

Company Name Corning
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 12.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
12.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 1 & 2: The Company indicates that 'at Corning, we: Respect and support human rights as set out in the ten principles of the UN Global Compact as well as the UN Guiding Principles on Business and Human Rights'. The Human Rights policy is signed off by the Chairman and Chief Executive Officer. [Human Rights policy, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company indicates that 'at Corning, we: Respect and support human rights as set out in the ten principles of the UN Global Compact as well as the UN Guiding Principles on Business and Human Rights'. The Human Rights policy is signed off by the Chairman and Chief Executive Officer. [Human Rights policy, N/A: corning.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company indicates that 'At Corning, we: Respect and support human rights as set out in the ten principles of the UN Global Compact'. [Human Rights policy, N/A: corning.com] Met: Explicitly list ALL four ILO for ICT suppliers: The Company states in its code for supplier the following requirements: 'Suppliers shall not use forced, bonded (including debt bondage) or indentured labor or involuntary prison labor or exploitative prison labor, slavery or trafficking of persons' [...] 'Suppliers shall not use child labor' [...] 'Supplier shall be committed to a workforce free of harassment and unlawful discrimination'. In relation to freedom of association and collective bargaining, it states the following: 'Suppliers shall respect the right of all workers to form and join trade unions, or not to form or join, of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. [Supplier Code of Conduct, 06/08/2020: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: The Company indicates that 'At Corning, we: [...] Are committed to providing a fair, safe and healthy working environment for our employees that is free from unlawful discrimination, harassment, bullying or victimization. Do not tolerate or support the use of child labor, forced or compulsory labor in our operations. Respect and support the right of employees to establish, join or not join trade unions or other associations, and we recognize any local rights to collective bargaining'. Moreover, 'Corning respects the rights of its employees to peacefully and lawfully form, join, not join, or leave workers' associations of their own choosing. Where employees are represented by a legally recognized union, Corning is committed to bargaining in good faith with the employees' freely chosen representative. All of our businesses respect the rights of workers to communicate openly with management regarding working conditions without fear of retaliation, harassment, intimidation or interference'. However, it is not clear if the company respects these rights in all contexts (ILO or equivalent workers bodies where there are law restricting the exercise of these rights), since refers to 'local' rights regarding freedom of association and collective bargaining. [Human Rights policy, N/A: corning.com] Met: Respect H&S of workers: The Company indicates that 'At Corning, we: [...] Are committed to providing a fair, safe and healthy working environment for our employees'. [Human Rights policy, N/A: corning.com] Met: H&S applies to ICT suppliers: The Company requires in the supplier code that 'Suppliers shall minimize the incidence of work-related injury and illness to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>help achieve a safe and healthy work environment'. It also provides different health and safety requirements. [Supplier Code of Conduct, 06/08/2020: corning.com]</p> <ul style="list-style-type: none"> • Not met: working hours for workers: The Company indicates in its Human Rights Policy tab that 'Corning complies with all laws and regulations related to working hours for employees, and ensures that working hours include the minimum breaks and rest periods set by law. Many of Corning's manufacturing plants run continuous (24/7) operations and will have either 8-hour or 12-hour shift patterns, or a combination of both, as well as overtime shifts. Actual shift patterns and duration are based upon production requirements, and hours worked by employees on a week-by-week basis will vary depending upon shifts and scheduling. In all instances Corning complies with contract terms and legal requirements related to work hours, shifts, overtime, and compensation'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights policy, N/A: corning.com] • Not met: Working hours for ICT suppliers: In its Supplier Code of Conduct, the Company indicates: 'A work week must not exceed 60 hours per week, including overtime, except in emergency or unusual situations. Emergency or Unusual Situations: Situations that are unpredictable events that require overtime in excess of expectations. Such events cannot be planned or foreseen. In no event shall hours per work week exceed the maximum set by applicable law. Working hours shall include the minimum breaks and rest periods set by law. Workers shall be allowed at least one day off every seven days'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supplier Code of Conduct, 06/08/2020: corning.