

# **Corporate Social Responsibility Report**

2015

# A Message From Glen Post

CenturyLink connects our customers to the digital world. We believe in being an honest partner who helps our customers use technology to enhance their lives, strengthen their businesses and connect their communities.

As our company continues to evolve and adapt in the midst of rapid technological change, we have remained committed to the same set of core values – our Unifying Principles – for more than a quarter of a century.

CenturyLink's Unifying Principles – Fairness, Honesty and Integrity, Commitment to Excellence, Positive Attitude, Respect, Faith and Perseverance – guide our interactions with our customers, communities and one another. In this publication, you will read how we have put these principles into action through efforts ranging from environmental stewardship to community investment.

Highlights of these efforts include:

- CenturyLink's commitment to providing employees and customers with a safe and healthy environment, including our environmental health, safety training and practices.
- Our sustainability efforts, including reduction of paper waste through programs such as online billing and autopay.
- Efforts to reduce carbon use in our data centers around the world.
- A waste minimization and recycling program that diverts millions of pounds of electronic and communications equipment from landfills each year.
- Our Corporate Ethics and Compliance Program, which guides employees to make ethical business decisions and provides mechanisms for employees to report concerns.
- A Supplier Code of Conduct that establishes expectations for our contractors and vendors regarding ethical business practices.
- CenturyLink's Privacy Policy, which protects our customers' information and keeps them informed about the information we collect and the choices they have regarding that information.
- A Matching Time Grant program that awards grants from the CenturyLink Clarke M. Williams Foundation based on the number of hours volunteered by employees to those organizations.
- A senior-level Diversity Steering Committee to help drive training, education, marketing, supplier selection, hiring, talent development, culture and employee engagement, including support of Employee Resource Groups, which represent our diverse employee base and assist in connecting us with our customers' varied cultures and backgrounds.

Additionally, CenturyLink is pleased to have been recognized by DiversityInc, Newsweek and Minority Business News USA for the various initiatives, programs and activities outlined in this report. Thank you for your interest in learning how CenturyLink is giving back to our communities and customers through our corporate social responsibility program.



**Glen F. Post, III**  
Chief Executive Officer and President

# About CenturyLink



**CenturyLink (NYSE: CTL)** is a global communications, hosting, cloud and IT services company enabling millions of customers to transform their businesses and their lives through innovative technology solutions. CenturyLink offers network and data systems management, Big Data analytics and IT consulting, and operates more than 55 data centers in North America, Europe and Asia. The company provides broadband, voice, video, data and managed services over a robust 250,000-route-mile U.S. fiber network and a 300,000-route-mile international transport network.

