Lumen Supplier Code of Conduct

LUMEN®

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LUMEN®

Lumen's commitment to integrity

Lumen is firmly committed to doing business with integrity, trust and transparency, and in accordance with all applicable laws and regulations. We expect the same commitment from our Suppliers.

At Lumen, our purpose is unleashing the world's digital potential. We are a global communications services provider that ignites business growth by connecting people, data, and applications - quickly, securely, and effortlessly. Our relationships with Suppliers are an integral part of fulfilling our priorities.

Scope

This Supplier Code applies to suppliers of Lumen Technologies, Inc. ("Lumen" or "company"), and all Lumen wholly-owned subsidiaries and affiliates around the globe, whether operating under the Lumen, CenturyLink or Quantum Fiber brand names. Lumen expects all agents, consultants, channel partners, contractors, distributors, manufacturers, suppliers and other business partners, as well as their respective employees, agents, and representatives (collectively "Suppliers") with whom we do business to embrace and share our commitment to integrity and compliance with the law, and to follow the principles set forth within this Supplier Code.

A global company headquartered in the United States, Lumen is subject to many different laws around the world. While Lumen recognizes the different legal and cultural environments in which its Suppliers operate throughout the world, we expect our Suppliers to comply with the fundamental principles described in this Supplier Code, to always act with integrity, and to take reasonable steps to ensure compliance with applicable laws and regulations. Lumen's Global Supply Chain and Strategic Sourcing teams play a critical role in ensuring that supplier relationships uphold our standards across all regions and procurement activities.

This Supplier Code contains general requirements applicable to all Lumen Suppliers. Particular supplier contracts may have more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any applicable contractual provision, the provision will control unless inconsistent with applicable law.

Suppliers should take appropriate steps to ensure this Supplier Code is communicated and understood by all of their employees, agents, subcontractors, and representatives doing business with or on behalf of Lumen.



Lumen's North Star Culture

Our Lumen 8 behaviors are the actions we take to operate at our best for ourselves, our team, and our customers. We infuse Teamwork, Trust, Transparency, Clarity, Courage, Customer Obsession, Growth Mindset and Respect - into everything we do.

Conducting business

Accuracy of business records

Suppliers must record and report information accurately and honestly. All financial books, records and accounts relating to Lumen business must accurately reflect transactions, payments, and events, and must conform to generally accepted accounting principles, applicable internal controls or policies, and applicable laws. All business records must be accurate, complete, filed in a timely fashion, and must conform to all other requirements as defined by written contract. Accordingly, Suppliers will provide Lumen with accurate and complete billing information concerning all transactions with the Company.

Anti-corruption

Lumen prohibits bribery, everywhere we do business, in both the public and private sectors.

Suppliers acting on behalf of Lumen must comply with all applicable anti-corruption laws including, without limitation, the Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act.

Suppliers must never offer a bribe, kickback, or inappropriate gift or courtesy to any Lumen employee or representative, or to any party while conducting business on behalf of Lumen.

Lumen Suppliers are prohibited from offering or providing bribes to government officials or representatives of commercial or private entities, whether in cash or any other form and whether paid directly or indirectly through an intermediary. Suppliers are also prohibited from accepting bribes.

Government Officials and Public Employees

Suppliers must not offer anything of value or make any improper payments to a government official for the purpose of obtaining or retaining business or to otherwise obtain an unfair advantage on behalf of Lumen. When companies are partially or wholly owned by a government entity, any representative of that company is considered a "government official."

When representing or performing work for Lumen, Suppliers are prohibited from providing any business courtesy or anything of value to any employee, official, agent or representative of any government, wherever located, without written pre-approval from Lumen's Corporate Ethics and Compliance Department.

Suppliers are further prohibited from making facilitation payments while doing business with or on behalf of Lumen. Facilitation payments are any payments to government employees to expedite an administrative process or to perform a function that is normally performed as part of their job.



