

# Supplier Code of Conduct

*Doing the Right Things*



**CenturyLink™**

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## GENERAL EXPECTATIONS

CenturyLink is firmly 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 general public.

As used in this Supplier Code, our “Company” or “CenturyLink” includes CenturyLink, Inc. and its wholly owned subsidiaries and affiliates, and “employees” means all individuals employed by the Company whether on a regular, temporary, part-time, or full-time basis.

CenturyLink expects all agents, consultants, contractors, distributors, manufacturers, suppliers and other business partners as well as their respective employees, agents and representatives (collectively “Suppliers”) with whom CenturyLink does business to embrace and share CenturyLink’s commitment to integrity and compliance. While CenturyLink understands that its Suppliers are independent entities, a Supplier’s business practices may impact or reflect upon CenturyLink. Therefore, CenturyLink requires all Suppliers and their employees, agents, and authorized subcontractors to review and comply with this Supplier Code of Conduct (“Supplier Code”), in addition to their own comparable standards of ethical business conduct, while conducting business with or on behalf of CenturyLink.

Although CenturyLink recognizes the different legal and cultural environments in which its Suppliers operate throughout the world, CenturyLink Suppliers must comply with the fundamental legal and ethical principles described in this Supplier Code and take all reasonable steps to ensure compliance with applicable laws and regulations. This Supplier Code contains general requirements applicable to all CenturyLink Suppliers. Particular Supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Supplier Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code and any other provision of a particular contract, the contractual provision will control except to the extent it is contrary to law. CenturyLink reserves the right to revise this Supplier Code and its Corporate Ethics and Compliance Program at any time.

### **The Supplier Code and the Law**

As a Supplier, you are expected to comply with the Supplier Code and all laws, rules and regulations that govern your business around the world. However, if a provision of this Supplier Code conflicts with applicable law, the law controls.

Because CenturyLink, Inc. is incorporated in the United States, our operations are generally subject to U.S. laws. However, the laws of other countries also may apply to the Company’s operations and its business relationships with Suppliers. If you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, seek guidance before proceeding.

Suppliers should take appropriate steps to ensure that this Supplier Code is communicated and understood by all of their employees, agents, subcontractors, and representatives doing business with or on behalf of CenturyLink. This includes taking appropriate steps to ensure that the Supplier's own supply chain adheres to these standards as well. For questions related to this Supplier Code, contact the [CenturyLink Integrity Line](#).

Suppliers may be required to provide annual certification to CenturyLink of their compliance with this Supplier Code and all applicable laws and regulations, including extraterritorial laws of all countries that govern the conduct of CenturyLink, such as the United States Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act. In addition, CenturyLink reserves the right, as a condition of doing business with CenturyLink, to conduct (or have its designee conduct) inspections, audits or reviews of its Suppliers and their facilities and business practices to verify compliance with these standards. However, CenturyLink assumes no duty or obligation to inspect, audit or review a Supplier's compliance with this Supplier Code, and assumes no liability or responsibility for the actions or omissions of its Suppliers.

## REPORTING CONCERNS AND SEEKING GUIDANCE

CenturyLink Suppliers are encouraged to report potential or actual violations of this Supplier Code. For assistance in resolving a business practice concern, please work with your primary CenturyLink contact. However, CenturyLink recognizes that there may be times when this is not possible or appropriate, in which case you can contact the CenturyLink Integrity Line in one of the following ways:

- E-mail [IntegrityLine@CenturyLink.com](mailto:IntegrityLine@CenturyLink.com)
- Web: <http://www.centurylinkintegrityline.com>
- Telephone: 1-800-333-8938 (U.S. and international)
- Fax: 303-675-0762

CenturyLink does not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought advice or has reported a possible violation of this Supplier Code.

### **Suppliers are expected to do the right things!**

This Supplier Code covers the most commonly encountered legal and ethical issues. It cannot, however, address every situation that may arise. If you are ever in doubt about a course of action, ask yourself:

- Is it legal?
- Is it ethical?
- Is it consistent with the Unifying Principles, the Supplier Code, and any written agreement between Supplier and CenturyLink?
- Would I want others to know about it?

