

Corning Incorporated

Political Contributions and Lobbying Policy

The political and legislative processes have an important impact on Corning Incorporated's business activities. As a result, Corning's management and Board of Directors believe that a government affairs program is a necessary and integral component to facilitating a business climate that enhances shareholder value.

In conducting its government affairs program, Corning is committed to ensuring that its political and lobbying activities are conducted in full compliance with applicable law and in a manner that reflects Corning's core corporate values. Corning's management and Board of Directors also are committed to providing shareholders with information about the political and policy-influencing activities that form the key components of Corning's Global Government Affairs program. The following sections address Corning's key activities and explain how Corning publicly discloses its spending in these areas for the benefit of its shareholders.

Corporate Political Contributions

Federal law prohibits corporations from contributing directly to federal candidates, federal political committees, or federal political parties. Corporations may contribute to Super PACs, i.e., political action committees that make independent expenditures supporting or opposing federal candidates. An independent expenditure is an expenditure for a communication "expressly advocating the election or defeat of a clearly identified candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or their agents, or a political party or its agents". Corning does not contribute to Super PACs or make independent expenditures supporting or opposing federal candidates, ballot measures, or referenda. Where permissible under state and local law, and consistent with the Company's interests, Corning makes contributions to non-federal candidates (e.g., candidates to state offices), and may make contributions to non-federal political committees, non-federal parties, and other non-federal political organizations that register and report to the Internal Revenue Service under section 527 of the Internal Revenue Code.

Corning's Global Government Affairs group has authority to make decisions on behalf of the Company regarding political contributions to non-federal candidates and other non-federal political entities where permitted by law. Such decisions are made in consultation with Corning's internal and/or external legal counsel and subject to oversight by the Corporate Relations Committee of the Board of Directors.

On a semi-annual basis, Corning will list non-federal political contributions (as described above) that exceed \$1,000 during a calendar year. The list is available [here](#) and will include all monetary contributions and in-kind contributions.

Corning Employees Political Action Committee

While corporations are prohibited from contributing directly to federal candidates, employees may do so collectively through employee-funded political action committees (PACs). In 1976, Corning employees formed the Corning Employees Political Action Committee (COREPAC), a PAC registered with the Federal Election Commission. COREPAC is funded through voluntary employee contributions. Corning pays the administrative expenses of COREPAC, but makes no financial contributions to it. Corning administers COREPAC in accordance with all applicable laws. COREPAC is managed by a Board of Trustees appointed by the Company. A separate nonpartisan Contributions Committee, comprised of employees representing Corning's businesses and staff functions, is responsible for approving all COREPAC contributions.

COREPAC contributions to federal, state and local candidates, where permissible by law, are made on a case-by-case basis without regard to political party affiliation. Contributions are directed to the federal, state, and local campaigns of candidates who represent Corning facilities and other candidates that share a common interest with the Company on issues that affect Corning. COREPAC also may contribute to national party committees, state party committees, leadership PACs, and other political committees. COREPAC receipts and disbursements are reported in detail, as required by law, to the Federal Election Commission. Such reports are publicly available at www.fec.gov.

Separately, Corning files the Form LD-203 Lobbying Contributions Report on a semi-annual basis with the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate listing COREPAC disbursements. The Form LD- 203 report is available at http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm and <http://lobbyingdisclosure.house.gov>.

Lobbying Activities

Corning engages with officials in the legislative and executive branches at all levels of government on issues of importance to the Company and its shareholders. Corning's Global Government Affairs group is responsible for overseeing all of these lobbying activities, and the Company discloses its lobbying activities and expenditures as required by applicable federal, state, and local law.

From time-to-time, Corning also encourages citizens to engage in "grassroots lobbying" by contacting legislators and policymakers directly to express the citizens' views on particular matters.

With respect to federal law, Corning files with the Clerk of the House of Representatives and the Secretary of the United States Senate registration statements (Form LD-1) and quarterly Lobbying Reports (Form LD-2). Corning's quarterly Lobbying Reports identify its lobbyists and the specific legislation or executive action that is the subject of their lobbying activity. Separately, as part of the Form LD-203 report mentioned above, Corning lobbyists disclose their

personal contributions to federal candidates and associated organizations. Corning's registration and reporting information can be found at http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm and <http://lobbyingdisclosure.house.gov/>.

Corning files similar registration statements and reports with state and local officials, as appropriate. The states in which Corning regularly engages in lobbying activity are New York and North Carolina. For New York, Corning's registration and reporting information can be found at <http://www.jcope.ny.gov/datasets/datasets.html>. For North Carolina, registration and reporting information is available at <http://www.secretary.state.nc.us/lobbyists/psearch.aspx>.

Participation in Trade Organizations

Corning participates in trade associations, chambers of commerce, and other organizations that collectively promote the interest of their respective members. Among the many activities that these organizations conduct, such as establishing industry standards and hosting trade shows, such organizations also enable members to collectively inform legislators, executive branch officials, and their staffs about industry positions on particular laws, policies, or proposals.

While Corning may not agree with every position or activity – political or otherwise – of each organization to which it belongs, Corning believes that on the whole each such organization acts in a manner consistent with the Company's core values and in a way that will help enhance shareholder value.

Corning participates in these organizations by paying dues and/or membership fees. In furtherance of Corning's goal of keeping shareholders informed of its government affairs activities, Corning will publish a list of all donations (which will include the portion of any such dues/fees that are tax-deductible) it has made during a calendar year to tax-exempt 501(c)(4) social welfare organizations or 501(c)(6) trade associations or chambers of commerce that exceed \$40,000 to a single recipient. That list is available [here](#).

Compliance and Oversight

Corning is committed to complying with all applicable laws that govern the political and lobbying processes. The Senior Vice President, Global Government Affairs, and other senior executives have oversight over political, lobbying, grassroots lobbying communications, and compliance activities, working with the Company's internal and external legal counsel as required. The Senior Vice President, Global Government Affairs, periodically updates the Corporate Relations Committee of the Board of Directors on the Company's political, lobbying, and other grassroots advocacy activities and COREPAC.

In connection with Corning's LD-203 certification process, Corning requires certain business, financial and staff function personnel to confirm on a semi-annual basis that no contributions of any kind have been made by or on behalf of Corning to legislative and executive branch officials of the U.S. Government, including funds, meals, entertainment, gifts or travel, without prior approval by Corning's Global Government Affairs office.

In connection with monitoring compliance with Corning's Code of Conduct, on an annual basis, Corning requires certain management-level personnel to indicate whether or not the employee, or any member of the employee's immediate family, or Corning employee for whom the management-level employee has supervisory responsibility, has authorized or provided any payment, on behalf of Corning, to any U.S. Congressperson or high-level U.S. executive branch official (e.g., President, Vice President or Cabinet member) or their staff.

Additionally, business segments are required to report any fees associated with lobbying expenses on a quarterly basis to Corning's Global Government Affairs office.

In the event any contributions or expenditures are made as an exception to this policy, we will disclose such contribution or expenditure on the Company's [website](#).

Effective July 31, 2018