

LUMEN®

2024 Impact Report

Building the backbone for AI

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Our approach

At Lumen, we see a future powered by artificial intelligence — and we're building the backbone to make it possible.

To support this vision, we're investing in what matters most — network resilience, robust cybersecurity and data privacy — because trust is the foundation of innovation. And through it all, we hold ourselves to the highest standards of ethical conduct.

Together with our stakeholders, we're unlocking digital opportunities, protecting the planet, and empowering the people and communities we serve.

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North Star

Our strategy and cultural blueprint, **the North Star** guides our actions. It advances our purpose of unleashing the world's digital potential and drives our transformative culture.



About this report

Welcome to the Lumen 2024 Impact Report.

At Lumen, responsible business is at the heart of our strategy and culture. For more than a decade, our company and its predecessors have published reports detailing our commitment to corporate responsibility — a commitment that continues to evolve alongside our business. This year marks the launch of our newly named Impact Report, which sets out how our focused approach influences our company, communities and the environment. Our efforts are informed by ongoing stakeholder engagement, including our 2023 materiality assessment, which helps to identify our most material topics.[1]

Unless otherwise noted, reported data and progress in this report reflect the 2024 calendar year. Our reporting also follows internationally recognized standards and frameworks, including the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-related Financial Disclosures (TCFD), which have been incorporated into the International Financial Reporting Standards (IFRS) Foundation Sustainability Disclosure Standards. We also share our climate risk management activities each year through the CDP Climate Change Questionnaire.

As expectations change and as we transform our business to be the trusted network for AI, we continue to engage regularly with stakeholders and refine our efforts. Through transparent reporting grounded in credible standards, we strive to provide a clear and thorough picture of our priorities. As we look to the future, we remain confident in our ability to turn challenges into opportunities for our stakeholders, our communities and the world we share — while helping to build the backbone of AI that fuels innovation and drives progress.

Lumen reporting

- 2025 Proxy Statement
- 2024 Form 10-K
- 2025 CDP Corporate Questionnaire
- 2024 TCFD and SASB Index

Corporate social responsibility

- Additional information can be found on our website.

Sustainability-related policies

- Anti-Corruption Policy
- Code of Conduct
- Human Rights Policy
- Integrity Line
- Supplier Code of Conduct

How to navigate this year's report

Look for these symbols in this year's report:

- Link to another section of this report
- Download
- Link to a website
- North Star Designates North Star initiatives

1 Materiality, as referred to in this report, is different from "materiality" in the context of Securities and Exchange Commission (SEC) disclosure obligations. Issues deemed material for purposes of our impact reporting and for purposes of determining our impact strategy may not be considered material for SEC reporting purposes, nor does inclusion of information in our impact reporting indicate that the topic or information is material to our business or operating results.

A message from our CEO



At Lumen, our commitment to operating responsibly is core to how we create long-term value for shareholders, drive sustainable growth for our business and fulfill our purpose of unleashing the world's digital potential.

> "We're building the backbone of the AI economy, a network designed for scale, speed and security. Our infrastructure connects people, data and applications quickly, securely and effortlessly."

This year's annual Impact Report reflects that commitment. It shows how responsibility, innovation and performance go hand-in-hand, fueling transformation that benefits our customers, employees, communities and investors. Our transformation is anchored in disciplined governance, sustainable growth and a commitment to stakeholder trust.

We're building the backbone of the AI economy, a network designed for scale, speed and security. Our infrastructure connects people, data and applications quickly, securely and effortlessly. Last year, we advanced our mission by expanding our high-speed fiber network, modernizing our digital platform and delivering connectivity that powers innovation across industries.

We're also showing up with purpose. Last year, Lumen employees volunteered more than 28,000 hours in communities around the globe. This spirit of service is part of our DNA and demonstrates how we bring our Lumen 8 behaviors to life and create impact beyond our business.

We remain uncompromising in governance. With active oversight from our Board and a rigorous enterprise risk management framework, we're ensuring our transformation is bold, transparent and responsible.

At the heart of this progress are our people. Guided by our North Star, we launched Goal-Focused Performance to elevate not just what we achieve, but how we achieve it. And because the future will be powered by AI, we introduced our AI Literacy program to ensure every employee has the skills to innovate responsibly and thrive in this new era.

This report reflects our progress and our promise. We're proud of how far we've come, and we're energized by the road ahead.

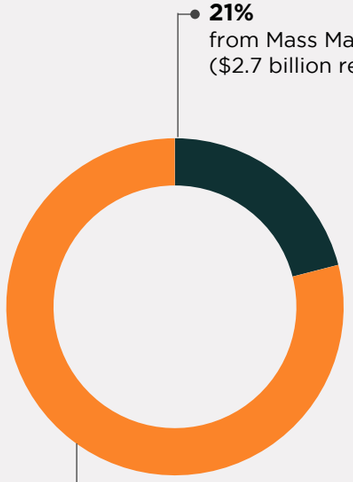
Kate Johnson,
CEO

About Lumen

Lumen at a glance[1]

Financial Strength: 2024 Results

$13.1 billion
total revenue



Our Employees

~25,000
employees worldwide with ~3,400 outside the U.S.

Our assets

163,000
on-net buildings

340,000
fiber route miles

4.2M
fiber broadband-enabled locations

17.8M
other broadband-enabled locations

Who we are

We are a networking company with the goal of connecting people, data and applications quickly, securely and effortlessly. We are unleashing the world's digital potential by providing a broad array of integrated products and services to our domestic and global business customers and our domestic mass market customers.

Lumen operates one of the world's most interconnected communications networks. Our platform empowers our customers to swiftly adjust digital programs to meet immediate demands, create efficiencies, accelerate market access and reduce costs, which allows our customers to rapidly evolve their IT programs to address dynamic changes.

We conduct our operations under the following brands:

LUMEN®
Our flagship brand for serving the enterprise and wholesale markets, including our Private Connectivity Fabric (PCF) network architecture, Lumen Digital products, and our priority services including Edge, Network-as-a-Service (NaaS) and cybersecurity

Quantum FIBER
Our brand for providing fiber-based broadband services to residential and small business customers

CenturyLink
Our long-standing brand for providing primarily mass-marketed, copper-based communications services

BLACK LOTUS LABS®
Our cyber threat research and intelligence arm

In May 2025, Lumen entered into an agreement to sell its Mass Markets fiber-to-the-home business in 11 states to AT&T. AT&T's acquisition includes approximately 95% of Quantum Fiber, approximately 4 million enablements and nearly 1 million subscribers as of March 31, 2025. As part of this deal, which is expected to close in early 2026, Lumen will retain assets that will continue to serve as the foundation of its enterprise transformation, including all national, regional, state and metro-level fiber backbone network infrastructure, central offices and associated real estate. The information presented in this report reflects the state of operations prior to the finalization of the pending sale. Some of the values presented in this year's report may be subject to change as a result of the closure of this transaction, resulting from a shift in operational scope and strategic direction.

1 For additional information about how we define and calculate the statistical data presented herein, see our periodic reports filed with the U.S. Securities and Exchange Commission.

Our North Star

THE PATH TO DISRUPTION

PURPOSE

Unleashing the world's **digital potential**

MISSION

Igniting business growth by connecting **people, data and apps – quickly, securely and effortlessly**

CUSTOMER SOLUTION AREAS



Infrastructure Services



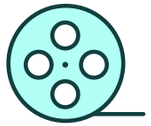
Connectivity Services



Security Services



Communication Services



Media and Entertainment Services

Connectivity Fabric

SUCCESS



Innovation that customers value



Delightful Experiences for employees, customers and partners



Profitable **Revenue Growth**

CULTURE

We operate with **Teamwork, Trust, Transparency**
We infuse **Clarity, Customer Obsession, Courage, Growth Mindset, Respect** in everything we do

Our customer-centric approach

The Lumen Advisory Board continues to be a valuable source of strategic insight, helping shape how we meet customer and partner needs and market expectations. Twice a year, representatives from leading organizations share perspectives on emerging technology trends and business needs. In 2024, the Lumen Advisory Board members offered insights on AI's real impacts, data quality and ethical use, and expressed the urgent need for network modernization, flexible cost models and exceptional customer experience.