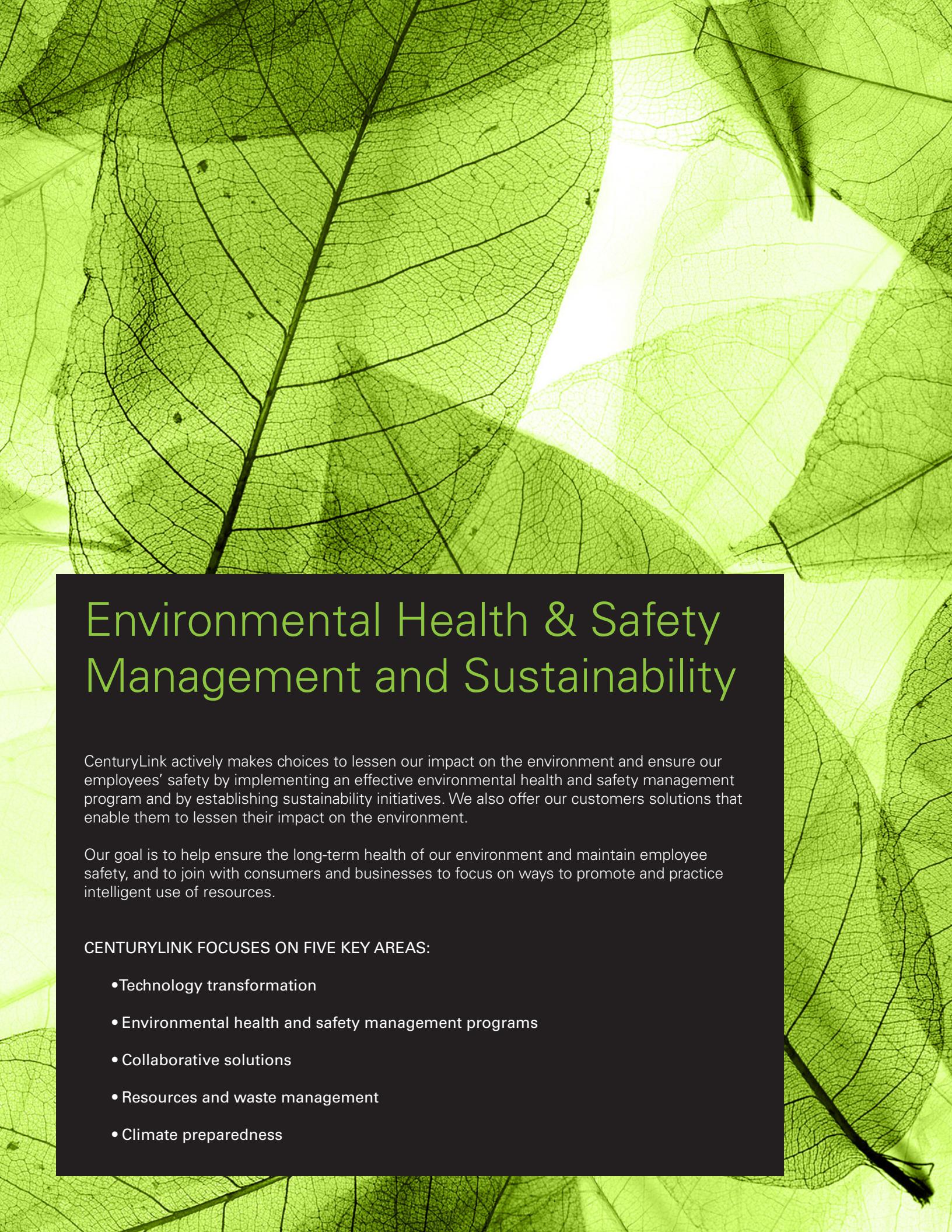
## Unifying Principles

Our Unifying Principles represent the fundamental values upon which CenturyLink was built. They serve as the foundation upon which we continue to grow and prosper, conduct our business and relate to one another, as well as our customers, shareholders, business associates and the general public.

Our Unifying Principles are Fairness, Honesty and Integrity, Commitment to Excellence, Positive Attitude, Respect, Faith and Perseverance.

## CONTENTS

Environmental Health & Safety Management and Sustainability	4
Diversity and Inclusion	13
Supplier Diversity	13
Internet Basics	14
Lifeline	14
Corporate Ethics & Compliance Program	15
Political Contributions and Transparency	16
Customer Privacy	16
Community Involvement	17
Awards and Accolades	18



# Environmental Health & Safety Management and Sustainability

CenturyLink actively makes choices to lessen our impact on the environment and ensure our employees' safety by implementing an effective environmental health and safety management program and by establishing sustainability initiatives. We also offer our customers solutions that enable them to lessen their impact on the environment.

Our goal is to help ensure the long-term health of our environment and maintain employee safety, and to join with consumers and businesses to focus on ways to promote and practice intelligent use of resources.

## CENTURYLINK FOCUSES ON FIVE KEY AREAS:

- Technology transformation
- Environmental health and safety management programs
- Collaborative solutions
- Resources and waste management
- Climate preparedness

# Environmental Sustainability Technology Transformation

## Green Information Technology Program

CenturyLink's IT organization has implemented initiatives to reduce energy consumption as well as the company's carbon footprint. These projects include decommissioning unused servers and replacing aging equipment with newer, more efficient server installations.

### Hosting Center Efficiency

Our approach to energy efficiency in our hosting centers is multifaceted: airflow management, upgraded technology and economization.

Airflow management involves circulating server air to maximize heat rejection. Technology upgrades at select sites allow for extended economization hours. These upgrades include load-specific cooling capacities, variable-speed cooling equipment and control systems, and tailoring systems to utilize outside air and ambient weather conditions. Implementation of energy-efficiency measures resulted in an estimated annual energy savings in 2015 of more than 19 million kilowatt hours and a reduction of an estimated 13,101 metric tons of carbon dioxide equivalent (Co2e). This 13,101 metric tons is estimated to be equivalent to a reduction of more than 31 million miles driven by an average passenger vehicle.

### Network Energy Efficiency Group

The CenturyLink Network Energy Efficiency Group launched several initiatives in 2014, which continued in 2015. These initiatives continued to create energy savings and efficiency within the network, including:

- Shutting off power to excess rectifiers and unused converter plants, resulting in energy savings.
- Switch consolidations, resulting in an estimated annual energy savings in 2015 of more than 5.9 million kilowatt hours, which equates to an estimated 9.7 million miles driven in an average passenger vehicle.
- Removal of common power supply unit cards from unused transport shelves providing additional energy savings.
- Replacement of less-energy-efficient fluorescent lights in 2015 at almost 430 CenturyLink buildings at a cost of approximately \$8.6 million to reduce energy consumption.

In 2015, CenturyLink spent approximately \$2.4 million at 25 CenturyLink buildings to re-commission them to gain more efficient operation of the building systems. By completing these projects, CenturyLink expects to save approximately \$800,000 a year in reduced energy usage.

# Environmental Health and Safety Management Programs

CenturyLink's Environmental Health and Safety management programs provide a framework to address federal, state and local environmental health and safety regulations. CenturyLink Environmental Health and Safety provides assistance to employees in understanding and interpreting regulations; implementing compliance options, programs and training; and communicating directly with regulatory officials.

CenturyLink's commitment to providing employees and customers with a safe and healthy environment is detailed in the CenturyLink Environmental Health and Safety Policy. Employees can find the policy on the company's intranet and are expected to comply with all environmental health and safety laws and to make responsible environmental management

a company priority. Where needed, CenturyLink has established detailed compliance plans, procedures and systems that manage environmental risks in day-to-day operations. CenturyLink strives to meet all applicable environmental laws and regulations in a cost-effective manner and to incorporate environmental considerations into our business planning processes.

### **CenturyLink Environmental Health and Safety Corporate Policy**

CenturyLink strives to conduct its operations in compliance with applicable environmental, health and safety laws and regulations, in a manner designed to minimize the risk of occupational injury, illness and property damage.

- CenturyLink instructs its employees to comply with all applicable laws, regulations, the CenturyLink Code of Conduct and practices governing environmental health and safety.
- CenturyLink management supports environmental health and safety initiatives to protect employee health and safety and minimize losses to property and the environment.
- CenturyLink management fosters open communication and dialogue on workplace health, safety and environmental issues and actively responds to concerns and suggestions to ensure a safe work environment.
- CenturyLink strives to integrate fundamental principles of resource conservation into our business processes, facilities and operations.

