

Modern Slavery Statement 2019

June 2020





Introduction

At CenturyLink, we are committed to doing business with integrity and in compliance with our Unifying Principles and all applicable laws and regulations. These Unifying Principles – Fairness, Honesty and Integrity, Commitment to Excellence, Positive Attitude, Respect, Faith and Perseverance – represent the fundamental values upon which CenturyLink was built, and they will serve as the foundation upon which we continue to grow and prosper, conduct our business and relate to one another, as well as to our customers, shareholders, business associates and the public. At CenturyLink, our commitment to human rights is integrated into every aspect of our business. Our employees and workers are expected to respect the rights of others, and we seek to work only with suppliers and partners equally committed to doing the right thing and who maintain high ethical standards. We will not tolerate modern slavery, human trafficking or any other abuse of human rights within our business or supply chains.

This statement, which is published in accordance with the Modern Slavery Act 2015, covers all of CenturyLink's UK trading operations. It describes CenturyLink and its supply chains, and what we did in 2019 to combat modern slavery and human trafficking within our business and supply chains. It also explains how we intend to continue to review our policies and procedures and strengthen our programme for combatting modern slavery.





CenturyLink and Supply Chains

About CenturyLink



CenturyLink is a technology leader delivering networking, cloud connectivity and security solutions to customers around the world, with a significant presence in the UK. CenturyLink's goal is to deliver technology that creates customer experiences that are better, easier, and simpler. Through our extensive global fibre network, CenturyLink provides secure and reliable services to meet the growing digital demands of business and consumers. CenturyLink is a valued solutions partner and the trusted connection to the networked world.

CenturyLink Supply Chains



Our main supply chains comprise suppliers within the telecom and IT industries who provide us with the services and electronic equipment we use in the provision of services to our customers, but we also buy goods and services for our own business needs, including office supplies, IT equipment or people-based security and cleaning services. We have more than 4,400 direct suppliers, but that is not the whole picture. We buy goods and services from suppliers in all countries in which we provide services, and they have their own suppliers, and thus our supply chains are large with a wide range of suppliers.

CenturyLink Policies



It is both important and critical to operate in an environment that is open and honest, and which maintains trust and integrity with everyone who works with us, including our employees, customers, business partners, investors, and most importantly with each other. Operating in a highly competitive industry, we have developed a reputation for ethical behaviour, corporate responsibility, and integrity. We believe that is one main reason that customers choose to do business with us, why investors decide to invest in us and why great people come to work at CenturyLink.



CenturyLink has a robust global [Ethics & Compliance programme](#), which is led by a Chief Ethics & Compliance Officer and is designed to communicate the ethical and legal standards that govern our business conduct. The [CenturyLink Code of Conduct](#) is the cornerstone of our Ethics & Compliance programme and sets forth the basic principles we must follow to uphold our company's ethical business culture. This Code is a global document and all our employees worldwide are trained on and are required to abide by it.



CenturyLink's Code addresses our position on topics that relate directly to human rights, including privacy, data security, diversity, inclusion and fair treatment, individual rights, confidentiality of information, health and safety, and our prohibition on the use of forced or involuntary labour, including human trafficking, in the supply chain. At CenturyLink, we work only with people who choose freely to work with us. We value equal opportunity for all and do not tolerate discrimination, harassment, or any abuse of human rights, and we respect the rights and freedoms of all individuals who work for our company.



In addition, we require that our suppliers, vendors and contractors comply with our [Supplier Code of Conduct](#), which prohibits the use of any form of child labour or forced labour, including human trafficking, in our supply chain, and requires that suppliers uphold CenturyLink's commitment to freedom of association. [CenturyLink's Environmental, Social and Governance report](#) contains additional information on our commitment to human rights.

CenturyLink and Modern Slavery

We continue to work hard to ensure there is no modern slavery or human trafficking within our business operations or our supply chains and have many safeguards in place.

CenturyLink People

Our aim to combat modern slavery still begins with our people. We maintain a dedicated team responsible for hiring our workers who ensure proper process is followed. We continue to recruit many of our employees and workers through internal vacancies. For external recruitment, we look to hire directly where possible through advertising. Where we must use agencies, we use only reputable agencies that abide by contractual terms in their dealings with CenturyLink, including compliance with law, and who meet our ethical requirements. We have maintained our robust induction process which requires our employees to participate in a detailed programme part of which describes CenturyLink's ethical requirements and business values. We continue to ensure that employees and workers have access to various information sources, including easily accessible policies and contacts for guidance on specific ethical concerns, training and opportunities for career development. We aim to make working at CenturyLink the best experience possible. We consistently reinforce our Unifying Principles and our expectations for making ethical business decisions. We also make it clear that employees who violate the Code of Conduct or the law may face disciplinary action up to and including termination of employment.