The Lumen Customer Community is an interactive online platform designed exclusively for our customers. With almost 700 members, it serves as a central hub where customers can connect, exchange knowledge and consult valuable resources. Members can also access expert tips, receive the latest updates on Lumen solutions, and engage directly with Lumen specialists for guidance and support.

Lumen continues to sponsor a national networking organization for technology leaders. Through our involvement, we gain firsthand insights from senior executives into the challenges and priorities shaping their organizations. In 2024, our commitment expanded to include premier sponsorship of a major industry event, along with active participation in regional chapter engagements.

Customer advocacy

We're committed to listening, taking action and continuously improving. Customer obsession is a core element of our North Star strategy, guiding how we engage, respond and evolve. To this end, we have a Customer Advocacy Group dedicated to resolving customer concerns swiftly and effectively. Customers can reach us through multiple channels, including online platforms, phone or written communication.

Our aim is for every issue to receive a thorough and timely response using our well-defined and stringent process, supported by service-level agreements that set clear performance targets. Beyond resolving individual cases, we strive to use what we learn to enhance our people, processes and technology — ensuring every interaction builds trust and strengthens the overall customer experience.

Connecting communities

Lumen is dedicated to enhancing connectivity and connecting communities through expanded network access. One central approach is to deliver robust middle-mile connections, made possible through innovative partnerships.

Working alongside others helps bring fiber infrastructure to communities, offering benefits such as lowering costs and accelerating project timelines. By leveraging existing assets and building strategically, partners can cut upfront investments. This collaborative model also leads to operational efficiencies and shared savings, reducing financial exposure and enhancing project success.

Lumen connects New Mexico K-12 schools

In 2024, Lumen proudly delivered 900 miles of new fiber optic connections across New Mexico, a state with some of the most critical educational connectivity needs in the nation. By expanding broadband infrastructure into rural schools and historically underserved communities, we empowered educators and students and laid the groundwork for economic growth. Altogether, Lumen was selected by the New Mexico Office of Broadband Access and Expansion to provide high-speed fiber connectivity that will securely link about 15,000 students at 27 public schools around the state, including charter and tribal schools.

California Department of Technology and Lumen advance fiber expansion

The State of California and Lumen are collaborating to expand high-speed fiber broadband access across the state. Under a $400 million contract, Lumen is building open-access, middle-mile infrastructure — essential for linking last-mile providers and delivering reliable internet to underserved and remote communities.

As of the end of 2024, the project had reached 40% completion, reflecting substantial progress toward California's digital infrastructure goals. We remain on track to meet the state's connectivity objectives by 2026, and this initiative continues to serve as a blueprint for future public-private partnerships nationwide.

Impact In action: customer success stories

Connecting farmers to the grid:

Upstate Niagara Cooperative supports 24/7 operations with scalable, resilient communications.

Read the story

Smart cyber defense for retail:

Micro Center fortifies its network against threats, enhancing customer experiences.

Learn how they did it

When every call counts:

Donor Network West relies on Lumen for secure, dependable communications in organ and tissue coordination.

Learn more

Our impact strategy

We believe our commitment to sustainability — through environmental stewardship, strong governance, innovation and empowering people — drives our business's long-term success and deepens trust with employees, communities, customers and investors.



Empowering People

We want our employees to be proud to work for us and be fully engaged with our efforts to make the world a better place. This includes fostering a culture of safety and encouraging meaningful community engagement.



Protecting Our Planet

We are committed to environmental stewardship, which we believe promotes the health of our planet and our business, and creates value for our employees, communities, customers and investors.



Driving Responsible Business

We believe responsible decision-making, strong governance and effective risk management are essential to building business resiliency. Our culture of teamwork, trust and transparency helps protect the interests of our company and our stakeholders.

Our top sustainability issues

Our 2023 double materiality assessment helped to identify the following top priority topics.

Cybersecurity and data privacy

Protecting our organization, our customers and their data is paramount, and we prioritize cybersecurity, risk management and data privacy as fundamental pillars of our business. Please refer to the Cybersecurity and privacy section of this report for more information.

Ethical conduct

Lumen is dedicated to maintaining the highest standards of ethics and compliance in all our business operations. Our comprehensive program, guided by our Code of Conduct and reinforced through training and communication, seeks to ensure our employees and partners act with integrity and adhere to all applicable laws and regulations. Please refer to the Ethics and compliance section of this report for more information.

Network resilience and reliability

Our network is engineered for industry-leading resilience, leveraging diverse routes and redundant infrastructure to provide continuous connectivity. Our proactive monitoring and rapid response capabilities minimize downtime and maintain the highest levels of reliability, even in the face of unexpected disruptions. Please refer to the Business resiliency and preparedness and Supply chain management and resiliency sections of this report for more information.

Stakeholder engagement

We value input from our stakeholders. Our ongoing engagement informs our initiatives and allows us to align our actions with both industry expectations and business priorities.

Stakeholder	How we engage
Investors, analysts and stockholders	One-on-one meetings, email engagement via targeted outreach, group meetings, quarterly earnings calls, annual shareholder meetings, and participation in industry conferences and Analyst Days
Customers	Customer surveys, one-on-one meetings and other feedback channels
Suppliers	Vendor onboarding forms, supplier risk and sustainability assessments, questionnaires, educational discussions on sustainability topics, partnership conversations and individual engagement
Communities	Employee engagement in volunteering and donation-matching programs, local investments and empowering employees to support their passions through company-supported initiatives
Employees	Employee engagement survey, performance management process, learning and development training, volunteerism and donation-matching



2024 highlights



Our support for people and communities

- Launched **AI literacy training** for all employees
- Donated $892,732.57 to 2,727 **nonprofits worldwide**
- Launched an updated performance management approach called **Goal-Focused Performance**



Our efforts on environmental sustainability

- Achieved by year-end 2024 a 30% reduction in **Scope 1 and Scope 2 GHG emissions** and a 17% reduction in upstream **Scope 3 GHG emissions** from 2028 baseline
- Awarded an A- on our **2024 CDP Corporate Questionnaire**
- Established **new science-based targets** to reduce greenhouse gas (GHG) emissions



Our commitment to responsible business

- 99.9% of employees completed **Business Continuity Management** training, underscoring our commitment to network resilience and reliability
- 99.5% of employees completed **Code of Conduct** training
- Developed an **AI Governance Framework** to guide the responsible deployment of AI

Our support for people and communities

At Lumen, our people are our edge. When they feel healthy, safe and valued, we all succeed. We have embarked on a cultural transformation anchored in clear performance goals, robust learning and flexible benefits that put well-being front and center. Beyond our walls, our employees extend their impact through service and volunteerism in the communities where we live and work. Together, we're building a stronger Lumen and a brighter future for those we serve.

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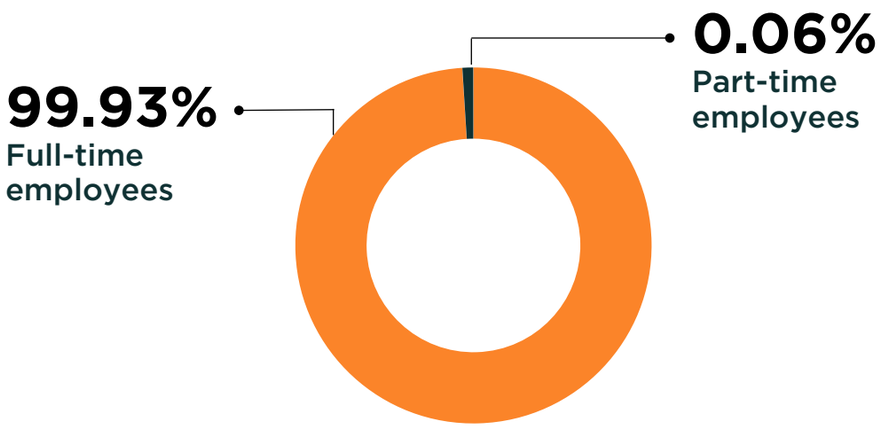
North Star

Driven by our **North Star**, we're creating a culture infused with teamwork, trust and transparency. We champion clarity, customer obsession, courage, a growth mindset and respect — living these behaviors fuel innovation and set the foundation for our long-term success.