### **Environmental Health and Safety Practices and Procedures**

The CenturyLink Environmental Health and Safety team monitors environmental health and safety legislative activity. It develops practices and procedures supporting compliance with applicable environmental, health and safety laws and regulations through the CenturyLink safety and health practices and environmental practices.

### **Environmental Health and Safety Training**

Employees understand and adhere to applicable occupational health and safety requirements. CenturyLink provides environmental, health and safety training in compliance with federal and state laws. Management is responsible for ensuring employees complete required training.

### **Emergency Procedures**

Each business unit participates in the development and implementation of emergency procedures for each facility that they occupy. Management communicates emergency plans to all employees. Employees participate in evacuation drills and adhere to requirements contained in these plans. Business units ensure that emergency procedures integrate with business continuity and disaster recovery plans and procedures.

### **Accident Reporting Responsibilities**

CenturyLink employees report all work-related accidents immediately to their manager and to the company's 24/7 reporting system. Work-related accidents include on-the-job injuries and occupational-related illnesses, automobile accidents, property damage and equipment accidents. CenturyLink Environmental Health and Safety will report all serious accidents involving multiple injuries or a fatality to the appropriate government agencies when required.

### **Occupational Injury & Illness Rate (per 100 employees)**

**Industry Rate 2015: 2.60**

**CenturyLink 2015: 2.55**

### **Accident Investigations**

Management is responsible for initiating the immediate investigation of an accident and calling the company's 24/7 reporting system prior to investigating when third parties are involved. Third parties are involved when there is injury to individuals not employed by CenturyLink or damage to property not owned by CenturyLink.

### **Unsafe Conditions**

Any employee who observes an unsafe or hazardous condition or suspected violation of the law reports it immediately to management. If an unsafe or hazardous condition exists, managers provide necessary warnings and immediately report the unsafe or hazardous condition to the company's 24/7 reporting system. Violations of the law are reported to the Integrity Line, the company's compliance hotline.

# Environmental Sustainability Collaborative Solutions

## CenturyLink's Environmental Sustainability Statement

CenturyLink improves lives, strengthens businesses and connects communities by delivering advanced technologies and solutions with honest and personal service. While delivering customer benefits through our services, we are mindful of the impacts our actions may have on the environment.

Reducing environmental impact requires a thoughtful approach, balancing the needs of our employees, customers, shareholders and the environment. A balanced approach means that we support the financial health of our business while ensuring environmental sustainability efforts that create value for our stakeholders, which includes our communities.

CenturyLink has adopted the following objectives to inform and drive our environmental sustainability efforts:

- Consider sustainability in the context of stakeholder value
- Build and operate efficient networks and data centers
- Pursue sustainability initiatives that reduce energy, waste and materials consumption
- Engage employees and suppliers in our sustainability efforts
- Comply with applicable sustainability legal requirements
- Establish sustainability metrics to measure the results of our efforts

CenturyLink is committed to environmental stewardship. We incorporate environmental sustainability principles and practices throughout our operations as we work to serve our customers and our communities.

## Environmental Sustainability Council

The CenturyLink Environmental Sustainability Council facilitates collaboration across the company to identify and implement actionable "greening" initiatives. The council aims to reduce the company's carbon footprint and evaluates the ongoing economic feasibility of "green" initiatives.

## Our Customers

CenturyLink helps customers "go green" with products and services that use environmentally friendly architectures such as IP and Ethernet to reduce environmental impact and better manage natural resources.

Some examples include:

- Reduction of paper waste with online billing and autopay.
- Remote energy management through CenturyLink® Smart Home allows customers "anywhere management" of thermostat settings and to preprogram efficient energy practices such as turning lights on/off at specific times.
- Minimization of carbon footprints through technologies that reduce the need for air travel and other transportation.

## Our Employees

CenturyLink employees care about the environment and sustainability. CenturyLink has a "Going Green" internal online page that encourages employees to submit suggestions for helping the company go "green." Suggestions are evaluated based on feasibility, economics and other factors.

To showcase both individual and business unit efforts that make a positive environmental impact, CenturyLink has established an internal online Green Tip Board for "green" ideas and news.

# Environmental Sustainability

## Our Partnerships

### Alliance for Telecommunications Industry Solutions (ATIS)

As an active member and contributor to ATIS, CenturyLink works alongside other industry leaders to identify and promote energy-efficient technologies and equipment. CenturyLink is also a member of the ATIS Exploratory Green Group (EGG), which develops recommendations and shares best management practices for the telecommunications industry in the area of environmental sustainability.

The EGG examines ways the telecommunications industry can assist businesses in reducing their carbon footprints through video conferencing, telecommuting, smart buildings and other technology solutions.

### Carbon Disclosure Project

CenturyLink submits its annual carbon inventory to the Carbon Disclosure Project (CDP). The CDP is an independent, nonprofit organization that aims to create an ongoing relationship and meaningful dialogue between shareholders and corporations about the implications of climate change.

The CDP issues an annual questionnaire and then assigns a Carbon Disclosure Leadership Index rating based on how the company is reducing its carbon footprint.

