

**Corporate Human Rights Benchmark  
2022 Company Scoresheet**

**Company Name** Corning  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 36.2 out of 100

Theme Score	Out of	For Theme
3.3	10	A. Governance and Policies
12.1	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
7.1	25	D. Performance: Company Human Rights Practices
7.2	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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: General HRs commitment: The Human Rights Policy states 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' [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the 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'. However, current statement seems to refer to respecting human rights as reflected in the document rather than commitment to respect the document itself. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The HR policy states that they 'Are committed to respecting the rights of workers, in accordance with the International Labour Organization (ILO) fundamental conventions'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>Met: Company has an explicit commitment to All four ILO Core: The HR policy states 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 rights to collective bargaining for represented employees. Do not tolerate or support the use of child labor, forced, or compulsory labor in our operations and in our supply chain.[...] Are committed to providing a fair, safe, and healthy working</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>environment for our employees that is free from unlawful discrimination, harassment, bullying or victimization'. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: See below.</li> <li>• Met: Company explicitly list All four ILO for suppliers: The supplier code states that '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. [...] Suppliers will ensure workplace environments enables workers to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association'. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The CHR policy indicates that 'At Corning, we: [...] Are committed to providing a fair, safe and healthy working environment for our employees'. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates in its Human Rights Policy website section: We respect applicable international standards and comply with all laws and regulations related to working hours for employees, including ensuring 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. The standard work week in our manufacturing plants, excluding overtime and exceptional cases, does not exceed 48 hours. 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 applicable contract terms and legal requirements related to work hours, shifts, overtime, and compensation'. However, this evidence does not seem to be part of the actual Human Rights Policy. Only policy statements are considered suitable sources for A.1 indicators under CHR's revised approach. In addition, no commitment statement to pay overtime at a premium rate was found. The Company has indicated to CHR that it will consider making changes in the future in order to meet CHR revised standards. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Company requires in the supplier code that 'Suppliers shall minimize the incidence of work-related injury and illness to help achieve a safe and healthy work environment'. It also provides different health and safety requirements. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: In its Supplier Code of Conduct, the Company indicates: 'work week must not exceed 60 hours per week, including overtime, except in emergency or unusual situations. A standard work week (one without overtime) must not exceed 48 hours. All overtime must be voluntary. 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 formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry –	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: Responsible mineral sourcing: The Responsible Minerals policy states that it 'is committed to the responsible sourcing of minerals – sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain and preserves the environment'. [Responsible Minerals Policy, 02/2022: <a href="https://www.corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	responsible sourcing of minerals (ICT)		<ul style="list-style-type: none"> <li>• Met: Based on OECD Guidance: The RM policy states that '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. [Responsible Minerals Policy, 02/2022: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: The Supplier code states that 'Suppliers shall adopt a policy and exercise due diligence to assure minerals in their supply chains originating from conflict-affected and high-risk areas (CAHRAs) do not directly or indirectly finance or benefit armed violence or contribute to human rights abuses. The scope of such policies and due diligence shall include but also go beyond the regulated "conflict minerals" (tantalum, tin, tungsten and gold) and cobalt to include the responsible sourcing of all minerals in conflict-affected and high-risk areas (CAHRAs). Suppliers shall have a due diligence framework that is in alignment with 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 (link). Suppliers shall make their responsible minerals sourcing policy and due diligence measures available to customers upon request. Suppliers shall also extend these expectations to their own suppliers'. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to follow OECD Guidance for all minerals: The RM policy states that 'our responsible minerals sourcing program – which covers all minerals, as well as suppliers and smelters/refiners previously or currently certified as "conflict free" and non certified suppliers and smelters/refiners on their journey towards certification'. [Responsible Minerals Policy, 02/2022: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Suppliers expected to make similar requirements of their suppliers: As indicated above, the Supplier Code of Conduct indicates: 'The scope of such policies and due diligence shall include but also go beyond the regulated "conflict minerals" (tantalum, tin, tungsten and gold) and cobalt to include the responsible sourcing of all minerals in conflict-affected and high-risk areas (CAHRAs)'. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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: Migrant worker's rights: According to its Human Rights Policy the Company 'respect the rights of vulnerable groups particularly relevant to the industry, including women, migrants, and children, in accordance with the ILO fundamental conventions'. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The Supplier code states that 'Suppliers shall commit to uphold human rights of workers and treat workers with dignity and respect as generally understood by the international community. This commitment applies to all workers including temporary, migrant, student, contract, direct employees or any other worker. Suppliers shall also respect the rights of vulnerable groups particularly relevant to the industry, including, for example, women, migrants, and children, in accordance with the ILO fundamental conventions'. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The Company states on its website section 'Human Rights Policy': 'Corning is committed to the advancement and empowerment of women in the workforce, their personal lives, and the communities in which they live. At Corning, we acknowledge, respect, and promote the basic human rights of women to be free from discrimination, violence, poverty and other barriers that can deny equal access to the workplace and the enjoyment of their lives regardless of gender. In furtherance of our commitment to the elimination of discrimination against women, Corning strictly prohibits any harassment, intimidation, and violence against women. We follow the Women's Empowerment Principles (WEPs) and are a member of the WEP's global community to foster business practices that empower women everywhere we operate. [...]' [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</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 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"> <li>• Not Met: The Company commits to remedy: The Company states in its Whistleblowing Policy: '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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>provide remedy where we find impacts directly linked to our business operations, goods, or services.' However, 'to be its aim' is not considered a formal statement of commitment according to CHRB wording criteria. The Company has provided additional comments to CHRB, however, no evidence of a formal commitment found. CHRB wording criterion looks for an explicit commitment or any form of promise that the Company will uphold the commitment rather than an aspiration goal. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Collaborating with other remedy initiatives: In addition, the Company indicates: 'Our mechanisms do not obstruct access to other remedy channels or procedures and, where appropriate, we will collaborate with organizations and other companies to help prevent, mitigate, and remedy adverse human rights impacts'. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Human Rights Policy: 'Respect the rights of human rights defenders. We do not tolerate unlawful threats, intimidation, or attacks against human rights defenders'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Code of conduct, N/A: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Company expect suppliers to make this commitment: In addition, the Company indicates: 'Respect the rights of human rights defenders. We do not tolerate unlawful threats, intimidation, or attacks against human rights defenders, including those exercising their legal rights to freedom of expression, association, or peaceful assembly. We expect our suppliers to make a similar commitment'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</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>• Met: Board level responsibility for HRs: The Company indicates: 'The Corporate Responsibility and Sustainability Committee regularly discusses and reviews Corning's sustainability activities and philosophy and maintains general oversight of environmental and social risks, with particular responsibility for employee welfare and labor relations, social justice, supply chain integrity, human rights, political activity, community responsibility, and environmental matters'. The Committee is composed of four board members. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO: The Company has provided an additional sources to this indicator, indicating it is among the best Companies to work for in terms to LGBTQ+ and Equality as well as inclusion. However, no evidence found of material where Board members or the CEO signal the Company's commitment to human rights discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [2021 "Best-of-the-Best", N/A: <a href="http://nglcc.org">nglcc.org</a>] &amp; [Best Places to Work for LGBTQ (web), N/A: <a href="http://hrc.org">hrc.org</a>]</li> </ul>