Our workforce

As of December 31, 2024, we had approximately 25,000 employees worldwide. On average, our permanent employees have a tenure of 14.8 years with Lumen.



People-driven performance

Our recruiting, development and retention objectives focus on treating talent as a differentiator and a leading indicator of business performance. We strive to hire and retain the best talent available and ensure fair opportunities for all employees across every aspect of employment. We have implemented a rigorous hiring process and regular career development and training programs, which we believe empower our employees to pursue their professional goals and improve employee engagement and retention.



Culture

Culture is the operating system for our business. That's why our business transformation began with a careful look at how we work together. Early in our transformation, we developed the Lumen 8 cultural behaviors. More than words, these habits and actions guide how we collaborate, lead, make decisions and serve our customers. Whether it's speaking truth to power, putting our customers at the center or embracing a "play to win" mindset, these behaviors move us forward together and with purpose.

Lumen earned the American Opportunity Index Employer of Choice award for 2024.



Lumen 8 cultural behaviors

Eight behaviors guide our North Star culture.

Teamwork

Understanding, respecting and collaborating with others toward a common goal. Showing up for each other every day, supporting a no-hero culture and committing to the team's collective success.

Trust

Doing what you say you will do, owning your mistakes and only sharing information that is yours to share. Being vulnerable, promoting authenticity and empowering others to fully demonstrate trust.

Transparency

Telling the whole story by representing information and data accurately, completely and timely even when difficult.

Clarity

Clear is kind. Communicating in a clear, concise and thoughtful way. If anything is unclear, including goals, then ask.

Customer Obsession

Listening to our customers from a place of empathy to understand their needs. Taking ownership to determine priorities and advocating for the customer. Responding in a prompt manner to deliver and delight our customers beyond their expectations with a solution.

Courage

Boldly advocating an idea or opinion especially when it creates a sense of vulnerability. Leaning in and being willing to rumble respectfully for the benefit of the conversation or desired result. Living your values, asking for help and supporting others to do the same.

Growth Mindset

Having an open mind and a commitment to learning. Seeing challenges, failures and change as opportunities for growth.

Respect

Valuing others' contributions, experiences and well-being through active listening, thoughtful communication and professionalism. Fostering a culture of mutual care and connection by recognizing and appreciating the unique qualities and skills of all individuals (Lumenaries, customers, partners and communities).

"At Lumen, our clear ambition is to power the AI economy with our global fiber network — and to build the strongest possible culture to drive that transformation. Our culture is the operating system of our business, essential to everything we do. We believe that people and culture are the true drivers of performance, and as we create the trusted network for the AI economy, that belief will continue to guide us forward."

Ana White
Chief People Officer



At Lumen, our culture powers how we lead, how we work and how we grow. We've embedded the Lumen 8 behaviors into the core of how we work, our processes and our systems. Not only did we clearly define the behaviors that would make us future-ready, but we also gave our leaders the tools and accountability to live these values every day. Leaders are the culture's architects — their actions, choices and willingness to grow set the tone for everyone. In 2024, we sharpened our focus on culture by working to empower leaders to activate it across the organization.

Our executives set the tone — demonstrating how culture guides the way we operate, innovate and deliver. Their leadership made culture a visible and intentional part of decisions and interactions. People leaders brought this to life by engaging their teams in meaningful ways, making culture a shared experience and a source of energy and impact. To reinforce this, we embedded culture into the everyday — through leadership programs and by integrating Lumen 8 into how we grow, recognize and reward performance. Please refer to the Learning and development section of this report for more information.

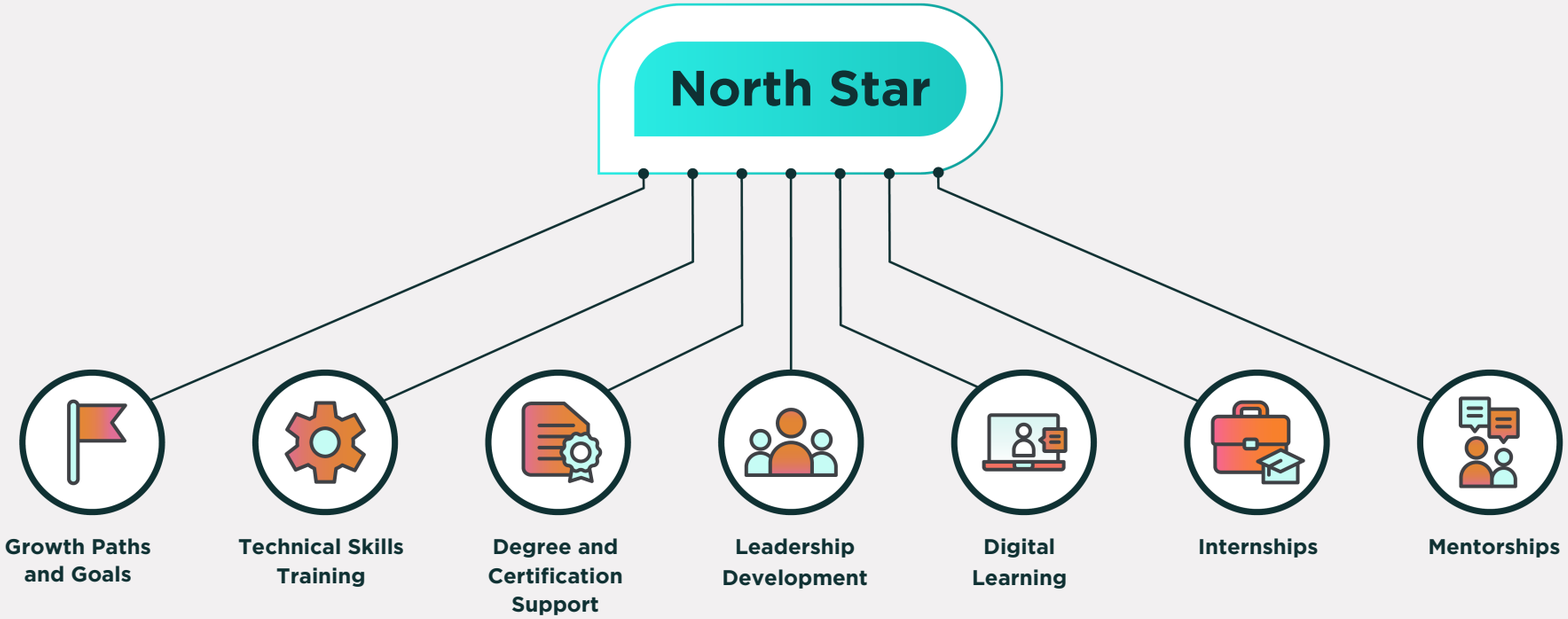
We're measuring success, tracking progress, listening for feedback and embracing challenges with a growth mindset. Engagement surveys, feedback loops and behavior adoption data help us track progress and identify opportunities to grow. Please refer to the Employee engagement section of this report for information on the survey results. Our goal is clear — to make culture real and lasting, support every employee to bring their best, and build a Lumen that's bold, resilient and ready for what's next.

Infuse culture across the organization



Learning and development

At Lumen, learning is a way of life and is built to support our North Star strategy. We invest in broad-based development for our employees in various ways such as skills-building programs, on-demand learning options, tuition reimbursement, and tailored intern and mentoring programs, along with a suite of leadership development courses.



Internships

Our award-winning internship program remains a key cornerstone of our talent strategy and an internationally recognized launchpad for early-in-career professionals. Every year, our highly sought-after U.S. internship program invites undergraduate and graduate students to take part in a rigorous, 10-week experience. The intention of our internship program is to create a talent pipeline by investing in students' growth and development and creating a pathway of success to full-time roles at the onset of their career.

Our focus on early-in-career development extends beyond the United States. Lumen has also expanded our program into India with a six-month internship cycle tailored for engineering and technology candidates.

Lumen was recognized as one of WayUp's Top 100 Internship Programs for 2024.

Growth Paths and digital learning

Career growth is never one-size-fits-all. That's why we work with our employees to map out tailored Growth Paths, action plans designed to guide professional and personal advancement. Each step is meant to be clear and focused, so employees know how to turn growth into impact.

