Introduction

At Lumen, we are committed to doing business ethically and in compliance with all applicable laws and regulations. In accordance with Lumen’s Unifying Principles, we approach our dealings with each other, our customers, shareholders, suppliers, business associates and the public with fairness, honesty, and integrity. 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 Lumen’s UK trading operations. It describes Lumen and its supply chains, and what we did in 2020 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.
Lumen and Supply Chains

About Lumen. Lumen is a multinational technology leader - with a significant presence in the UK - enabling companies to capitalize on emerging applications and power the 4th Industrial Revolution. We integrate network assets, cloud connectivity, security solutions, and voice and collaboration tools into one platform that enables businesses to leverage data and adopt next-generation technologies. Lumen’s core purpose is to further human progress through technology. We believe humanity is always at its best when it produces innovative technologies that advance the ways we live and work. In support of this purpose, our mission is to deliver amazing customer experiences with networking, cloud and security solutions that power next-gen business applications.

Lumen 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.

Lumen Policies

It is critical to Lumen that we operate in an open and honest environment and maintain trust and integrity with everyone who works with us, including our employees, customers, 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, why investors decide to invest in us, and why great people come to work at Lumen.

Lumen has a robust global Ethics & Compliance programme, which is led by a global Chief Ethics & Compliance Officer and is designed to communicate the ethical and legal standards that govern our business conduct. 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 our employees worldwide are trained on the Code every year and are required to abide by it.

Lumen’s Code addresses our commitment to the Unifying Principles and describes 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. 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 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 Lumen’s commitment to freedom of association. Lumen’s Environmental, Social and Governance report contains additional information on our commitment to human rights.
Lumen 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.

Lumen People. Our aim to combat modern slavery 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 Lumen, 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 Lumen’s ethical requirements and business values. We continue to ensure that employees and workers can easily access various information sources, including policies and contacts for guidance on specific ethical concerns, training and opportunities for career development. We aim to make working at Lumen 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 Whistleblower Hotline.
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 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 Human Resources or their managers if they have any concerns. Lumen 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. 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 Code of Conduct training upon hire. Further, all Lumen employees are required to complete and acknowledge Code training on an annual basis, which is a comprehensive training on all aspects of Lumen’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. Lumen’s prohibition on forced labour, including any form of human trafficking, and a specific reference to the UK Modern Slavery Act are specifically covered as part of the annual training.

Due Diligence. 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. Before onboarding a direct 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 needs to be rejected because it does not meet Lumen’s required standards. 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.

Audit team provides assurance over compliance with Lumen’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 2020. 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, despite the challenges of the global pandemic and adjusting to a new normal for the majority of our global workforce. In October 2020, we implemented our global Human Rights Policy, which we communicated to our employee base and posted on our external website. This policy makes clear Lumen’s commitment to protect internationally recognized human rights; that we do not and will not tolerate any form of modern slavery; and that any suspected violation of human rights must be promptly reported to the Integrity Line.

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. In 2020, Lumen’s Procurement team implemented a new supplier onboarding tool and process, which ensures that all suppliers onboarded consistently go through the appropriate diligence processes. The tool allows for enhanced reporting and risk ranking criteria.

The global Ethics & Compliance team conducted a global risk assessment beginning in the 4th quarter of 2020 – in addition to Internal Audit’s yearly risk assessment – with a focus on and assessment of legal and compliance risks in each unit and region of Lumen’s business, including the UK and global modern slavery risks. Although the risk assessment did not uncover any new or significant concerns in the area of modern slavery, Ethics & Compliance is partnering with Procurement on actioning additional supplier reviews, diligence processes and training sessions in the coming year following this risk assessment to simply improve upon the processes we already have in place.

Lumen’s dedicated team has continued to meet and collaborate on any potential issues presented by our operations and to progress efforts in combatting modern slavery.

Teamwork. To strengthen our ethical practices in the wake of the Modern Slavery Act, we have 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, Human Resources, Compliance, and Legal. The Internal Audit team provides assurance over compliance with Lumen’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.

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Lumen and Next Steps

Looking forward. We continue to make progress in our efforts to combat modern slavery, but there is more we can do – particularly as we continue to make changes through and following the effects of the global pandemic. 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 2021. We intend to continue to assess our business practices and areas where we may focus more diligence and audit efforts over the next year.

Direct Suppliers. We continue to think the risks of modern slavery at Lumen, if any, will be within our supply chains. To combat any such risks, Lumen will release a global procurement training programme to all employees in 2021 which will outline the requirements for engaging suppliers, including procurement engagement and diligence, and the importance of only doing business with ethical suppliers that agree to our ethical requirements, including our Supplier Code of Conduct. Lumen is also engaging with a third-party company to further automate risk rankings of vendors and issuance of questionnaires, including, where appropriate, modern slavery questionnaires. Lumen will be working on implementation of processes using this vendor diligence tool in 2021 and will provide a progress update in its next annual report.

In addition, 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.

Indirect Suppliers. We have in place contractual protections to address our indirect supplier risk, and we must continue to gain more visibility into our indirect suppliers. We will continue to 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 Lumen. Within Lumen, we will continue to review our policies and standards and ensure our employees continue to abide by 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 we are excited about the release of new procurement training to ensure all Lumen employees are engaging with third parties in compliance with our ethical standards. We will continue to raise awareness generally within the organisation of the risks of modern slavery and how to identify it and report it, and Ethics & Compliance will ensure any complaints of modern slavery are promptly investigated and given leadership visibility and priority. 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 2020 to 31st December 2020 and has been approved by the boards of directors of Lumen Technologies UK Limited and Lumen Technologies Europe Limited.

Signed

Salman Agha, Director

Date: June 30, 2021