A.2.2	Board responsibility	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 HRs strategy: The webpage section Human Rights indicates: 'The Corporate Responsibility and Sustainability Committee regularly discusses and reviews Corning's sustainability activities', including the Company's human rights approach. The 2022 Proxy Statement notes that the Committee met five times in 2021. However, it is not clear the process the Company has in place to discuss and address human rights issues at Board level. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [2022 Proxy statement, 18/03/2022: <a href="http://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company indicates: 'Corporate Responsibility and Sustainability Committee member received additional cash compensation of \$10,000'. However, it is not clear this compensation is linked to the Company's human rights policy commitments or strategy. No further evidence found. [2022 Proxy statement, 18/03/2022: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not Met: At least one key 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> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.</li> <li>• Met: Senior responsibility for HR implementation and decision making: 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: <a href="https://corning.com">corning.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: How it assigns 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. Corning's Senior Vice President and Chief Supply Chain Officer oversees the application of our Supplier Code of Conduct and Human Rights Policy with third-party suppliers. The Senior Vice President and Chief Supply Chain Officer also maintains performance objectives, including communicating and implementing our Supplier Code of Conduct, which covers our most salient supply chain human rights risks'. [Human Rights policy, N/A: <a href="https://corning.com">corning.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: The Human Rights Policy webpage section indicates: 'Corning's Senior Vice President and Chief Supply Chain Officer oversees the application of our Supplier Code of Conduct and Human Rights Policy with third-party suppliers. The Senior Vice President and Chief Supply Chain Officer also maintains performance objectives, including communicating and implementing our Supplier Code of Conduct, which covers our most salient supply chain human rights risks'. [Human Rights policy, N/A: <a href="https://corning.com">corning.com</a>]</li> <li>• Not Met: At least one key 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> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0.5	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 website indicates that 'We also integrate human rights into our internal management processes, such as our Enterprise Risk Management process, which is reviewed annually by our Audit Committee and is based on material issues regardless of where they are identified within the value chain. Corning also established a sustainability goal to address Environmental, Social and Governance (ESG) issues, including human rights issues, in its Enterprise Risk Management process'. [Human Rights policy, N/A: <a href="https://corning.com">corning.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides an example</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) to workers and external stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: 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 twelve languages'. [2020 Statment on Effort to combat human trafficking, 01/2020: <a href="http://corning.com">corning.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder: The Human Rights Policy webpage section indicates: 'We use and make available to our stakeholders our sustainability website and sustainability report—published annually and based on recognized reporting standards—to communicate our Code of Conduct, Supplier Code of Conduct, and Human Rights Policy and provide regular updates on how we are making progress on our commitments and how effective we have been in addressing our salient risks and impacts'. However, it is not clear how it proactively communicates its policy commitments to affected stakeholders, including at least local communities affected by its operations. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: How policy commitments are made accessible to audience: Although the Company indicates that it publishes annually and based on recognized reporting standards its sustainability website and sustainability report, it is not clear how it directly communicates and ensures that this form is accessible to its audience, including local communities. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.</li> <li>• Met: Requires suppliers to communicate policy requirements: In its Supplier Code of Conduct the Company states '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 flow down the same requirements throughout their supply chains. When there is a difference between a local law and our Supplier Code of Conduct, we seek to apply the higher standard. Corning monitors its suppliers to ensure compliance with this Code'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul> Score 2 <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, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Company requires suppliers to cascade down to their 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, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>
B.1.5	Training on Human Rights	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.</li> <li>• Met: How workers are trained 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 twelve languages'. [2020 Statment on Effort to combat human trafficking, 01/2020: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Trains relevant managers including procurement: The Company indicates on its website that 'In 2019, all members of Corning's Global Supply Chain Management team, from senior leadership to supply chain personnel, participated in human trafficking, forced labor and modern slavery awareness training. This training was designed to provide our leadership with the knowledge and skills to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>promote human rights compliance throughout our supply chain network. In addition, Corning’s Global Supply Management and Supply Chain organizations are educated on supply chain social responsibility issues such as human trafficking, forced labor, 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. Supply Chain Social Responsibility training has been integrated into functional employee learning plans and new employee onboarding program’. [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.</li> <li>• Met: Meets both requirements under score 1: See above.</li> <li>• Met: Trains suppliers to meet company's HR commitment: The webpage section Supplier Responsibility indicates: ‘To promote social responsibility within its supply chain, Corning provides ongoing training to its management leadership and employees, as well as supply chain partners. Supply Chain Social Responsibility Supplier Training – High risk suppliers are currently being trained on forced labor/slavery and human rights/trafficking as part of our third-party audit program. Beginning in 2020, Corning will expand awareness training on forced labor/slavery and human rights/trafficking to all strategic preferred suppliers to ensure Corning’s supply chains reflect our values and respect human rights’. [Supplier Responsibility website, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Disclose % trained</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>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its Human Rights policy that ‘Our various internal management and oversight systems and processes—which include, among others, due diligence of high-risk locations; supplier audits and compliance oversight; ongoing health and safety audits within our facilities; regular surveys that employees can complete anonymously to provide feedback; and a secure Code of Conduct hotline that any party can access to raise concerns or express grievances anonymously, if desired—help us identify human rights risks and impacts’. The 2021 Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains indicates: ‘key component of our Supplier Relationship Management process is to conduct on-site audits, which is part of ongoing work that Corning has planned for 2021. Additionally, Corning has a comprehensive audit program for its highest risk strategic Suppliers, including a specific focus on contract manufacturers, where Corning has determined the risk of human trafficking in its supply chains to be the highest, given the nature of such operations’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains 2021, 07/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored: The Company indicates that in 2021 it had a total of 610 Supplier Performance Assessments (including sustainability) and also 100 % ‘ thereof high-risk facilities audited’. However, it is not clear the proportion of supply chain monitored as a whole. [2021 Sustainability Report, 03/2022: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring: The Company provides comments, in its feedback to CHRB indicating how workers are engaged in the audits. However, although the Company has provided a source for this comment, no evidence was found to contrast its content in the document provided. On the other hand, in this indicator, the Company is expected to provide evidence of how the Company’s own workers are involved in the monitoring process, rather than how workers are engaged in it.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Describes corrective action process: 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 (e.g., labor and human trafficking), environmental sustainability, health and safety, quality, and performance. Based on the findings of the third-party audit, these plans are created by Corning, in collaboration with our third-party auditors and the supplier’s Corporate Social Responsibility lead and senior management, to ensure the supplier meets or exceeds Corning’s corporate social responsibility requirements. These plans are designed to bring the supplier into compliance within a defined timeframe. While working within a corrective action plan, a supplier will be subject to frequent progress reviews. Corrective action plans for the highest risk suppliers are reviewed with senior corporate leadership,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>including the Corporate Risk Council'. The Company has provided an additional source to this indicator, however key information was already in use. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Disclose findings and number of corrective action: The Company discloses the number of 'Corrective action agreed/completed for priority non-conformances', 33 and for 'Corrective action agreed/completed for other non-conformances' 262 for 2021. However, no further information found of the finding of its monitoring process. [2021 Sustainability Report, 03/2022: <a href="http://corning.com">corning.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers: The Company indicates that 'Corning's risk management process begins before companies join our supply chain. Suppliers identified in high risk countries are screened via our third-party risk tool for more than 50 risk elements. Potential suppliers are screened to monitor corporate social responsibility areas, which includes the monitoring of potential forced labor, child labor and/or human rights violations'. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Company indicates in its website that 'Based on the [audit] results, improvement plans for mitigation and training are developed, and follow-ups are scheduled. Insufficient remediation may result in contract termination'. This is also indicated in the statement on slavery and human trafficking: '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'. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>] &amp; [2020 Statement on Effort to combat human trafficking, 01/2020: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights: The Company indicates: 'Our internal team of sustainability experts regularly use a tool to assess risks associated with our own operations and suppliers. The tool 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. The tool also provides risk scores for Tier 2 suppliers and critical industry suppliers. Each score is comprised of five major factors: Viability, Delivery, Market/Cost, Image &amp; Compliance, and Quality &amp; Performance. The tool also enables risk prioritization across the enterprise by utilizing these risk scores in combination with internal impact scores'. However, it is not clear if the Company has specific positive incentives it puts into place via its purchasing practices to encourage its business relationships to act with respect for human rights. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Working with suppliers to meet HR requirements: The webpage section Supply Chain Accountability indicates: 'We have performed two training sessions in which forced labor topics were covered and highlighted: In June 2018, classroom training was provided by a third party to major contract manufacturers associated with Corning® Gorilla® Glass products. On Dec. 15, 2020, online training was provided to contract manufacturers across all business units by third party trainers and Corning. In 2021, a Supply Chain Social Responsibility eLearning Program was developed. Over 300 suppliers participated in the e-learning and completed the assigned courses. In 2022, a CSR refresh training is planned for our contract manufacturers and suppliers highlighting the updated requirements of the RBA standard'. Also: 'Corning and/or a third-party hold a training summit to present Corporate Social Responsibility to all identified suppliers to discuss the criteria and overall outcome of the Social Responsibility Audit. Best practices, strategies, and tactics to improve and mitigate social responsibility practices and risks (including the topics of forced labor, child labor and human trafficking) are shared and discussed to ensure alignment with Corning values and expectations'. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>
B.1.8	Approach to engagement with 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 to identify and engage with workers/communities in the last two years: The Company discloses a list of different stakeholders, including 'our people', 'our partners (customers and suppliers)', 'our communities', 'society'. It also indicates how it engage with each group and key topics. However, it is not clear how it has identified, and engaged with affected stakeholders, including workers or local communities in its supply chain, in the last two years. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>] &amp; [Stakeholder Engagement__, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: The Company indicates: ‘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 salient and applicable human rights issues. Our various internal management and oversight systems and processes—which include, among others, due diligence of high-risk locations; supplier audits and compliance oversight; ongoing health and safety audits within our facilities; regular surveys that employees can complete anonymously to provide feedback; and a secure Code of Conduct hotline (...) —help us identify human rights risks and impacts. Assessments are typically triggered by mergers and acquisitions, new country operations or entries into new markets, new business relationships (such as a new supplier) or changes in the human rights conditions in particular locations. Our approach to human rights due diligence aligns with our corporate Human Rights Policy and includes these points of review: a safe and healthy workplace; a workplace free from discrimination, harassment, bullying or victimization; freedom of association; and prohibition on and prevention of any use of child labor or forced labor. Our internal team of sustainability experts regularly use a tool to assess risks associated with our own operations and suppliers. The tool 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. The tool also provides risk scores for Tier 2 suppliers and critical industry suppliers’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Identifying risks through relevant business relationships: See above, the processes include both own operations and supply chain. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As it is mentioned above: ‘Our various internal management and oversight systems and processes—which include, [...] regular surveys that employees can complete anonymously to provide feedback; and a secure Code of Conduct hotline (...) —help us identify human rights risks and impacts. [...] Our internal team of sustainability experts regularly use a tool to assess risks associated with our own operations and suppliers. The tool 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. The tool also provides risk scores for Tier 2 suppliers and critical industry suppliers’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Triggered by new circumstances: It indicates: ‘Assessments are typically triggered by mergers and acquisitions, new country operations or entries into new markets, new business relationships (such as a new supplier) or changes in the human rights conditions in particular locations’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates: ‘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 salient and applicable human rights issues. (...) Assessments are typically triggered by mergers and acquisitions, new country operations or entries into new markets, new business relationships (such as a new supplier) or changes in the human rights conditions in particular locations. (...) Our internal team of sustainability experts regularly use a tool to assess risks associated with our own operations and suppliers. The tool 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. The tool also provides risk scores for Tier 2 suppliers and critical industry suppliers. Each score is comprised of five major factors: Viability, Delivery, Market/Cost, Image &amp; Compliance, and Quality &amp; Performance. The tool also enables risk prioritization across the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>enterprise by utilizing these risk scores in combination with internal impact scores'. The salient risks for its own operations are: Forced labor and child labor; Health and safety; Working hours; Non-discrimination; Freedom of association; Fair compensation. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: How process applies to supply chain: As mentioned above, the webpage section Human Rights indicates: '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 salient and applicable human rights issues. (...) Assessments are typically triggered by mergers and acquisitions, new country operations or entries into new markets, new business relationships (such as a new supplier) or changes in the human rights conditions in particular locations. (...) Our internal team of sustainability experts regularly use a tool to assess risks associated with our own operations and suppliers. The tool 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. The tool also provides risk scores for Tier 2 suppliers and critical industry suppliers. Each score is comprised of five major factors: Viability, Delivery, Market/Cost, Image &amp; Compliance, and Quality &amp; Performance. The tool also enables risk prioritization across the enterprise by utilizing these risk scores in combination with internal impact scores'. The webpage section Supply Chain - Accountability notes: 'Corning has a comprehensive audit program for its highest risk strategic Suppliers, which includes a specific focus on contract manufacturers, where Corning has determined the risk of human trafficking in its supply chains to be the highest, given the nature of such operations. Corning has developed a matrix to identify high-risk countries which is based upon (i) the Amfori 6 factors (...) and (ii) a third-party tool, risk methods, which is a supply risk profile/rating solution that utilizes 49 risk indicators to identify potential risks'. The salient risks for workers and local communities in our supply chain are: Labor, ethics, health and safety, and environmental risks. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Public disclosure of the results of HR assessment: The Company provides a table with the results of its assessment process. The table discloses different segments and respective salient risks and action plan to prevent, mitigate or remediate risk each. For Company employees, the Company indicates that salient risks include 'forced and child labor', 'health and safety', 'working hours', 'non-discrimination', 'freedom of association', 'fair compensation'. For supply chain workers, salient risks include forced and child labour, and, together this group and local communities in supply chain, 'labor, ethics, health and safety, and environmental risks as outlined in Corning's supplier code of conduct'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks: For each of the salient risk and stakeholder group, the Company describes the measures taken/in place. For instance, in relation to working hours and own employees, the Company states that 'We respect applicable international standards and comply with all laws and regulations related to working hours for employees, including ensuring 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. The standard work week in our manufacturing plants, excluding overtime and exceptional cases, does not exceed 48 hours. 