At the heart of our learning experience is Percipio, our digital platform. This learning ecosystem provides access to over 160,000 resources, including around 8,000 Lumen-specific courses. Here, employees can choose from a collection of articles, audiobooks, immersive labs, interactive courses and real-time skill tracking — all available on demand to meet different learning preferences and schedules.

2ForU program

The 2ForU program offers hourly employees in North America two hours of paid time each month to attend company-sponsored events during regular working hours. It creates space for employees to connect, learn, share ideas and feel included, aligning with the North Star strategy. Participation is voluntary, and eligible activities include company-wide webcasts, leadership meetings, wellness events and Lumen-sponsored volunteer events.

Skills-based learning

Learning at Lumen is as varied as the roles we support. From a variety of technical disciplines and tailored programs for customer experience teams, to helping our other functions use tools to increase efficiency and innovation, our skills training equips teams to meet the challenges ahead. Power skills such as collaborative leadership, communication and relationship-building are developed alongside technical expertise, recognizing that lasting business success depends on both.

In 2024, Lumen launched a company-wide leadership development initiative designed to build the skills needed to lead with courage, navigate uncertainty and inspire bold thinking. This program empowers employees at every level to grow their confidence and impact in a fast-changing world. We also connect employees to vendor partner academies, opening doors to new certifications and industry credentials at little or no cost.

24.6

hours of training on average completed per Lumen employee annually



AI literacy training

At Lumen, we recognize the transformative power of AI to revolutionize our work. As we build the backbone for AI, we're committed to making AI learning accessible to every employee by offering high-quality educational resources. Through the AI Literacy program, we aim to educate all employees on the fundamentals of AI, including its applications and ethical considerations. Our goal is to give people the knowledge and tools they need to innovate, no matter their background or skill level. In October 2024, we rolled out AI literacy training company-wide. Please refer to the Responsible artificial intelligence section of this report for more information.

Sustainability learning

Sustainability is one of the many areas where employees can expand their knowledge and skills at Lumen. Through Percipio, employees can explore more than 80 courses spanning different facets of sustainability. These resources help Lumen employees deepen their understanding of environmental practices and make more informed, responsible choices that enhance our sustainability commitments every day.

Mentoring

Mentorship is central to our rotational programs. Our two-year Finance and Accounting Rotational program guides high-performing talent through four six-month rotations and offers mentorship to build skills supporting our company's evolving business needs. In Human Resources, the Rotational Leadership Development program pairs each participant with a dedicated mentor per rotation, exposing them to different HR functions and building strong professional networks over three years.

Tuition reimbursement

The Lumen Tuition Reimbursement program is designed to make continuing education more accessible for our employees. Eligible team members can receive up to $5,250 per calendar year to cover tuition costs, along with an additional $450 each year for books and required fees. This investment in learning nurtures personal and professional advancement, empowering employees to pursue degrees and certifications that help them grow their skills and contribute to our future success.

$1,079,569

tuition reimbursement received by 386 Lumen employees

Leadership development

Developing strong leaders who can move our company forward is a priority for Lumen. Our onboarding program ensures every new executive gets a strong start, accelerating their integration and impact. Ongoing growth is underpinned by our partnership with BetterUp, which delivers personalized, one-on-one coaching to leaders across Lumen. Executive participation in 2024 was exceptionally strong, and feedback has been overwhelmingly positive, with leaders describing the coaching experience as extremely valuable.

Performance management

In 2024, we launched an updated performance management approach, called Goal-Focused Performance, that gives equal importance to both what we achieve and how we achieve it. This system emphasizes setting larger, more impactful goals anchored in the Lumen 8 behaviors. Throughout the year, employees reflect on their progress and contributions, while managers provide support through check-ins that foster open dialogue, timely feedback and real-time adjustments. The process culminates in a comprehensive year-end review, which 89% of employees completed in early 2025. This process reinforces a culture of consistent communication and progress, empowering employees to develop and grow all year long.

Our Goal-Focused Performance approach



Goal setting
Employees collaborate with their managers to set clear, achievable goals that align with both their personal aspirations and company objectives, including the Lumen 8 behaviors.



Self-reflections
Throughout the year, employees regularly consider their own performance and behaviors — identifying strengths and areas for growth.



Regular check-ins
Managers and employees engage in ongoing conversations to monitor progress, exchange feedback and make adjustments as needed.



Collaborator feedback
Colleagues contribute additional insights, offering a well-rounded perspective on performance and contributions.



Year-end reviews
The process culminates in a formal review, recognizing accomplishments and pinpointing new opportunities for development.

Employee engagement

Employee engagement is woven throughout our culture. We're committed to listening deeply, valuing different perspectives and turning feedback into forward momentum.

At Lumen, employee engagement means feeling connected — to your work, your team and the impact you make. When employees feel supported, heard and proud of what they do, it shows in how they collaborate, grow and embody our Lumen 8 culture. Engagement isn't just a survey — it's a measurable outcome we strive for.

Throughout the year, Lumen creates meaningful opportunities for employees to feel connected to the company, each other and their communities.

Our Senior Leadership Team hosts Global Town Halls to reinforce our mission, help employees align work with strategic priorities and connect to them directly through Q&A.

A commitment to continuous learning is central to our culture. This year, we introduced innovative programs to help employees grow their skills. The inaugural Lumen Narrative Knockout invited employees to articulate our story in their own words, fostering storytelling and strategic alignment. We also launched AI literacy training and expanded our leadership development program, reinforcing courage and a growth mindset across the organization. Please refer to the Learning and development section of this report for more information.

Our Employee Resource Groups (ERGs) offer welcoming spaces that are open for everyone to build connection. Whether building cross-functional partnerships, volunteering locally or honoring veterans with service projects, ERGs demonstrate the power of purpose-driven collaboration. Please refer to the Community engagement section of this report for more information.

Beyond these initiatives, employees engage through programs that promote well-being, recognition and belonging — making Lumen a place where people thrive. These include lunch and learns, leadership conversations and technical forums that foster collaboration and a growth mindset. Recognition ranges from formal awards to informal shout-outs and team celebrations, reinforcing shared values and strategic goals.

We also encourage engagement through various channels designed to drive continuous improvement and innovation across Lumen, including our Going Green mailbox — an open channel for employees to share ideas for greener practices.

Employee survey

Engaging our people starts with truly listening to their experiences and perspectives. In 2024, we continued our commitment to open dialogue through our biannual employee engagement survey. All global employees — with the exception of contractors, interns and those on leave — were invited to share their voice, ensuring the insights collected reflected the breadth of our workforce.

The response was clear and encouraging — between spring and fall 2024, agreement with recommending Lumen as a great place to work rose by 9 points. This increase signals growing employee satisfaction and engagement, contributing to the highest employee Net Promoter Score in three years. In addition, overall employee well-being increased to 82%, reflecting meaningful progress in how our people feel supported and valued.

The Senior Leadership Team reviews overall results and shapes priorities based on what employees tell us. At the team level, people leaders receive tailored feedback when at least five team members respond, helping identify both strengths and opportunities for improvement.

91%
of Lumen employees feel they can be themselves at work

90%
of Lumen employees have trusting relationships at work

83%
of Lumen employees feel positive about themselves at work

91%
of Lumen employees believe their manager's behavior aligns with the Lumen 8 behaviors

Health and safety

At Lumen, safety comes first. Lumen strives to outperform the industry-average safety performance as we continue our investments in programs and training to support health and safety. We conduct risk assessments, review safety incident data, conduct audits, and monitor health and safety legislation to develop policies and procedures designed to minimize safety hazards and support compliance with applicable laws and regulations. We continuously monitor safety performance to identify trends and evaluate opportunities to eliminate or reduce the risks of workplace hazards.

Safety management and governance

Our Environment, Health and Safety (EHS) team has primary responsibility for overseeing our safety management systems, monitoring performance metrics, and developing and helping implement policies in step with emerging regulations and leading practices. In close partnership with Risk Management, the EHS team analyzes incident and workers' compensation data to identify trends and prioritize targeted safety initiatives. Business unit stakeholders, such as Field Operations, Real Estate and Fleet, work hand-in-hand with EHS to embed safety protocols directly into daily workflows, ensuring they are communicated and measured for real results. This collaborative, accountable approach is reinforced at the highest level, with EHS and Risk Management providing annual safety performance updates to the Board's Risk and Security Committee.