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company indicates that 'Corning is committed to engaging with our stakeholders'. The Company has a table with the stakeholder groups, the engagement channels and the key topics addressed via their engagements. It includes employees, suppliers, communities, charitable organizations, non-profits and NGOs. [Responsible Processes, N/A: corning.com & Stakeholder Engagement, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company indicates on its website Supply Chain Social Responsibility / Accountability that it requires supplier to provide Corrective Action Plan when needed: 'a key component of our supplier assessment and audit process is the development of corrective action plans to remedy non-compliance'. In addition, on its website Social Responsibility Audit the Company states: 'Remediation – Based on the findings of the third-party audit, a remediation plan is created in by Corning, our third-party auditors and in collaboration with supplier Corporate Social Responsibility lead and senior management that ensures supplier meets or exceeds Corning's CSR.' However, this applies to suppliers in the context of supplier audits, no evidence of company general commitment. In addition, according to its Whistleblower Policy, the Company indicates that 'Our aim is to provide effective remedy where we determine that we have caused or contributed to adverse human rights impacts in our value chain and to use our leverage to encourage our suppliers and partners to provide remedy where we find impacts directly linked to our business operations, goods, or services'. However, 'aim to' is not considered a formal commitment following CHRB wording criteria. No evidence has been found of a commitment of the Company to remedy adverse impacts that it has caused or contributed to. [Supply Chain - Accountability on website, N/A: corning.com & Social Responsibility Audit, 19/04/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company states: 'Our mechanisms do not obstruct access to other remedy channels or procedures'. [Whistleblower Policy, 13/07/2020: s22.q4cdn.com] • Not met: Work with ICT suppliers to remedy impacts: The Company states on its website about supplier accountability how remediation works for suppliers in cases of non-compliance in supplier audits. On Social Responsibility Audit website, it indicates: 'Remediation – Based on the findings of the third-party audit, a remediation plan is created in by Corning, our third-party auditors and in collaboration with supplier Corporate Social Responsibility lead and senior

Indicator Code	Indicator name	Score (out of 2)	Explanation
			management that ensures supplier meets or exceeds Corning's CSR'. No evidence has been found of a commitment to collaborating with suppliers to remedy through the suppliers' own mechanisms or through collaborating with them on the development of third party non-judicial remedies. [Social Responsibility Audit, 19/04/2019 & Supply Chain - Accountability on website, N/A: corning.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to the UNGC. • Met: Senior responsibility for HR: The Human rights policy states that 'The Senior Vice President of Human Resources has internal oversight over employee and contingent worker human rights matters'. [Human Rights policy, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company indicates: 'The Senior Vice President of Human Resources relies upon Corning's global and regional human resource personnel for day-to-day responsibilities to implement our programs and policies regarding employee and contingent worker human rights matters worldwide'. [Human Rights policy, N/A: corning.com] • Met: Day-to-day responsibility for ICT in supply chain: The webpage Human Rights policy states that the 'Senior Vice President and Chief Supply Chain Officer oversees the application of the policy to third party suppliers'. On its webpage Governance, it further describes that 'Corning has a dedicated supply chain sustainability team, which is part of the company's global supply management organization. The team is led by the Jeanne Estep, Director of Compliance and Sustainability, Global Supply Management. The team drives internal programs designed to ensure supply chain sustainability (social and environmental), with a particular focus on minimizing the risk of forced labor in the supply chain. The team also collaborates with colleagues across Corning to provide ongoing oversight of the supplier management process'. [Human Rights policy, N/A: corning.com & Supply chain - governance, N/A: corning.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: In its Human Rights webpage, it states: 'In our view, human rights due diligence requires a holistic approach. We assess our own business as well as those who are acting on our behalf — in supply roles, and in mergers and acquisitions — to identify the salient human rights issues applicable to our business. (...) Our assessment of human rights aligns with our corporate Human Rights Policy and includes these points of review: a fair, safe and healthy workplace; a workplace free from unlawful discrimination, harassment, bullying or victimization; freedom of association; and prohibition on and prevention of any use of child labor or forced labor. Evaluations are integrated into other assessment and management processes such as our Enterprise Risk Management process and are based on material issues regardless of where they're identified within the value chain. (...) We use the tool Riskmethods to assess risks associated with suppliers and our own operations. Riskmethods provides enterprise-wide visibility to existing and emerging risks by generating risk scores for suppliers, customers, transportation locations, our own manufacturing locations and entire supply paths. Riskmethods can also provide risk scores for Tier 2 suppliers and critical industry suppliers. Each score is comprised of five major areas: Viability, Delivery, Market/Cost, Image & Compliance and Quality & Performance. Riskmethods also enables risk prioritization across the enterprise by utilizing these risk scores in combination with internal impact scores'. However, it is not clear the process(es) to identify its human rights risks and impacts in its own operations. Evidence seem to refer to specific risks already identified and supplier specific risk. It is not clear how it identifies which are the potential human rights risks in own operations. [Human Rights policy, N/A: corning.