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 applicable contract terms and legal requirements related to work hours, shifts, overtime, and compensation'. See below other examples in relation to another topic. Similar evidence is provided for the different issues affecting employees. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain: The webpage section Supply Chain Accountability indicates: '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), environmental sustainability, health and safety, quality, and performance. Based on the findings of the third-party audit, these plans are created by Corning, in collaboration with our third-party auditors and the supplier's</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Corporate Social Responsibility lead and senior management, to ensure the supplier meets or exceeds Corning’s corporate social responsibility requirements. These plans are designed to bring the supplier into compliance within a defined timeframe. While working within a corrective action plan, a supplier will be subject to frequent progress reviews. Corrective action plans for the highest risk suppliers are reviewed with senior corporate leadership, including the Corporate Risk Council’. 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. In its webpage section Human Rights, the Company provides a table with the results of the assessment process, including its supply chain. The table discloses different segments and respective salient risks and action plan to prevent, mitigate or remediate risk each. However, supply chain measures refer to the monitoring process in general. There are measures described for forced labour. However, these refer mainly to own employees rather than workers in the Supply chain. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>] &amp; [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Example of actions decided on at least 1 salient HR issues: For instance, in relation to 'fair compensation' for own employees, the Company states that 'We are currently in the process of researching and gathering living wage standards and data by country and identifying any gaps in meeting such living wage standards in all countries where we have significant operations (representing over 97% of our in-scope employees). By the nature of the jobs we provide, we know that Corning provides compensation that always meets, and very often significantly exceeds, minimum wage requirements in all the jurisdictions we operate in. Our preliminary analysis, starting with the countries where Corning has the greatest number of employees, indicates that Corning also provides compensation that would meet or exceed a higher living wage standard for more than 99% of the 43,000 employees assessed to date. Similar to the annual assessment Corning conducts on pay equity, we intend to develop a repeatable process to assess and monitor our continued progress against evolving living wage standards. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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: System for tracking or monitor if actions taken are effective: The Company indicates: ‘Each functional area with ownership of a salient human rights risk has the responsibility to monitor the implementation of Corning’s Human Rights Policy and 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 tracks progress toward this goal through the existing employee 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. Functional areas are also responsible for improving the ongoing effectiveness of their existing risk management systems based on the successes or challenges that they face in implementing action plans to mitigate the identified human rights risks and impacts’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Lessons learnt from checking system effectiveness: The Company states: 'Each functional area with ownership of a salient human rights risk has the responsibility to monitor the implementation of Corning’s Human Rights Policy and 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 tracks progress toward this goal through the existing employee 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. Additionally, 'Corning has encountered cases where workers were required to cover the cost of onboarding health-check fees in 2019, 2020, 2021. Fees ranged between USD \$6-\$25. Corning initiated the following remediation plans with identified suppliers and requested corrective actions: Revision of recruiting process/procedures; Reimbursement of the fees to the impacted workers; Establishment of a solution in collaboration with the supplier to sign a contract with a third-party health-check company to ensure health-check fees will be paid directly by the company. Corning is highlighting the onboarding health-check fee issue along with latest RBA requirements, which were tightened in 2020, in CSR training with suppliers starting in Q4 2014'. However, although the Company provides an example of actions taken when encountering non-compliances in its audits, and how its monitoring system works, no example found 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 its due diligence process. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights 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"> <li>• Not Met: Provides two examples of comms with stakeholders: It indicates: 'We use and make available to our stakeholders our sustainability website and sustainability report—published annually and based on recognized reporting standards—to communicate our Code of Conduct, Supplier Code of Conduct, and Human Rights Policy and provide regular updates on how we are making progress on our commitments and how effective we have been in addressing our salient risks and impacts'. The Company also discloses its Code of Conduct Reporting data, which contains figures on alleged Human Rights cases and one example of a non-compliance case addressed. However, no further example found of how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Code of Conduct Reporting Data, 11/02/2022: <a href="http://corning.com">corning.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul> </li></ul>

### C. Remedies and Grievance Mechanisms (20% 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	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: 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, should report'. 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, 05/06/2021: <a href="http://corning.com">corning.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: The webpage section Human Right indicates: 'All employees are required to complete training related to Corning's Code of Conduct. (...) Corning's training also ensures employees know how to report concerns, including through Corning's anonymous third-party hotline, if desired'. The EthicsPoint website of the whistleblower policy is available in more than 50 languages. [EthicsPoint, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>] &amp; [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> </li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier Code of Conduct indicates: '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 (...). Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct will not be tolerated. Suppliers are required to provide these grievance channels to all workers during the hiring process and within worker onboarding. Corning's grievance channel phone number and website should also be clearly posted for worker use at supplier facilities'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Expect Suppliers to convey expectation to their own suppliers: See above. In addition, '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, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: 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, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: The online channel (EthicsPoint) is available in more than 50 languages. However, it is not clear how affected external stakeholders, at its own operations, are made aware of it. The webpage section Governance Guidelines indicates: 'Corning makes the Code of Conduct available to all employees electronically, in 13 different languages. We also provide posters in local language explaining how to report Code of Conduct violations and reinforcing our commitment against retaliation. Through a contract with a third-party, we provide a service allowing employees and persons outside of Corning the ability to report concerns anonymously, in local language, either by phone or internet, all day and every day, around the world'. However, it is not clear how it ensures affected external stakeholders are made aware of its grievance mechanism, as it is not clear the reach of the posters. This subindicator looks for communication to external stakeholders (awareness of employees is assessed in indicator C.1) [EthicsPoint, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>] &amp; [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers: The Supplier Code of Conduct indicates: '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 <a href="http://ethicspoint.com">ethicspoint.com</a>'. However, although the Company indicates that the line is open to 'relevant external stakeholders', it is not clear that suppliers' external individuals and communities are included in this group and have access to it. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: '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 <a href="http://ethicspoint.com">ethicspoint.com</a>'. Also, '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 flow down the same requirements throughout their supply chains'. However, as it is mentioned previously, it is not clear the line is also open to external individuals and communities at supply chain level, therefore, it is not clear suppliers have to convey the provision to their own suppliers of having a</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			grievance line available to these stakeholders. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a> ]
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: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism: Regarding its grievance mechanism, the webpage section Governance indicates: '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'. The Human Rights Policy webpage section indicates: 'We may receive feedback from our stakeholders, including Corning employees, to help us track and monitor the performance and effectiveness of our Code of Conduct hotline'. However, although the Company indicates it may receive feedback from workers, it is not clear how it engages with potential or actual users (or individuals or organisations acting on their behalf) on the improvement of the mechanism. [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>] &amp; [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, 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 and how complainants will be informed: The Whistleblower Policy states that 'Upon receipt of a Report, the Chief Compliance Officer shall review the Report and shall determine if the investigation of such Report is warranted in accordance with the company's written Investigation Protocol. [...] After the completion of an investigation, if the findings of the Investigative Liaison indicate that the Report has validity, the Chief Compliance Officer, in accordance with appropriate Human Resources representatives, management for the employee in question, and the General Counsel, as appropriate, will determine the appropriate actions required to remedy any past or existing misconduct, fraud, abuse or illegal activities and to prevent the occurrence of such misconduct, fraud, abuse or illegal activities in the future. [...] The Chief Compliance Officer will also discuss the findings as necessary with the General Counsel to determine whether public disclosure (e.g., to external individuals and/or communities) or disclosure to governmental agencies and/or reporting to the full Board of Directors is necessary or appropriate. Although timing will vary depending on the complexity of the Report, Corning will strive to complete all investigations within 90 days. The complainant will be notified of the outcome of the investigation'. It is not clear, however, what's the procedure for informing the complainant throughout the process. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants: The Company provided comments and sources to this indicator, however, no material evidence was found.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism: The Company provides in its feedback to CHRB data on human rights cases and an example of a specific case. However, it is not clear the types of outcomes to the complainant through use of the grievance mechanisms. [Code of Conduct Reporting Data, 11/02/2022: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Escalation to senior/independent level: The Whistleblower Policy indicates: 'Upon referral of a Report, the appointed Investigative Liaison shall review the Report, determine the appropriate method of investigating the matters raised in the Report, and conduct the investigation in accordance with the instructions contained in Corning's Investigation Protocol. Depending upon the subject matter of the Report, the Investigative Liaison will typically be from Corning's Human Resources Department, Law Department, Global Security Department, or Finance Department. Depending on the nature of the allegations and issues involved, the Investigative Liaison may escalate the investigation to the Chief Compliance Officer, who may in turn escalate to other senior officials or external resources as determined in the Chief Compliance Officer's discretion'. However, it is not clear if escalation to more senior levels or independent third party adjudicators or mediators also entails challenging the process or outcome and that it can be done at complainant discretion. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	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: 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’. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</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, it indicates 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, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders: The webpage section Governance Guidelines indicates: ‘Corning does not retaliate, and has not retaliated, against employees or others who have brought forward concerns in good faith’. Similarly, the Whistleblower Policy states: ‘Retaliation of any kind (including, for example, harassment) against those reporting a good faith concern about improper business conduct or against anyone participating in an investigation into such concerns will not be tolerated. Additionally, no employee shall be adversely affected because the employee refuses to carry out an instruction that would constitute fraud, or would be a violation of federal or state laws or Corning’s Code of Conduct. Corning does not retaliate, and has not retaliated, against employees or others who have brought forward concerns and/or participated in compliance investigations in good faith’. However, although the Company indicates that it does not and it has not retaliated, no further evidence found indicating that it will not specifically retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts [...] as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>] &amp; [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company indicates in the Supplier Code of Conduct that ‘There shall be no discrimination or retaliation against workers, including migrant workers, who raise grievances in good faith’. Additionally, ‘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 flow down the same requirements throughout their supply chains’. The webpage section Supplier Responsibility notes: ‘Suppliers, and other relevant stakeholders, can submit any questions or report any violation or grievance to Corning’s confidential and anonymous Code of Conduct Line’. However, it is not clear this provision extends to suppliers’ external stakeholders, as it is not clear the mechanism is accessible to external stakeholders and communities at supply chain level. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>] &amp; [Supplier Responsibility website, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial	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: Complainants not asked to waive rights: It indicates: ‘We do not ask affected individuals to waive their legal rights to bring a claim through a judicial process as a condition of participating in our grievance process’. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Will work with state based non judicial mechanisms: The Human Rights policy indicates: 'We also will not obstruct access to judicial or non-judicial mechanisms and will cooperate with such mechanisms should the situation arise'. Additionally, the Whistleblower Policy indicates: 'Our mechanisms do not obstruct access to other remedy channels or procedures, including state-based judicial or non-judicial mechanisms or other available mechanisms for persons who make allegations of adverse human rights impacts. Where appropriate, we will collaborate with organizations and other companies to help prevent, mitigate, and remedy adverse human rights impacts. We will cooperate with state-based nonjudicial grievance mechanism complaints that may be brought against Corning and work reasonably to resolve such matters'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Whistleblower Policy, 05/06/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Example of issue resolved (if applicable): Although the Company has provided, in its feedback to CHRB, an example of a case resolved, no example found of an issue resolved as the result of it cooperating with state-based non-judicial grievance mechanism on complaints brought against it. [Code of Conduct Reporting Data, 11/02/2022: <a href="http://corning.com">corning.com</a>]</li> </ul>
C.7	Remedying adverse impacts	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: Describes how remedy has been provided: The Company indicates: 'In 2021, concerns were raised via Corning's grievance mechanism related to living conditions and payment of fees for Filipino workers at a Corning plant in Taiwan. (...) In responses to these complaints, Corning instituted several detailed review processes, including (1) a third-party audit of the dorms provided by a broker under contract with Corning; (2) an internal review of the roles, responsibilities, and conditions for Corning's foreign workers; and (3) an external review by a third party of Corning's foreign worker program in Taiwan. The third party audit of the living facility conditions identified a short list of findings, including improvements to management systems and minor dorm safety improvements, which were promptly addressed by the broker with oversight from Corning. The external and internal reviews led to several improvement areas being identified, which likewise have been implemented. One of those areas was the reimbursement of recruitment and other certain fees paid by the foreign workers contrary to RBA guidance. Corning has reimbursed these fees to existing foreign workers per RBA guidance and is in the process of notifying and reimbursing former foreign workers, again in line with RBA guidance. Corning is also monitoring the situation through increased oversight of the broker and communications with the foreign workers to avoid any similar future issues'. [Code of Conduct Reporting Data, 11/02/2022: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact: 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. [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Number grievances filed, addressed or resolved and outcome achieved: The Human Rights Policy webpage section indicates: 'In calendar year 2021, 62 cases raising human rights issues, in whole or in part, were filed, addressed, and/or resolved'. These were brought 'by employees or others'. Although the Company discloses figures for cases dismissed, substantiated and ongoing, no further information found of outcomes for stakeholders (i.e to who filed the complaint, either employees, supplier employees, local communities, etc.). The Code of Conduct Reporting Data discloses data on alleged Human Rights issues, the region the reports took place and an example of a case raised through its grievance mechanism: 'In responses to these complaints, Corning instituted several detailed review processes, including (1) a third-party audit of the dorms provided by a broker under contract with Corning; (2) an internal review of the roles, responsibilities, and conditions for Corning's foreign workers; and (3) an external review by a third party of Corning's foreign worker program in Taiwan. The third party audit of the living facility conditions identified a short list of findings,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>including improvements to management systems and minor dorm safety improvements, which were promptly addressed by the broker with oversight from Corning. The external and internal reviews led to several improvement areas being identified, which likewise have been implemented. One of those areas was the reimbursement of recruitment and other certain fees paid by the foreign workers contrary to RBA guidance. Corning has reimbursed these fees to existing foreign workers per RBA guidance and is in the process of notifying and reimbursing former foreign workers, again in line with RBA guidance. Corning is also monitoring the situation through increased oversight of the broker and communications with the foreign workers to avoid any similar future issues'. However, although it provides an outcome of an investigation, it is not clear the other outcomes for the reporting stakeholders. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Code of Conduct Reporting Data, 11/02/2022: <a href="http://corning.com">corning.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result: The webpage section Governance Guidelines indicates: '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. As explained in Corning's Whistleblower Policy [...] the leaders of Corning's Compliance Program review all reports received and determine the level of action and investigation required. Corning's internal processes are followed to ensure consistent investigation, reporting, and remedial actions are taken in each case. The results of all Code of Conduct investigations are periodically reported to the Audit Committee of the Board of Directors'. The Human Rights Policy webpage section notes: 'We may receive feedback from our stakeholders, including Corning employees, to help us track and monitor the performance and effectiveness of our Code of Conduct hotline'. However, although the Company indicates it periodically reports investigations to the Audit Committee and that leaders of the Compliance Program review all reports, as well as that stakeholders can leave performance feedback of the channel, it is not clear the process it has in place to review the effectiveness of the grievance mechanism. The Company is also expected to provide an example of changes made to improve it based on this review. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% 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: Pays living wage or sets target date: Regarding its own employees, the Company indicates that 'Our preliminary analysis, starting with the countries where Corning has the greatest number of employees, indicates that Corning also provides compensation that would meet or exceed a higher living wage standard for more than 99% of the 43,000 employees assessed to date. Similar to the annual assessment Corning conducts on pay equity, we intend to develop a repeatable process to assess and monitor our continued progress against evolving living wage standards'. It is not clear, however, if it pays all workers a living wage, as the Company reports having approximately 50,000 employees. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>] &amp; [Sustainability Report 2020, 2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Describes how living wage determined: It indicates: 'We are currently in the process of researching and gathering living wage standards and data by country and identifying any gaps in meeting such living wage standards in all countries where we have significant operations (representing over 97% of our in-scope employees)'. However, no further description found of how it determines a living wage for the regions where it operates, which includes involvement of relevant trade unions (or equivalent worker bodies where the rights to freedom of association and collective bargaining are restricted under law). [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Paying living wage: Regarding its own employees, the Company indicates that 'Our preliminary analysis, starting with the countries where Corning has the greatest number of employees, indicates that Corning also provides compensation that would meet or exceed a higher living wage standard for more than 99% of the 43,000 employees assessed to date. Similar to the annual assessment Corning conducts on pay equity, we intend to develop a repeatable process to assess and monitor our continued progress against evolving living wage standards'. It is not clear, however, if it pays all workers a living wage, as the Company reports having approximately 50.000 employees. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Definition of living wage reviewed 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: Discloses living wage requirements in supplier code or contracts: The Supplier Code of Conduct indicates: '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. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. (...) In addition, suppliers are expected to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family. Where wages do not meet basic needs and provide some discretionary income, suppliers are expected to take appropriate actions that seek to progressively realize a level of compensation that does'. However, although the Company requires its suppliers to take action to progressively pay to a living wage to its workers, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage: Alternatively, no requirement found to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. [Supplier Code of Conduct, 12/2021: <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: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with 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: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Met: Practices adopted to pay suppliers in line with agreed timeframes: It indicates: 'to mitigate adverse human rights impacts on workers in the supply chain, we implement several responsible purchasing practices, including paying first-tier suppliers, particularly small, disadvantaged suppliers, within 60 days and minimizing changes in orders once they are placed'. [Supply chain social responsibility social website, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</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 direct and indirect suppliers back to manufacturing sites (factories or fields): 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'. However, no evidence found of the Company identifying direct and indirect suppliers (not restricted to conflict minerals) and how it goes about it. [Governance Guidelines (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses a list of 'all legitimate smelter or refiner information included in the CMRTs we received'. 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). [2019 Conflict Minerals Report, 29/05/2020: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	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: 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, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Age verification of workers recruited: The Company indicates: 'Consistent with applicable law, we also verify the eligibility of job applicants and workers to ensure compliance with their right and legal ability to work in their respective jurisdictions. Corning maintains a global HR system that captures key data for all global employees, including birthdate'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</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 of child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall not use child labor in any stage of manufacturing or otherwise. (...) Suppliers shall verify age of young workers to ensure age is above that of minimum employment. (...) If child labor is identified, assistance/remediation is provided'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: How working with suppliers on child labour: The Company indicates that 'Corning and/or a third-party hold a training summit to present Corporate Social Responsibility to all identified suppliers to discuss the criteria and overall outcome of the Social Responsibility Audit. Best practices, strategies, and tactics to improve and mitigate social responsibility practices and risks (including the topics of forced labor, child labor and human trafficking) are shared and discussed to ensure alignment with Corning values and expectations'. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Met: Analysis of trends in progress made: The webpage section Supply Chain Accountability indicates: 'Corning has not encountered any child labor issues while auditing suppliers, but has found cases of young workers (age 16-18) working overtime and/or night shifts, which violates the RBA requirements'. It also discloses an analysis of trends for the past reporting years, indicating its auditing findings for child labor and young workers. In the case of child labor the results were always zero. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul>
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (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: Job seekers and workers do not pay recruitment fee: Regarding its workers, the Company indicates: 'We do not require our employees to pay work-related fees or costs'. However, it is not clear it entails that job seekers and workers do not pay any recruitment fees. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (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: Debt and fees rules in codes or contracts: The Supplier Code of Conduct indicates: 'Workers should not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, then these fees should be repaid to the worker'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on debt &amp; fees: It indicates, 'In 2020, Corning launched Corporate Social Responsibility Training for its contract manufacturers, and in 2021 Corning will launch Human Rights training for our strategic suppliers. These trainings are intended to re-enforce our Supplier Code of Conduct, which includes slavery and human trafficking, and to ensure Corning's supply chains reflect our Values and respect for human rights as identified in our Supplier Code of Conduct and Statement on Efforts to Combat Human Trafficking and Slavery. Additionally, high-risk suppliers are currently being trained on these subjects as part of our third-party audit program'. However, although the Company discloses different training programmes aimed at addressing force labour, no further evidence found of how it works with suppliers to specifically eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. The webpage section Supply Chain Accountability indicates: 'Corning has encountered cases where workers were required to cover the cost of onboarding health-check fees in 2019, 2020, 2021. Fees ranged between USD \$6-\$25' As consequence, the Company initiated remediation plans. Corning is highlighting the onboarding health-check fee issue along with latest RBA requirements, which were tightened in 2020, in CSR training with suppliers starting in Q4'. The Code of Conduct Reporting Data also provides another example, related to Filipino workers at a Corning plant in Taiwan although evidence refers to corrective actions. Although corrective action processes are not material to this subindicator, there's evidence of supplier training, including regarding health-check fees. [Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains 2021, 07/2021: <a href="http://corning.com">corning.com</a>] &amp; [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	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: Pays workers in full and on time: Regarding its workers, the Company indicates: 'Across our operations, we pay our employees regularly, in full, and on time'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Met: Payslips show any legitimate deductions: Moreover, 'all employees receive a payslip with their wages and explanations of any legitimate deductions'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (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: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates: '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. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted'. However, no further evidence found of requirements to pay workers regularly and on time. [Supplier Code of Conduct, 12/2021: <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 supply chain to pay workers regularly and on time: It indicates, in its Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains 2021: 'In 2020, Corning launched Corporate Social Responsibility Training for its contract manufacturers, and in 2021 Corning will launch Human Rights training for our strategic suppliers. These trainings are intended to re-enforce our Supplier Code of Conduct, which includes slavery and human trafficking, and to ensure Corning's supply chains reflect our Values and respect for human rights as identified in our Supplier Code of Conduct and Statement on Efforts to Combat Human Trafficking and Slavery. Additionally, high-risk suppliers are currently being trained on these subjects as part of our third-party audit program'. However, although the Company discloses different training programmes aimed at addressing force labour, no further evidence found of how it works with suppliers to specifically tackle payment of workers. The webpage section Supply Chain Accountability indicates: 'Audits are conducted using Responsible Business Alliance (RBA) standard principles and performed by selected APSCA certified third-party auditors chosen from RBA's approved audit firms, with reassessments to follow on a two-year cycle thereafter. Based on the results, improvement plans for mitigation and training are developed, and follow-ups are scheduled'. However, no description found of how it proactively works with its supply chain to pay workers in full and on time.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Statement on Efforts to Combat Human Trafficking and Slavery in Our Supply Chains 2021, 07/2021: <a href="https://www.corning.com">corning.com</a>] &amp; [Supply Chain Accountability (web), N/A: <a href="https://www.corning.com">corning.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	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: Does not retain documents or restrict movement: Regarding its own operations, the Company indicates: 'We do not retain personal documents or restrict our employees' freedom of movement outside of work hours and we do not require our employees to stay at and pay for accommodations'. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.f	Prohibition of forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Supplier Code of Conduct indicates: 'Employers and agents and sub-agents', if any, 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. In this case, at no time should workers be denied access to their documents'. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: How working with suppliers on free movement: It indicates: 'Corning and/or a third-party hold a training summit to present Corporate Social Responsibility to all identified suppliers to discuss the criteria and overall outcome of the Social Responsibility Audit. Best practices, strategies, and tactics to improve and mitigate social responsibility practices and risks (including the topics of forced labor, child labor and human trafficking) are shared and discussed to ensure alignment with Corning values and expectations'. However, it is not clear the training also covers the elimination of detention of worker's documents or other actions to physically restrict movement. [Supply Chain Accountability (web), N/A: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates: 'Corning does not have operations in any countries that prohibit membership in or affiliation with unions or other workers' associations. Over 70% of Corning employees worldwide are represented by unions or other workers' associations, and we endeavour to maintain positive and constructive relations with all such worker representative groups wherever we do business'. The significant percentage of workers covered by collective bargaining agreements is taken as a proxy for not intimidating or retaliating in practice. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Discloses % total direct operations covered by collective CB agreements: As it is mentioned above, the Company indicates: 'Over 70% of Corning employees worldwide are represented by unions or other workers' associations'. [Human Rights policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1: See above.</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)	0.5	<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: FoA &amp; CB rules in codes or contracts: The Supplier Code of Conduct indicates: ‘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. 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. Suppliers will ensure workplace environments enables workers to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association’. [Supplier Code of Conduct, 12/2021: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB: The webpage section Supply Chain Accountability indicates: ‘Questions about freedom of association and collective bargaining are included in Corning CSR audits. We have never found a violation, but if we do, remediation will be required’. However, it is not clear how it proactively works to support the practices of its suppliers in relation to freedom of association and collective bargaining. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [Supply Chain Accountability (web), N/A: <a href="https://www.corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of 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: Describes process to identify H&amp;S risks and impacts: It indicates: ‘Corning’s standards require each operation to inventory all of its routine and nonroutine tasks, analyze the health and safety risks associated with each task, prioritize operational risks, and take proactive steps to mitigate each risk until it is as low as reasonably achievable. After completing an initial inventory of all tasks, each operation reviews and updates its inventory at least annually. Each task is analyzed using a formal risk assessment methodology. After a risk has been assessed, each operation identifies control measures that can be implemented to reduce risk. Cross-functional teams that represent operations, engineering, maintenance, health and safety, medical services, as well as employees performing the work identify task risks and control measures to ensure robust risk-mitigation processes across all operations. Each control is assigned to a responsible person for implementation and tracked to closure. Control effectiveness is assessed post-implementation, and additional controls are identified for implementation, as required’ [2021 Sustainability Report, 03/2022: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses its Lost-Time Injuries for 2021: 0.24. [2021 Sustainability Report, 03/2022: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: It also discloses its fatalities for 2021: 0. [2021 Sustainability Report, 03/2022: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: Occupational disease rate for last reporting period: No occupational disease rate found for the last reporting period. Previous assessment was based on information for 2019. The methodology requests information on occupational disease rate for the last reporting period.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: It indicates: ‘Corning’s vision is for every employee to enjoy a career free from injury and illness’. However, it is not clear it set targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. [Health and safety policy, N/A: <a href="https://www.corning.com">corning.com</a>]</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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 Supplier Code of Conduct indicates: 'Suppliers shall minimize the incidence of work-related injury and illness to help achieve a safe and healthy work environment, enhancing the quality of products and services, consistency of productions, worker retention and morale. Suppliers recognize that ongoing worker input and education is essential to identifying and solving health and safety issues'. Provisions include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for lasting reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S: The Supplier Code of Conduct indicates: 'Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation'. However, it is not clear how it engages with suppliers to improve their practices in relation to health and safety. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</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 against women: Regarding its own operations, the Company indicates: 'In furtherance of our commitment to the elimination of discrimination against women, Corning strictly prohibits any harassment, intimidation, and violence against women'. However, it is not clear the process it has in place to prohibit and address harassment, intimidation and violence against women. The Company has provided feedback to CHRB, however, the content seems the be related to its supply chain. This indicator focuses on its own operations. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Working conditions take account of gender: The Company has provided feedback to CHRB, however, the content seems the be related to its supply chain. This indicator focuses on its own operations.</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: It indicates: 'Equal work deserves equal pay. In 2021, Corning achieved 100% gender pay equity among our global salaried workforce. This is a significant corporate-wide milestone that built upon our prior success in achieving 100% gender pay equity in our seven largest countries. Corning continues to annually track and implement actions to maintain 100% gender pay equity globally'. However, pay equity refers to equal pay for work of equal value. This datapoint looks for evidence in relation to pay gap. The Company has provided feedback to CHRB, however, the content seems the be related to its supply chain. This indicator focuses on its own operations. [2021 Sustainability Report, 03/2022: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1: See above.</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>