In the United States, our Mutual Occupational Safety and Health Committee allows represented employees to shape our safety journey and champion a culture of shared responsibility. The committee actively evaluates safety concerns, recommends management system updates and maintains a process for resolving issues as they arise. For mutually agreed topics, it initiates joint projects with clear deliverables, supports state-level implementation efforts and facilitates discussions on shared priorities.

Employee feedback

Every employee has a seat at the table when it comes to building a safer workplace. We encourage our workforce to share fresh ideas, raise concerns, and identify emerging risks in real time through our safety committees and reporting channels such as UNIcall and the Integrity Line. This feedback is valued and reviewed to uncover workplace trends and recurring themes. These insights help us address root causes and drive meaningful safety enhancements across Lumen.

Safety training

Effective safety training is critical to enabling our team members to know, understand and consistently implement the work practices necessary to safely perform their work. Our Safety Training Plan tool helps managers assess each employee's job duties and potential exposures to help identify training gaps; any missing requirements are addressed through tailored online or instructor-led courses. Foundational training, including First Aid/CPR, Personal Protective Equipment, Respecting Current, and Hazard Communication, is mandatory across our workforce to ensure a strong baseline of safety competency.

Monthly safety meetings, developed by EHS and led by our frontline managers, offer an essential forum for learning and discussion. These gatherings address timely risks and new challenges, and foster a culture of continual learning. To ensure accountability, participation is meticulously tracked in our Safety Meeting Reporting System. Building on the power of feedback, we began development of a new safety training program for field operations supervisors in 2024, equipping our leaders to drive safe practices within their teams. This training was launched in 2025.

79,586

hours of safety training were completed across the organization

Transforming fleet safety

In 2024, Lumen launched a transformative field safety initiative by investing in advanced technology and training. We began equipping our vehicles with cutting-edge telematics along with driver and forward-facing cameras. This technology rollout was paired with comprehensive training and communications. Since launching this initiative, Lumen has observed positive change in collision trends and driving behaviors across our fleet.

Safety audits and inspections

Our EHS team facilitates a robust program of annual internal and external safety-related and property protection audits, scrutinizing our compliance with both regulatory requirements and our own high standards. Every year, our Internal Audit team conducts comprehensive reviews across multiple technical sites, assessing health and safety practices, risk management and control processes. Each audit includes clear findings assigned to business units for immediate action and resolution. Progress is tracked and reported to our Senior Leadership Team and the Audit Committee of the Board of Directors, ensuring accountability and follow-through.

We amplify this approach by partnering with independent property loss prevention consultants, who focus on our highest-value locations. These experts help us measure compliance against the latest fire and life safety codes, industry best practices and internal protocols. Their findings are systematically managed to resolution by our process owners and tracked in centralized systems.

$282 million

reduction in potential property loss was achieved through the resolution of 183 risk reduction recommendations

Beyond formal audits, our EHS team performs annual EHS compliance reviews at key facilities, using standardized checklists to spot and address compliance gaps across local, state and federal regulations, as well as our own health and safety practices. Deficiencies are flagged for corrective action, with follow-up tracked by EHS to verify closure.

Every day, our managers and supervisors bring safety directly to the front lines, conducting detailed inspections of high-risk work activities. Through direct observation, reviewing safe work practices and immediate coaching, we strive to ensure such work practices are correctly implemented. Inspections are documented in a mobile system and integrated into field technicians' monthly performance discussions.

Incident reporting and response

Report | **Investigate** | **Corrective Action** | **Prevent**

Employees are empowered and expected to play an active role by quickly reporting any work-related incidents to both their manager and our dedicated 24/7 reporting system. This helps us launch prompt, thorough investigations and immediately implement corrective actions, mitigating risks and helping to prevent similar events in the future.

In addition to routine incident reporting, we require employees to report all unsafe conditions, hazards, or suspected legal or ethical violations to managers, who are responsible for ensuring proper safeguards are in place and for escalating issues through our established channels. For heightened confidentiality or sensitive concerns, the Lumen Integrity Line is always available, allowing employees to safely and securely report possible violations of our Code of Conduct or legal obligations.

We have thoughtfully managed the relatively small quantity of lead-sheathed cables in our network and have a positive record of safeguarding the health and well-being of our employees and the communities we serve. That has been and remains our priority.



Our safety performance

In 2024, we achieved an Occupational Safety and Health Administration (OSHA) recordable occupational injury and illness rate of 1.81 per 100 employees in the United States. This rate is below the currently available industry average of 2.6 for wired telecommunications companies. Although Lumen strives to comply with all applicable OSHA standards, an OSHA inspection of a Lumen work site found 2 violations of OSHA's standards related to excavation safety in 2024. These citations resulted in $14,799 in penalties. Lumen took prompt action including a state-wide "safety stand-down" to emphasize required safe work practices and the duties of the competent person.

1.6

Days Away Restricted or Transferred rate compared to the industry average of 1.9

Safety in our supply chain

Lumen extends our commitment to health and safety beyond our direct workforce to encompass our supply chain. Suppliers are required by contract to comply with all local, state and federal health and safety laws. We require that construction contractors maintain a written, robust safety management program with a designated safety contact responsible for enforcing compliance and ensuring their teams receive appropriate training.

Within our Custom Networks projects, Lumen maintains a strong commitment to safety and regulatory compliance. We consistently request and evaluate supplier documentation regarding safety management systems, historical compliance performance and operational protocols. Project status is tracked through required EHS incident reports, comprehensive incident investigations and the adoption of corrective actions when appropriate. Dedicated construction safety experts conduct on-site evaluations, employ construction partner scorecards, and periodically review safety processes designed to ensure expectations are clearly communicated and safety performance is managed effectively.

Certifications

Our India operations are International Organization for Standardization (ISO) 45001 certified, demonstrating our commitment to systematically managing workplace safety and health risks.



Employee well-being and benefits

We're committed to helping our employees thrive — at work and beyond. We offer a comprehensive suite of benefits designed to drive engagement and positively impact our culture, job satisfaction, recruiting and retention. Lumen regularly reevaluates how to best support our employees' well-being and continues to advance our Future of Work Policy, providing flexible, hybrid working arrangements. For the sixth year in a row, healthcare premiums have not increased for employees or their covered dependents if they live a smoke-free or tobacco-free lifestyle. To learn more, please refer to our full list of benefits.



Healthcare

- Medical, prescription drug, dental, vision coverage (0% premium increase for employees or their covered dependents if they live a smoke-free or tobacco-free lifestyle)
- 2nd.MD second opinion service
- Telemedicine
- On-site clinics (select locations)
- Chronic condition management
- Virtual physical therapy



Well-being and support

- Well Connected wellness program: physical, mental and financial wellness resources
- Preventive care (annual physicals, screenings, vaccines)
- Calm app (all global employees have a premium subscription)
- Rally wellness platform: up to $600 in preventative rewards
- Lifestyle reimbursement for wellness expenses
- Mental health support: 24/7 (Employee Assistance Program, Talkspace, behavioral coaching)
- Weight management programs
- Healthy pregnancy programs
- Gym and fitness discounts (Active&Fit Direct gym, One Pass gym discounts)
- RethinkCare for parenting and well-being



Work-life balance

- Paid and flexible time off
- Hybrid and flexible work options
- Bright Horizons Family Solutions: company-paid backup care
- On-site and virtual wellness resources



Leave benefits

- Paid parental leave
- Adoption assistance
- Survivor benefits: six months' pay and health for eligible survivors
- Short-term and long-term disability
- Enhanced bereavement leave
- Enhanced military leave



Financial support

- 401(k) with company match
- Life/AD&D insurance
- Tuition reimbursement program
- 529 college savings plan and college coaching
- Access to PerkSpot and Purchasing Power money-saving products and services
- Health savings account
- Identity theft information (InfoArmor)
- Financial coaching (SmartPath)
- Student loan refinancing (CommonBond)
- Legal services

Improving accessibility

Lumen wants all employees to have access to the tools and assistance they need to improve and excel. In 2024, we expanded our accessibility resources to create a workplace where employees can thrive. We launched an American Sign Language (ASL) Interpreter program and contracted with multiple ASL providers to deliver seamless services upon request. Through this program, employees can request ASL interpreting services for large town halls, interviews, one-on-one meetings and other key events.

