



Lumen Human Rights Policy





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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 reflected by our purpose, to further human progress through technology. We believe we are at our best when technology advances how we live and work. To enable that, our core mission is to digitally connect people, data, and applications quickly, securely, and effortlessly. This mission improves our communities by breaking down barriers and improving access to information. 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; diversity, inclusion and fair treatment; 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. More information on Our Privacy & Data Protection Program is available on our website.

We prohibit discrimination and foster diversity.

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 are committed to fostering a diverse and inclusive work environment, and we are committed to pay equity. Our efforts to focus on diversity and inclusion are led by our Chief Diversity Officer and the ongoing actions of our Diversity and Inclusion Steering Committee (“DISC”), a group which includes senior leadership and actively pursues ways to strengthen our diversity efforts in the areas of talent acquisition, talent management, analytics, communications and compensation and benefits. Our diversity efforts also include listening circles, employee voice groups, employee resource groups for persons with shared experiences and characteristics and their allies, and unconscious bias training. We recognize that our employees’ varying backgrounds and cultures are one of our greatest assets.

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, 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. One of our missions is to leverage our time, talents, and resources to invest in and create a long-term positive impact in the communities we serve. We provide many opportunities to volunteer time and talent in support of local causes that matter to our employees, and we support non-profit organizations around the globe through our Dollars for Doers grants program, our Employee Giving Campaign, and our Campaign to Fight Hunger. We care about our communities and are committed to giving back, addressing needs, and creating a more inclusive community around the globe.

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. 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 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 our purpose, furthering human progress through technology. As we continue to expand our network and our business - connecting more people around the world - 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.