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks in ICT suppliers: The Company indicates that 'Corning's risk management process begins before companies even join our supply chain. Corning utilizes Riskmethods, a supply risk profile / rating solution, to identify potential risks before we select and add a supplier to our supply chain. Riskmethods is an easy to use portal that provides real-time, objective, enterprise-wide risk exposure measurement and reporting across the supply chain. Our risk managers use Riskmethods' digitalization technologies, including big data monitoring, machine learning and AI, to make proactive assessments of supply chain risk across the globe at a moment's notice, including social and environmental responsibility risks. Supply chain social and environmental responsibility risks are monitored and evaluated, across the enterprise-wide supply chain, against the following risk profiles: Labor Practices and Human Rights; Environmental; Information and IP Security; Regulatory and Legal; Corruption and Bribery. In its Human Rights webpage, it states: 'In our view, human rights due diligence requires a holistic approach. We assess our own business as well as those who are acting on our behalf — in supply roles, and in mergers and acquisitions — to identify the salient human rights issues applicable to our business'. [Supply chain visibility, N/A: corning.com & Supply Chain - Accountability on website, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders: Although the Company reports in relation to climate survey among employees, it is not clear in existing evidence whether and how this informs due diligence process for human rights risk identification. • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The 'Elementum platform' 'monitors over 30 million data sources, from EDIs and ASNs, to news and social media, tracking specific terms such as conflict minerals, worker diversity, child labor, workers safety, emissions and human rights. This provides us timely insight into the events and geopolitical issues that can influence our overall supply chain performance, including social responsibility behaviors within our supply chain'. In addition, the Company indicates that 'Corning has developed a matrix to identify high-risk countries which is based upon (i) the Amfori 6 factors and a third-party tool, Riskmethods, which is a supply risk profile/rating solution that utilizes 49 risk indicators to identify potential risks'. Moreover, as stated in the Human Rights webpage: 'Our assessment of human rights aligns with our corporate Human Rights Policy and includes these points of review: a fair, safe and healthy workplace; a workplace free from unlawful discrimination, harassment, bullying or victimization; freedom of association; and prohibition on and prevention of any use of child labor or forced labor. Evaluations are integrated into other assessment and management processes such as our Enterprise Risk Management process and are based on material issues regardless of where they're identified within the value chain. Corning established a sustainability goal to address Environmental, Social and Governance (ESG) issues in its Enterprise Risk Management process. The ESG issues include human rights'. [Supply Chain - Accountability on website, N/A: corning.com & Supply chain visibility, N/A: corning.com] • Not met: Public disclosure of salient risks: The Company provides a table with the results of Riskmethods assessment process. The table discloses different segments and respective salient risks and action plan to prevent, mitigate or remediate risk each. Regarding the segment suppliers, the salient risk identified is 'Assuring conformance with Corning's Supply Chain Social Responsibility and Supplier Code of Conduct expectations'. As for Corning employees: 'Assuring conformance with the Corning Code of Conduct' as well as 'Assuring a safe and healthy workplace'. However, although the Company discloses various salient risks for different stakeholders, it is not clear which human rights salient risks it faces. This indicator looks for a description of which are the salient human rights risks it faces. [Human Rights policy, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company provides a table with the results of Riskmethods assessment process. The table discloses different segments and respective salient risks and action plan to prevent, mitigate or remediate risk each. As for the salient risk of Corning employees: 'Assuring conformance with the Corning Code of Conduct', the action plan is to 'See sustainability goal to ensure that all employees understand the Code of Conduct including how to report allegations of ethical or legal misconduct'. Finally, for the other salient risk identified among employees, 'Assuring a safe and healthy workplace', the Company suggests looking into their Health and Safety webpages and their sustainability goal for occupational health and safety to find action plans. No action plans were found on these webpages. It is not clear its global system to take action to prevent, mitigate or remediate its salient human rights issues, rather than salient risks is general. [Human Rights policy, N/A: corning.com] • Not met: Including in ICT supply chain: The Company indicates that 'A key component of our supplier assessment and audit process is the development of corrective action plans