

**Company Name** Corning Inc  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score (\*)** 16.1 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
3.6	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
2.1	20	D. Performance: Company Human Rights Practices
3.2	20	E. Performance: Responses to Serious Allegations
1.7	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 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." [Human Rights Policy, 19/04/2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>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, 19/04/2019]</li> <li>Not met: Explicitly list ALL four ILO for ICT suppliers: The Company indicates that the CoC for Suppliers applies to everyone that do business with Corning Incorporated and/or its affiliates Suppliers will comply with this Code in all aspects of their operations that relate to their business with Corning. "Corning's Supplier Code of Conduct embraces the key principles of the International Labour Organization's (ILO) eight fundamental conventions, which cover subjects that are considered by the ILO as fundamental principles and rights at work. These conventions are: 1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) 2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98); 3. Forced Labour Convention, 1930 (No. 29) 4. Abolition of Forced Labour Convention, 1957 (No. 105) 5. Minimum Age Convention, 1973</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>(No. 138) 6. Worst Forms of Child Labour Convention, 1999 (No. 182) 7. Equal Remuneration Convention, 1951 (No. 100) 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)". However, when the Company specifically describes its requirements in relation to collective bargaining, it states the following: 'In conformance with local law suppliers shall respect the right of all workers to form and join trade unions 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'. It is not clear whether it is committed to respect these rights in all contexts, as it is committed to respect them 'in conformance with local laws' (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights) [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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." However, it is not clear if the company respects collective bargaining rights in all contexts (ILO or equivalent workers bodies where there are law restricting the exercise of these rights). [Human Rights Policy, 19/04/2019]</li> <li>• Met: Respect H&amp;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, 19/04/2019]</li> <li>• Met: H&amp;S applies to ICT suppliers: The Company indicates in the Supplier CoC that "Suppliers shall minimize the incidence of work-related injury and illness to help achieve a safe and healthy work environment" [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• Not met: working hours for workers</li> <li>• Not met: Working hours for ICT suppliers: The Company indicates in the Supplier CoC that "Workweeks are not to exceed the maximum working hours and shall include the minimum breaks and rest periods set by local law." However, no further details found, including references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	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"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company indicates that 'We require our suppliers to source 3TG for Corning products only from smelters that comply with the Responsible Minerals Initiative 's (RMI) Responsible Minerals Assurance Process (RMAP), which requires a third-party sourcing audit'. No evidence found however, of a formal commitment to responsible sourcing from conflict affected and high risk areas (it is not clear the extent of the Company's commitment, whether it covers all conflict affected and high risk areas; see also requirements for suppliers below). [Conflict Minerals Policy, 01/03/2019]</li> <li>• Met: Based on OECD Guidance: The Company indicates that "Our due diligence measures implemented as part of our conflict minerals program have been designed to conform, in all material respects, with the framework in The Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas." [Conflict Minerals Policy, 01/03/2019]</li> <li>• Not met: Requires responsible mineral sourcing from suppliers: The supplier code states that 'Suppliers shall have a policy to assure that conflict minerals (e.g. tantalum, tin, tungsten and gold) in products manufactured by or for the Supplier do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses in the Democratic Republic of the Congo or any adjoining country. Suppliers shall have in place a due diligence program that conforms, in all material respects, with the framework in The Organization for Economic Co-Operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High -Risk Areas on the source and chain of custody of these minerals, and shall also make their due diligence measures available to customers upon customer request'. However, no evidence found if there's an expectation of commitment to responsible sourcing (respecting human rights and not financing/benefiting armed groups) that goes beyond Democratic Republic of the Congo or adjoining countries, covering all</li> </ul>

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			<p>conflict-affected and high risk areas. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	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"> <li>• Not met: Women's Rights [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a> &amp; Human Rights Policy, 19/04/2019]</li> <li>• Not met: Children's Rights: Although the Company contains commitments in relation to child labour and young workers, no specific evidence found in relation to children rights. [Human Rights Policy, 19/04/2019]</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights: The 2019 Supplier Code of Conduct states that 'Supplier shall not engage in or permit discrimination or harassment based on [...] age, gender [...] pregnancy [...] marital status in its workforce'. It also states 'Supplier shall establish measures to eliminate health and safety concerns that are especially prevalent among women workers (for example, physical security and sexual harassment)' and 'There shall be no discrimination or retaliation