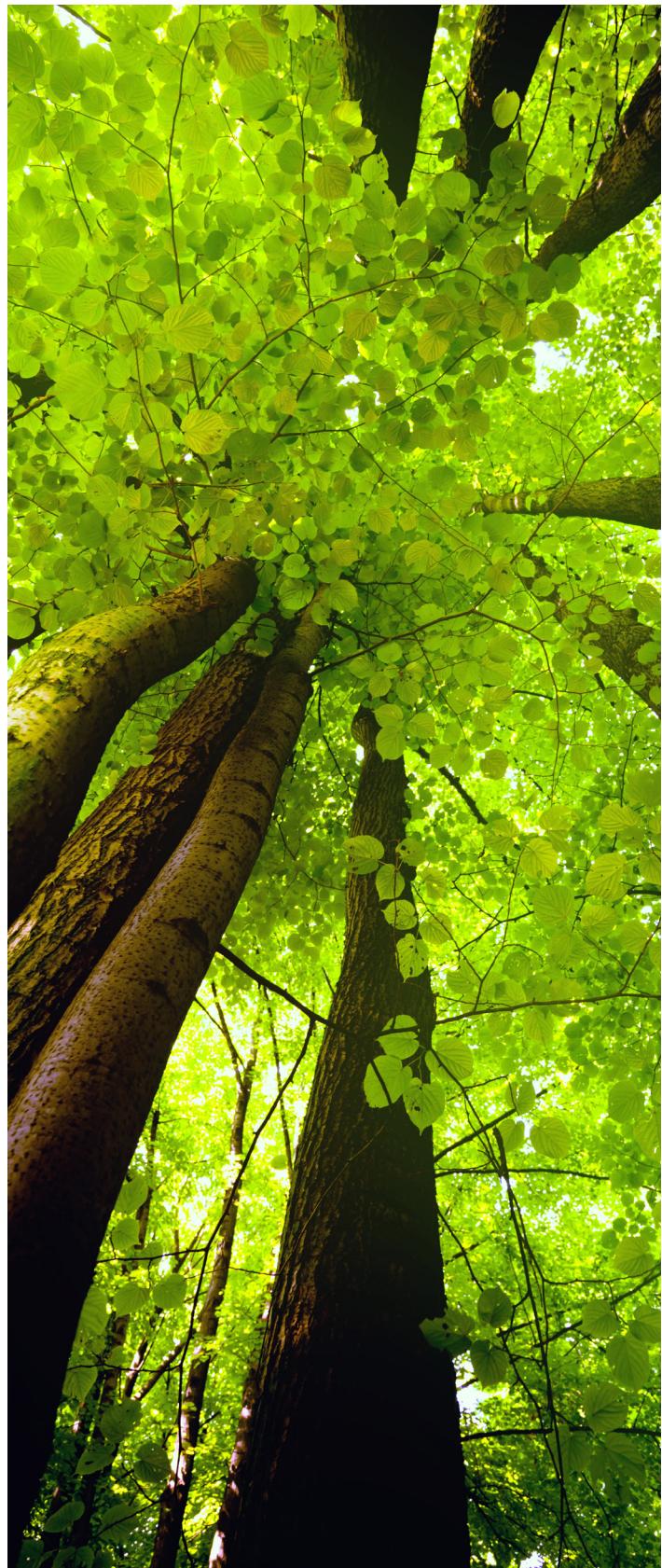
CenturyLink reported the following Green House Gas emissions for the 2015 CDP:

- Direct (Exhaust) 271,362 Tons CO<sub>2</sub>e
- Indirect (Electricity) 2,080,188 Tons CO<sub>2</sub>e

### Greenhouse Gas Emission Reduction Targets

CenturyLink developed targets to reduce greenhouse gas emissions. These targets are:

- 20 percent reduction in direct (exhaust) CO<sub>2</sub>e by 2024
- 25 percent reduction of indirect (electricity) by terabyte by 2024



# Environmental Sustainability Resources and Waste Management

## Recycling

The CenturyLink Waste Minimization and Recycling Program diverts millions of pounds of electronic and communications equipment from landfills each year. CenturyLink recycles telecommunications equipment and many other items such as batteries, wood poles, electronics, copper wire, fluorescent lamps, fleet oil and solvents.

CenturyLink's recycling program exceeded 8.5 million pounds in 2015. Since 2007, CenturyLink has recycled more than 47,750 short tons of material.

## Paper Recycling

When it's time to dispose of paperwork or non-paper media, CenturyLink values the security of that information - whether it's customer, company or employee-related. CenturyLink uses a secure shred program where employees dispose of company documents and media through responsible "green" recycling practices.

In 2015, more than 1,000 CenturyLink sites collected, securely shredded and recycled more than 3.4 million pounds of paper - saving the equivalent of more than 29,000 trees or avoiding more than 2.4 million pounds of CO<sub>2</sub>e.

## Procurement

CenturyLink is actively initiating programs in the procurement of its products and services to lessen its environmental impact. Programs include:

- **EPA SmartWay** - CenturyLink is a member of the EPA's voluntary SmartWay Transport Shippers program. The SmartWay program recognizes partners that set and achieve goals to reduce greenhouse gas emissions in their freight transport operations. It encourages using SmartWay Partner freight carriers that are improving their own fuel efficiency, which helps reduce potential environmental impacts from freight shipping activities.
- **Telecommunications Energy Efficiency Ratio** - CenturyLink requires suppliers to apply the Telecommunications Energy Efficiency Ratio (TEER) metric to appropriate proposal submissions. The TEER measures and uniformly quantifies energy consumption for network components, which helps ensure the energy efficiency of new network equipment.
- **Set-Top Box Energy Conservation** - CenturyLink announced its voluntary participation with 13 other companies in an unprecedented Set-Top Box Energy Conservation Agreement. The agreement stipulates that at least 90 percent of all new set-top boxes purchased and installed after Jan. 1, 2013, will meet the U.S. Environmental Protection Agency Energy Star 3.0 efficiency levels. Based on market projections, the Consumer Electronics Association and National Cable & Telecommunications Association estimate an annual residential energy savings of more than \$1.5 billion when the agreement is fully realized.

