

Modern Slavery Statement 2018

June 2019

Introduction

At CenturyLink, we are committed to doing business with integrity and in compliance with our Unifying Principles and all applicable laws and regulations. Our Unifying Principles – Fairness, Honesty and Integrity, Commitment to Excellence, Positive Attitude, Respect, Faith and Perseverance – represent the fundamental values upon which CenturyLink was built, and they will serve as the foundation upon which we continue to grow and prosper, conduct our business and relate to one another, as well as to our customers, shareholders, business associates and the public. At CenturyLink, 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 CenturyLink's UK trading operations. It describes CenturyLink and its supply chains, and what we did in 2018 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 program for combatting modern slavery.

CenturyLink and Supply Chains

About CenturyLink. CenturyLink, Inc., the parent company of CenturyLink Limited, CenturyLink Communications UK Limited and CenturyLink Communications Europe Limited, is a global, Fortune 500 state-of-the-art communications company that provides local, national and global communications services to enterprise, government, small-medium business, carrier, and consumer customers. CenturyLink, Inc. is the second largest U.S. communications provider to enterprise customers. Across the CenturyLink group, we employ approximately 45,000 people around the world. Although U.S.-based, CenturyLink has a large employee base and significant operations in the UK and Europe. In the UK, we employ 1200 people. We work closely as a group globally and operate with centralized processes and ethical values. With revenue in the EMEA region of \$1BN, our comprehensive portfolio of secure, managed solutions includes fibre and infrastructure solutions; IP-based voice and data communications; wide-area Ethernet services; video and content distribution; data centre and cloud-based solutions. We serve customers in more than 500 markets in over 60 countries across a global services platform anchored by owned fibre networks on three continents and connected by extensive undersea facilities. We strive to provide the very best customer experience possible, wherever in the world our customers may be, underpinned by the highest standards of ethical practices.

CenturyLink 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.

CenturyLink Policies

It is important, and critical to our success, for us to operate in an environment that is open and honest, and which maintains trust and integrity with everyone who works with us, including our employees, customers, business partners, investors, and most importantly with each other. Operating in a highly competitive industry, we have developed a reputation for ethical behaviour, corporate responsibility and integrity. We believe that is one main reason that customers choose to do business with us, why investors decide to invest in us and why great people come to work at CenturyLink.

CenturyLink has a robust global [Ethics & Compliance program](#), which is led by a Chief Ethics & Compliance Officer and is designed to communicate the ethical and legal standards that govern our business conduct. The [CenturyLink Code of Conduct](#) is the cornerstone of our Ethics & Compliance program and sets forth the basic principles we must follow to uphold our company's ethical business culture. All our employees are trained on and are required to abide by CenturyLink's global Code of Conduct.

CenturyLink's Code addresses 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. At CenturyLink, we work only with people who choose freely to work with us. We value 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 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 CenturyLink's commitment to freedom of association. [CenturyLink's CSR report](#) also contains information on our commitment to human rights.

CenturyLink 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.

[CenturyLink People](#). Our aim to combat modern slavery still 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 CenturyLink, 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 program part of which describes CenturyLink's ethical requirements and business values. We continue to ensure that employees and workers have access to various information sources, including easily accessible policies and contacts for guidance on specific ethical concerns, training and opportunities for career development. We aim to make working at CenturyLink 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 Whistleblowing. CenturyLink 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. 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 HR or their managers if they have any concerns. CenturyLink 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, and 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 program, including contacts to the Integrity Line and compliance initiatives, to the Risk Committee of CenturyLink's Board of Directors on a quarterly basis.

Training. All CenturyLink employees are required to complete Code of Conduct training upon hire. Further, all CenturyLink employees are required to complete and acknowledge Code of Conduct training on an annual basis, which is a comprehensive training on all aspects of CenturyLink'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. In 2018, we incorporated coverage of CenturyLink's prohibition on forced labour, including any form of human trafficking, and a specific reference to the UK Modern Slavery Act in our Code of Conduct training, which was released to all employees globally in March 2019. Specifically relating to modern slavery, we have implemented more specialized training for those involved in purchasing goods and services for CenturyLink, to raise awareness of the risk of modern

slavery and human trafficking and to help them identify any red flags and report them accordingly.