against workers, including migrant workers, who raise grievances in good faith.' However, no evidence found of formal commitment to respect women's rights, children's rights or migrants' rights in general. [Supplier Code of Conduct (SCOC), 16/07/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	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"> <li>• Not met: Commits to stakeholder engagement: Although it indicates that is committed to "preserving the trust of all our stakeholders - our employees, customers, partners, investors, and the communities where we live and operate. We preserve that trust by always living our Values - all seven, all the time all around the world". No formal statement found of commitment to engage with stakeholders, including affected. [Corning Code of Conduct: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Human Rights Policy, 19/04/2019]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	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"> <li>• 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 in different areas, including labor and human trafficking. 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. No evidence has been found of a commitment of the Company to remedy adverse impacts that it has caused or contributed to. [Supply Chain Social Responsibility / Accountability, 19/04/2019 &amp; Social Responsibility Audit, 19/04/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts: Although the Company states on its website Social Responsibility Audit: '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.' 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]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.6	Commitment to respect the rights of human rights defenders	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"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its 2019 Corning Incorporated Whistleblower Policy: ‘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. [...] Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated’. However, no further evidence has been found of a commitment to respect Human Right defenders in general, beyond commitment to non-retaliate employees for raising concerns about ‘improper business conduct’. [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects ICT suppliers to reflect company HRD commitments: The Company states on its website Supplier Code of Conduct ‘Humane Treatment-Suppliers shall not subject or threaten workers to any inhumane treatment, including any sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.’ It also states ‘Suppliers shall respect the right of all workers to form and join trade unions 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. Workers and/or their representative shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.’ However, no further evidence has been found of a commitment to respect Human Right defenders in general. This only applies to workers and/or their representatives. [Supplier Code of Conduct   Suppliers   Corning, 19/04/2019]</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> <li>• Not met: CEO or Board approves policy: The Corning Code of Conduct has been signed by the CEO. However, the code does not contain human rights policies. Modern slavery statement signed by senior VP Supply Chain, but no evidence of board level signature. The Corporate Relations Committee of the Board of Directors Committee Charter states ‘The function of the Corporate Relations Committee is to assist the Board of Directors in fulfilling its oversight responsibility by reviewing the corporation’s strategies and policies in the areas of [...] employment policy and employee relations’ It also states that the corporation’s responsibilities as an employer and its relationship with employees includes human rights. However, no evidence was found that the Company’s human rights policy commitments are actually approved by the Board. [Corning Code of Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Corporate Relations Committee of the Board of Directors Committee Charter, 02/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Board’s Corporate Relations Committee charter indicates that the committee focuses its work in, among other areas, responsibilities as an employer and its relationship with employees, which include: ‘safety and health policies; code of conduct; diversity and inclusion; values; human rights and labor matters; and compliance’. [Corporate Relations Committee of the Board of Directors Committee Charter, 02/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	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"> <li>• Not met: Board/Committee review of salient HRs: Although the Company states in its “2019 Corporate Relations Committee of the Board of Directors Committee Charter” that it is the Corporate Relations Committee’s responsibility to assist the Board of Directors in fulfilling its oversight responsibility regarding human rights, there is no description of a process the Company has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company’s salient human rights issues. [Corporate Relations Committee of the Board of Directors Committee Charter, 02/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: On its website, the Company states that Cheryl Capps is the Senior Vice President, responsible for the Global Supply Chain. Among other things, she is responsible for making sure that suppliers adhere to the Supplier Code of Conduct. However, this responsibility seems to apply to the supply chain only. No evidence found for a senior manager(s) roles responsible for relevant human rights issues within the Company. [Corporate Relations Committee of the Board of Directors Committee Charter, 02/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Supply Chain Social Responsibility, n/a]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: The Company indicates that "As part of our corporate risk management process, the Board and our management monitor long-term risks that may be impacted by environmental, social and governance issues." The Company indicates in a chart following this statement that HR is a part of these environmental, social, governance and human capital matters. [2019 Corning Proxy Statement, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates that "All employees are required to complete training related to Corning's Code of Conduct. This training ensures that employees are familiar with the areas covered by Corning's Code, including ethical and legal obligations toward the protection of human rights" The Company also indicates that "The Code of Conduct is available in thirteen languages". [2019 Statement on Human Trafficking and Slavery, 25/03/2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring ICT suppliers to communicate policy down the chain: In its Supplier Code of Conduct the Company states "This Code applies to people and companies (collectively, "Suppliers") that do business with Corning Incorporated and/or its affiliates (collectively, "Corning") and shall be updated annually. Suppliers (as well as their respective employees, subcontractors, and suppliers) are expected to comply with this Code and Corning's Human Rights Policy in order to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>comply with their contractual obligations to Corning. 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. Corning monitors its suppliers to ensure compliance with this Code'. [Supplier Code of Conduct (SCOC), 16/07/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated above, suppliers 'are expected to comply with this Code and Corning's Human Rights policy in order to comply with their contractual obligations to Corning'. [Supplier Code of Conduct (SCOC), 16/07/2019]</li> <li>• Met: Including on ICT suppliers: As indicated above, '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'. [Supplier Code of Conduct (SCOC), 16/07/2019]</li> </ul>
B.1.5	Training on Human Rights	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"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Company indicates that 'All employees are required to complete training related to Corning's Code of Conduct. This training ensures that employees are familiar with the areas covered by Corning's Code, including ethical and legal obligations toward the protection of human rights'. The Company also indicates that 'The Code of Conduct is available in thirteen languages'. [2019 Statement on Human Trafficking and Slavery, 25/03/2019]</li> <li>• Met: Trains relevant ICT managers including procurement: See above. In addition the Company states on its Supply Chain Governance website: 'All members of Corning's Global Supply Chain Management team, from senior leadership to supply chain personnel, are required to participate in human trafficking and modern slavery training. This program is designed to provide our leadership with the knowledge and skills to promote human rights compliance throughout our supply chain network. In addition, Corning's Global Supply Management and Supply Chain entire organizations are educated on supply chain social responsibility issues such as human trafficking, modern slavery, transparency, child labor and human rights to build awareness and ensure that Corning's supply chains reflect our values and respect for human rights.' [2019 Statement on Human Trafficking and Slavery, 25/03/2019 &amp; Supply Chain Governance  , 19/04/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Company indicates in the Supplier CoC that 'Corning monitors its suppliers to ensure compliance with this Code'. However, no description of how the company monitors the implementation of its human rights policy commitments across its own operations. [Supplier Code of Conduct (SCOC), 16/07/2019]</li> <li>• Met: Monitoring ICT suppliers: The Company indicates that the 'Corning Social Responsibility Audit is an extensive multi-step and comprehensive process to evaluate our highest risk suppliers to ensure compliance with our standards for supply chain social responsibility'. The audit process includes 'supplier self-assessments'; 'On-site visit from Corning Auditors'; 'Third-party Audit'; 'Remediation'. [Social Responsibility Audit, 19/04/2019 &amp; Supply Chain Visibility   Supplier Risk Management   Corning, 21/08/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: The Company indicates that 'based on the finding of the third party-audit, a remediation plan is created by Corning auditors'. 'Corning conducts regularly scheduled meetings with suppliers to assess progress against the remediation plans, and follow-up is managed by certified Corning auditors. Closure is completed by the third-party auditors to maintain consistency and fairness'. No evidence found, however, in relation to numbers of incidence. [Supply Chain Social Responsibility / Accountability, 19/04/2019 &amp; Social Responsibility Audit, 19/04/2019]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of ICT supply chain monitored</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	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"> <li>• Met: HR affects ICT selection of suppliers: The Company indicates that “The selection and onboarding process is the best time to ensure that Corning Values and the values of our suppliers are aligned. As part of the selection process, suppliers are screened to identify potential risks early and ensure that suppliers meet Corning’s standards, including those related to supply chain responsibility.” [Supply Chain Social Responsibility / Accountability, 19/04/2019]</li> <li>• Met: HR affects on-going ICT supplier relationships: The Company indicates that “In the event of a violation of Corning’s Supplier Code, Corning reserves the right to either terminate its relationship with the Supplier or to work with the Supplier to implement corrective action to remedy the non-conformance, depending on its nature and severity.” [2019 Statement on Human Trafficking and Slavery, 25/03/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> <li>• Not met: Working with ICT suppliers to improve performance: The Company indicates that 'Corning presents a training summit to discuss the criteria and overall outcome of the Social Responsibility Audit. Best practices, strategies, and tactics to improve social responsibility practices are shared and discussed to ensure alignment with Corning values and expectations'. However, no details or specific examples found. [Social Responsibility Audit, 