If the answer to any of these questions is "no," don't do it. If you are still uncertain, seek guidance from one of the many resources available to you.

# CONDUCTING BUSINESS

## ACCURACY OF BUSINESS RECORDS

Suppliers must record and report information accurately and honestly. All financial books, records and accounts relating to business involving CenturyLink must accurately reflect transactions, payments and events, and 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 conform to all other requirements as defined by written contract. Accordingly, Suppliers will provide CenturyLink with accurate and complete billing information concerning all transactions with the Company.

## ANTI-CORRUPTION

Suppliers acting on behalf of CenturyLink must comply with anti-corruption laws of the United States and countries in which we work and do business, including without limitation, the FCPA and the U.K. Bribery Act. CenturyLink Suppliers are prohibited from offering or providing bribes to government officials or representatives of commercial entities, whether in cash or any other form, and whether paid directly or indirectly, through an intermediary. Suppliers are also prohibited from accepting bribes and making facilitation payments while doing business with or for CenturyLink. 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. If you are ever in doubt as to whether a transaction constitutes a prohibited bribe or facilitation payment, contact the [CenturyLink Integrity Line](#).

***CenturyLink prohibits bribes and facilitation payments.***

The FCPA and similar laws of other countries make it illegal for companies such as CenturyLink, their subsidiaries, and employees or agents to bribe government officials for the purpose of obtaining or retaining business or obtaining an unfair advantage in any business dealing or transaction. CenturyLink requires its Suppliers to comply with these anti-corruption laws. A “government official” is any public official in any branch of government (executive, legislative or judicial), at any level (local or national) of government, in any country. Examples include:

- Any officer, employee, or other person employed by or working in an official capacity on behalf of a government or a government department or agency, or of a political party
- An employee or official of a government-owned entity, such as a government-owned telecommunications company
- An employee or official of a public international organization, such as NATO or the United Nations
- Members of royal families
- Candidates for political office
- Immediate family members (e.g., parents, children, spouse, and in-laws) of government officials

For countries with government ownership of the telecom industry, banking institutions, transportation facilities and the like, one should assume any official of such an institution is a “government official.”

If a Supplier, in connection with its work for CenturyLink, is approached by anyone, including a government official or an agent thereof, and asked to provide a payment or anything of value to influence an act or decision of the official or his/her government, or to secure an improper advantage, the Supplier is required to refuse to

make the payment or to provide the thing of value and immediately report the incident to the CenturyLink Integrity Line.

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

In addition, as noted above, CenturyLink Suppliers must never engage in false or misleading accounting practices or record keeping. The FCPA and other similar anti-corruption laws require accurate and complete books and records to be maintained regarding all transactions relating to CenturyLink's relationships with its Suppliers. By receiving this Supplier Code, Supplier warrants and certifies that it has complied, and will continue to comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the FCPA and U.K. Bribery Act. Moreover, CenturyLink Suppliers must never engage in illegal activities, including money laundering or actions related to terrorism, or do business with parties or persons who have been sanctioned by the U.S. government.

## **BUSINESS COURTESIES**

Although the exchange of gifts, meals, entertainment or other business courtesies can promote successful working relationships and goodwill, CenturyLink Suppliers are expected to compete based on the merit of their products and services. CenturyLink expects its Suppliers to follow all applicable laws and respect CenturyLink policies regarding the exchange of business courtesies when working with or representing CenturyLink. Ordinary business courtesies that are reasonable in value, infrequent and related to a legitimate business purpose are acceptable, but Suppliers should avoid offering CenturyLink employees travel, frequent meals or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed. Suppliers should also never offer a business courtesy to a CenturyLink employee involved in making or influencing a purchasing decision, such as a Request for Proposal or Request for Information.

## **CONFLICTS OF INTEREST**

CenturyLink awards business on the basis of several factors, including but not limited to, product or service needs, cost, project management resources, experience and performance record. Suppliers and their representatives must not have a relationship with any employee at CenturyLink that affects the objectivity of the employee's judgment or is otherwise a conflict of interest.

Suppliers must not allow any CenturyLink employee to hold any position with, provide consulting or other services to, or have any financial or business relationship with a Supplier that has not been pre-approved in writing by the [CenturyLink Corporate Ethics and Compliance Department](#). Suppliers must disclose all actual or potential conflicts of interest involving CenturyLink to the [CenturyLink Integrity Line](#).

