

CenturyLink Social Media Policy

Social Media

Social media is a category of Internet-based sites and applications built on user participation and user-generated content. Social media or online collaboration platforms, includes blogs, forums, wikis, etc. as well as social networking sites like Facebook, YouTube, LinkedIn and Twitter.

Social media platforms are fundamentally changing the way we work and engage with each other, customers and partners. CenturyLink is using select social media sites, as well as industry-specific sites like dslreports.com, to increase company and product/service awareness, improve customer satisfaction and explain products and services to our customers.

At the same time, we are using these sites to gather insight and feedback with a goal to improve customer care and reduce churn. CenturyLink's corporate social media strategy includes engaging with our customers online. Due to the rapidly growing use of these sites to promote products and services, government and other regulatory agencies, such as the Federal Trade Commission ("FTC"), have directed their attention to how businesses are using these sites. Many of the following guidelines are intended to address the expanding concerns of these agencies.

In addition, social media outlets are a proven influencer of brand perception. These sites are also great places to refer customers and let them have an interactive experience with the brand.

Policy Scope – Who and What

This policy provides guidance to all CenturyLink employees, vendors and contingent workers, who participate in social media. It applies any time you connect to social media sites using CenturyLink assets or its employee network. It also applies if you discuss CenturyLink (including its business, products, employees or customers) on line, even if through your own computer or internet provider. This policy applies equally to all CenturyLink, CenturyTel, Embarq, Qwest and Savvis logos, images, trademarks and discussions. It supplements the provisions of the [Code of Conduct](#), the [Employee Handbook](#) and other corporate policies.

Employees are responsible for complying with CenturyLink's [Code of Conduct](#), the [Employee Handbook](#) and all other applicable corporate policies when using social media to interact online, talk to customers or chat with an acquaintance. Whether you are on or off the clock, you continue to represent CenturyLink. Therefore, this policy applies to both company-sponsored and personal use of social media as it relates to CenturyLink.

Managing CenturyLink's Social Media Presence / Group Sites

To maintain consistency in our approach to the market, CenturyLink Brand Management and designated personnel within some organizations are responsible for establishing and maintaining the official company presence on social media sites. Advance approval of CenturyLink Brand Management is required to use any CenturyLink, CenturyTel, Embarq, Qwest or Savvis logo, image or trademark for any purpose including to create and maintain a social media presence.

Employees wishing to start or host a social media site (the "Sponsoring Employee") either to speak externally on behalf of CenturyLink or for internal communications processes, such as to communicate work related information, must obtain the approval of their Tier 1 leader for the topic and the proposed group of authorized persons who will have access to the site. Once they have the approval of their own Tier 1 leader, the Sponsoring Employee must then submit the proposal along with a completed [social media strategy worksheet](#) to SocialMedia@CenturyLink.com to ensure the proposed site is in line with the corporate social media strategy. In addition to other

requirements, please note that the Sponsoring Employee must identify him/herself on the created social media site. If approved, Brand Management will provide the Sponsoring Employee with additional guidance related to access controls, security measures, messaging, branding and other expectations.

Internal project collaboration should be done on existing internal platforms such as the intranet (for CenturyLink employees) or Jive (for Savvis employees), rather than on social media sites. External platforms are not the appropriate avenues for these discussions.

Brand Management, Corporate Communications or employees with approval from Brand Management are authorized to officially represent company policies and positions (blog, tweet, etc.) on behalf of CenturyLink. Employees should seek internal approval prior to posting.

Social Media Marketing

Social media marketing is an engagement with online communities like Twitter, Facebook, LinkedIn and YouTube to generate exposure, opportunity and sales interest. Examples of social media marketing tactics include, but are not limited to, sweepstakes and giveaways.

All consumer, enterprise and small business social media marketing tactics must be in alignment with our current policy. To ensure alignment, Digital Marketing must be made aware before implementation of or contribution to a social media marketing community. Contact SocialMarketing@CenturyLink.com for more information or to request a review of your proposed content.