19/04/2019]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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"> <li>• Not met: Stakeholder process or systems</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in ICT SC engaged</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not met: Identifying risks in own operations: The Company describes its process for identifying the human rights risks and impacts in the Supply chain. However, no evidence has been found of description of how the Company does the same in its own operations. In addition, on the website Supply Chain Social Responsibility/Visibility it also refers to possible risks and how they are identified and monitored in its supply chain. No evidence of how the Company does the process in its own operations. [Supply Chain Visibility   Supplier Risk Management   Corning, 21/08/2019]</li> <li>• Met: Identifying risks in ICT suppliers: The Company indicates that “One method for identifying risks in our supply chain is through automatic checks in the ACM system based on criteria established by Assent for supplier responses Assent uses 3 factors to determine the level of risk that each smelter poses to the supply chain by identifying the following red flags: Geographic proximity to the DRC and Covered Countries; RMAP audit status; Credible evidence of unethical or conflict sourcing.” [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> <li>• Not met: Salient risk assessment (and context): On its website, the Company states: ‘Supply chain social 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’ However, no description found in relation to the process(es) for assessing which are the Company’s human rights risks and what it considers to be its salient human rights issues, including how relevant factors are taken into account, such as geographical, economic, social and other factors. [Supply Chain Visibility   Supplier Risk Management   Corning, 21/08/2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Public disclosure of salient risks: See above. Although the company provides a list of supply chain social responsibility risks there is no evidence of public disclosure of the results of the assessments of the salient risks. [Supply Chain Visibility   Supplier Risk Management   Corning, 21/08/2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company explains how it takes steps to 'evaluate, assess, and verify potential risks in our supply chain through our supplier selection, on-boarding, and ongoing management processes.' It then goes on to provide information about Supplier Performance Assessment, On-site Audit Process, Social Responsibility Audit and Corrective Action Plans. It gives more detailed information about the Company's Social Responsibility Audit. However, this indicator looks for specific steps in a due diligence process to address human rights risks or impacts, rather than systemic approach to on-going monitoring and follow-up on policy implementation. [Social Responsibility Audit, 19/04/2019 &amp; Supply Chain Social Responsibility / Accountability, 19/04/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• 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. [Supply Chain Social Responsibility / Accountability, 19/04/2019: <a href="http://corning.com">corning.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Example of Actions decided</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: On its websites 'Supply Chain Social Responsibility/Accountability' the Company states that 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, on the website 'Social Responsibility Audit' the Company indicates that it 'conducts regularly scheduled meetings (daily/weekly) with suppliers to assess progress against the remediation plans'. 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). [Supply Chain Social Responsibility / Accountability, 19/04/2019 &amp; Social Responsibility Audit, 19/04/2019]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including ICT suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>



## C. Remedies and Grievance Mechanisms (15% of Total)

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"> <li>• Met: Channel accessible to all workers: The Company has a reporting mechanism available for all workers at EthicsPoint. 'Corning employees who are or become aware of (a) suspected misconduct, illegal activities, fraud [...] or (d) possible violations of Corning's Code of Conduct, are encouraged to report such matters as follows (each, a "Report"): [...] Contact Corning's Code of Conduct Line at (888) 296-8173 or at <a href="https://ethicspoint.com">ethicspoint.com</a>. These services can be used to make an anonymous report and are available on a 24/7 basis. An outside organization provides these services and your report cannot be traced back to you unless you choose to identify yourself'. [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages</li> <li>• Met: Opens own system to ICT supplier workers: The Company indicates that "Supplier 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". [Supplier Code of Conduct, 22/03/2019: <a href="https://corning.com">corning.com</a>]</li> </ul>
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"> <li>• Met: Grievance mechanism for community: In its 2019 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'. [Corning Code of Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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. However, it is not clear if is accessible to all including in local languages. The online channel (EthicsPoint) is available in more than 30 languages. [Supplier Code of Conduct (SCOC), 16/07/2019 &amp; Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• 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 (SCOC), 16/07/2019]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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"> <li>• Not met: Response timescales: The Company describes the procedures for managing the complaints and is committed to properly investigate and respond to every submission in a timely manner. However, no evidence has been found of a clear defined response timescales. [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: How complainants will be informed: No evidence [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Who is handling the complaint</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: 'The Chief Compliance Officer will discuss the findings with the General Counsel to determine whether public</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			disclosure or disclosure to governmental agencies and/or reporting to the full Board of Directors is necessary or appropriate.' However, the whistleblower policy does not include all external individuals and communities. [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> ]