## Gas Emissions

It is estimated that gas emissions from transportation represent 33 percent of total domestic emissions. Programs to reduce gas emissions include:

- **CenturyLink Fleet** - The CenturyLink fleet includes flex-fuel and propane-fueled vehicles. These vehicles produce significantly less greenhouse gas emissions than traditional vehicles. The CenturyLink fleet team routinely evaluates greenhouse-gas-friendly alternatives for possible addition to the fleet.
- **Commuter Programs** - CenturyLink offers commuter programs to employees in Seattle, Portland and Phoenix. In partnership with Denver's Regional Transportation District (RTD), CenturyLink offers employees who commute to work discounted monthly transit via bus or light rail paid on a pre-tax basis. RTD estimates the average commuter using public transit saves about \$9,100 annually.

# Environmental Sustainability Leadership in Energy and Environmental Design

## Technology Center of Excellence

The CenturyLink Technology Center of Excellence officially opened in March 2015. It includes a technology research and development lab, a network operations center and collaborative office and meeting space.

In the Center, employees with network, cloud, information technology and other skills work together to create innovative products and services for CenturyLink's customers.

CenturyLink is pursuing LEED (Leadership in Energy and Environmental Design) certification at the Technology Center. LEED is a rating system devised by the United States Green Building Council to evaluate the environmental performance of a building and encourage sustainable design.

The CenturyLink corporate headquarters is located on 77 acres in Monroe, Louisiana. Dramatic growth occurring in the number of employees based in the Monroe area created the need to expand the headquarters facilities. Internal planning identified the desire for a Technology Center of Excellence that would pull together information technology, network operations and corporate strategy into a collaborative environment.



*Technology Center of Excellence*

The design of the project included a master plan for the site, substantial utility relocations, a 300,000-square-foot facility, and a five-story parking structure to accommodate more than 1,000 vehicles. The process also yielded a 2.2-acre landscaped courtyard designed to unite the new Technology Center with the existing 365,000-square-foot headquarters building.

CenturyLink made sustainable design a priority and incorporated unique design strategies to pursue a LEED rating. These features are showcased throughout the building to allow it to perform at a higher efficiency as well as improve the indoor environmental quality for employees.

## **Fast Facts**

Targeting LEED Silver certification for the Technology Center of Excellence building:

- Green roof is a mixture of 28 varieties of slow-growing vegetation that bloom throughout the year.
- Tankless point-of-source hot water heating in restrooms and break rooms.
- “Smart Building” controls for mechanical and electrical systems, lighting, View Dynamic Glass intelligent windows, audio visual, security, Uninterruptible Power Supply and generator backup systems.
- Carpet and modular furniture are 100 percent recyclable.

## **Sustainable Sites**

The building is located in a mature pecan orchard; therefore, it was a priority for the design to minimize the removal of these mature trees. The 80 trees that were removed were milled locally, yielding 20,000 square feet of lumber from which veneer paneling and flooring as well as solid material for coffee bar countertops throughout the facility were produced. The landscape design for the campus included planting a new tree for each tree removed.

## **Electrochromic Glazing**

The building also incorporates 37,000 square feet of View Dynamic Glass, making this facility the single largest installation of electrochromic glass in the country. View's glass leverages nanotechnology and pre-programmed intelligence to tint automatically in response to outside conditions and user preferences, eliminating the need for blinds or shades, as well as providing enhanced occupant experience and improved energy efficiency. Use of electrochromic glazing has been shown to reduce lighting, heating and cooling loads in typical buildings by 20 percent or more.

## **Roofing Materials**

CenturyLink set an ambitious goal for the roof design, with no roof-mounted mechanical equipment. To accomplish this goal, the design team moved all of the typical rooftop equipment into a separate mechanical building. This equipment includes all backup generators, chillers and cooling towers. The result is a pristine roof surface finished with vegetated trays (lower roof) and a white membrane (upper roof). These roof surfaces, which are very visible from the adjacent existing headquarters facility, provide a striking visual appearance and introduce the sustainable features of the two materials.

## **Recycling Program**

Each floor of the Technology Center of Excellence has a dedicated storage area for recycling glass, plastic, metal and paper. Items from these collection points are collected weekly, and a similar recycling program is being pursued in the current headquarters building.

## **Lighting Contribution**

CenturyLink's lighting design has optimized energy performance by 20 percent over the current energy code. High performance luminaires and daylight harvesting contribute to reduction in energy use. Building occupants have control of their environment via low-voltage controls within the space as well as task lighting.

# Environmental Sustainability Alternative and Renewable Energy

## Bloom Fuel Cell

In 2014, CenturyLink expanded its sustainability commitments by installing Bloom Energy fuel cells to generate up to 500 kilowatts of clean, reliable power for one of its data centers in Irvine, California. The Bloom fuel cells continued to be used in 2015. The fuel cells produce nearly 4.4 million kilowatt hours of annual electricity and will help power cloud, managed hosting and colocation services housed within the data center and reduce CenturyLink's carbon emissions.

## Solar-Powered Remote Sites

CenturyLink has approximately 30 standalone (off-grid) solar-powered radio sites ranging in size from a few hundred to several thousand watts in its portfolio.

## Electric Car Charging Stations

In 2015, CenturyLink partnered with Kansas City Power & Light to install three Level 2 ChargePoint dual electric car charging stations at CenturyLink's office in New Century, Kansas. The stations provide charging for up to six electric cars simultaneously.

## Hydroelectric-Powered Data Center

In 2015, CenturyLink opened a new data center in central Washington. The facility's electricity is supplied, in part, by hydroelectric generators powered by the nearby Columbia River. The central Washington climate allows significant use of free-air cooling, driving some of the most energy efficient rates in the data center industry, as supported by the center's power usage effectiveness (PUE).