To enhance digital accessibility, our partnership with Everway (formerly TextHelp) gives employees access to an intuitive, multi-application toolbar, so everyone can work with greater confidence, accuracy and efficiency. Beyond these solutions, our dedicated Accommodations team stands ready to support individual needs, providing tailored accessibility resources on a case-by-case basis.

Thrive Together

To continue to transform our culture, Lumen is making a commitment to employee well-being through new and enhanced benefits programs that support our workforce. Launched in 2024, Thrive Together initiatives take a holistic approach to well-being, empowering employees to balance personal and professional commitments.

Thrive Together features an array of programs and policy improvements, including new enhancements such as:

Expanded bereavement leave

We broadened the scope and duration of bereavement leave, extending coverage to include relationships beyond the traditional definition of immediate family, so employees have time and support to grieve and care for their loved ones.

Phased retirement

Our new phased retirement program acknowledges the experience of our tenured team members, allowing them to transition to retirement on their own timeline while sharing their wisdom and mentorship along the way. Some have contributed to Lumen for over 50 years, and we're proud to help create a graceful next chapter.

Greater assistance for military service

Eligible employees participating in military training now benefit from increased paid leave and full compensation, reflecting our deep respect for our veterans and their families.

Company-wide Wellness Day

On March 14, 2025, we paused operations so every employee could take the day off, recharge and enjoy what brings them joy. This signature Wellness Day will be an annual moment for reflection and self-care.



Community engagement

Lumen is committed to championing the passions of our employees and partnering with them to impact our communities. We continue to strengthen our culture of giving, volunteerism and connection — amplifying our collective reach in the places we live, work and play.

By the numbers

663,361
meals provided through the campaign to fight hunger

57
employees supported through the Employee Relief Fund

2,486
Lumen Cares Challenges completed in two months

1,498
employees volunteering

28,952
total volunteer hours

$2.24M
invested in our communities

Employee volunteering activities

In 2024, our employees spent over 28,000 hours volunteering — a remarkable 46% increase over 2023 — and partnered with the Lumen Clarke M. Williams Foundation to give over $2.24 million to nonprofit organizations through our Lumen Cares Portal. The Lumen Volunteer Rewards program makes every hour of service count, awarding $10 per hour volunteered up to $1,000 per employee annually (increased to $3,000 in early 2025) to support the causes closest to their hearts.

Employee-driven giving comes to life through our Employee Giving program, which matches 100% of donations (with the annual cap increased from $1,000 to $3,000 per employee starting in 2025), with double and triple matches available for special campaigns like Giving Tuesday and our Campaign to Fight Hunger. On Giving Tuesday 2024, 6,125 employees leveraged our triple match to donate $881,086 to over 3,715 nonprofits. Other targeted campaigns, such as our food relief partnership, powered 35,000 meals for Food Lifeline during a single all-hands event, and our annual Campaign to Fight Hunger provided over 660,000 meals to communities in need through employee donations and our double match offer.

Extending their impact beyond financial contributions, Lumen employees also dedicate time to environmental initiatives — from neighborhood cleanups to nonprofit collaborations focused on sustainability — reinforcing their commitment to building stronger, healthier communities.

Lumen Cares

In 2024, we also saw small acts of good could add up in a big way — our newly launched **Lumen Cares Challenges** suggested ways Lumen employees can impact their community, the environment or their own well-being. In just the first two months, 2,486 challenges were completed by 538 employees, including activities like Walk This Way to promote personal well-being, Dog Toy which encouraged donations to local animal shelters and Give a Little to support causes employees care about.

The Lumen Cares Portal, now a global platform, fuels employee engagement by connecting our workforce to over 2 million nonprofits and streamlining every step of giving back. Employees can easily identify new causes, coordinate group volunteer projects, and track volunteer hours and donations, together uplifting over 5,500 organizations in 2024.

Team spirit in action

We believe in the power of collective action. Lumen actively encourages employees and teams to come together to volunteer as a group to build bonds, strengthen teamwork and make a positive impact in their communities. In 2024, we saw employees team up on projects such as the 9-11 Day of Service to support national cemetery cleanups alongside Carry the Load, honoring those who served and reinforcing our commitment to service and remembrance.

We know sometimes our own employees need a helping hand too. That's where the Lumen Employee Relief Fund steps in, offering immediate financial assistance to colleagues affected by hardship from house fires or natural disasters. The Employee Relief Fund is primarily funded by Lumen but employees are also able to donate to support impacted co-workers. In 2024, 57 grants were distributed to employees through this vital program.

President's Volunteer Service Award Program

In an effort to further encourage and uplift our amazing volunteers, we continued as a certifying organization for the President's Volunteer Service Awards (PVSA) in 2024. This allowed us to celebrate Lumen employees who logged more than 100 volunteer hours serving their communities. In 2024, 69 Lumen employees were honored with this prestigious award, each having contributed over 100 hours of volunteer service. These employees dedicated their time and energy to serving various organizations, contributing to a variety of causes they are passionate about. In addition to the PVSA recognition, each recipient was awarded a $1,500 grant to give to nonprofits of their choice through the Lumen Cares Portal.

Employees leveraged these grants to further impact the nonprofits they volunteer with.

Kelly Hoffman, a two-time winner of this prestigious award, is a Girl Scout leader in Southeast Michigan. She leveraged her grant dollars to renew memberships for the scouts in her troop ensuring they could continue to participate in the wake of an increase in dues.

Susie Pietz mentors a robotics team that qualified for a world competition. Some team members struggled to be able to afford the trip to the competition but Susie leveraged her PVSA grant to help members of the team attend.

2024 President's Volunteer Service Awards



Michael Garavaglia



Brian Oliver
Candace Rak-Kinonen
Chris Temple
David Espinoza
Eric McIver
Janet Lewis
Liz Mykietyn
Michael Murrell
Pam Dechert
Susie Pietz



Alvin Henry Ort
Amanda Albert
Anna Getchell Hansen
April Irons
Brandon Checchi
Brandon Di Maria
Brian Roberts
Caleb Micho
Chad M Haines
Charlene Sloan
Christina Wright
Cintia Zanata Serra
Coty Clack
Cynthia Rodriguez
Denise Reznicek
Ebin Barnett
Eddie Hostler
Eric Chaitman
Erica Shaut
Frank Goff Jr.
Hans-David Whitcomb
Jeffrey Jackson
Jenn Hass
Jennifer Dailey
Jennifer L Moore
Jeremiah Greenfield
Jim Caldwell
Judy Fichtl
Kate Aanestad
Kelly Burns Gallagher
Kelly Hoffman
Kristy Butler LaCroix
Lisa Devine
Lisa Ranstrom
Malinda Malek
Marcus Seehaver
Mark Kislenger
Mathew Ortensie
Matthew J Kenslea
Matthew Smith
Michelle Denise Baumgardner
Natalie Vande Vuss
Pam Kliegel
Rick Basham
Rickey Meyer
Scott Gabel
Shashikiran Kunigal
Stephanie Embry
Stephen M. Rudy
Suresh Kumar
Susan Caya
Tara Acton
Thomas Jennings
Timothy Clayborn Jr
Toni L. Taylor
Tzeitel Buchanan
Wesley Bridwell
William C. Whetzel

Our efforts on environmental sustainability

As we expand digital connections globally, Lumen remains dedicated to minimizing our environmental footprint — not only through operational practices but also by delivering sustainable products and services that help customers reduce their own impact. We're focusing on reducing greenhouse gas emissions, managing waste and using water responsibly. To guide the next phase of our sustainability journey, we have set new science-based GHG emissions reduction targets and developed an Energy Efficiency and Innovation Plan.

In this section

26 Environmental compliance and management
27 Climate risk management
29 Greenhouse gas emissions
34 Water
35 Waste
36 Sustainable products and services

North Star

In keeping with our North Star, we recognize our customers seek both sustainability and productivity, and we help them achieve these goals through intelligent network solutions and advanced technologies.