C.5	Commitment to non-retaliation over complaints or concerns made	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"> <li>• Met: Public statement prohibiting retaliation: The Company states that '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. Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated' In addition, on its Supply Chain 'Governance' website the Company states 'In line with this commitment, employees, suppliers and other external stakeholders have the right – and the duty – to raise, in good faith, concerns about improper business conduct without fear of retaliation in any form.' [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Supply Chain Governance  , 19/04/2019]</li> <li>• Met: Practical measures to prevent retaliation: The Company indicates that 'Corning will protect the confidentiality of the concern raised and the identity of the reporting person. Such information shall be shared only on a "need-to-know" basis with those individuals investigating or responding to the concern, consistent with the need to conduct an adequate review and to prepare an adequate response.' Furthermore, if you make a complaint through Ethics Point they indicate 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.' [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Met: Expects ICT suppliers to prohibit retaliation: The Company indicates in the Supplier Code of Conduct that 'Supplier shall ensure equal opportunities throughout all levels of employment. There shall be no discrimination or retaliation against workers, including migrant workers, who raise grievances in good faith'. However, no evidence of commitment to non-retaliation being extensive to suppliers' stakeholders. As indicated above, on its website, supply chain governance, the Company states that ' employees, suppliers and other external stakeholders have the right – and the duty – to raise, in good faith, concerns about improper business conduct without fear of retaliation in any form'. [Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Supplier Code of Conduct   Suppliers   Corning, 19/04/2019]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
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"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	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"> <li>• Not met: Living wage target timeframe</li> <li>• Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Achieved payment of living wage</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	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"> <li>• Not met: Living wage in supplier code or contracts: The company indicates in the Supplier Code of Conduct that “Compensation paid to workers shall comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits.” However, no evidence has been found of living wage requirements or descriptions. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	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"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	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"> <li>• Not met: Identifies suppliers back to product source: The Company indicates that 'Because of our size, the complexity of our products, and the depth and breadth of our supply chain, it is difficult to identify actors upstream from our direct suppliers' and 'The 3TG supply chain is complex, typically including many stages between Corning and the smelters that purchase and process the ore into metals'. The Company also states on its 'Governance' website: 'Through a centralized platform that supports its operations, Corning purchases direct materials and services from suppliers in over 90 countries.' However, no evidence found of the Company identifying direct and indirect suppliers (not restricted to conflict minerals) and how it goes about it. [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a> &amp; Conflict Minerals Policy, 01/03/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why: The Company discloses a list of 'all legitimate smelters or refiners provided by our suppliers in response to our survey requests'. However, no evidence was found of the Company disclosing the names and addresses of suppliers for the most significant parts of its supply chain (indicating what are the most significant parts). [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> </ul>
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	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"> <li>• Met: Does not use child labour: The company indicates that “At Corning we: [...] Do not tolerate or support the use of child labor” [Human Rights Policy, 19/04/2019]</li> <li>• Not met: Age verification of job applicants and workers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	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"> <li>• Not met: Child Labour rules in codes or contracts: The Company indicates in its Supplier Code of Conduct that ‘Suppliers shall not use child labor. “Child” in this section means any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall verify age of young workers to ensure age is above that of minimum employment.’ In addition, on its website ‘Social Responsibility Audit’ the Company states that ‘third party auditors conduct an extensive on-site audit that include assessments related to [...] child labor’ and that ‘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, no evidence found in the specific remediation programmes in case child labour is found. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a> &amp; Social Responsibility Audit, 19/04/2019]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Pays workers in full and on time</li> <li>• Not met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The company indicates that “Our Supplier Code expressly prohibits the use of slavery or other involuntary labor: Suppliers shall not use forced, bonded or indentured labor or involuntary prison labor. [...] In order to address the risks of involuntary labor arising from unethical hiring practices, our Supplier Code requires that workers be provided a written employment contract in their native language. We also prohibit the payment of recruitment fees or other similar fees in connection with employment. Suppliers are required to repay any such fees to workers in the event they are found.” [2019 Statement on Human Trafficking and Slavery, 25/03/2019]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Does not retain documents or restrict movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How sure about agencies or brokers</li> </ul>