Due Diligence. Our fight against modern slavery continues with our supply chains, and we have maintained our due diligence process to ensure that our suppliers comply with our requirements. Our due diligence process requires that potential suppliers complete a slavery questionnaire as part of any tender process. 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, which is scored and, if highlighted as a risk, forwarded to CenturyLink's compliance team to review and confirm whether the supplier can be added to CenturyLink's supply base, or needs to be rejected because it does not meet CenturyLink's required standards. Once on board, we ask all our direct suppliers to implement and maintain ethical standards that equal CenturyLink'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. As a matter of policy, CenturyLink 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. CenturyLink actively encourages diversity amongst its suppliers, as set forth in our CSR report.

Teamwork. To strengthen our ethical practices in the wake of the Modern Slavery Act, we have a team of people from various functions across CenturyLink, who focus on modern slavery. The team is led by procurement and is supported by other departments who purchase goods and services for CenturyLink, HR, compliance, and legal. The Internal Audit team has oversight of our compliance with our program to combat modern slavery. 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 2018. We maintained our strong tradition of ethical practices and policies and continued to raise awareness of modern slavery within our organization. We applied our due diligence process to all new Suppliers and included our modern slavery questionnaires with our standard tender documentation. The requirement that all new contracts with suppliers and standard PO's include a modern slavery clause to ensure transparency in their own measures to combat modern slavery continued to be universally followed, and we implemented a program to review existing supplier contracts and ensure a modern slavery clause was inserted into our agreements with them.

In July 2018, CenturyLink implemented a new global whistleblower hotline, which provides a broad range of options to our employees all over the world, including language options and dedicated phone lines in the countries in which we operate. In connection with this change, employees are given a specific option of reporting a "human rights" violation, which should encourage employees in the UK to report any violation of modern slavery and other

fundamental human rights, including any form of forced labour or servitude, child labour, human trafficking, and any violation of international human rights laws.

CenturyLink and Next Steps

More to do. We continue to make progress in our efforts to combat modern slavery, but there more we can do. While we remain firm in our belief that the risk of 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 recognize that some services we buy will include areas of risk, such as recruitment services, or cleaning, maintenance, guarding and construction contracts. Over the coming months, we intend to continue to assess our business practices and our supply chains to identify and address gaps and areas of risk Our next statement will set out the progress we have made.

Direct Suppliers. We continue to think the risks of modern slavery at CenturyLink, if any, will be within our supply chains. To combat any such risks, we plan to continue with our more thorough review of our suppliers based upon the types of goods and services we buy and where we buy them from. We intend that such review identifies all likely areas of risk, we will assess and will investigate any areas of risk we identify, and the findings of our review will determine what specific steps we take next in our efforts to combat modern slavery and human trafficking in our supply chains.

CenturyLink Indirect Suppliers. We must continue to try to have a better understanding of our indirect suppliers and work with our direct suppliers to identify our indirect supply chain and look at how we can strengthen our assessment of indirect suppliers and increase our due diligence processes and risk assessments.

Within CenturyLink. Within CenturyLink, we will review our policies and standards and ensure they 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 and will continue to update our training of those directly responsible for buying goods and services for CenturyLink. We will continue to raise awareness generally within the organization of the risks of modern slavery and how to identify it and report it. We will ensure our dedicated team meets to discuss progress, and we intend to develop further a program to measure the effectiveness of the steps we take to manage the risks associated with modern slavery.

This statement covers the period 1st January 2018 to 31st December 2018 and has been approved by the boards of directors of CenturyLink Limited, CenturyLink Communications UK Limited and CenturyLink Communications Europe Limited.

Signed



Date

28/06/19