D.4.8.b	Women's rights (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: Women's rights in codes or contracts: The Supplier Code of Conduct indicates: 'Supplier shall ensure equal opportunities throughout all levels of employment and shall establish measures to eliminate health and safety concerns that are especially prevalent among women workers (for example, physical security and sexual harassment). (...) Supplier shall ensure that all workers are paid equally for work of equal value, without regard to their sex'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on women's rights: The webpage section Supply Chain Accountability indicates: 'Corning has encountered a few cases that were in violation of women's rights expectations, such as missing risk analysis for pregnant women and nursing mothers, lack of nursing room availability, or lack of refrigerator or washing facilities inside nursing rooms. Corning initiated actions in collaboration with the suppliers to address the issues, ensuring that the suppliers: Establish general policies and procedures to minimize the Health &amp; Safety impact to pregnant woman and nursing mothers. Perform risk analysis to identify any work positions unsuitable for pregnant woman and nursing mothers. Provide reasonable accommodations for nursing mothers that include wash facilities and a refrigerator'. However, the actions provided seem to be as a result of non-compliances. It is not clear how the Company proactively works with suppliers to improve their practices in relation to women's rights. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Met: Provide analysis of trends in progress made: The Company provides an analysis of trends disclosing the results of its audits in relation to its commitments to women's rights for the past three reporting years. It also indicates: 'Corning has encountered a few cases that were in violation of women's rights expectations, such as missing risk analysis for pregnant women and nursing mothers, lack of nursing room availability, or lack of refrigerator or washing facilities inside nursing rooms'.</li> </ul>
D.4.9.a	Working hours (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: Respects max hours, min breaks and rest periods in its own operations: It indicates: 'We respect applicable international standards and comply with all laws and regulations related to working hours for employees, including ensuring 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. The standard work week in our manufacturing plants, excluding overtime and exceptional cases, does not exceed 48 hours'. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets: It also indicates: '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 applicable contract terms and legal requirements related to work hours, shifts, overtime, and compensation'. However, it is not clear the Company assesses the ability of workers within its factories to comply with its commitments to respect working hours and minimum breaks and rest periods when allocating work or setting targets. [Human Rights policy, N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations</li> </ul>
D.4.9.b	Working hours (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: Working hours in codes or contracts: The Supplier Code of Conduct indicates: 'a work week must not exceed 60 hours per week, including overtime, except in emergency or unusual situations. A standard work week (one without overtime) must not exceed 48 hours. All overtime must be voluntary. 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'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on working hours: The webpage section Supply Chain Accountability indicates: 'Third party auditors conduct an extensive on-site audit that includes assessments related to social responsibility. The on-site audit consists of management interviews, site observations (facility walk-throughs) and document reviews (e.g. [...] working hours), as well as off-site employee interviews'. As detailed results of Corning's supply chain on-site social responsibility audits identified working hours risks, the Company, in response, 'collaborated with suppliers to take appropriate actions to successfully address' them. Actions taken included 'the implementation of an attendance management system and training for workers and managers to effectively manage hours/days worked per week'. However, the current evidence seems to refer to corrective action plans once non-compliance has been found. No evidence found of proactive work conducted with suppliers to prevent those situations and mitigate risks. [Supply Chain Accountability (web), N/A: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by excessive working hours</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: Due diligence in accordance with OECD Guidance in supplier contracts: The Supplier Code of Conduct indicates: 'Suppliers shall adopt a policy and exercise due diligence to assure minerals in their supply chains originating from conflict-affected and high-risk areas (CAHRAs) do not directly or indirectly finance or benefit armed violence or contribute to human rights abuses. (...) Suppliers shall have a due diligence framework that is in alignment with 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' It also 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'. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity</li> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information: Previous assessment was based on "Incorporated Conflict Minerals Report", dated 29/05/2018, which is now out of the three-year timeframe that the methodology requires. No further evidence found.</li> <li>• Not Met: Contractual requirement covers all minerals: The Supplier Code of Conduct indicates: 'Suppliers shall adopt a policy and exercise due diligence to assure minerals in their supply chains originating from conflict-affected and high-risk areas (CAHRAs) do not directly or indirectly finance or benefit armed violence or contribute to human rights abuses. The scope of such policies and due diligence shall include but also go beyond the regulated "conflict minerals" (tantalum, tin, tungsten and gold) and cobalt to include the responsible sourcing of all minerals in conflict-affected and high-risk areas (CAHRAs). Suppliers shall have a due diligence framework that is in alignment with 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'. Although the Company requires suppliers to conduct due diligence in accordance with the OECD Guidance for at least 3TG to all minerals, no further evidence found that it incorporates into commercial contracts/written agreements with suppliers' requirements to disclose to the company (as necessary on a confidential basis) updated smelter/refiner information all mineral used in the production of its parts, materials, components and products. [Supplier Code of Conduct, 12/2021: <a href="http://corning.com">corning.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	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: Risk identification and disclosure in line with OECD Guidance: The Company indicates: '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 as outlined above. Another method Corning uses specifically for minerals supply chain risk management is an internal risk mapping of all mineral suppliers to Corning based on four criteria (supplier reputation, material risk, country risk, and sustainability compliance). More generally, Corning monitors risk across all of its suppliers using a third-party tool, risk methods, and its standard set of 49 risk indicators. In accordance with OECD Guidelines, it is important to understand 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. (...) 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. (...) Assent determines 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; Responsible Minerals Assurance Process (RMAP) audit status; Credible evidence of unethical or conflict sourcing; Known mineral source country of origin; and Peer Assessments conducted by credible third-party sources. Based on these criteria the following facilities have been identified as being of highest concern to the supply chain : Tony Goetz NV - CID002587, Kaloti Precious Metals - CID002563, African Gold Refinery Limited - CID003185, Fidelity Printers and Refiners Ltd. - CID002515, Sudan Gold Refinery - CID002567’. Although the Company does not specify which are the risks identified in general in relation to this process it has referred to the places considered to be at risk.IT indicates that conflict minerals are linked to funding for groups engaged in extreme violence and human rights atrocities. [2021 Conflict Minerals Report, 28/05/2021: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>Met: Identification of smelter/refiners and OECD Guidance: 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 303 legitimate smelter and refiners identified by our suppliers, we have validated 235 smelters or refiners as Responsible Minerals Assurance Process (“RMAP”) conformant'. [2019 Conflict Minerals Report, 29/05/2020: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the list of smelters/refiners, classifying them with the corresponding RMI Audit Status of 'conformant', 'non conformant', 'outreach required', etc. [2019 Conflict Minerals Report, 29/05/2020: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> <li>Not Met: Risk identification and disclosure covers all minerals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Reporting on 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>• Met: Describes mineral risk management plan for supply chain: In the Context of conflict minerals management system, the Company indicates that its Conflict Mineral Team includes a steering team sponsored by the Senior Vice President, Global Supply Chain as well as executive-level representatives from the company's finance and legal functions [...] Corning also uses a third-party service provider, Assent [...] in the development and implementation of additional due diligence steps that we will undertake with suppliers regarding conflict minerals'. It also 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. C. 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 will include establishing an alternative source of 3TG that does not support such conflict, with timing depending on factors such as the criticality of the specific part and the availability of alternate suppliers. F. Maintain Corning's membership in the Responsible Minerals Initiative, enabling us to expand our industry collaborative efforts through RMI membership and to utilize RMI's flagship Responsible Minerals Assurance Process (RMAP) through our supply chain.' [2019 Conflict Minerals Report, 29/05/2020: <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> <li>• Not Met: Disclose better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover 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 28.97 out of 80 points scored in themes A-D has been applied to produce a score of 7.24 out of 20 points for theme E.

### 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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