# Environmental Sustainability Climate Preparedness

Natural disasters are happening more frequently and with greater intensity. CenturyLink created an environmental sustainability governance council ("The Green Team") to support greening initiatives that aid the environment while aligning with recovery objectives. CenturyLink's risk-based approach to disaster mitigation focuses on the hydrological cycle, biodiversity, slope, topography, water quality and climate.

Our industry faces many environmental challenges, and CenturyLink is committed to working toward solving them. CenturyLink uses remote work strategies to minimize the impact to customers and the environment during disasters. Environmentally sound data center design and virtualization contribute to resiliency, high availability and recoverability.

# Diversity and Inclusion

We believe that embracing diversity and creating a culture of inclusion make CenturyLink a better company. By incorporating a variety of viewpoints, insights and perspectives, CenturyLink is a better service provider, a better community partner and better able to serve our diverse employee and customer bases. CenturyLink's Diversity and Inclusion initiatives are overseen by Odell Riley, Vice President – Operations and Corporate Systems and Chief Diversity Officer, and Scott Trezise, Executive Vice President – Human Resources.

## **CenturyLink Diversity Steering Committee**

CenturyLink has a senior-level Diversity Steering Committee which shapes and drives the company's overall diversity strategy. The committee reviews the company's diversity initiative results, which include training and education, marketing, hiring, talent development, company culture and employee engagement. In addition, it provides guidance and feedback on diversity initiatives.

## **Employee Resource Groups**

Employee Resource Groups (ERGs) play an important role in CenturyLink's diversity philosophy. ERGs assist with employee career development, increase employee engagement and help us connect with CenturyLink's increasingly diverse customer base.

CenturyLink ERGs include:

- ABTP – Alliance for Black Telecommunications Professionals
- EAGLE – Resource group supporting Gay and Lesbian employees and allies
- FRIENDS – Resource group supporting persons and family members with disabilities
- PAAN – Resource group supporting Asian and Pacific Islander employees
- SOMOS – Resource group supporting Hispanic employees
- CenturyLink Women Empowered – Resource group supporting women employees
- CenturyLink Veterans – Resource group supporting veteran employees
- Voice of Many Feathers – Resource group supporting American Indian employees

CenturyLink provides each ERG with an operating budget, meeting space and an internal website. ERGs are open to all CenturyLink employees and are publicized through the company's internal communication channels.

## **Recruiting and Outreach**

CenturyLink attracts candidates who are drawn to our strategy to improve lives, strengthen businesses and connect communities and who willingly embrace our Unifying Principles. Job openings are cross-posted on more than 200 diversity job boards, and we have an active military recruiting strategy, including an online military job code translator. We recruit through multiple diversity partners such as Historically Black Colleges and Universities and predominantly Hispanic educational institutions.

CenturyLink supports many community events and organizations, including Juneteenth, Asian New Year, Cinco de Mayo and Pride festivals in various communities.



# Supplier Diversity

The Supplier Diversity Organization is an integral part of CenturyLink's Global Supply Chain. CenturyLink values the unique blend of cultural and business expertise, as well as the flexibility and creativity that diverse suppliers provide to our operations.

We integrate supplier diversity into our strategic sourcing process through measurable goals and objectives. CenturyLink is proud of its 15 percent average annual spend with certified diverse businesses. Additionally, we maintain an open-door policy with our ethnic minority, women, and service-disabled, veteran-owned suppliers. They are included in our request-for-proposal processes and connected with diverse firms via an active presence in local, regional and national diversity business outreach events and chambers of commerce.

# CenturyLink® Internet Basics

No matter where families live in the world, Internet access and the right training can give them the gateway to participate in the global economy. CenturyLink supports the Federal Communications Commission's goal of bringing high-speed Internet to economically disadvantaged households. We work with nonprofit partners throughout our service areas and have conducted more than 130 basic computer and Internet training sessions where low-income residents of all ages learn how to find jobs, start businesses, gain education and increase their financial self-sufficiency through the use of the Internet. In many underserved, isolated and low-income communities, our Internet connectivity, discounted computer equipment and free training are offered to qualifying low-income households through the CenturyLink Internet Basics program. The training, regardless of income, is opening doors to better healthcare, education, jobs, social services and economic opportunities.

## Lifeline

CenturyLink participates in Lifeline, which provides certain discounts on monthly service to qualified subscribers (helping low-income households with phone service needs). CenturyLink fully complies with the Federal Communications Commission's annual Lifeline customer recertification program. Lifeline is available to qualifying customers in every U.S. state; qualifications vary by state.

Residents of American Indian and Alaskan Native tribal lands may qualify for up to an additional \$25 a month discount of enhanced Lifeline support. They may also qualify for the Link-Up program, which helps consumers pay the initial installation costs of getting telephone service. Link-Up provides a credit of up to \$100 of the initial installation charges for tribal customers. An individual living on tribal lands may qualify for Lifeline and Link-Up discounts if he or she participates in one of the following programs: the Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance to Needy Families; Food Distribution Program on Indian Reservations; or Head Start (for those households meeting its income-qualifying standard).



# Corporate Ethics & Compliance Program

We are committed to creating and maintaining an ethical business culture based on our Unifying Principles. CenturyLink's Corporate Ethics and Compliance Program advances our commitment by communicating the ethical and legal standards that govern our business conduct. We expect our employees, business partners and other third-party representatives to embrace these standards and to act with the highest level of integrity and in accordance with all applicable laws and industry and trade regulations when doing business with and on behalf of CenturyLink.

