

# Corning Inc.

**TICKER**  
NYS:GLW

**MARKET CAPITALIZATION**  
US\$27 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**  
UK Modern Slavery Act: Yes  
California Transparency in Supply Chains Act: Yes

**TARGETS**  
Yes

## OVERALL RANKING

**16 out of 49**

([2018 Rank](#): 37 out of 40)

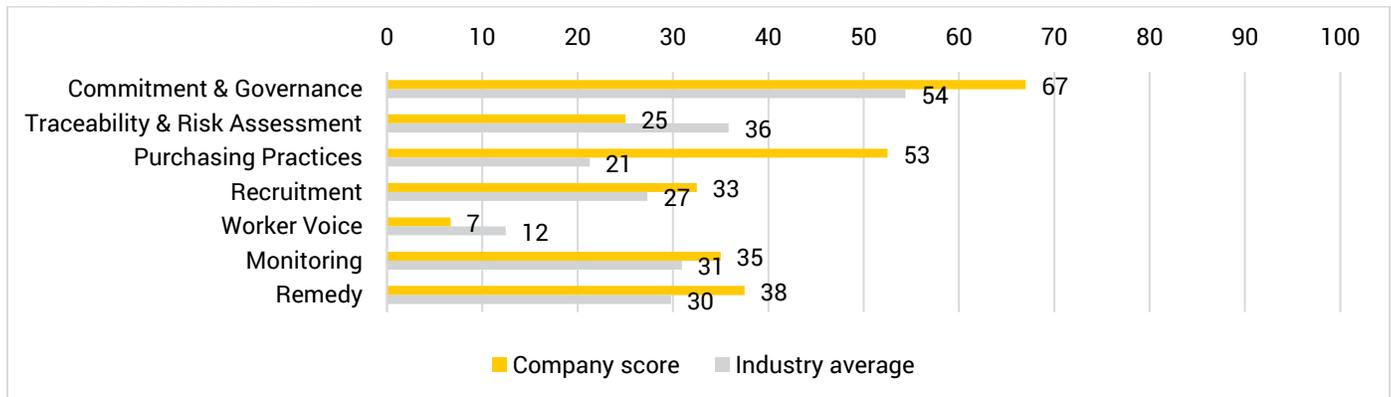
## OVERALL SCORE

**37 out of 100**

## SUMMARY

Corning Inc. (Corning), a supplier to companies such as Apple and Samsung, ranks 16<sup>th</sup> out of 49 companies, disclosing more information on its forced labor policies and practices than its peers. Compared to 2018, the company's score improved by 31 points as it disclosed a supplier code of conduct prohibiting worker-paid recruitment fees and passport retention, training for suppliers on forced labor, responsible purchasing practices, and a supplier selection process. Further, it now requires labor agencies used by its suppliers to conduct due diligence against its policies on forced labor, and it discloses an audit and corrective action process that covers forced labor. Notably, the company is one of only two companies to disclose multiple data points that demonstrate the purchasing practices it has in place. It is encouraged to improve its performance and disclosure on the themes of Commitment & Governance, Traceability & Risk Assessment, and Worker Voice.

## THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

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**KEY DATA POINTS****SUPPLIER LIST**

No

**NO-FEE POLICY**

Yes (Employer Pays Principle)

**AVERAGE SUPPLIER SCORE**

N/A

**REMEDY FOR SUPPLY CHAINS WORKERS**

No

**HIGH-RISK SOURCING COUNTRIES**Likely from Malaysia and/or China<sup>1</sup>

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**LEADING PRACTICES**

**Purchasing Practices:** Corning discloses data points on its responsible purchasing practices, which may reduce the risks of forced labor in its supply chains. It reports that 97% of its suppliers that are categorized as small and disadvantaged are paid within 60 days or less and that only 15% of orders with its suppliers are changed after an order is placed. In addition, it discloses that the average length of its contracts with suppliers is two years.

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**NOTABLE FINDINGS**

**Management and Accountability:** Corning outlines the team responsible for supplier management and notes that the team addresses the risks of forced labor in its supply chains. It also discloses that the Corporate Relations Committee of its Board of Directors has oversight of the strategies and policies that relate to supply chains and human rights and that the committee meets five times a year to discuss “relevant topics.”

**Integration into Supplier Contracts:** The company discloses that 100% of its supplier contracts and purchase orders incorporate a requirement to comply with its supplier code of conduct, which prohibits forced labor. In addition, it reports that its suppliers are required to include such provisions in agreements with their own suppliers.

**Monitoring and Responsible Recruitment:** The company discloses that labor agents used by its suppliers must conduct due diligence on their own sub-agents to ensure compliance with its supplier code of conduct.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Commitment & Governance:** The company is encouraged to engage with relevant stakeholders on forced labor and human trafficking (e.g., policy makers, worker rights organizations, or local NGOs) in countries in which its suppliers operate. The company is also encouraged to participate actively in one or more pertinent multi-stakeholder or industry initiatives.

**Traceability & Risk Assessment:** The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. The company may further consider disclosing the names and addresses of its first-tier suppliers and several data points on its suppliers' workforce.

**Worker Voice:** To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. Additionally, the company is encouraged to work with relevant stakeholders to engage with and educate workers in its supply chains on their labor rights.

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**ENGAGED WITH KNOWTHECHAIN**

Yes ([Provided Additional Disclosure](#)).

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<sup>1</sup> Most electronic devices are produced at least in part in China and/or Malaysia, two countries where electronics may be produced using forced labor. KnowTheChain (June 2020), "[2020 KTC ICT Benchmark Report](#)."