## **COMMUNICATION WITH THE MEDIA**

CenturyLink has designated spokespersons authorized to communicate with the media and the investment community on behalf of CenturyLink. Suppliers may only communicate with the media on behalf of or regarding business with CenturyLink with the express written pre-approval of the [CenturyLink Corporate Communications Department](#). In addition, use of CenturyLink's name and/or logo in public relations or marketing materials without prior written approval is strictly prohibited.

## **FAIR COMPETITION AND ANTITRUST**

Suppliers and their employees and representatives who are engaged in or seek to obtain CenturyLink business must comply with all applicable laws and regulations regarding fair competition and antitrust, including marketing and pricing. Suppliers must not misrepresent the products and services of CenturyLink 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, and divide territories or markets or otherwise limit the sale of our services or products.

## **INTERACTIONS WITH GOVERNMENT AGENCIES AND EMPLOYEES**

CenturyLink expects Suppliers to be truthful in all communications with regulatory agency representatives and government officials. 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 will provide services and/or products that meet or exceed applicable government standards, including environmental, quality and safety standards. Suppliers who support CenturyLink's work regarding government contracts may be subject to additional requirements as stated in the Suppliers' contracts with CenturyLink.

## **INTERNATIONAL BUSINESS**

CenturyLink and its Suppliers must adhere to all laws, rules and regulations applicable to international business transactions. Various U.S. laws may apply to activities outside of the United States, including:

- Anti-corruption laws
- Anti-boycott requirements
- Anti-money laundering laws
- Controls on exports and re-exports of products, technology and software
- Customs and import regulations
- Economic trade sanctions and embargoes

When representing CenturyLink or performing work for CenturyLink outside of the United States, we expect Suppliers to be aware of and comply with all applicable laws and regulations.

## **LOBBYING AND POLITICAL CONTRIBUTIONS**

Suppliers are prohibited from contacting legislators, federal or state regulatory officials or their staffs or making political contributions on behalf of CenturyLink without written pre-approval from an authorized representative of [CenturyLink's Public Policy Department](#). Suppliers will not contact any non-U.S. government agency or official on behalf of CenturyLink without the express prior written approval of the CenturyLink Law Department. Suppliers must be knowledgeable of and compliant with all relevant laws concerning lobbying and political contributions in all matters related to CenturyLink.

# CENTURYLINK ASSETS AND INFORMATION

## COMPANY ASSETS AND RESOURCES

CenturyLink's property and resources are highly valuable. Suppliers are responsible for protecting CenturyLink-owned or leased facilities, property or equipment and ensuring their legitimate CenturyLink-related business use. Some examples of Company facilities, property or equipment include, but are not limited to, our funds, buildings, company vehicles, communications equipment, office supplies, computers, software, telephones, intellectual property and confidential information. Suppliers are responsible for safeguarding CenturyLink property in their possession and control, and for using such resources only for legitimate business purposes to advance the interests of CenturyLink. CenturyLink property must not be taken, sold, loaned, given away, licensed, assigned, damaged, used for non-business purposes or otherwise disposed of regardless of its condition or value, unless Supplier has specific written approval from an authorized CenturyLink representative.

As a CenturyLink Supplier, you must:

- Acquire assets for CenturyLink in compliance with applicable CenturyLink policies and procedures, avoiding any real or apparent conflict of interest;
- Use CenturyLink assets only for legal and ethical activities, and only for the purpose intended by the Company (personal use of Company assets is prohibited);
- Protect CenturyLink assets from damage, waste, loss, misuse or theft, and only use CenturyLink assets after appropriate training; and
- Not use the CenturyLink name or trademarks in publicity, advertising, or for any other purpose without prior written approval from an authorized CenturyLink representative.

We expect Suppliers who interact with our customers to conduct themselves at all times in ways that reinforce and strengthen CenturyLink's good name and reputation.