The CenturyLink Code of Conduct is the cornerstone of the Corporate Ethics and Compliance Program. It sets forth the basic principles we must follow to uphold our company's ethical business culture and provides guidance and resources to help employees make ethical business decisions. CenturyLink employees are trained on the Code and must acknowledge their obligations under the Code. In addition, CenturyLink has implemented its Supplier Code of Conduct, which requires contractors, vendors and other third parties who conduct business with CenturyLink or on our behalf to act in accordance with our high ethical standards.

CenturyLink promotes a culture of honest communication and mutual respect, and, in this regard, maintains a compliance hotline – known as the Integrity Line – which is available to employees and external stakeholders 24 hours a day, seven days a week. CenturyLink encourages employees to contact the Integrity Line to seek guidance regarding ethics and compliance issues, to report actual or suspected misconduct, and to obtain information about CenturyLink's policies and procedures.

## **Human Rights**

At CenturyLink, our commitment to human rights is integrated into every aspect of our business. Our Code of Conduct addresses our position on topics that relate directly to human rights, such as privacy, data security, diversity, inclusion and fair treatment, individual rights, confidentiality of information, and health and safety. We train our employees to recognize and report violations of human rights laws, such as those relating to child labor, forced labor, discrimination and harassment, immigration, and fair compensation. In addition, our Supplier Code of Conduct and our third-party contracts further advance our commitment 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.

## **Anti-Bribery and Fair Competition**

CenturyLink competes in the marketplace on the basis of service and product quality, pricing and reputation. We prohibit all unlawful and unethical forms of payment, including bribes and kickbacks. We require our employees and those with whom we do business to adhere to all applicable anti-bribery and anti-corruption legislation, including the Foreign Corrupt Practices Act and the UK Bribery Act. In addition, we communicate our anti-bribery policy to our agents, contractors, partners and vendors, and require them to certify that they will abide by all applicable laws and regulations.

As our business expands globally, we will continue to shape our Corporate Ethics and Compliance Program to address those issues that are relevant to our business within our diverse world market.

# Political Contributions and Transparency

CenturyLink encourages its employees to be actively involved in the community, including supporting political candidates and initiatives of their choice. CenturyLink employees and representatives are expected to comply with all applicable laws regarding political contributions.

CenturyLink has established various Political Action Committees (PACs) that are legally recognized organizations that accept voluntary contributions and make expenditures to support candidates for elected office. Only eligible employees may contribute to a CenturyLink employee PAC. CenturyLink does not attempt to influence employee contributions or political activities.

The company may, on occasion, elect to spend authorized funds to publicize a specific event or viewpoint. CenturyLink complies with all applicable laws, including requirements regarding the filing of disclosure reports with the appropriate federal or state election commission.

CenturyLink values responsible corporate governance and participates in the political process in an effort to formulate public policies that benefit our customers, shareholders, employees and the communities we serve. We provide transparency regarding our political contributions and expenditures. The company publishes a semiannual Political Contributions Report on our corporate website.

## Customer Privacy

CenturyLink takes customer privacy very seriously; safeguarding personal information and protecting privacy are among our priorities.

Like most companies, we have certain information about our customers and may use it to provide our services. We also share it where appropriate to meet our business goals or fulfill our legal obligations. We protect the information we have about our customers, and we require those we share it with to protect it, too.

The CenturyLink Privacy Policy describes how we use and protect the information we collect about customers and their privacy options. Our Privacy Policy is available at [www.centurylink.com/privacy](http://www.centurylink.com/privacy).

# Community Involvement

CenturyLink is committed to strengthening the communities it serves through philanthropy, volunteerism and support of local community initiatives.

The company focused its charitable giving and volunteerism on strengthening communities through primary education, programs that support youth and technology-focused initiatives. The majority of CenturyLink's community investment is managed at the local level because local teams know how best to support the communities in which they live and work.

## **Volunteerism**

CenturyLink encourages employees to donate their time, talents and resources to local nonprofit organizations, and the company supports their efforts. With more than 43,000 employees around the world, CenturyLink's employees' interests and passions are varied. Employees volunteer with youth organizations, in schools, for health-related causes, with the underserved, as well as via arts and sports. Employees reported 26,485 volunteer hours in 2015. Since CenturyLink began tracking volunteer hours in 2013, more than 144,485 hours have been logged.

CenturyLink encourages volunteerism and supports it through the Matching Time Grants program funded by the CenturyLink Clarke M. Williams Foundation.

Through this program, employees who volunteer 40 hours or more within a six-month period to an eligible 501(c)(3) non-profit agency can earn a \$500 grant for that organization. As of Dec. 31, 2015, CenturyLink awarded almost 775 Matching Time Grants for a total of \$386,500.

CenturyLink encourages volunteerism throughout the year but gives added emphasis during National Volunteer Week by kicking it off with annual CenturyLink Celebrates Volunteerism Day projects across the country. Employees can view and sign up for volunteer projects in their area using the online Volunteer Center for the company's volunteer day and throughout the year.

## **Employee Giving**

CenturyLink also provides employees with a method for continual giving to charities they support. During the company's annual Employee Giving Campaign, employees are able to donate to eligible 501(c)(3) agencies through payroll deduction. In turn, the Foundation matches those donations with a gift to the United Way in the employee's local community.

CenturyLink's 2015 campaign resulted in more than \$2.6 million in individual donations to more than 2,500 nonprofit agencies in our U.S. markets and a match of \$1.7 million to more than 300 local United Way organizations across the United States.

## **Annual Food Drive**

The communities CenturyLink serves are diverse, but one common need in every community is hunger.

