

Whistleblower Policy

April 1, 2024



This Policy applies to all employees. If this Policy conflicts with local law in any jurisdiction, the local law shall govern and apply.

Purpose

The Lumen Whistleblower Policy (the “Policy”) outlines the process for reporting and protections available for Lumen employees who report conduct that is illegal, unethical, or violates Lumen’s Code of Conduct or any other Lumen policy (“Whistleblower”). This Policy is designed to supplement Lumen’s Code of Conduct and other policies prohibiting retaliation.

Scope

For the purposes of this Policy, our “Company” or “Lumen” includes Lumen Technologies, Inc., and its wholly-owned subsidiaries and affiliates. This Policy applies to all directors, officers, and employees of Lumen, and its subsidiaries, affiliates, and operating segments, wherever incorporated, chartered, organized, or located, including related companies, partnerships and joint ventures in which Lumen has a controlling interest.

U.S. employees only: Nothing in this Policy is intended to alter the “At-Will” employment status of those U.S.-based employees who are not covered by a contract of employment or a collective bargaining agreement. This Policy does not create any agreement for a specified term of employment, or any guarantee of notice, procedure, or cause prior to termination.

Policy

Reports Covered by This Policy

This Policy is intended to cover protections for reporting potentially unethical or illegal conduct at Lumen, including the following:

1. Unethical business conduct or a violation of the Code of Conduct or Company policy;
2. Accounting or auditing issues, including but not limited to questionable or irregular accounting methods, auditing conduct, or financial reporting practices, including:
 - fraud or deliberate error in either the preparation, evaluation, review or audit of the Company’s financial statements or the recording and maintaining of financial records of the Company;
 - deficiencies in, or noncompliance with the Company’s internal accounting controls;
 - a misrepresentation or false statement to a senior officer or an external auditor regarding any matter contained or reported in financial records, financial reports, or audit reports of the Company; or
 - any deviation from full and fair reporting of the Company’s financial condition;
3. Violations of state, federal or international laws, including, but not limited to, the Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”), the UK Bribery Act, the Sarbanes-Oxley Act of 2002, as amended (“SOX”), and the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as amended (“Dodd-Frank”);
4. Violations of state, federal or local health, safety or environmental laws and regulations, including but not limited to, the Occupational Safety and Health Act (“OSHA”);
5. Other activities not consistent with our commitment to ethics, including unusual payments or business arrangements that may implicate fraud, bribery, kickbacks, or other wrongdoing.

Lumen employees have a responsibility to report wrongdoing

We encourage employees to raise serious concerns internally in good faith so that Lumen can address and correct inappropriate conduct and actions. It is the responsibility of all Lumen board members, officers, and employees to report concerns about violations of Lumen's Code of Conduct ("Code") or suspected violations of law or regulations that govern Lumen's operations. Hereinafter, any reference to "Whistleblower" includes any Board member, officer, or employee who reports wrongdoing.

Good faith reporting does not mean that the Whistleblower must be right when they raise a concern; they only need to believe that the information provided is honest and accurate.

Lumen does not tolerate retaliation

We will not tolerate retaliation against anyone who, in good faith, reports known or suspected unethical or illegal misconduct, seeks advice, raises a concern, participates, or provides information in an internal or external investigation or legal proceeding pertaining to Lumen. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments, harassment, and threats of physical harm. Moreover, we do not tolerate retaliation against any Lumen employee who refuses or has refused to carry out a directive which would constitute fraud, a violation of the Code or the law.

Any Whistleblower who believes they are being retaliated against should contact the Lumen Integrity Line immediately. Allegations of retaliation are taken very seriously and will be investigated in accordance with the Company's investigations guidelines. Retaliatory acts may lead to disciplinary action against the person responsible for the retaliation, up to and including termination. However, the right of a Whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and determined to have occurred through investigation.

Reporting Procedures

If you become aware of or suspect unethical or illegal conduct, you must report your concerns. Although Lumen employees are permitted to submit reports anonymously, maintaining anonymity may limit our ability to investigate and address concerns. Please note that certain European countries may limit employees' ability to make anonymous reports. More information is available on the [Corporate Ethics and Compliance](#) intranet site.