Exchange of business courtesies

Lumen expects its Suppliers to follow all applicable laws and Lumen policies regarding the exchange of business courtesies, such as meals, gifts, or entertainment, when working with or representing Lumen. Suppliers must never offer any courtesies with the intent to improperly influence any person's business judgment or that might create the appearance of undue influence. Suppliers should keep the following in mind:

- Ordinary business courtesies that are reasonable in value, infrequent and related to a legitimate business purpose are generally acceptable, but Suppliers must avoid offering Lumen employees travel, frequent meals, or expensive gifts or entertainment.
- Suppliers must never offer a gift or courtesy to a Lumen employee that is prohibited by internal policy. Lumen employees are generally not allowed to accept any courtesy with a value of $150 USD or above without pre-approval from Lumen Ethics and Compliance.
- Gifts of cash or cash equivalents, such as gift cards, are never allowed, whether to a Lumen employee or to a third-party recipient on behalf of Lumen.
- Suppliers should never offer a business courtesy to a Lumen employee involved in making or influencing a purchasing decision, such as a Request for Proposal or Request for Information.

Conflicts of interest

Lumen awards business on the basis of several objective factors, including but not limited to, product or service needs, cost, project management resources, experience, and performance record.

Suppliers must disclose to the Lumen Ethics and Compliance Department any known family or close personal relationships with Lumen employees who have any influence over or involvement in Supplier's business dealings with Lumen or may otherwise create a conflict of interest.

Suppliers must not have any financial, employment, contracting, consulting or other business relationship with a Lumen employee, unless disclosed to and pre-approved in writing by the Lumen Corporate Ethics and Compliance Department.

International business; sanctions and export compliance

When conducting international business transactions, Suppliers must comply with all applicable U.S. and non-U.S. laws, including anti-boycott requirements, customs and import regulations, anti-money laundering laws, sanctions laws, and controls on exports and re-exports of products, technology and software.

Suppliers must comply with export control and economic sanctions laws of the United States and other countries, where applicable, including the Export Administration Regulations, 15 C.F.R. Parts 730-744 and regulations implemented by the U.S. Department of Treasury Office of Foreign Assets Controls ("OFAC").

In providing products or services to Lumen, Supplier must not source from or otherwise engage in any activities involving a country subject to comprehensive economic sanctions, including, without limitation, Cuba, Iran, North Korea, Sudan, Syria or the Crimea, Donetsk or Luhansk regions of the Ukraine.

Conflict minerals

Suppliers must take reasonable steps to ensure that any tantalum, tin, tungsten, and gold in products they manufacture or source do not directly or indirectly benefit armed groups that commit human rights abuses in or near the Democratic Republic of Congo.

Fair competition

Suppliers and Supplier employees and representatives who are engaged in or seek to obtain Lumen business must comply with all applicable laws and regulations regarding fair competition and antitrust, including laws applicable to marketing and pricing. Suppliers must not misrepresent the products and services of Lumen or its competitors. They must also avoid agreements – formal or otherwise – with their competitors to restrain trade, such as agreements to fix prices, rig bids, divide territories or markets or otherwise limit the sale of our services or products.

Interaction with regulatory and other government agencies

Lumen expects Suppliers to be truthful in all communications with regulatory agency representatives and government officials relating to Lumen business. Suppliers must comply with all applicable laws and regulations, including but not limited to, laws and regulations regarding government ethics, contact with or employment of current or former government officials, lobbying, and the handling of confidential, classified and other sensitive government information. Suppliers must provide services and/or products that meet or exceed applicable government standards, including environmental, quality and safety standards.



Suppliers are prohibited from (1) contacting legislators, federal, state, national or other regulatory officials or their staffs; and (2) making political contributions on Lumen's behalf, without written pre-approval from an authorized representative of Lumen's Public Policy Department.

Communication with the media

Lumen has designated spokespersons authorized to communicate with the media and the investment community on behalf of Lumen. Suppliers must obtain express written pre-approval from the Lumen Corporate Communications Department prior to (1) any communication with the media on behalf of or regarding Lumen, and/or (2) using Lumen's name and/or logo in any marketing or other public materials.

Lumen assets and information

Company assets and resources

Lumen property and resources are highly valuable. Suppliers are responsible for safeguarding Lumen property in their possession and control, and for using such resources only for legitimate business purposes consistent with the interests of Lumen.