Interaction with Customers

All CenturyLink employees should be ambassadors of our brands and products. We appreciate support and contribution on social media sites; however, we have designated employees who are responsible for online interactions to assist customers and help solve their issues. They are trained to respond via these social media sites and have the approved software and tools to monitor and respond on behalf of the company and brand.

- Refer customers to TalkToUs@CenturyLink.com.
- If you find a post or information on a social media site that compels a call to action, please forward the link to SocialMedia@CenturyLink.com.

Customers can also interact with the individual site (for example, send a message while on the CenturyLink YouTube page) to have their questions answered.

What Employees Need to Know

While the above guidelines describe expectations related to company-authorized sites, employees may encounter CenturyLink issues while using social media sites as part of their personal communications. These guidelines apply at all times, at work or otherwise.

We are a publicly traded company regulated by the Securities and Exchange Commission, the Federal Communications Commission and other governing bodies. As such, we need to be careful about the information we share with the outside world before we have officially filed public documents or have made a public announcement. These guidelines apply at all times, at work or otherwise, and have been developed to protect you and the company.

Proprietary, Copyrighted and Confidential Information

- Know and follow CenturyLink's Code of Conduct Policy.

- Information published on social networks, blogs, websites and forums must comply with all confidentiality and disclosure policies.
- Company logos, images and trademarks may be used only with written permission, per the guidelines above.
- Do not divulge any information that is confidential, proprietary or that has not otherwise been made public.
- Information considered confidential includes, but is not limited to, non-disclosed financial information; intellectual property; future product, services and feature releases; and customer information.
- If you are in possession of material non-public information, this information cannot be shared at any time prior to official company release of the information. “Material non-public information” means information that a reasonable investor would consider important when deciding to buy, sell or hold securities of a company. For more information, please refer to [CenturyLink’s Policy Statement on Insider Trading](#).
- Do not comment or speak on behalf of the company with regard to any legal matters, litigation, investigations or disputes involving any tariffs, contracts, agreements or other commercial matters relating to CenturyLink, any of its subsidiaries, customers or vendors.
- Be careful what you say about other persons or entities, including competitors, as laws related to libel, defamation of character and/or harassment could potentially result in claims or lawsuits brought against you individually and/or CenturyLink.
- All postings related to CenturyLink or competitor products, services or offers must be truthful and substantiated prior to distribution. To meet this standard, all postings must be either reviewed by the Commercial Law department before distribution, or use messaging that has been previously approved and used by CenturyLink.
- Please direct any questions you may have regarding proprietary, copyrighted and confidential information to the Integrity Helpline at 913-345-7929 or integrityhelpline@CenturyLink.com.

Use of Social Media While at Work – only if your job role or environment allows.

- Occasional personal use of the Internet and social media sites is allowed as long as it does not interfere with your work performance, does not impact CenturyLink computer systems and complies with the guidelines provided in this policy as well as the Internet Use Policy included in the [Employee Handbook](#), Code of Conduct and applicable corporate and department policies.
- Remember that anything transmitted through the company’s electronic communication systems or network is subject to CenturyLink’s Code of Conduct and applicable policies.
- Make sure that your social media activities do not interfere with your job or commitments to customers.

Use of CenturyLink or CenturyLink References in Social Media

While employees are encouraged to be ambassadors of the CenturyLink brand and speak from personal experience, you should take care not to represent your opinions as those of our company. The following guidelines provide a roadmap for constructive, respectful and productive dialogue between employees and the online community. These are best practices that are in the spirit of our culture.

1. **Know the [Code of Conduct](#) and Company Policies.** If you have any confusion about whether you ought to tweet or post something on your blog, chances are the Code or Policies will resolve it. Pay particular attention to what the Code and Policies state about

proprietary information and avoiding misrepresentation. If, after checking the Code and Policies, you are still unclear as to the propriety of a comment, it is best to refrain and contact the [CenturyLink PR](#) team.