Environmental compliance and management

Our Environmental Management System (EMS) is at the heart of how we advance our EHS and sustainability goals. This system empowers us to proactively identify and address the environmental impacts of our operations, help to ensure compliance with regulations and drive continuous improvements across the business. We're committed to strong EHS performance. As such, we endeavor to evaluate and reduce risks, meet or exceed industry requirements, allocate resources where they matter most and encourage every employee to participate through ongoing engagement.

Environmental practices

Our Environmental Compliance Governance Panel, made up of EHS team experts, optimizes our compliance programs. The panel reviews our facilities, operations and key suppliers, closely monitors regulatory developments and seeks to ensure we adapt swiftly to any changes.

Lumen also actively participates in the Environment, Health and Safety Communications Panel's Environment Committee and engages in collaborative platforms that connect us with industry leaders and policymakers, allowing us to share best practices and stay ahead of environmental trends.

Lumen operates thousands of sites that are subject to national, state and local environmental laws. In 2024, we had 6 instances of environmental non-compliance, resulting in fines totaling $5,725. Additionally, Lumen had 2 reportable spills which were reported to and closed with relevant regulatory agencies in 2024. We remain committed to continuous improvement to optimize our compliance efforts and minimize future events.

Environmental training

We empower our people through clear environmental practices and procedures, available to all employees on our intranet. We offer a blend of training and engagement opportunities to ensure everyone is equipped to contribute to our environmental goals.

Our Environment, Health and Safety teams collaborate closely with managers to develop role-specific training programs tailored to operational needs. These programs cover compliance requirements, proactive environmental practices and hazard awareness — reinforcing our shared responsibility to protect the environment and maintain a safe workplace.

Environmental responsibility in our supply chain

Lumen actively encourages our suppliers to adopt specific practices, including implementing environmental management systems, monitoring their performance, and using energy-efficient products and processes. We expect our suppliers to share our commitment to ethical conduct and to fully comply with all environmental laws and regulations. Our Supplier Code of Conduct encourages suppliers to proactively address environmental and sustainability issues within their own supply chains. We urge them to implement their own EMS plans, continuously monitor performance, prioritize environmentally preferable and energy-efficient services, and seek out solutions that reduce waste and promote the use of recycled materials. Please refer to the Supply chain management and resiliency section of this report for more information.

Certifications

Our commitment to environmental stewardship is reflected in our ISO 14001 certification, obtained in 2024, which affirms effective environmental management across our India operations.

Climate risk management

Lumen recognizes managing climate-related risks and opportunities is essential. Extreme events, such as floods, droughts, hurricanes and wildfires, pose significant threats to our ability to deliver reliable service, underscoring the importance of our Business Continuity Management program. Please refer to the ⇨ Business resiliency and preparedness section of this report for more information.

We manage climate-related risks and opportunities through scenario analyses, site-level risk assessments and ongoing investments in resilience measures. As part of this process, Lumen has adopted an Energy Efficiency and Innovation Plan, which will be reviewed annually and updated as needed. This plan ensures our flexibility and responsiveness to evolving market conditions, technologies and opportunities. A cross-functional team, including members from global sustainability, real estate, fleet, energy management, procurement and operations, provides support and takes responsibility for its execution.

Climate risk governance

As part of its risk oversight responsibilities, our Board monitors environmental management programs, including climate change-related issues. The Board believes sustainability and risk management expertise are among the essential skills necessary for effective oversight.

The Board receives periodic reports from management and the Board's four standing committees to inform and support the Board with its various risk management, governance and strategic oversight responsibilities. Generally, for climate change-related issues, the Board is supported by the Risk and Security Committee and the Nominating and Corporate Governance Committee.

Our Sustainability Management Committee (SMC) leads our efforts to manage environmental impacts across our operations responsibly. Through regular meetings and cross-functional collaboration, the SMC sets sustainability targets and seeks to proactively identify, assess and mitigate climate-related risks, and ensure continuous improvement.

Please refer to the ⇨ Sustainability and impact oversight of this report for more information.



Our climate change reporting is aligned with the recommendations established by the TCFD, as illustrated by our CDP Climate Response. This response provides stakeholders with insights into our climate-related governance, strategy, risk management, and metrics and targets. Our 2024 CDP Climate Response, covering the 2023 calendar year, received an A- score.

Understanding our climate risks and opportunities

To better understand our exposure to climate risks and inform our long-term planning, we conducted a physical risk scenario analysis in 2021. This assessment evaluated climate risks to seven critical sites and assets following TCFD recommendations and focusing on the Intergovernmental Panel on Climate Change (IPCC) business-as-usual scenario. The analysis considered near-term and long-term horizons, assessing impacts for the present, 2035 and 2060.

In 2022, Lumen conducted a scenario analysis to assess transition risks and opportunities related to changing climate policies, emerging technologies and shifting customer expectations during the transition to a lower-carbon economy. We used the International Energy Agency (IEA) Stated Policies Scenario (STEPS) and Sustainable Development Scenario (SDS) to capture a broad range of potential climate and policy developments. The analysis evaluated impacts on our business for both the present day and 2035 timeframes.

The scenario analysis helped us understand the risks and opportunities associated with climate change, which are diverse and could potentially impact our direct operations, suppliers and customers (see table to the right). Identified risks are prioritized based on the immediacy and potential severity of the disruption to our operations, while opportunities are typically prioritized based on a return-on-investment formula that considers the current business environment and financial performance.

	Specific risks/opportunities	Responses and activities
Physical risks	• Extreme heat and humidity • Potential increased flooding • Hurricanes, windstorms • Wildfires • Power interruptions	• Property protection audits • Site-specific business continuity and disaster recovery plans • Network and building investments to protect against extreme weather events (e.g., roof replacement and repair program)
Transition risks	• Cost to transition to new technologies • Enactment or expansion of cap-and-trade laws or carbon taxes • Customer sentiment and stakeholder concern on climate-related issues • Emerging climate-related regulations	• Continued energy-efficiency projects and facility upgrades • Working to procure more renewable energy in the U.S. and initiating a Supplier Engagement program to drive value chain emissions reductions • Communicating our environmental sustainability initiatives and progress to stakeholders via Impact Report, CDP Response and other disclosures
Opportunities	• Development of new sustainable products and services • Cost savings through energy-efficient real estate and fleet management • Differentiating from competitors by enhancing network resilience	• Enabling customers to utilize our innovative technologies to enhance their sustainability journeys and support the transition to a lower-carbon economy



Greenhouse gas emissions

At Lumen, we're working hard to reduce our GHG emissions as a means of protecting the environment, advancing stakeholder interests, and supporting our long-term resilience and success. By year end 2024, we achieved a 30% reduction in Scope 1 and 2 GHG emissions and a 17% reduction in upstream Scope 3 GHG emissions from our 2018 baseline, exceeding our 2018-2025 science-based targets to reduce Scope 1 and 2 GHG emissions by 18% and reduce upstream Scope 3 GHG emissions by 10%. Building on this success, we have set new science-based targets to achieve a 55% reduction in Scope 1 and 2 GHG emissions and a 33% reduction in upstream Scope 3 GHG emissions by 2033, based on a 2022 baseline.

Our carbon footprint in 2024[2]

GHG emissions (metric tons CO_2e)	2022	2023	2024	% change 2022 vs. 2024
Scope 1	172,766	171,640	164,690	(5)%
Scope 2 (market-based)	1,424,820	1,275,916	1,239,019	(13)%
Scope 1 and 2 (market-based)	1,597,586	1,447,555	1,403,709	(12)%
Scope 3 (upstream)	1,127,788	1,267,243	1,267,200	12%

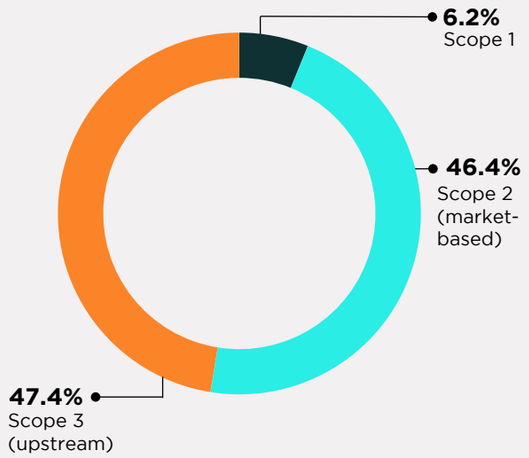
Scope 1
All direct sources of emissions owned or controlled by Lumen, primarily fuel to power our fleet, heat our buildings and power our backup generators.