Monitoring Compliance and Whistleblowing

CenturyLink promotes a culture of honest communication and mutual respect, and in this regard, maintains a compliance hotline - the Integrity Line, which is available 24 hours a day, 7 days a week, for employees and other parties to report concerns or seek guidance. Employees have the option of making a report anonymously and are promised no retaliation for making complaints in good faith. Through training and communications, our employees are advised that they have a duty to report actual or suspected conduct that is illegal, unethical or violates company policy, including violations of human rights and concerns about modern slavery. They are also encouraged to talk to HR or their managers if they have any concerns.

CenturyLink employees receive information about the Integrity Line frequently through leadership, annual training, communications, and policies. The Ethics & Compliance group responds to allegations of misconduct through our Corporate Investigations group, and reported incidents are fully investigated and appropriate action is taken where necessary.



The Chief Ethics & Compliance Officer monitors compliance and reports information on the Ethics & Compliance programme, including contacts to the Integrity Line and compliance initiatives, to the Risk Committee of CenturyLink's Board of Directors on a quarterly basis.

Training

All CenturyLink employees are required to complete Code of Conduct training upon hire. Further, all CenturyLink employees are required to complete and acknowledge Code training on an annual basis, which is a comprehensive training on all aspects of CenturyLink's Code, including its prohibition on discrimination, harassment, and abuse of human rights. We maintain an internal escalation process which drives an annual completion rate of approximately 99% of the employee population. CenturyLink's prohibition on forced labour, including any form of human trafficking, and a specific reference to the UK Modern Slavery Act have been incorporated into the training.



Due Diligence

Our fight against modern slavery continues with our supply chains, and we have maintained our due diligence process to ensure that our suppliers comply with our requirements. Our due diligence process includes a Modern Slavery Questionnaire which is used where deemed appropriate as part of the tender process. We set very clear expectations that our suppliers be (i) fully compliant with the Modern Slavery Act, (ii) transparent, accountable, and auditable, and (iii) free from ethical ambiguities. Before onboarding a direct supplier, we carry out an initial risk assessment which, if highlighted as a risk, is forwarded to CenturyLink's compliance team to review and confirm whether the supplier can be added to CenturyLink's supply base, or needs to be rejected because it does not meet CenturyLink's required standards. Once on board, we ask all our direct suppliers to implement and maintain ethical standards that equal CenturyLink's policies and business requirements. Further, through our contractual agreements with suppliers, we require that suppliers agree to abide by our Supplier Code of Conduct, comply with all applicable laws and specifically commit to us that they will comply with the Modern Slavery Act. As a matter of policy, CenturyLink deals only with reputable suppliers and will not engage with any business known to have engaged in unethical practices or activities prohibited by the Modern Slavery Act.



Teamwork

To strengthen our ethical practices in the wake of the Modern Slavery Act, we have a team of people from various functions across CenturyLink, who focus on modern slavery. The team is led by procurement and is supported by other departments who purchase goods and services for CenturyLink, HR, compliance, and legal. The Internal Audit team provides assurance over compliance with CenturyLink's Ethics & Compliance programme, including whistleblowing facilities, staff training and supplier due diligence. Together, the team is responsible for implementing our practices and procedures to combat modern slavery, making recommendations for any enhancements and for reviewing and measuring their success.

Assessment of 2019

We maintained our strong tradition of ethical practices and policies and continued to raise awareness of modern slavery within our organisation. We applied our due diligence process to all new Suppliers. The requirement that all new contracts with suppliers and standard PO's include a modern slavery clause to ensure transparency in their own measures to combat modern slavery continued to be universally followed, and we implemented a programme to review existing supplier contracts and ensure a modern slavery clause was inserted into our agreements with them. In 2019, we began to look further into tier 2 suppliers by working with tier 1 suppliers to implement Modern Slavery commitments into their contracts, starting with contingent labour agencies. High risk areas in the tier 1 supply chain were identified and the implementation of the 'Real Living Wage' was agreed in the UK as the minimum standard for all, starting with cleaning, guarding, and catering services. A new Modern Slavery cross-functional Working Group was established and met on a regular basis to discuss progress, direction, and any issues.



