

# Lumen Human Rights Policy



## **Lumen human rights policy**

This policy applies to Lumen Technologies, Inc., and its subsidiaries and affiliates around the globe (“Lumen” or “Company”). Lumen complies with all applicable laws and standards governing our business and recognizes the importance of complying with internationally recognized human rights principles in our operations around the globe.

# Our commitment to human rights

At Lumen, our commitment to human rights is integrated into every aspect of our operations and is guided by our purpose, to unleash the world's digital potential, and our mission – to ignite business growth by connecting people, data, and apps – quickly, securely, and effortlessly.

Our progress as a company is driven by our culture, the foundation of which is our Lumen 8 Behaviors. We value our team and our customers, operating with Teamwork, Trust, and Transparency. We infuse Clarity, Customer Obsession, Courage, Growth Mindset, and Respect into everything we do. Our employees and workers are expected to respect the rights of others, and we seek to work only with suppliers and partners who maintain high ethical standards and are equally committed to doing the right thing. We will not tolerate any abuse of human rights within our business or supply chains.

## Our commitment to human rights is integrated into our Ethics and Compliance Program and Code of Conduct

At Lumen, we are committed to maintaining an ethical business culture. Lumen has a robust global Ethics and Compliance program led by our Chief Ethics and Compliance Officer and overseen by the Board of Directors. This program, designed to establish and communicate legal and ethical standards that govern our business conduct, sets forth our expectations regarding the treatment of one another, as well as our employees, contractors, suppliers, customers, and members of the general public.

[The Lumen Global Code of Conduct](#), which governs our directors and employees across the world, is the cornerstone of our Ethics and Compliance program. The Code addresses our position on topics that relate directly to human rights, such as privacy and the protection of confidential information; fair treatment and non-discrimination; individual rights; health and safety; and prohibitions on the use of forced or involuntary labor in the supply chain.

## We respect privacy rights and protect confidential information

Lumen takes data privacy very seriously – respecting a person's right to family life, home, and communications, as well as the right to the protection of one's data, which are among our top priorities. As a technology company that enables the exchange of information across our networks, our leadership is keenly focused on maintaining the confidentiality and integrity of information, data, and systems. Lumen maintains robust information security and compliance programs which include strong controls around cybersecurity and data privacy.

As technology continuously changes, Lumen believes that our policies should change and adapt with that evolution. With the advent of artificial intelligence (“AI”) and its growing use in nearly every industry but especially technology, Lumen will continue to develop and use AI ethically and with human-centered values, such as individual freedoms, equality, fairness, and data protection and privacy.

More information on our Privacy Program is available on our [website](#) and the [Lumen Trust Center](#).

## **We require fair treatment and prohibit discrimination, harassment, and retaliation**

As a global company, Lumen values individual rights and freedoms, and is intent on creating a culture of mutual respect. Lumen strictly enforces policies to provide a workplace free from illegal discrimination, harassment, and retaliation, as well as other policies aimed at ensuring equal opportunity and fair treatment for all individuals. We also recognize that accessibility is a human right that enables everyone to participate fully in society and enjoy the benefits of technology, and we strive to provide a consistent and accessible experience for our customers, employees, and partners.

## **We value individual rights and strictly prohibit any form of modern slavery or human trafficking**

Our commitment to human rights includes compliance with all applicable state, federal and international labor, statutory minimum wage, and working hour laws and regulations. Our employees and workers are treated with dignity and respect and enjoy freedom of association.

We will not employ individuals under the legal minimum working age in any region of operation, and we require the same of our contractors, suppliers, business partners and others with whom we do business.

Lumen requires that our suppliers and business partners share our commitment to ethics and compliance. We incorporate into our policies and contracts strict prohibitions against child labor, involuntary or forced labor, whether bonded, imprisoned, or indentured, and human trafficking, both in our business and supply chain.

## **We provide our employees with a safe workplace**

We operate in accordance with all applicable safety laws and procedures to ensure we maintain a safe and healthy work environment for our people. We strongly prohibit and address with urgency any threats or acts of violence and ensure that our employees, customers, and third parties are safe.

## **We protect human rights in our supply chains**

[The Lumen Supplier Code of Conduct](#) and our third-party contracts further advance our commitment to protecting human rights by holding our vendors, suppliers and other third parties with whom we do business accountable for upholding the laws and ethical standards that promote human rights.

## We care about our communities

Lumen cares. At Lumen, we are committed to supporting the passions of our employees and partnering with them to support communities around the globe. We recognize that our employees are enthusiastic about diverse causes, so we empower them to give back in ways that resonate with them. We encourage and enable our employees to volunteer and reward their efforts with volunteer rewards dollars that can be donated to the non-profits of their choice. We also offer matching on their charitable giving throughout the year including special match campaigns like our Campaign to Fight Hunger and Giving Tuesday.

## We encourage employees and third parties to report concerns to our Integrity Line

Lumen maintains a global 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. The Integrity Line has dedicated lines in the countries where our teams are located and offers translation services so that reports may be made in local languages. The Integrity Line is available via telephone, e-mail, or online form. Those who utilize the Integrity Line have the option of making a report anonymously, where permitted by local law, and employees are promised no retaliation for contacts made in good faith.

Through training and regular communications, our employees are educated on the channels and processes available for reporting actual or suspected conduct that is illegal, unethical, or violates company policy. We train our employees on our human rights policies, and we train them to recognize and report violations of human rights laws, such as those relating to discrimination and harassment, child labor, forced labor and fair compensation.

The Lumen Ethics and Compliance team promptly acts, investigates, and addresses allegations of misconduct, including those involving potential human rights abuses.

## Our ongoing commitment

At Lumen, we operate with Teamwork, Trust, and Transparency – and human rights are at the center of who we are. As we continue to unleash the world's digital potential, Lumen is committed to operating ethically, in compliance with law and protecting the internationally recognized human rights of those who work with us, for us, and those we serve around the world.

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