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The company indicates in the supplier Code of Conduct that “There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.” [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: See above. In addition, in its Supplier Code of Conduct the Company states: ‘Corning is aware the use of recruitment and labor agencies increases the risk of forced labor. All labor agents acting on behalf of Corning and its suppliers must have a clear policy that adheres to this Code. Labor agents acting on behalf of Corning must conduct due diligence with employment and recruitment agencies and sub-agents in relevant countries of operation to ensure compliance to Corning’s Supplier Code of Conduct.’ [Supplier Code of Conduct   Suppliers   Corning, 19/04/2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: See above</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The company indicates that “At Corning we: [...] 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.”. However no evidence has been found of specific measures to prohibit intimidation or retaliation against workers trying to exercise these rights.</li> <li>• Not met: Discloses % covered by collective bargaining</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	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"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company's Human Rights Policy states 'At Corning, we: [...] 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.' It also states 'Employees who suspect any behavior which is inconsistent with this policy should follow the reporting procedures in Corning's Code of Conduct. Corning strictly prohibits any form of retaliation for good faith reports, as described in our Code of Conduct and Whistleblower Policy.' On the website Supplier Code of Conduct the Company states 'This Code applies to people and companies (collectively, "Suppliers") that do business with Corning Incorporated and/or its affiliates (collectively, "Corning") and shall be updated annually. Suppliers (as well as their respective employees, subcontractors, and suppliers) are expected to comply with this Code and Corning's Human Rights Policy in order to comply with their contractual obligations to Corning.' The actual Supplier Code of Conduct also states 'In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions 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.' The Whistleblower Policy states 'Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated.' However, as indicated above, regarding suppliers the policy refers to 'in conformance with local law'. It is not clear if there is a requirement to support alternative mechanisms or equivalent worker bodies when these rights are restricted under local law. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a> &amp; Corning Incorporated Whistleblower Policy, 7/10/2019: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	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"> <li>• Met: Injury Rate disclosures: The Company discloses a chart showing employee incident rates for both recordable cases and lost workday cases for the past 10 years. The incident rate is calculated using the standard OSHA definition. (number of cases x 200,000 hours worked). [Health and Safety Performance, 19/04/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Lost days or near miss disclosure: See above</li> <li>• Met: Fatalities disclosures: Corning indicates in the H&amp;S webpage that has experienced zero employee fatalities in the past 10 years.</li> <li>• Not met: Occupational disease rates</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance</li> <li>• Not met: Met targets or explains why not</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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"> <li>• Met: Sets out clear Health and Safety requirements: The company indicates in the Supplier Code of Conduct that "Suppliers shall minimize the incidence of work-related injury and illness to help achieve a safe and healthy work environment," Furthermore, the Supplier CoC has an entire section about H&amp;S requirements covering industrial hygiene, machine safeguarding and others. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	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"> <li>• Not met: Process to stop harassment and violence</li> <li>• Not met: Working conditions take account of gender</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Equality of opportunity at all levels: Although the Company has a resource groups that is "dedicated to attracting and retaining women to Corning, and providing opportunities for professional development, networking and exposure", no evidence found of equal opportunity provided, monitored and maintained throughout all levels of employment. [Employee Resource Groups   Corporate Values, 21/04/2019 &amp; Corning EEO Statement, 01/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	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"> <li>• Met: Women's rights in codes or contracts: The Supplier Code of Conduct states that 'Supplier shall establish measures to eliminate health and safety concerns that are especially prevalent among women workers (for example, physical security and sexual harassment)'. The Company also indicates that 'Supplier shall ensure that all workers are paid equally for work of equal value, without regard to their sex'. Finally, it also states that 'supplier shall ensure equal opportunities throughout all levels of employment'. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on women's rights</li> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	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"> <li>• Not met: Respects max hours, min breaks and rest periods in its own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this</li> </ul>