As a Lumen Supplier, you must:

Acquire assets for Lumen in compliance with applicable Lumen policies and procedures, avoiding any real or apparent conflict of interest;

- Use Lumen assets only for legal and ethical activities and only for the purpose intended by the Company (personal use of Company assets is prohibited);
- Protect Lumen assets from damage, waste, loss, misuse, or theft, and only use Lumen assets after appropriate training
- Not use the Lumen name or trademarks in publicity, advertising, or for any other purpose without prior written approval from Lumen's Corporate Communications Department.

When using Lumen property or resources, including computers, internet, e-mail, or voicemail, Suppliers and Supplier representatives should not expect that the information they access, send, or receive is private. Where permitted by and consistent with the requirements of applicable law, Lumen may monitor use of its resources and block or filter information to protect its resources, employees or customers, and confidential information; to improve efficiency, collaboration, and similar business purposes; and to comply with Lumen Ethics and Compliance policies. In certain locations outside of the United States, such as the European Union, such activities may be subject to relevant notices, approvals, and other requirements.

Lumen premises security requirements

If Supplier performs work or requires access to Lumen premises, Supplier representatives must comply with all required security measures and requests, including the following:

- Accessing only authorized areas
- Allowing searches of vehicles, bags, briefcases, and purses taken onto Company premises
- Complying with Visitor Management requirements including logging visitors, wearing visitor badges and being properly escorted at times.
- Presenting and wearing Lumen photo/access card on or above the waist and visible at all times while on the property
- Promptly reporting known (1) security violations; (2) lost or missing access cards or keys (3) or any case of property loss or damage
- Understanding all applicable Lumen security guidelines and procedures

Protecting confidential information

Suppliers must protect Lumen confidential information, proprietary information, and personal information ("Lumen Confidential Information") in accordance with applicable law, including information about Lumen customers, employees, operations, finances and business plans, and information stored or processed by its customers using its services. Suppliers who have been given access to Lumen Confidential Information as part of the business relationship must not share this information and must adhere to all contractual provisions governing its use and protection.

Suppliers must take measures to protect against unauthorized collection, use, access to, disclosure, damage to or loss of Lumen Confidential Information and must ensure that it is stored and transmitted in electronic format securely. Suppliers must only use Lumen's Confidential Information for the purposes provided for in the Supplier contract and must not make any independent use of it, commercial or otherwise. Lumen Confidential Information can be shared within a Supplier's company only on a need-to-know basis and only if sufficient safeguards are taken to ensure that the information is treated appropriately, in accordance with the terms of the Supplier contract. Suppliers must return or destroy Lumen information when that information is no longer necessary for the performance of Supplier's obligations, at the conclusion of its relationship with Lumen, or upon request. Destruction must include adequate attention to the confidentiality of the information.

Suppliers must use, transmit, and store information about or stored or processed by Lumen's customers or employees only in accordance with applicable law and Lumen policies. The obligation to preserve Lumen Confidential Information is ongoing, even after the business relationship ends, as provided in Lumen's confidentiality agreements.

Privacy

Suppliers must follow all local privacy and data protection laws, including providing clear and accurate privacy notices when collecting or processing personal information. Suppliers must also cooperate with Lumen's compliance efforts.

Information security

Lumen administers an information security program, supports practices that meet recognized industry standards for information protection and expects Suppliers to do the same. Suppliers with access to Lumen Confidential Information must comply with all laws and the highest industry standards applicable to such data. Upon request from Lumen, Supplier will provide information to Lumen to enable Lumen to determine compliance with applicable law or Lumen contract requirements. As part of compliance checks, Lumen may require Supplier to, without limitation, answer security questionnaires or conduct server, database, and other network hardware scans and submit an attestation by an officer of Supplier with knowledge of Supplier's compliance.

Suppliers that store and/or process Lumen customer payment card data must protect that payment card information per the Payment Card Industry Data Security Standard published by PCI Security Standards Council, Inc. Suppliers that store, transmit or process Lumen customer financial account information (e.g., bank account or credit union account information) must protect that information in accordance with the National Automated Clearing House Association's NACHA/ACH Rules and Operating Guidelines and other applicable laws.

No later than 24 hours after discovery, Suppliers are required to promptly report to the Lumen Integrity Line any known or suspected unauthorized access, use, misuse, disclosure, destruction, theft, vandalism, modification, loss, or transfer of Lumen Confidential Information. Suppliers must also agree to provide Lumen with the ability to review Supplier information security practices upon reasonable request.