As an employee, you may report violations and submit complaints to a manager with whom you feel comfortable or to a Human Resources representative. You may also make a report through the following channels. If you are a manager, you must immediately report any suspected misconduct, whether observed or reported by an employee, to the Integrity Line.

- The Integrity Line
 - E-mail: IntegrityLine@Lumen.com
 - Web: LumenIntegrityline.com
 - Telephone (U.S.): 1-800-333-8938
 - Telephone (non-U.S.): [list](#) of international dialing numbers

The Integrity Line, the Company's compliance hotline, is available to all employees 24 hours a day, seven days a week. Contact the Integrity Line by phone, e-mail, or web inquiry to report misconduct. *In general, members of Lumen's Board of Directors should seek guidance or report concerns by contacting the Chair of the Risk and Security Committee of the Board of Directors, the General Counsel, or the Chief Ethics and Compliance Officer. If the issue involves a financial or accounting matter, directors should also contact the Chair of the Audit Committee.*

- Chief Ethics and Compliance Officer
 - Ethics.compliance@lumen.com
 - [Ethics and Compliance](#) contacts

The Company's [Chief Ethics and Compliance Officer](#) ("CECO") is responsible for the handling of complaints made through the Integrity Line and for reporting on these concerns to the Risk and Security and/or Audit Committee of the Board of Directors as appropriate. You may contact the CECO or a member of the Ethics and Compliance team directly to report misconduct.

- The Chair of the Audit Committee of our Board of Directors
 - E-mail: boardinquiries@lumen.com
 - Mailing Address:
 - Audit Committee Chair c/o Post Office Box 4364
 - Monroe, Louisiana 71211 (US)

All matters relating to internal accounting, internal accounting controls, or external auditing matters must be reported to the Audit Committee, either by the Reporting Party or the CECO.

- A member of the Law Department
 - [Law Department](#) resource page
- The Chairman of our Board of Directors
 - E-mail: Boardinquiries@lumen.com
 - Mailing Address:
 - Chairman c/o Post Office Box 5061
 - Monroe, Louisiana 71211 (US)

Security incidents which may be reportable under this Policy should be reported through UNICall (866-864-2255 (U.S.) or 303-797-3995 (non-U.S.)). These include, but are not limited to, reports of suspicious activity, theft, cybersecurity incidents, physical injuries, illness, motor vehicle accidents, property damage, vandalism, building evacuation, chemical spills, government inspections, and other conduct or activity affecting the safety and security of our physical sites or network.

Handling of Complaints and Investigations

Upon receipt of complaints via the Integrity Line or the other identified means of reporting, the CECO or a delegate of the CECO will review and evaluate the complaint in accordance with internal investigation guidelines to determine next steps. The CECO will promptly inform and provide regular updates to the Chair of the Audit Committee and/or the Risk and Security Committee, as appropriate, until resolution.

Allegations of serious misconduct, such as fraud, accounting and auditing irregularities, or violations of law, will be thoroughly investigated. Investigations will be conducted in a fair, unbiased, and impartial manner, and without retaliation.

Reports and complaints made by Whistleblowers will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation and engage the appropriate parties in the handling of complaints. All investigation-related information will be handled in accordance with applicable privacy laws.

This Policy is intended to encourage employees to raise good faith concerns about potentially illegal or unethical conduct to designated company personnel prior to providing notification or reporting outside of the Company. However, nothing in this Policy is intended to prevent an employee from reporting information to an appropriate government agency (including, for example, the U.S. Securities and Exchange Commission ("SEC") or the Department of Justice) when the employee has reasonable cause to believe a violation of law has occurred.

HR Use Only:

Effective Date: April 1, 2024

Supersedes: June 1, 2022

Issued By: Corporate Ethics and Compliance

Applies To: Directors, officers, and employees of Lumen worldwide

Scope: This policy applies globally