2. **Be mindful of all of our Unifying Principles.** When conducting yourself on the Internet, be mindful of our [Unifying Principles](#): Fairness – the golden rule, honesty and integrity, commitment to excellence, positive attitude, respect, faith and perseverance.
3. **Do not present yourself as a representative of CenturyLink.** Unless you are authorized to do so, do not represent yourself as speaking on behalf of CenturyLink. If you wish to write about a CenturyLink product or service, please contact a member of the relevant team for review before posting. If you are uncertain who that contact is, send a request to SocialMedia@CenturyLink.com. This will help provide your readers with accurate insights and ensure you are properly representing fellow employees or their work.
4. **Respect your audience and your co-workers.** CenturyLink is a global organization whose employees, customers and partners reflect a diverse set of customs, values and points of view. Be yourself, but do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenities, etc.) but also consideration of privacy and topics that may be considered objectionable or inflammatory. You are responsible for your postings on the Internet, so exercise good judgment. Your personal conduct has a direct impact on the reputation of CenturyLink. The [Employee Handbook](#) prohibits the posting of derogatory, defamatory or harassing comments about the company's products, services, customers or vendors.
5. **Respect copyright and fair use laws.** For CenturyLink's protection as well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of copyrighted material owned by others, including CenturyLink's own copyrights and brands. You should avoid quoting more than short excerpts of someone else's work. And it is good general practice to link to sources.
6. **Respect confidentiality agreements.** Customers, partners or suppliers should not be cited or referenced without their approval. Never identify a client, partner or supplier by name without permission and do not discuss confidential details of a client engagement. It is acceptable to discuss general details about projects and to use non-identifying pseudonyms for a client (e.g., Client 123) so long as the information provided does not violate any non-disclosure agreements that may be in place with the client or make it easy for someone to identify the client. Furthermore, the public Internet is not the place to conduct business with a client.
7. **Use your best judgment.** You are responsible for what you say online, including its accuracy and appropriateness. A good rule of thumb is that any conduct or comment that would not be in line with our stated company Unifying Principles and our [Code of Conduct](#) if expressed in any other form or forum should not be considered OK on the Internet. There are always consequences to what you write. If you are about to post something that makes you even the slightest bit uncomfortable, review the suggestions above and think carefully about the language you are about to post. If you are still unsure, and the post is about CenturyLink business, feel free to discuss your proposed post with your manager and/or the public relations team. Ultimately, you are responsible for what you choose to tweet, post to a blog, etc.

8. **Do not make derogatory statements in a social media forum.** While you are free to comment on your employment conditions with other employees, keep in mind that making negative statements about your employer or fellow employees does not give CenturyLink an opportunity to resolve an issue when it first surfaces. As a company, we have a number of options for our employees to be heard and for action to be taken. We encourage you to use the internal options we provide to you to express ideas on how we can improve the company and/or to report complaints or address concerns. For further information about these processes, see Human Resources points of contact in the [Employee Handbook](#).
9. **Be aware.** Be mindful that individuals could be using social media outlets to solicit information from you without you knowing it. If you feel someone is trying to solicit information of a confidential/sensitive nature from you, you should immediately reach out to SocialMedia@CenturyLink.com and report it to CenturyLink Corporate Security.

Correcting Errors Found in Information

1. Social media tools, by their very nature, encourage conversation. If you see something wrong, correct it, but remember to engage in a positive way.
2. If you see erroneous information posted to a CenturyLink sponsored site, notify SocialMedia@CenturyLink.com. If you see erroneous information on a non-company-sponsored site, follow the direction below.
3. It is OK to point out misstatements of fact, but avoid being rude or insulting, which can only serve to diminish your own credibility. The best way to correct public mistakes is to simply make your point and quote a source if you have one (or, even better, provide a link).
4. If you find false information posted online, send a note with your concern and details about the post to SocialMedia@CenturyLink.com.
5. You should alert SocialMedia@CenturyLink.com if you become aware of a posting that includes any of the following:
 - a. Misstatement or misrepresentation of facts regarding the company
 - b. Company confidential or proprietary information (including trade secrets)
 - c. Defamatory or slanderous comments toward the company or a company employee, customer or vendor, in his/her capacity as an employee, customer or vendor
 - d. Comments that violate the company's Equal Employment Opportunity policy (including discriminatory or harassing comments)
6. After the incident has been reported, CenturyLink will initiate an appropriate investigation. To the extent possible, the company will protect the confidentiality of complaints, information gathered during the investigation and the identity of persons making reports and providing information