D.4.9.b	Working hours (in the supply chain)	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"> <li>• Not met: Working hours in codes or contracts: The company indicates in the Supplier Code of Conduct that "Workweeks are not to exceed the maximum working hours and shall include the minimum breaks and rest periods set by local law." However, no evidence has been found of a commitment with international standards or details about requirements on maximum working hours and rest periods. [Supplier Code of Conduct, 22/03/2019: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on working hours</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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"> <li>• Met: Responsible mineral sourcing due diligence in supplier contracts: As indicated in A.1.3, the Company's supplier code contains a responsible sourcing commitment. The supplier code states that: 'Suppliers (as well as their respective employees, subcontractors, and suppliers) are expected to comply with this Code and Corning's Human Rights Policy in order to comply with their contractual obligations to Corning. 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 flowdown the same requirements throughout their supply chains'. [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a> &amp; Supplier Code of Conduct (SCOC), 16/07/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Builds capacity with smelters/refiners</li> <li>• Met: Disclosure of smelter information in supplier requirements: As indicated above, the Company has added a "conflict minerals clause to our purchase order terms and conditions and relevant contract templates in order to communicate our suppliers our expectations and requirements regarding the sourcing and disclosure of conflict minerals". This includes disclosing smelter/refiner information. [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	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"> <li>• Not met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that "one method for identifying risks in our supply chain is through automatic checks in the ACM [Assent Compliance Manager] system based on criteria established by Assent [third-party service to assist in surveying supply chain] for supplier responses". Assent then compared facilities indicated in surveys responses to the list of smelters and refiners maintained by the RMI, and determines the risk from smelters based in its criteria (audit status, proximity to DRC and covered countries). "It is important to understand the risk levels associated with conflict minerals in the supply chain. Smelters or refiners not being certified DRC-Conflict Free pose a significant risk to the supply chain. However no further details found on processes to identify risks and the risks identified (besides having non-certified DRC-conflict free). [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Met: Identification of smelter/refiners and OECD due diligence: As indicated above, the Company uses a third party service to assist in surveying suppliers and obtaining lists of smelters. "Assent compared these facilities listed in the responses to the list of smelters and refiners maintained by the RMI and if a supplier indicated that the facility was certified as "Conflict-Free", confirmed that the name was listed by RMI." It indicates that "of the 321 legitimate smelters identified on the CMRTs [Conflict Minerals Reporting Templates] we received, as of May 18, 2018, 257 were identified as RMAP Conformant, and 11 were actively working toward a "conflict-free" designation" [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses the list of smelters/refiners. However, no evidence found on whether the Company clarifies which are conformant to the RMAP. [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	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"> <li>• Met: Describes mineral risk management plan for supply chain: The Company states that it is taking the following steps to improve due diligence to further mitigate any risk that conflict minerals could benefit armed groups: "A) Include a conflict minerals flow-down clause in relevant new or renewed supplier contracts; B) Include a step to our new supplier enrolment process to directly identify new suppliers who could potentially supply Corning with products or materials containing 3TG; Partner with a third party company, Assent Compliance, which specializes in conducting conflict minerals compliance programs, to improve the accuracy and efficiency of our supplier survey and reporting process; D) Engage with suppliers to attempt to increase the response rate and improve the content of the supplier survey responses; E) Engage any of our suppliers found to be supplying us with 3TG from sources that support conflict in the DRC or any adjoining country to address the situation, which could include establishing an alternative source of 3TG that does not support such conflict, depending on factors such as the criticality of the specific part and the availability of alternate suppliers". [Corning Incorporated Conflict Minerals Report, 29/05/2018: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

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, and so the score of 12.92 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.23 out of 20 points for theme E.

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.69 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Corning Inc made data public that met one or more elements of the methodology in 22 cases, leading to a disclosure score of 1.69 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Corning Inc met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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and Wales.

As CHRB Ltd, 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.