on-site audits, may be needed to validate conformance with our standards and expectations. **Directly engaging and working with suppliers, especially priority suppliers that we identify as higher risk, enables us to determine whether they are meeting the expectations outlined in our Supplier Code of Conduct, from verifying suppliers’ nonconformance or performance on specific topics, such as forced labour, child labour, freedom of association, health and safety, working hours, wages, and non-discrimination, to ensuring they are implementing socially responsible businesses practices, such as verifying the age of their workers, ensuring recruitment fees are not being paid by workers, and preventing instances of retaining workers’ personal documents that may restrict their freedom of movement.** We use highly experienced, third-party Responsible Business Alliance (RBA)-approved monitoring organizations, such as Intertek, to independently monitor, audit, and investigate actual and potential nonconformances. Audits typically include direct interviews with a sample size of workers, which is based on the Responsible Business Alliance’s recommended standard, calculated as the square root of the total number of workers (e.g., minimum 30 workers must be interviewed for a 900-person workforce) and must be no fewer than 20 workers in all instances. Key documents, such as wage slips, overtime documents, health and safety documents, and social security allowance documents, are also thoroughly reviewed to understand and verify conformance to our standards. Based on audit results, corrective action plans are developed and additional follow-ups with suppliers are scheduled. In the event we determine remediation to be insufficient, we may terminate our contract with the supplier.
Our CSR audit check list specifically monitors for compliance to five (5) key indicators related to forced labour:

1. Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labour is not used.
2. Adequate and effective policy and procedures are established ensuring that any form of forced, bonded, involuntary or exploitative prison, trafficked or slave labour is not used.
3. Terms of contract are provided in writing and in their native language prior to employment (in case of migrant workers, before they leave their home country/region and no substitution or change(s) was made 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) of the key employment terms and conditions via employment letter/agreement/contract and explained verbally in their native language so workers understand what the contract states.
4. Upon hiring, the workers government issued identification and personal documentation originals are not held by employer/labour agent/contractor (if applicable).
5. There are no unreasonable restrictions on the movement of workers and their access to basic liberties.

11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

In alignment with Corning’s commitment to continuous improvement, we proactively work with suppliers to monitor and evaluate the effectiveness of corrective actions. Corning has seen significant improvement in total CSR audit scores (which include the Human Rights scores shown above), increasing from an initial average of 48 out of 200 to an average of 134 out of 200 in 2021. While we have made great progress in responding to CSR risks and impacts, we do not feel we have achieved satisfactory score with all suppliers. Therefore, efforts continue to identify and act on opportunities for improvement.

Questions about freedom of association and collective bargaining are included in Corning CSR audits. We have never found a violation, but if we do, remediation will be required.

Corning has not encountered any child labour issues while auditing suppliers, but has found cases of young workers (age 16-18) working overtime and/or night shifts, which violates the RBA requirements. Corning initiated the following actions with the supplier:

1. Requested immediate action to remove young worker from the overtime or night shift situation.
2. Organized communication sessions with the impacted worker, their supervisor, and management.
3. Reviewed HR procedures with management and updated those policies and procedures to ensure ongoing compliance.
4. Requested a self-assessment by the supplier regarding this finding.
5. Conducted a follow-on pre-assessment audit to validate actions taken by supplier prior to a formal third-party audit.
Corning has encountered cases where workers were required to cover the cost of onboarding health-check fees in 2019, 2020, 2021. Fees ranged between USD $6-$25. Corning initiated the following remediation plans with identified suppliers and requested corrective actions:

1. Revision of recruiting process/procedures
2. Reimbursement of the fees to the impacted workers
3. Establishment of a solution in collaboration with the supplier to sign a contract with a third-party health-check company to ensure health-check fees will be paid directly by the company.

Corning is highlighting the onboarding health-check fee issue along with latest RBA requirements, which were tightened in 2020, in CSR training with suppliers starting in Q4 2014. Corning has encountered a few cases that were in violation of women’s rights expectations, such as missing risk analysis for pregnant women and nursing mothers, lack of nursing room availability, or lack of refrigerator or washing facilities inside nursing rooms. Corning initiated actions in collaboration with the suppliers to address the issues, ensuring that the suppliers:

1. Establish general policies and procedures to minimize the Health & Safety impact to pregnant woman and nursing mothers.
2. Perform risk analysis to identify any work positions unsuitable for pregnant woman and nursing mothers.
3. Provide reasonable accommodations for nursing mothers that include wash facilities and a refrigerator.