to remedy non-compliance in the areas of social responsibility drivers (e.g., labor and human trafficking), environmental sustainability, health and safety, quality, and performance'. However, evidence seems to focus in compliance monitoring and correcting wrongdoings from suppliers, rather than about specific steps in the human rights due diligence process to address salient human rights impacts. Moreover, in its Human Rights webpage, the Company provides a table with the results of Riskmethods assessment process. The table discloses different segments and respective salient risks and action plan to prevent, mitigate or remediate risk each. Regarding the segment suppliers, the salient risk identified is: 'Assuring conformance with Corning's Supply Chain Social Responsibility and Supplier Code of Conduct expectations'. The action plan to prevent, mitigate or remediate this risk is: 'See sustainability goal to ensure that 100% of Corning's high risk suppliers are certified as socially responsible'. However, it is not clear a global system to take action to prevent, mitigate or remediate specific salient human rights issues applies to its supply chain. The latter piece of evidence makes reference to a risk that may not necessary be a salient human right risk. Evidence is expected to reflect how the company has an approach to mitigate the different issues it faces (even if using a similar approach for all of them). [Supply Chain - Accountability on website, N/A: corning.com & Human Rights policy, N/A: corning.com] • Not met: Example of Actions decided: The Company indicates: 'Corning has seen significant improvement in the CSR audit scores, improving from an average of 5 for the initial audit score to an average of 94 currently. Detailed results of Corning's supply chain on-site social responsibility audits identified risks within the following areas: A3.1 Hours worked in a workweek over the last 12 months does not exceed 60 hours. A3.2 Workers receive at least one (1) day off every seven (7) days. B2.2 Adequate and effective fire detection, alarm and suppression systems are in place. B2.4 Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained. In response, Corning collaborated with suppliers to take appropriate actions to successfully address these risks. Actions taken varied according to the need, but ranged from the implementation of an attendance management system and training for workers and managers in order to provide visibility to manage hours/days worked per week to address items 1 and 2, to the installation of safety exit signs, emergency lighting, and alarm bells and other safety measures to address items 3 and 4'. However, although provides an example of actions taken, this indicator is also looking for example of the specific conclusions reached. [Supply Chain - Accountability on website, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: On its website the Company states that ‘A key component of our supplier assessment and audit process is the development of corrective action plans to remedy non-compliance in the areas of social responsibility (e.g., labor and human trafficking), (...), health and safety’, among others. It has ‘corrective action plans to remedy non-compliance in the areas of social responsibility drivers (e.g., labor and human trafficking)’. It talks about its purposes and how they are reviewed. In addition, it indicates that it ‘conducts regularly scheduled meetings (daily/weekly) with suppliers to assess progress against the remediation plans’. In its Human Rights tab, the Company states: ‘Each functional area with ownership of a salient risk has the responsibility to track actions taken to prevent, mediate or remediate the risk through their established management systems’. However, no evidence found in relation to system to check if action plans to mitigate identified and assessed human rights risks and impacts have been effective (beyond the specific corrective action plans for specific suppliers' non-compliances). This indicator looks for evidence of risk mitigation-based approach, rather than individual facility compliance approach. [Supply Chain - Accountability on website, N/A: corning.com & Human Rights policy, N/A: corning.com] • Not met: Lessons learnt from checking effectiveness: On the website, the Company states: ‘Each functional area with ownership of a salient risk has the responsibility to track actions taken to prevent, mediate or remediate the risk through their established management systems. For example, Corning established a sustainability goal that all Corning Incorporated employees will understand Corning’s Code of Conduct, including how to report allegations of ethical or legal misconduct. The Compliance team in the Law Department will track progress toward this goal through the existing Climate Survey process. As another example, Global Safety Services tracks health and safety performance through their existing management system and will compare Corning’s performance with our industry benchmark values to ensure that we maintain our safety metrics in the top quartile, our Occupational Safety and Health sustainability goal. Lessons learned within the Global Safety Solutions function are regularly shared throughout Corning operations using multiple methods to include written communications and regularly scheduled meetings’. Moreover, in its Supplier Accountability webpage, the Company indicates: ‘In alignment with Corning’s commitment to continuous improvement, we proactively work with suppliers to monitor and evaluate the effectiveness of corrective actions. As such, while we have made great progress in responding to human rights risks and impacts (...), we do not feel we have achieved satisfactory score with all suppliers therefore, efforts continue to identify and take action on opportunities for improvement’. However, no further evidence found of an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process. [Human Rights policy, N/A: corning.com & Supply Chain - Accountability on website, N/A: corning.