Insider trading

Suppliers must adhere to all applicable securities laws and regulations regarding insider trading. Suppliers must not buy or sell Lumen securities while in the possession of material, non-public information about the Company. Doing so – or "tipping" others to buy or sell securities based on such information – could subject those involved to serious civil and criminal penalties.

Intellectual property

Intellectual property ("IP") is an important asset to Lumen that is essential to our competitive advantage and must be protected. Examples of IP include the Company's copyrights, inventions, patents, plans, research, software, strategies, trade names, trademarks, and trade secrets.

Suppliers must respect and must never infringe upon the IP rights of Lumen or other companies and must abide by the specific IP-related terms and conditions in the Supplier contract with Lumen.

Employment practices and human rights

Lumen is committed to good citizenship and promoting values that foster human rights. Lumen upholds the human rights of workers by treating them with dignity and respect, and we expect the same commitment from our Suppliers. Accordingly, all Lumen Suppliers are expected to adhere to the following standards.

Non-discrimination and fair treatment

At Lumen, our business culture and company policies promote mutual respect, acceptance, and cooperation. Lumen expects that our Suppliers will maintain a respectful work environment, and will not tolerate any behavior of Supplier employees or representatives that is inconsistent with these expectations.

Lumen does not tolerate illegal discrimination, harassment, or retaliation in any form, and expects Suppliers to share this commitment.

Suppliers must provide equal employment opportunities to all potential workers, applicants, and employees and must maintain a workplace free from abuse, illegal discrimination, harassment, and retaliation. Suppliers must not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity or expression, gender characteristic or information, sexual orientation, ancestry, caste, citizenship, national origin, religion, covered veteran status, disability, creed, marital status, family status, pregnancy, or other legally protected status.

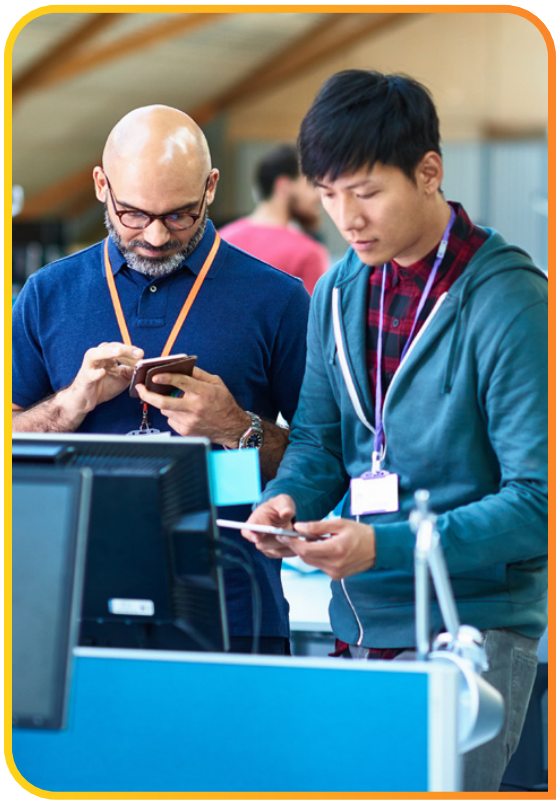


Forced labor and modern slavery

Suppliers will not permit any form of forced or involuntary labor, whether bonded, imprisoned, or indentured, including debt servitude or any form of human trafficking. All work must be voluntary, and workers must be free to terminate their employment at any time.

Child labor

Lumen does not tolerate any form of child labor in its operations or within our supply chain. Lumen expects Suppliers to prohibit and prevent child labor in their operations and encourages Suppliers to participate in efforts aimed at combating and eliminating these practices. Suppliers must not employ individuals under the legal minimum working age of the jurisdiction and/or country in which Supplier is operating.



Freedom of association and collective bargaining

Lumen respects the rights of employees to freedom of association and collective bargaining. Suppliers must respect employee rights to form, join, or not join trade unions or organizations of their own choosing and to bargain collectively in accordance with the laws of their jurisdiction without fear of discrimination, retaliation, harassment, or intimidation.

Wages and compensation

Suppliers will comply with all applicable state, federal, and international labor, wage, and work hour laws and regulations; will pay legally mandated wages and benefits; and will comply with applicable laws regarding wage deductions. Suppliers must pay their workers as required by law and contract.

