

# Corning Energy Corporation



## Supply Chain Standards

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# Corning Energy Corporation Human Rights Policy

## Introduction

Corning Energy Corporation (Corning) is committed to operating with the highest ethical standards and improving our environmental, social and governance (ESG) practices. Respecting human rights and contributing to positive human rights outcomes help us to mitigate risks, adhere to regulatory requirements and build strong partnerships with our employees, customers, contractors, supply chain and communities. It is also our responsibility to improve lives by providing safe jobs and protecting vulnerable groups. In addition, focusing on human rights helps us contribute to a more sustainable and inclusive business environment, fostering long-term economic stability and resilience.

The purpose of this policy is to formalize our commitment to upholding human rights through existing decision-making, governance, corporate policies, and procedures. Our efforts are grounded in The UN Guiding Principles on Business and Human Rights, which we are committed to implement and uphold.

## Scope

This Human Rights Policy defines how Corning considers human rights in our operations, within our business relationships and across our supply chain. Where we do not manage or control, we seek to work with our business partners for them to align with our policy commitments.

Our Policy applies to all officers, employees, temporary workers, and contractors acting on behalf of Corning.

This Policy supplements our Code of Conduct and Employee Handbook.

## Governance

Our Human Rights Policy Statement is overseen by our Chief Executive Officer. This Policy has been approved by our Board of Directors.

## Commitments

We comply with all human rights-related laws in the countries in which we operate and abide to all applicable labour laws and standards addressing employment, working conditions, hours of work, discrimination, employment equity, freedom of association, child labour, and human slavery.

We recognise that we must take steps to identify and address any actual or potential adverse human rights impact which we may cause or contribute to through our activities, or products or services, or our supplier relationships.

We commit to identify and assess these impacts, act on findings, remedy when needed, track and work to measure our actions, and communicate with our stakeholders. We commit to continuous improvement by integrating the results of our risk assessments, monitoring systems and general due diligence into our policies and internal systems. This may include:

- Incorporating material human rights risks into risk assessments and risk controls.

- Engaging with suppliers to understand their exposure to human rights risks and their related management systems.
- Embedding supply chain due diligence requirements, including, where feasible, in supplier contracts.
- Assigning internal responsibilities to track, manage and reduce human rights risks.

We make available general human rights training for all employees and focused training on specific human rights issues for select employees in relevant roles. This includes training on our employment standards, and anti-harassment and discrimination policies in our employee handbook.

Our employee handbook includes an explicit whistleblower policy statement for employees to raise any issues related to human rights without fear of retaliation, and we are committed to enable remedy by investigating or collaborating with authorities. We also maintain public communication channels for external stakeholders to identify potential human rights concerns.

## Labor Rights

### Child Labor

Corning Energy Corporation does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) at least 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Workers under the age of 18 (“young workers”) must not perform hazardous work. Suppliers employing young workers must follow all local laws related to hours of work.

### Involuntary or Forced Labor, and Modern Slavery

Suppliers must not use forced labor; slave, prison, indentured, bonded, or otherwise. Corning does not tolerate Suppliers that traffic workers or in any way exploit workers. All work must be voluntary. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty.

### Working Hours

Suppliers should monitor working hours to maintain the safety, health, and welfare of workers. Working hours must not exceed the maximum amount permitted by law. Suppliers are required to provide workers with legally required breaks, or reasonable breaks where the law is silent.

### Anti-Discrimination

Suppliers must not discriminate on the basis of race, color, national origin, sex, gender identity, sexual orientation, religion, creed, the presence of any physical, sensory, or mental disabilities, age, political opinion, pregnancy, citizenship, migrant status, veteran status, ethnicity, ancestry, marital or family status, or legally protected statuses in hiring and work practices such as recruitment, job applications, promotions, job assignments, training, wages, benefits, and termination.

## Anti-Harassment and Abuse

Corning believes that all workers must be treated with respect and dignity. Suppliers must not engage in or tolerate violence, harassment, abuse, or coercion, including physical, verbal, sexual, psychological, or any form of torture or cruel, inhuman, or degrading treatment. We encourage suppliers to provide sexual harassment and abuse training to all managers, supervisors, and workers.

## Freedom of Association

Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining.

## Health, Safety, and the Environment

### Safe Working Conditions, Occupational Safety, and Industrial Hygiene

Suppliers are required to provide workers with a safe and healthy work environment that avoids harm to workers' physical and mental health. Suppliers must comply with all applicable laws regarding occupational safety, working conditions, and health standards.

We require that suppliers monitor workers' potential for exposure to health and safety hazards (e.g., chemical, biological, mechanical, electrical, and other energy sources; physical agents; fire; vehicles; fall hazards). Suppliers are required to identify, assess, and mitigate these hazards using best practices.

### Physically Demanding Work

Suppliers must continually identify, evaluate, and control physically demanding tasks to help ensure that worker health and safety is not jeopardized. If workplace conditions could result in harm from heat or cold stress, workers must be provided with adequate heat, ventilation, PPE, rest options, sun protection (e.g. shade), and/or hydration.

## Environment

Corning respects the right to a clean, healthy, and sustainable environment. Suppliers are required to comply with applicable environmental laws and regulations. Suppliers should minimize adverse impacts on the environment, (including reducing the use of energy, air emissions, greenhouse gas emissions, waste, use of water, pollution, and hazardous materials). Suppliers are encouraged to engage in efforts that support environmental sustainability.

## Management and Disposal of Hazardous Substances

Suppliers must comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances in products, manufacturing, operations, and services. Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of hazardous substances (e.g. chemicals and materials) that pose a threat to humans or the environment. Suppliers must provide training on the safe-handling and disposal of hazardous substances.

# Ethical Behavior

## No Bribery and Anti-Corruption

Corning will not tolerate Suppliers that engage in bribery with anyone for any reason, whether involving dealings with government officials or the private sector. This includes offering, promising, authorizing, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason. Suppliers are required to comply with applicable anti-corruption laws. Suppliers must not induce Corning Energy Corporation employees to violate our Code of Ethics.

## Whistleblower Protections

Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against whistleblowers, who in good faith report improper conduct (for example, related to environmental or human rights violations, workplace grievances, and unethical business practices) by a Supplier or an employee or officer of a Supplier.

# Due Diligence

## Human Rights in Risk Assessments and Controls

Corning has incorporated material human rights risks into our risk assessments and controls. Suppliers should also establish a due diligence process to identify, prevent, address, mitigate, and account for the environmental, human rights, health, safety, and ethical risks associated with their business practices. Corning will engage with suppliers to understand their exposure to human rights risks and their related policies and management systems.

## Supplier Human Rights Attestation and Company Contracts

Corning has developed a human rights attestation that will be sent to Suppliers that do not have human rights policies readily available. Corning will embed the supply chain human rights due diligence, where feasible, in supplier contracts. The separate attestation will be required for Suppliers to fill out on an annual basis unless the Supplier has the information available or the attestation is incorporated in their contract with Corning.

## Internal Tracking and Management

Corning has an Environmental Social Governance Officer who is responsible for the tracking and management of human rights risks. This employee is also responsible for the annual tracking and management of the Supplier human rights policies and due diligence, company contract human rights due diligence, and/or Supplier human rights attestation.