

Modern Slavery Statement 2022

June 2023



Who We Are At Lumen

Lumen is a multinational telecommunications and technology leader - with a significant presence in the UK. Our purpose is to further human progress through technology. Our mission is to digitally connect people, data, and applications – quickly, securely, and effortlessly. Under new leadership as announced in 2022, we are focused on five core priorities for the future: Develop Customer Obsession, Innovate & Invest for Growth, Build a Reliable Execution Engine, Radically Simplify our Company, and Further Develop our Culture.

At Lumen, ethics and compliance with the law are at the core of who we are. Our core operating principles are Teamwork, Trust, and Transparency, all of which are focused on our most important asset: our people. Our commitment to human rights is integrated into every aspect of our business. Our employees 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 Lumen's UK trading operations. It describes Lumen and its supply chains, our efforts to combat modern slavery, what we did in 2022 to combat modern slavery and human trafficking within our business and supply chains, and our plans going forward.

Lumen and Ethics

At Lumen, we operate in an open and honest environment and maintain trust and integrity with everyone who works with us, including our employees, customers, suppliers, business partners, and investors. Operating in a highly competitive industry, we have developed a reputation for ethical behaviour, corporate responsibility, and integrity. We believe this is why customers choose to do business with us and why great people come to work at Lumen.

Lumen has a robust global **Ethics & Compliance programme**, which is designed to communicate the ethical and legal standards that govern our business conduct. The programme is led by an independent global Chief Ethics & Compliance Officer, is overseen by the Risk and Security Committee of Lumen's Board of Directors, and partners with regional Ethics and Compliance teams, including an EMEA regional team, to address region-specific risks. The **Lumen 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 employees worldwide are trained on the Code every year and are required to abide by it.

Lumen's **Code** addresses our commitment to ethical business conduct and describes our position on topics that relate directly to human rights, including:

- privacy and data security
- diversity, inclusion, and fair treatment
- individual rights, confidentiality of information, health and safety
- our prohibition on the use of forced or involuntary labour, including human trafficking, in the supply chain

Lumen's **Human Rights Policy**, implemented in 2020, clearly sets forth our commitment to human rights and how it is integrated into our ethics and compliance programme and Code of Conduct. At Lumen, we work only with people who choose freely to work with us. We value diversity, inclusion and belonging, and equal opportunity for all. We 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, partners, 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 Lumen's commitment to freedom of association.

Lumen and ESG

Lumen's purpose to further human progress through technology is guided by our belief that humanity is at its best when technology advances the way we live and work. Lumen is committed to strong corporate governance principles, growing our business in a sustainable and socially responsible manner, and making a positive difference in the world, specifically in the communities we serve. **Lumen's ESG Report** contains additional information on our commitment to human rights and the value we place on our people and the people we work with.

Lumen and Our Supply Chains

At Lumen, 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 buy goods and services from suppliers in all countries in which we provide services, including the UK, and they have their own suppliers. Thus, our supply chains are large with a wide range of suppliers. As further elaborated on below, we take steps to ensure that we are doing business with suppliers that share our commitment to



ethics, and that they pass down those requirements to their suppliers. We hold suppliers accountable for these ethical requirements through our contractual agreements.

Lumen and Our Efforts to Combat 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.

Lumen People. Our programme to combat modern slavery begins with our people. We maintain dedicated teams responsible for hiring our employees (including workers) who ensure proper process is followed. We continue to recruit many of our employees 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 Lumen, including compliance with the 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 Lumen's ethical requirements and business values.

From onboarding throughout employment, we ensure that employees have access to company-provided facilities and are provided with a safe and healthy working environment. We also provide a number of remote work opportunities, which support employees through providing flexibility. We ensure employees can easily access various information sources, including policies and contacts for guidance on specific ethical concerns. We provide extensive training opportunities and support employees with external training and qualifications. We actively run growth programs providing opportunities for career development within Lumen and aim to make working at Lumen the best experience possible. We consistently reinforce our expectations for making ethical business decisions. We also make it clear that employees who violate Lumen's ethical policies, including the Code or the law, may face disciplinary action up to and including termination of employment.

Whistleblower Hotline, Investigations Process, and Promise of No Retaliation. Lumen 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. Our Integrity Line offers local phone numbers and translation options for employees and third parties around the world. Employees and third parties 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 made aware of the importance of ensuring Lumen is alert to the possibility of modern slavery and human trafficking. They are encouraged to report suspected conduct that is illegal, unethical, or which violates company policy, including violations of human rights and concerns about modern slavery, without fear of retaliation. Employees are also encouraged to talk to HR or their managers as an alternative, and managers have a duty to report Code violations or illegal conduct to the Integrity Line. Lumen employees receive information about the Integrity Line frequently through leadership, the employee intranet, annual training, communications, and policies.

Serious allegations of misconduct are investigated by the company's Corporate Investigations group, and the company does not tolerate retaliation against those involved in investigations. 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 and Security Committee of Lumen's Board of Directors on a quarterly basis.

Training. All Lumen employees are required to complete and acknowledge Code training upon hire and on an annual basis, which is a comprehensive training on all aspects of Lumen's Code, including the company's prohibitions on discrimination, harassment, and abuse of human rights. We maintain an internal escalation process that drives an annual completion rate of approximately 99% of the employee population. Lumen's prohibition on forced labour, including any form of human trafficking, and a specific reference to the UK Modern Slavery Act are covered as part of the annual training.