In terms of forced labour, to date, our monitoring efforts have not revealed any nonconformances or violations against the standards and indicators in our Supplier Code of Conduct and CSR audit checklist that are related to forced labour.

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers’ rights and priorities).

**INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS**

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

Although timing will vary depending on the complexity of any report, Corning strives to complete all investigations within 90 days and to communicate the outcomes of these investigations to the complainant(s) and other affected stakeholders, if any, through appropriate channels. Depending on the nature of the allegations and issues involved, investigations may be completed by internal Corning resources or escalated to external resources, as determined by Corning’s Chief Compliance Officer.

To complete investigations, Corning may ask complainant(s) and other affected stakeholders to participate in a company investigation. An investigation may involve interviews with complainant(s) and other affected stakeholders to understand the nature of the allegations and issues involved. Corning prohibits retaliation against anyone who in good faith participates in a company investigation.

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers’ workers.

In 2021, concerns were raised via Corning’s grievance mechanism related to living conditions and payment of fees for Filipino workers at a Corning plant in Taiwan.

In responses to these complaints, Corning instituted several detailed review processes, including (1) a third-party audit of the dorms provided by a broker under contract with Corning; (2) an internal review of the roles, responsibilities, and conditions for Corning’s foreign workers; and (3) an external review by a third party of Corning’s foreign worker program in Taiwan.

The third-party audit of the living facility conditions identified a short list of findings, including improvements to management systems and minor dorm safety improvements, which were promptly addressed by the broker with oversight from Corning. The external and internal reviews led to several improvement areas being identified, which likewise have been implemented. One of those areas was the reimbursement of recruitment and other certain fees paid by the foreign workers contrary to RBA guidance. Corning has reimbursed these fees to existing foreign workers per RBA guidance and is in the process of notifying and reimbursing former foreign workers, again in line with RBA guidance. Corning is also monitoring the situation through increased oversight of the broker and communications with the foreign workers to avoid any similar future issues.

This is a positive example of the use of Corning’s grievance mechanism to raise concerns and to ensure appropriate action is taken. This is also an example of Corning acting to ensure its Supplier Code of Conduct is being followed and taking action to require the reimbursement of fees contrary to RBA guidance when identified.


The supply chains workers represented in this spotlight case were hired through a third-party recruitment agency, which, as with all recruitment agencies we may work with, is required to meet our Supplier Code of Conduct.

In addition, where an allegation is identified in a company’s supply chains:

B.1.1 that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s)

B.1.2 outcomes of the remedy process in the case of the allegation(s); and

B.1.3 evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.
Where an allegation is identified in the company’s supply chains, but is denied by the company:

B.2.1 a description of what actions it would take to prevent and remediate the alleged impacts; and

B.2.2 as part of this process, it would engage with affected stakeholders and their representatives.

Reporing Legislations

UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.

Yes/No. Please provide link to a publicly available statement.

California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

Yes/No. Please provide link to a publicly available statement.

Australia Modern Slavery Act: Where applicable, the company discloses at least one statement under the Australia Modern Slavery Act.

The Australia Modern Slavery Act is not applicable to us.

Yes/No. Please provide link to a publicly available statement.

High Risk Sourcing

Please indicate whether your company sources from China or Malaysia. Note where a company does not provide this information, KnowTheChain will review the company’s website as well as third party sources to identify relevant information.

As stated in our 2021 Conflict Minerals Report, we list China and Malaysia as locations where smelter facilities in our supply chain may be located (see Appendix A) and as potential countries of origin (see Appendix B).

Link: https://d18rn0p25nwr6d.cloudfront.net/CIK-0000024741/eaac22f6-3e2e-4fb2-bcc3-e6a926fad0b9.pdf

High-risk suppliers go through Corning’s CSR audit and the Responsible Mining protocol.