## CENTURYLINK PREMISES SECURITY REQUIREMENTS

While on CenturyLink premises, Supplier representatives must comply with all required security measures and requests. These may include, but are not limited to, the following:

- Accessing only authorized areas
- Allowing searches of vehicles, bags, briefcases and purses taken onto Company premises
- Complying with metal detection screening and signing a visitor log
- Presenting and wearing CenturyLink or government-issued identification photo/access card on or above the waist and visible at all times while on CenturyLink property
- Promptly reporting known security violations
- Promptly reporting lost or missing access cards or keys
- Promptly reporting property loss or damage
- Understanding the Company's security guidelines and procedures

## CONFIDENTIAL INFORMATION

CenturyLink values and protects confidential information, including information about its customers, employees, operations, finances and business plans, and information created by its customers, in accordance with applicable law. CenturyLink executes nondisclosure agreements or procurement agreements with confidentiality provisions before providing Suppliers with access to CenturyLink confidential information. Suppliers are expected to protect CenturyLink's confidential information in accordance with those agreements and applicable law. Suppliers are expected to take appropriate measures to protect against inadvertent, as well as intentional, disclosure of CenturyLink's confidential information. This means that, among other things, Suppliers must not have discussions involving CenturyLink confidential information in public areas where the discussions could easily be intercepted or overheard (e.g., in airports, on planes, in elevators) and must ensure that they use CenturyLink confidential information in electronic format securely. Suppliers must only use CenturyLink's confidential information for the purposes provided for in the agreement, and must not make any independent use of CenturyLink's data. 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.

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

## INFORMATION SECURITY

CenturyLink supports an information security program and practices that meet recognized industry standards for information protection and expects Suppliers to do the same. Suppliers with access to information about CenturyLink or its customers must comply with all laws and industry standards applicable to such data. Suppliers that store and/or process CenturyLink 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 CenturyLink 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.

Upon discovery, or at the latest within 24 hours, Suppliers are required to report any known or suspected unauthorized access, use, misuse, disclosure, destruction, theft, vandalism, modification, or transfer of CenturyLink, CenturyLink employee, or CenturyLink customer information to the Integrity Line at 1-800-333-8938 (U.S. and international). Suppliers must also agree to provide CenturyLink 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 CenturyLink securities while in the possession of material, non-public information about the Company. Doing so – or “tipping” others to buy securities based on such information – could subject those involved to serious civil and criminal penalties. These restrictions apply not only to information about CenturyLink securities, but also to information about other companies that Suppliers may obtain while engaged in CenturyLink work.

## **INTELLECTUAL PROPERTY**

Intellectual property is an important asset to CenturyLink that helps with our competitive advantage and must be protected. Examples of intellectual property include the Company's:

- Copyrights
- Inventions
- Patents
- Plans
- Research
- Software
- Strategies
- Trade names, trademarks and trade secrets

Suppliers must respect the Company's intellectual property rights. While engaged in business for CenturyLink, Suppliers must not infringe upon the intellectual property rights of CenturyLink or of other companies, or violate their terms and conditions as determined by the contract.

## **EMPLOYMENT PRACTICES AND HUMAN RIGHTS**

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

### **CHILD LABOR**

Suppliers will not employ individuals under the legal minimum working age of the jurisdiction and/or country in which Supplier is operating.

### **COMPENSATION**

Suppliers will comply with all applicable state, federal, and international labor, wage and work hour laws and regulations, and will uphold CenturyLink's commitment to freedom of association. Suppliers must pay their workers when and as required by law and contract.

### **DISCRIMINATION AND HARASSMENT**

CenturyLink complies with all applicable civil rights, human rights, immigration and labor laws. This includes providing equal employment opportunities to job applicants and employees, and maintaining a workplace free from illegal discrimination, harassment and retaliation. While Supplier employees are not CenturyLink employees, we expect Suppliers to share this commitment. CenturyLink will not tolerate illegal

discrimination, harassment or retaliation in any form, and expects Suppliers to provide equal opportunity to all, regardless of race, color, ancestry, citizenship, national origin, religion, veteran status, disability, genetic characteristic or information, age, gender, sexual orientation, gender identity or expression, sex, creed, marital status, family status, pregnancy, or other legally protected status. At CenturyLink, our business culture and Company policies promote mutual respect, acceptance and cooperation. CenturyLink will not tolerate any conduct by Supplier employees or representatives that is harassing, abusive, threatening or otherwise inconsistent with a respectful workplace while working on CenturyLink premises or with CenturyLink personnel, or otherwise.