Supplier Due Diligence and Supplier Code of Conduct. Our fight against modern slavery continues with our supply chains, and we undertake appropriate due diligence to ensure that our suppliers comply with our requirements. 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. When onboarding a supplier, we carry out an initial risk assessment and diligence review which, if highlighted as a risk, is vetted by Lumen's Ethics & Compliance team to review and confirm whether the supplier can be added to Lumen's supply base or requires further actions to remedy or rejection.

Once on board, we ask all our direct suppliers to implement and maintain ethical standards that equal Lumen'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 and pass down these requirements to any subcontractors, which compliance is subject to audit. As a matter of policy, Lumen 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.



Ethics and Compliance Risk Assessments. As part of the global Ethics and Compliance programme, the team conducts annual risk assessments in partnership with Internal Audit, in addition to focused Ethics and Compliance risk assessments. Through these risk assessments, the team identifies high – medium risk areas, including geographical regions or business units where risks may be heightened, and makes modifications to our program to address these risks. Thus far, the Ethics and Compliance team has not identified modern slavery or human trafficking as high or medium risk in our supply chain through these risk assessments.

Teamwork. To strengthen our commitment to a program to combat modern slavery and ensure transparency within the company and within our supply chains, we have established a team of people from various functions across Lumen, who focus on modern slavery. The team is led by procurement and is supported by other departments who purchase goods and services for Lumen, HR, compliance, and legal. Together, the team is responsible for identifying areas of risk within the business and supply chains, implementing our practices and procedures to combat modern slavery, making recommendations for any enhancements, and for reviewing and measuring their success.

Moreover, the Internal Audit team provides assurance over compliance with Lumen's Ethics & Compliance programme, including whistleblowing facilities, staff training, and supplier due diligence.

A Look Back at 2022

In 2022, we maintained our strong tradition of ethical practices and policies and continued to raise awareness of modern slavery within our organisation through policies, trainings, and our processes.

The 2022 highlights in the areas of managing vendor risk and combatting modern slavery in the supply chain include:

- Consistent with prior years, more than 99% of our employees globally completed and acknowledged the Code of Conduct through training, which includes the company's commitment to human rights and prohibition on modern slavery.
- We launched a voluntary Ethics and Compliance survey, which provided employees the opportunity to anonymously provide feedback on our culture of ethics and compliance and their comfort reporting legal and ethical concerns. We received very

positive feedback on employee comfort with the culture of compliance with the law and comfort making reports to our Integrity Line.

- We partnered with the Vendor Risk Management team to evaluate various crucial suppliers and their commitment to Ethics and Compliance, including issuing and requiring responses on questions relating to modern slavery and other Ethics and Compliance topics.
- We implemented a new Whistleblower Policy, outlining employees' rights to make whistleblower complaints and their protections for voicing concerns.

We continued to apply our due diligence process to all new suppliers and to ensure our suppliers agreed to our Supplier Code of Conduct and to operate in alignment with our ethical principles, including compliance with modern slavery laws. We continued to utilize the new supplier onboarding tool and processes implemented by Procurement in 2020, which assures that all suppliers onboarded consistently go through the appropriate diligence processes.

Looking Forward

We at Lumen 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. However, we recognise that some services we buy will include areas of risk, such as recruitment services, cleaning, maintenance, guarding, and construction contracts. We also recognise heightened risks in certain areas we do business. In the coming year, we will continue to include targeted suppliers in our VRM process to conduct additional diligence and audits.

Suppliers. With strong internal processes, we believe the risks of modern slavery at Lumen, if any, will be within our supply chains. To combat any such risks, Lumen will continue to focus on its supplier diligence processes and to hold suppliers accountable for compliance through our agreements. Through our VRM tool, we will identify higher-risk vendors and issue additional diligence questionnaires.

We will release global Procurement training in 2023, which will overview the requirements of onboarding suppliers with Procurement support, and that our suppliers must abide by Lumen's ethical standards. We will also be updating our Supplier Code of Conduct.



We will continue to monitor our suppliers based upon the types of goods and services we buy and where we buy them from, in order to ensure we have identified all likely areas of risk. We will continue to assess and investigate any identified areas of risk to determine what specific steps we take next in our efforts to combat modern slavery and human trafficking in our supply chains.


We have in place contractual protections to address risk associated with our second, third, and other tier suppliers, and we will work to further gain visibility into the suppliers of our suppliers.

Within Lumen. Within Lumen, under new leadership, we are positioning Lumen for an amazing future. We will be focusing on our North Star priorities, one of which is further developing our culture, and our core operating principles of teamwork, trust, and transparency. Teamwork means understanding, respecting, and supporting each other in working towards a common goal.

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. We will continue to raise awareness within the organisation of the risks of modern slavery and how to identify and report it, and Ethics & Compliance will ensure any complaints of modern slavery are promptly investigated and given leadership visibility and priority.

This statement covers the period 1st January 2022 to 31st December 2022 and has been approved by the boards of directors of Lumen Technologies UK Limited and Lumen Technologies Europe Limited.

Signed


Salman Ali Agha (on 21, 2023 17:07 GMT+1)

Salman Agha, Director

Date: June 30, 2023