Media Inquiries

- To assure our message is consistent to the marketplace and to protect you and the company from disclosing information before it is publicly available, no one is allowed to comment on behalf of, or imply that they are commenting on behalf of, CenturyLink to a member of the media regarding CenturyLink without the permission and guidance of Corporate Communications. Please refer to the [CenturyLink News Media Policy](#).
- This includes print, online and broadcast media, as well as contact via email, online postings, phone or in-person conversations. For all media inquiries, please refer to [CenturyLink media contacts](#).

Records Retention

You should not create or transmit company records through social media. But if you do so accidentally, or if something you create or transmit through social media becomes subject to legal hold, you will be responsible for compliance with the [Records Retention Policy](#) with respect to that information.

Endorsements

Sometimes bloggers are asked to write about our products and services. This section provides guidance for those situations.

When an external site contains testimonials on CenturyLink's products or services, there are specific FTC guidelines to follow. Please contact socialmedia@centurylink.com for additional details on these guidelines.

Prior to posting or arranging endorsement blogs, contact [Becky Barthol](#) for consumer-related issues and [Mary Ann Domsch](#) for business-related issues.

The consequences for not following these guidelines can result in various levels of discipline up to and including termination. Use good judgment, and if you are not sure about something you would like to write, check with your supervisor or the Integrity Helpline.

APPENDIX A

Situation Examples and Solutions

The following examples are designed to provide guidance on how the above policy should be put to use in everyday situations.

Example 1: You are on Facebook when you notice that one of your friends (or friend of a friend) posted something derogatory about CenturyLink's product or services on his or her wall as a result of personal experience. What should you do?

Answer: While you have no official obligation to reply, we would encourage you to respond to the post and suggest that the posting person contact TalkToUs@CenturyLink.com for assistance.

If you are uncomfortable responding directly to the post for whatever reason, you can notify SocialMedia@CenturyLink.com directly with details of the post (person and posted content) so appropriate research and follow up can be initiated.

If you are uncomfortable being identified as the reporting person, anonymously contact the Integrity Hotline with details of the post (person and posted content). The incident reported will be shared with SocialMedia@CenturyLink.com so appropriate research and follow up can be initiated.

Example 2: You are on an online discussion board where it would be appropriate to share information about a CenturyLink product (with or without the CenturyLink logo included) for the purpose of solving a problem. What should you do?

Answer: If you are not trained and officially designated to respond, you should contact a member of the relevant product team prior to sharing information about our services. If you do not know

who the appropriate contact is, you can ask through TalkToUs@CenturyLink.com. Permission to use the CenturyLink logo should also be requested through SocialMedia@CenturyLink.com.

Example 3: John is working on an important business deal with a company, the identity of which is highly confidential. John flies to the city where the target (XYZCo) is located, a city where John does not travel frequently and where CenturyLink has no current operations. When John arrives, he opens Facebook on his iPhone and indicates through the Facebook application “4Square” that he is in the airport in XYZCo’s headquarters city. Friends who know that John works on these kinds of business deals, and know enough about CenturyLink to suspect or identify the target, contact him through Facebook to ask him if CenturyLink is considering buying XYZCo. He realizes he has inadvertently compromised the confidentiality of the business deal.

Answer: Although inadvertent, John’s actions were improper. Information published on social networks, blogs, websites and forums must comply with confidentiality and disclosure policies. Information considered confidential includes, but is not limited to, non-disclosed customer information. John is in possession of material, non-public information that CenturyLink is considering a business deal with XYZCo. “Material non-public information” means information that a reasonable investor would consider important when deciding to buy, sell or hold securities of a company. This means he cannot share the information at any time prior to official company release of the information. Even though John did not blatantly state that CenturyLink is considering a business deal with XYZCo, he did provide enough information via social networks that a conclusion may be drawn.