CenturyLink and Next Steps

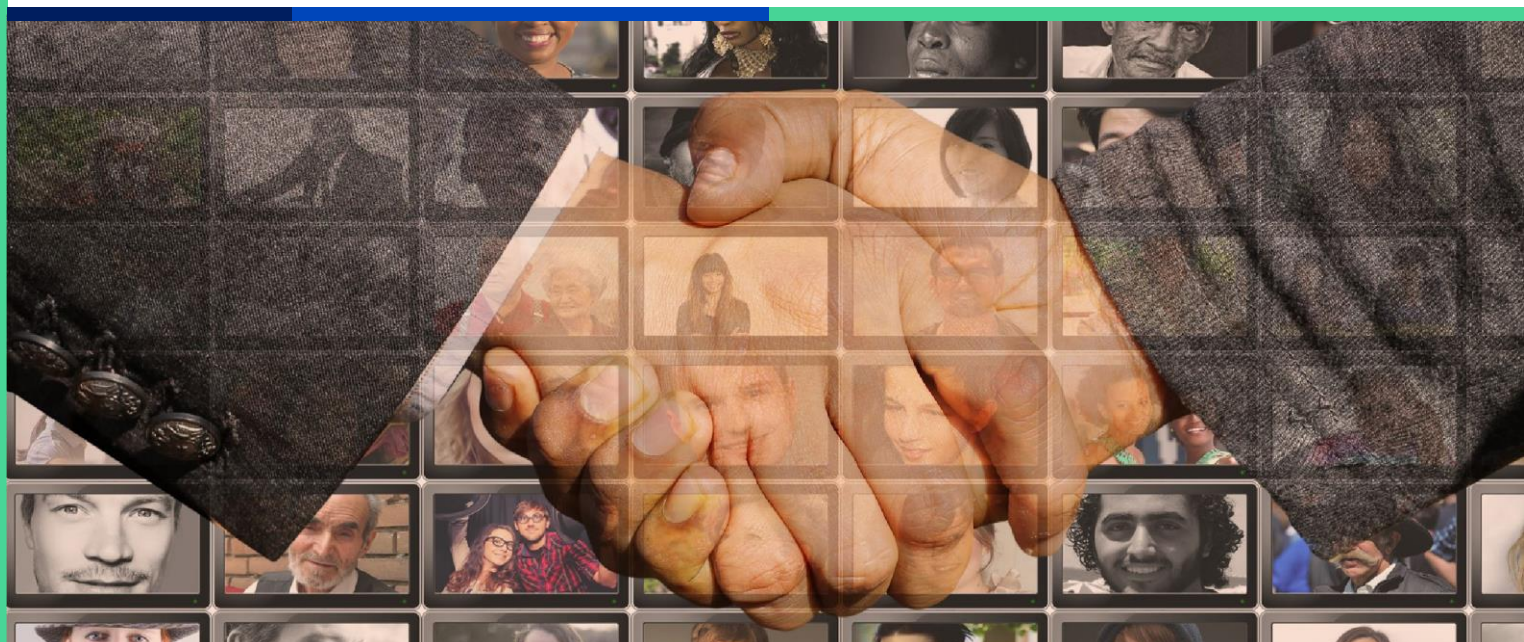
More to do

We continue to make progress in our efforts to combat modern slavery, but there is more we can do. While we remain firm in our belief that the risk of modern slavery within our own operations is low, and there are many areas within our supply chains that do not present a high risk of modern slavery, we recognise that some services we buy will include areas of risk, such as recruitment services, cleaning, maintenance, guarding, and construction contracts and we will be expanding our focus on this throughout 2020. Over the coming months, we intend to continue to assess our business practices and our supply chains to identify and address gaps and areas of risk. Our next statement will set out the progress we have made.

In 2020, CenturyLink is implementing a Human Rights Policy, which sets forth our commitment to protect internationally recognised human rights. This Policy outlines the various elements of CenturyLink's programme and policies protecting individual freedoms, including our prohibition on any form of modern slavery, child labour, and human trafficking. The Ethics and Compliance team will also be conducting a global risk assessment of all compliance risks beginning in 2020, to include risks associated with modern slavery, which will further inform additional steps we may need to take internally or in our due diligence processes.

Direct Suppliers

We continue to think the risks of modern slavery at CenturyLink, if any, will be within our supply chains. To combat any such risks, we plan to continue with a more thorough review of our suppliers based upon the types of goods and services we buy and where we buy them from. We intend that such review identifies all likely areas of risk, we will assess and investigate any areas of risk we identify, and the findings of our review will determine what specific steps we take next in our efforts to combat modern slavery and human trafficking in our supply chains. CenturyLink is implementing a new vendor onboarding system in 2020, which will allow additional risk review and assessments of suppliers when engaged and throughout the supplier relationship. We will further expand the usage of our Modern Slavery Questionnaire to additional direct suppliers which may be deemed higher risk due to the services they provide.



Indirect Suppliers

We have added to our contractual protections to address our indirect supplier risk, and we must continue to gain more visibility into our indirect suppliers. We will work with our direct suppliers to identify our indirect supply chain and look at how we can strengthen our assessment of indirect suppliers in terms of due diligence processes and risk assessments.



Within CenturyLink

Within CenturyLink, we will continue to review our policies and standards and ensure our employees continue to require the highest ethical standards, including requirements regarding modern slavery. We will continue to require mandatory Code of Conduct training and monitor how many people have completed it. We will include our prohibition of modern slavery in annual Code of Conduct training and will continue to update our training of those directly responsible for buying goods and services for CenturyLink. We will continue to raise awareness generally within the organisation of the risks of modern slavery and how to identify it and report it. We will ensure our dedicated team meets to discuss progress, and we intend to develop further a programme to measure the effectiveness of the steps we take to manage the risks associated with modern slavery.

This statement covers the period 1st January 2019 to 31st December 2019 and has been approved by the boards of directors of CenturyLink Communications UK Limited and CenturyLink Communications Europe Limited.

Signed


Michael C Reinke (Jun 29, 2020 15:42 GMT+1)

Michael Reinke, Director

Date: June 30, 2020