Immigration

Suppliers must ensure that all Supplier employees who work in the United States and other regions are authorized to do so. Suppliers must also ensure compliance with all applicable immigration laws and must obtain all necessary documentation, including I-9s, visas, and/or work authorizations.

Independence of supplier personnel

Suppliers must ensure that their personnel do not represent themselves as employees of Lumen and do not engage in unauthorized acts, such as attempting to bind Lumen to obligations or attempting to speak on behalf of Lumen.

Safety and health

Suppliers must maintain a healthy and safe working environment for all Supplier employees and representatives and must adhere to all applicable safety and health laws, regulations, and safety practices. Suppliers are required to protect all employees and representatives with appropriate personal protective equipment. Suppliers must also ensure that employees and representatives receive all necessary safety and health training and must enforce both Supplier's and Lumen's safety policies and procedures while working on Lumen's behalf or while on Lumen's premises.

Suppliers must comply with all applicable environmental, health and safety laws and regulations, as well as Lumen's site safety requirements. Suppliers, upon request, shall provide information on safety processes used when performing work on behalf of Lumen.

Emergency preparedness and response

Suppliers will maintain an Emergency Preparedness and Response plan and will educate workers on effective implementation of emergency response procedures and recovery plans. Supplier's emergency preparedness and response plan must be aligned and coordinated with any existing Lumen plan.

Reporting of injuries and hazardous conditions

Supplier employees or representatives working on behalf of Lumen or on Lumen premises must promptly report all OSHA "reportable" injuries (fatality, hospitalization, amputation and other serious injuries and hazardous conditions) to Lumen at ehs@lumen.com (North America), safety.europe@lumen.com (EMEA); or international.claims@lumen.com (APAC). The email notification should provide a date, description, and location of the incident. Contact information should also be provided.

Alcohol and drug use

Drugs and alcohol in the workplace affect everyone's safety – negatively affecting job performance and causing potentially severe safety hazards. Suppliers may not possess, distribute or be under the influence of illicit drugs while on Lumen premises or when conducting business on behalf of Lumen. In addition, Suppliers are prohibited from abusing or misusing prescription medication and possessing or being under the influence of alcohol (other than reasonable consumption of alcohol at an approved business-related social event) while on Lumen premises or when conducting business on behalf of Lumen.

Suppliers must follow applicable laws, including Drug Free Workplace requirements, contract requirements, and related Lumen customer requirements.

Firearms and other weapons

Unless contrary to applicable law, Supplier representatives must not carry firearms or other weapons while in Lumen buildings or vehicles or when the Supplier is engaged in a business activity with or on behalf of Lumen, even if such representatives possess concealed weapons permits.

Environment

Lumen is committed to ensuring that our environmental compliance supports our business, employees, customers, and shareholders. Lumen expects Suppliers to demonstrate the same commitment by complying with all environmental laws and requirements including those relating to : (i) the management and disposal of hazardous materials; (ii) contaminants in air, soil or water; (iii) the protection of natural resources, wildlife and wetlands; and (iv) recycling. Suppliers are encouraged to implement environmental management systems and focus on continuously monitoring and improving their performance.

Suppliers must use reasonable efforts to employ environmentally preferable and energy-efficient services and must work with their own suppliers to assess and address environmental issues within their supply chains. Suppliers, upon request, must provide documentation of their environmental practices.

Reporting concerns and seeking guidance

Lumen Suppliers should report potential or actual violations of this Supplier Code and other legal or ethical concerns. For assistance in resolving a business practice concern, please work with your primary Lumen contact. To report a violation of the Supplier Code, an ethical concern or a legal violation involving Lumen, contact the Lumen Integrity Line, available 24 hours a day, 7 days a week.

- E-mail: integrityline@lumen.com
- Web: lumenintegrityline.com
- Telephone (U.S.): 800-333-8938
- Telephone (non-U.S.): List of international dialing numbers

Suppliers may also contact the Ethics and Compliance Department at ethics.compliance@lumen.com or find additional information on the Doing Business with Lumen page.

Lumen does not tolerate any retribution or retaliation taken against any individual who, in good faith, seeks advice or reports a possible violation of this Supplier Code.



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