Example 4: A CenturyLink employee is listed as the inventor in a patent application owned by CenturyLink. On her Facebook page, the employee reveals the details of the patent application that was recently filed with the Patent Office but not yet published.

Answer: This employee acted inappropriately. Information published on social networks, blogs, websites and forums must comply with all confidentiality and disclosure policies. Do not divulge any information that is confidential, proprietary, or that has not otherwise been made public. Information considered confidential includes, but is not limited to, non-disclosed financial information, intellectual property, future product, services and feature releases and customer information.

Example 5: A CenturyLink employee is on Facebook when he notices that one of his friends is inquiring about advanced TV options in her city. The employee knows CenturyLink plans to roll out advanced TV in that area by end of the year, so he responds to his friend’s status update by sharing that information – even though it has not yet been made public.

Answer: This employee disclosed a trade secret. Information published on social networks, blogs, websites and forums must comply with confidentiality and disclosure policies. Do not divulge any information that has not been made public. The employee’s actions were improper, even though his intentions were good and he did not disclose this information to a competitor outright. The risk is that he did allow competitors potentially to access this information through Facebook’s robust friend network. There is also no guarantee that the friend will not re-post the answer somewhere more public. Information disclosed on a social networking site can make its way to a competitor and be used to the competitor’s advantage.

Example 6: A CenturyLink call center employee creates a Facebook group using a CenturyLink logo. The page is utilized to communicate with other call center employees.

Answer: Departments or individuals not authorized to create and maintain a social media presence that uses the CenturyLink, CenturyTel, Qwest, Embarq or Savvis logo to establish an online community (internal or external) should not set up communities of this nature unless authorized by CenturyLink Brand Management. Requests for authorization to establish a social media presence that uses the CenturyLink, CenturyTel, Qwest, Embarq or Savvis logo, image or trademark on a social media site should be directed to SocialMedia@CenturyLink.com for approval and posting. Company logos may be used only with written permission.

Example 7: A CenturyLink network supervisor creates a Facebook group to communicate with other employees about service outages and a network technician uses his/her Facebook page to communicate with potential customers about CenturyLink HSI and video products.

Answer: Departments or individuals not authorized to create and/or maintain a social media presence to establish an online community to speak on behalf of CenturyLink should not create a social media presence of this nature unless authorized by CenturyLink Brand Management. Requests for authorization to establish a social media presence that will speak on behalf of CenturyLink on a social media site should be directed to SocialMedia@CenturyLink.com for approval and posting.

APPENDIX B

Best in class practices

- 1. Be the first to respond to your own mistakes.** If you make an error, be up front about your mistake and correct it quickly. If you choose to modify a blog post, tweet, etc., make it clear that you have done so.
- 2. Use a disclaimer.** When appropriate, make it clear that your social media activities are representative of your views and opinions and not necessarily the views and opinions of CenturyLink. In some instances, such as your Twitter or blog bio, you should consider including a disclaimer such as “My comments are my own and don’t necessarily represent CenturyLink’s positions or opinions.”
- 3. Be who you are.** In the spirit of transparency, do not use pseudonyms or false screen names when commenting about CenturyLink, its business or issues with which the company engages. Transparency and honesty are critical in the social media space. If you are commenting about your work for CenturyLink, use your real name and be clear about who you are and who you work for. If you have a vested interest in something you are discussing, be the first to point it out. But be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and be judicious in disclosing personal details.
- 4. Speak in the first person.** Use your own voice; bring your own unique perspective to your commentary.
- 5. Do not pick fights.** When you see misrepresentations made about CenturyLink, you may respond. However, always do so diplomatically and with facts. If you comment about a competitor, you must make sure that what you say is factual and not disparaging. Also, do not try to settle scores or goad competitors or others into inflammatory debates.

Note: This policy is not to be interpreted or applied in a way that interferes with rights protected by applicable laws, including the National Labor Relations Act.