In 2015, CenturyLink hosted its Backpack Buddies Food Drive to provide food to students during weekends and holidays when school lunches are not available. Through this drive, employees and community members donated an equivalent of more than 13 million pounds of food and monetary donations to more than 170 food banks across the United States. The CenturyLink Clarke M. Williams Foundation added a match of \$1 million to the drive to bring the company's nationwide total to 19 million pounds of food to fight hunger in the communities CenturyLink serves.

# Awards and Accolades

## 2015

### **CenturyLink wins 2015 Data Center Excellence Award for operational excellence, innovation and certification achievements**

CenturyLink won a 2015 TMC InfoTECH Spotlight Data Center Excellence Award for operational excellence and numerous global data center achievements. The award recognizes the most innovative and enterprising data center vendors and is a reflection of the numerous highlights in CenturyLink's data center business in 2015. In 2015, CenturyLink completed data center expansion projects in Boston, London, Minneapolis-St. Paul, Phoenix, Seattle and Washington, D.C. The company also grew its market presence into Australia and in central Washington, where it opened a hydroelectric-powered data center.

### **Newsweek recognizes CenturyLink with Green Ranking**

Newsweek's Green Rankings comprehensively assess the environmental performance of the largest publicly traded companies in the United States and around the world. CenturyLink rose to #182 out of the top 500 companies in 2015 from #258 in 2014.

### **Million Dollar Circle of Excellence in Supplier Diversity**

For the fourth consecutive year, CenturyLink was named to the Arizona Hispanic Chamber of Commerce Million Dollar Circle of Excellence for Arizona companies spending more than \$1 million annually in supplier diversity.

### **CenturyLink a member of the FTSE4Good Index Series**

The FTSE4Good Index Series has been designed to objectively measure the performance of companies that meet globally recognized corporate responsibility standards. Inclusion on the list is a reflection of meeting or exceeding FTSE standards; ranks are not assigned. CenturyLink continues to be a member company of the FTSE4Good Index.

## 2014

### **18 Enterprises Receive Global Recognition for Data Center Design and Operations Efficiency**

Uptime Institute, an independent division of the 451 Group, announced 18 winners, including CenturyLink, in the first annual Brill Awards for Efficient IT. In the judgment of more than 90 industry professionals who evaluated submissions from leading enterprises around the world, these companies best exhibited efficiency in data center and IT operations in the broadest sense of the word – efficiency of capital deployment, technology, design, operations and overall management. The Brill Awards program seeks to showcase companies and technologies that improve the industry's ability to sustainably deliver IT services to the end user.

### **CenturyLink named to DiversityInc's Top 10 Companies for Veterans list**

DiversityInc announced that CenturyLink ranked No. 10 on the 2014 Top 10 Companies for Veterans. More than 1,000 public and privately held companies competed for spots on the coveted list.

### **Newsweek recognizes CenturyLink with Green Ranking**

Newsweek's Green Rankings comprehensively assess the environmental performance of the largest publicly traded companies in the United States and around the world. CenturyLink was ranked #258 in 2014. Newsweek did not conduct the Green Rankings in 2013.

### **Million Dollar Circle of Excellence in Supplier Diversity**

For the third consecutive year, CenturyLink was named to the Arizona Hispanic Chamber of Commerce Million Dollar Circle of Excellence for Arizona companies spending more than \$1 million annually in supplier diversity.

### **Minneapolis-St. Paul Data Center Earns Tier III Certification of Constructed Facility**

CenturyLink's data center in Minneapolis-St. Paul, MP2, received Uptime Institute's coveted Tier III Certification of Constructed Facility. MP2 is the first colocation data center in Minnesota to receive this award, which signifies that the design, construction and commissioning meet the Uptime Institute's rigorous criteria for concurrent maintainability.

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## **2013**

### **CEEDA: Certified Energy Efficient Data Center Awards – Savvis, a CenturyLink company, receives Silver Award for LO3**

BCS, the Chartered Institute for IT, awarded Savvis a Silver Certified Energy Efficient Data Center Award for its LO3 London Docklands data center. Savvis is the seventh organization in the world to demonstrate its leadership in sustainability and data center energy efficiency by earning a CEEDA honor, which is administered by DCProfessionals on behalf of BCS.

### **Savvis, a CenturyLink company, receives Carbon Trust Standard**

All of Savvis' UK data centers have been awarded the Carbon Trust Standard. This recognizes Savvis' ongoing efforts to ensure its operational procedures are as energy efficient as possible in its LO1, LO3, LO5 and LO6 data centers in London, Slough and Reading.

The Carbon Trust Standard is widely acknowledged as the world's leading certifier of organizational carbon footprint reduction. The certification has been achieved as a result of Savvis' long-term commitment to reducing its carbon footprint and the associated energy costs. Savvis is one of a small number of cloud infrastructure and hosted IT solutions companies to achieve this standard across all of its UK facilities.

### **Million Dollar Circle of Excellence in Supplier Diversity**

For the second consecutive year, CenturyLink was named to the Arizona Hispanic Chamber of Commerce Million Dollar Circle of Excellence for Arizona companies spending more than \$1 million annually in supplier diversity.

### **United Kingdom Carbon Trust Award**

CenturyLink was presented with the UK Carbon Trust Award for efforts to reduce its carbon footprint within all CenturyLink's United Kingdom data centers. Carbon Trust is a world-leading certifier of organizational carbon-footprint reduction. CenturyLink is one of only a few data center providers to receive this distinction. Carbon Trust measures and certifies the environmental footprint of organizations, products and services.

### **Minority Business News USA – Ambassador for Supplier Diversity**

Minority Business News USA is the leading print and digital publication supporting the national minority supplier development initiative. It recognized CenturyLink as an ambassador for its supplier diversity efforts.

### **CenturyLink a member of the FTSE4Good Index Series**

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