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Not met: Ensuring affected stakeholders can access communications: The Company indicates that 'Corning has established a goal to issue a sustainability report in 2021. We anticipate using that report as well as our sustainability webpages to communicate how we assess and protect human rights. Furthermore, our Whistleblower Policy states that any "...complainant will be notified of the outcome of the investigation.'" Corning's Whistleblower Policy would govern any allegation of a human rights impact received through the channels indicated above in the section "Raising, addressing and resolving concerns". However, this indicator is looking for a description of how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access communications in the context of specific concerns raised'. [Human Rights policy, N/A: corning.com]

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has a reporting mechanism available for all workers at EthicsPoint: 'Corning employees or others who are or become aware of (a) suspected misconduct, illegal activities, fraud or abuse relating to the company's accounting, internal accounting controls or auditing matters, [...] (d) possible violations of Corning's Code of Conduct, are encouraged to report such matters'. The Company offers different channels of reporting, including Corning's Code of Conduct Line, with a phone number and a webpage. The Corning's Code of Conduct Line 'can be used to make an anonymous report and are available on a 24/7 basis'. [Whistleblower Policy, 13/07/2020: s22.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company indicates that 'For calendar year 2019, we received a total of 115 reports alleging possible violations of Corning's Code of Conduct through all of our reporting mechanisms globally'. Two charts are provided, one disclosing the regions where reports came from and the other primary issues alleged. According to the latter chart, 60% of the issues alleged were concerning 'HR, Diversity and Workplace Respect'. However, it is not clear if all these are human rights related and/or whether there can be others outside this category. This indicator looks for the total number of grievances related to human rights issues filed, and either addressed or resolved. [2019 COC Reporting Data, 13/07/2020: corning.com] Met: Channel is available in all appropriate languages: The EthicsPoint website of the whistleblower policy is available in more than 50 languages. [EthicsPoint, N/A: secure.ethicspoint.com] Met: Opens own system to ICT supplier workers: The Company states 'Suppliers and other relevant external stakeholders can submit any questions or report any violation or grievance to Corning's confidential and anonymous Code of Conduct Line 24 hours per day, 7 days per week, at U.S. (country code 1) number (888) 296-8173 or at ethicspoint.com.' [Supplier Code of Conduct, 06/08/2020: corning.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: In its Whistleblower Policy the Company states 'Corning's Compliance Council is adopting this Policy to ensure (a) that employees of Corning and other relevant external stakeholders have a confidential and, if so desired, anonymous means by which to submit good faith concerns about improper business conduct, without fear of retaliation, and (b) that every submission is properly investigated and responded to in a timely manner.' It also states that it provides different options to communicate suspected violations, including EthicsPoint and that 'these services can be used to make an anonymous report and are available on a 24/7 basis. An outside organization provides these services and your report cannot be traced back to you unless you choose to identify yourself'. [Whistleblower Policy, 13/07/2020: s22.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Describes accessibility and local languages: The Company's whistleblowing policy (and the supplier code of conduct) indicates that employees, suppliers or others can submit questions or report violations, including through an online service. The online channel (EthicsPoint) is available in more than 30 languages. [Supplier Code of Conduct, 06/08/2020: corning.com & Whistleblower Policy, 13/07/2020: s22.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: ICT supplier communities use global system: The supplier code states that 'suppliers and other relevant external stakeholders can submit any questions or report any violation or grievance to Corning's confidential and anonymous Code of Conduct Line', including through telephone or an online address. [Supplier Code of Conduct, 06/08/2020: corning.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition: The Company indicates that 'In order to ensure the effectiveness of our reporting mechanism, we regularly review and analyze data showing our reports by location and function. We also work with the third-party service provider to update and upgrade our reporting mechanism as required to ensure it is available to our employees and other stakeholders around the world'. However, no further evidence found of changes to systems and procedures to prevent human rights impacts in the future, rather than to changes to reporting mechanisms. [Sustainability - Governance, N/A: corning.com] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for

human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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