## **FORCED LABOR**

Suppliers will not use forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude, or any form of human trafficking.

## **IMMIGRATION**

Suppliers will ensure that all Supplier employees who work in the United States are authorized to do so. Suppliers will also ensure they are in compliance with all applicable immigration laws and have obtained 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 CenturyLink and do not engage in unauthorized acts, such as attempting to bind CenturyLink to obligations or attempting to speak on behalf of CenturyLink.

## **SAFETY, HEALTH AND ENVIRONMENT**

CenturyLink is committed to providing a safe workplace free of recognized hazards. Meeting this commitment is a responsibility expected of our Suppliers. Suppliers are responsible for the health and safety of their own employees and representatives working on behalf of CenturyLink, and for following all applicable laws and safety practices. Suppliers are responsible for ensuring that their employees and representatives receive all necessary safety and health training and for enforcing Supplier's and CenturyLink's safety policies and procedures while working on CenturyLink's behalf or on CenturyLink's premises.

Supplier employees or representatives working on behalf of CenturyLink or on CenturyLink premises must promptly report all injuries and hazardous conditions to CenturyLink at 1-866-864-2255 (North America), [Safety.Europe@CenturyLink.com](mailto:Safety.Europe@CenturyLink.com) (EMEA) or [Gestion.HSE@CenturyLink.com](mailto:Gestion.HSE@CenturyLink.com) (Latin America). In Asia Pacific (APAC), supplier employees or representatives working on behalf of CenturyLink or on CenturyLink premises must promptly report injuries to [International.Claims@CenturyLink.com](mailto:International.Claims@CenturyLink.com) and hazardous conditions to [3Safety@Level3.com](mailto:3Safety@Level3.com) Suppliers must comply with all applicable environmental, health and safety laws and regulations. CenturyLink supports Suppliers who actively implement procedures to reduce waste and minimize the environmental impact of their products and services.

## **ALCOHOL AND DRUG USE**

Drugs and alcohol in the workplace affect everyone's safety. Being under the influence can negatively affect job performance and cause severe safety hazards. Suppliers may not possess, distribute or be under the influence of illicit drugs while on CenturyLink premises or when conducting business on behalf of CenturyLink. 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 CenturyLink premises, or when conducting business on behalf of CenturyLink. Suppliers must follow applicable laws, including Drug Free Workplace requirements, contract requirements, and related CenturyLink customer requirements.

## **FIREARMS AND OTHER WEAPONS**

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

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# RESOURCES AND CONTACT INFORMATION

## INTEGRITY LINE

Telephone: 1-800-333-8938

E-mail: [IntegrityLine@CenturyLink.com](mailto:IntegrityLine@CenturyLink.com)

Online: <http://www.CenturyLinkIntegrityLine.com>

Intranet: <http://ethics> > Integrity Line tab > Report/Advice

## ETHICS AND COMPLIANCE DEPARTMENT

<http://www.centurylink.com/Pages/AboutUs/Governance/ethics.jsp>

## SUPPLY CHAIN MANAGEMENT

<http://www.centurylink.com/Pages/AboutUs/CompanyInformation/DoingBusiness/>

## INVESTOR RELATIONS DEPARTMENT

<http://ir.centurylink.com>

## PUBLIC POLICY DEPARTMENT

<http://www.centurylink.com/Pages/AboutUs/CompanyInformation/Regulatory/>

## CORPORATE COMMUNICATIONS DEPARTMENT

<http://news.centurylink.com>

## BOARD OF DIRECTORS

Chairman and Lead Outside Director

c/o Post Office Box 5061

Monroe, Louisiana 71211

USA

[boardinquiries@centurylink.com](mailto:boardinquiries@centurylink.com)

## AUDIT COMMITTEE

Audit Committee Chair

c/o Post Office Box 4364

Monroe, Louisiana 71211

USA

## LAW DEPARTMENT

100 CenturyLink Drive

Monroe, Louisiana 71203

318-388-9000

USA