

# Notice: Amendments to Lumen Code of Conduct

May 13, 2025



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This notice is posted pursuant to the requirements of 17 CFR § 229.406(d). Lumen Technologies, Inc. ("Lumen") has made the following updates to its [Code of Conduct](#) applicable to all employees, directors, and officers of Lumen, including its wholly owned subsidiaries and affiliates, whether operating under the Lumen, CenturyLink, or Quantum Fiber brand names, effective and approved by the Board of Directors May 13, 2025:

- "Our Operating Principles and Core Beliefs" were modified to replace "Allyship" with "Respect," to reflect updated Lumen 8 behaviors.
  - Respect is defined as "valuing others' contributions, experiences, and well-being through active listening, thoughtful communication, and professionalism. Fostering a culture of mutual care and connection by recognizing the unique qualities and skills of individuals." (p. 5)
- In the "Resources" section, a directive to contact "your local Human Resources representative" was replaced with "contact Human Resources." (p. 9)
- In the "What if I Am Concerned About Retaliation" section, the following language was added after "Allegations of retaliation": "for reporting suspected violations of the law or Code." (p. 10)
- "Revisions were made to the "Diversity, inclusion and Fair treatment" section, including changing the heading to "Non-discrimination and fair treatment," revising and updating certain content, and removing an introductory statement on diversity and inclusion. (p. 12)
  - Our non-discrimination statement has been updated to align with the changed EEO policy statement.
  - We revised our non-discrimination statement to prohibit discrimination on the basis of "characteristics associated with such protected statuses such as hair texture, hair style, skin color, facial features, head coverings or attire."
- In the "Proprietary and Confidential information" section, we added "unlawful employment practices" to the list of protected disclosures employees may report externally. (p. 20)
- The section on the environment has been updated to align with executive orders applicable to ESG programs. (p. 31)
  - "Protecting the Environment" title was replaced with "Environment," and minimally revised to read: "We are committed to environmental stewardship, which we believe promotes the health of our planet and our business and creates value for our employees, communities, customers and investors. We therefore must meet all requirements set forth by applicable environmental laws, rules, and regulations that govern our business. If you know of a practice that does not comply with our Company's policies or with governing environmental laws, rules, and regulations, you have a duty to report it."
  - The heading, "Building sustainable supply chains" was changed to "Building ethical supply chains" (p. 31)
- Other minor updates were made for clarity and readability.