Scope 2
Indirect emissions from energy purchased by Lumen, primarily electricity to power our networks and data centers, with a small amount of steam and heat purchased to heat our buildings.

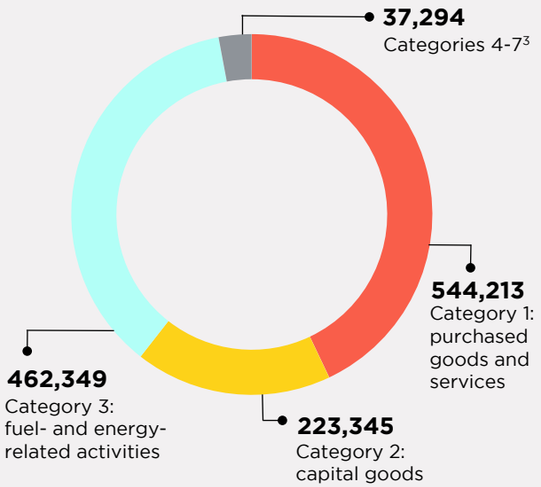
Scope 3
Indirect emissions associated with our upstream value chain. The largest categories are purchased goods and services, capital goods, and fuel- and energy-related activities.

2024 emissions

Total emissions



Upstream Scope 3 emissions ($MtCO_2e$)



2 Historical GHG emissions figures have been adjusted due to improved data quality.

3 Categories 4-7 include the following: Category 4: Upstream transportation, Category 5: Waste generated in operations, Category 6: Business travel and Category 7: Employee commuting.

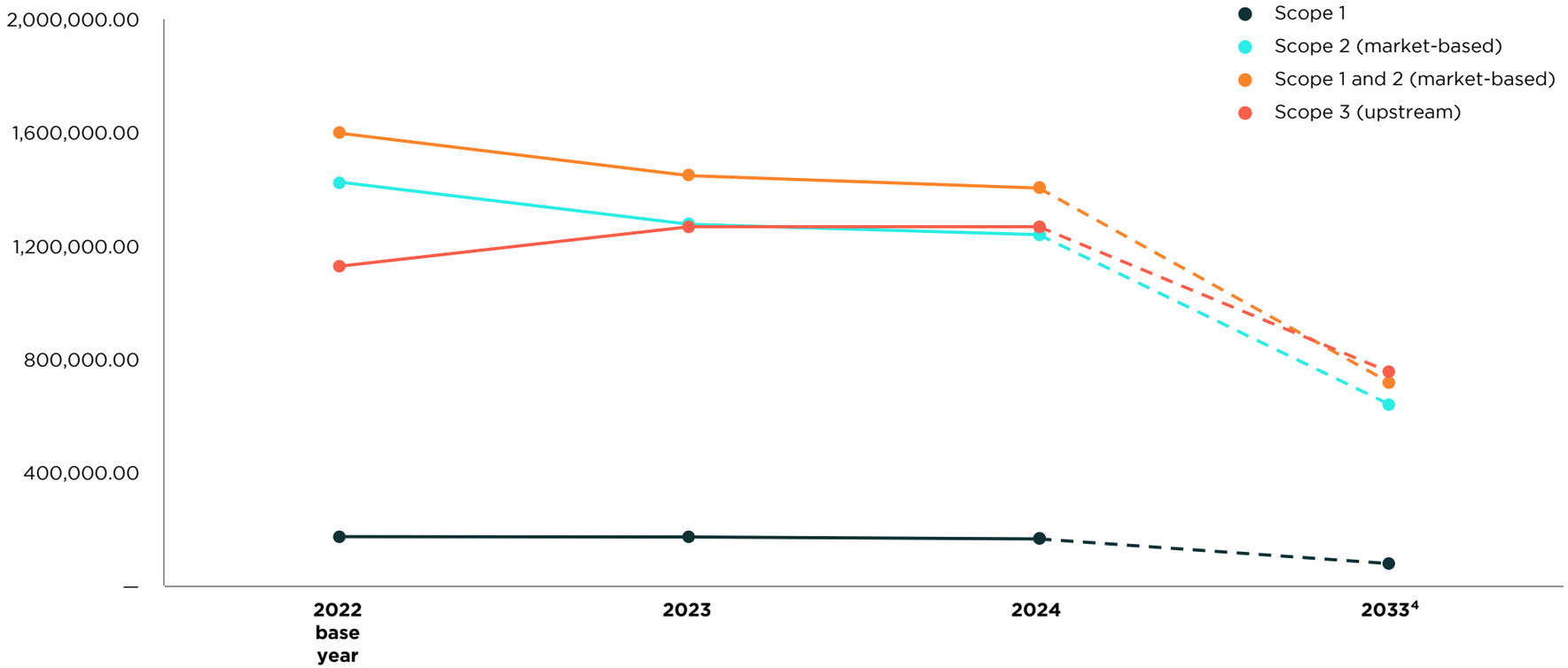
Our GHG emission reduction targets

Following the achievement of our 2018-2025 reduction targets, Lumen is setting new GHG emissions reduction targets. The new targets, which have been validated by the Science Based Targets initiative (SBTi), are as follows:

- Reduce Scope 1 and 2 GHG emissions by 55% by 2033, from a 2022 base year
- Reduce upstream Scope 3 GHG emissions by 33% by 2033, from a 2022 base year

Based on various assumptions, we believe these near-term, science-based targets are aligned with a target of achieving net-zero emissions across Scope 1, 2 and 3 by 2050, demonstrating our long-term vision for environmental stewardship.

GHG reduction progress and goals ($MtCO_2e$)[4]





4 Future years shown in the graph represent an illustrative pathway toward our 2033 GHG emissions target. Reductions may not occur in a linear fashion or in the amounts projected, and could vary materially in terms of pace or amount due to multiple factors.

Our GHG emission reduction roadmap

To support the achievement of our emissions reduction targets, Lumen has developed a comprehensive roadmap that engages every part of our business — from our own operations to our value chain and product offerings. This roadmap, which is outlined in our Energy Efficiency and Innovation Plan, identifies targeted actions across Scope 1, 2 and 3 emissions, including facility energy-efficiency initiatives, expanded use of renewable energy and deeper collaboration with suppliers to drive reductions throughout our value chain.

Driving global energy efficiency

Our Energy Management teams drive continuous improvement in energy efficiency across our global network of 11,341 active sites. For instance, our Energy Network Operations Center (ENOC) allows us to centrally monitor, manage and optimize facility energy use using advanced control systems and analytics. In 2024 alone, our collective efforts to improve energy efficiency helped us avoid 24,645 metric tons of greenhouse gas emissions.

Scope 1

Lumen's commitment to reducing our direct (Scope 1) GHG emissions targets the two largest contributors — our vehicle fleet and energy use at operational sites.

Emissions from our fleet of 6,859 vehicles, which our field technicians use to support customers nationwide, represent a substantial portion of our Scope 1 carbon footprint. We are actively working to reduce these emissions with the following strategies:

- **Reducing vehicle idling:** We have installed sensors across our fleet to monitor and minimize unnecessary engine idling. By addressing idling behavior, we are not only cutting emissions but also reducing overall fuel costs.
- **Optimizing dispatch:** All Lumen vehicles are equipped with GPS technology, enabling more efficient routing and dispatch. This operational improvement lowers both fuel consumption and GHG emissions.



Scope 2

Our expert Energy Management teams continually identify and implement projects that enhance operational performance while reducing electricity consumption, including:

- **Building energy management:** In 2024, Lumen undertook several projects at U.S. locations to install, upgrade and commission Building Energy Management Systems, gaining greater control over energy use and supporting data-driven decision making.
- **Utility optimization:** We partner with energy consultants to identify opportunities for electric, water and gas savings, choosing projects based on return on investment, utility incentives and power use efficiency metrics.
- **Continuous improvement projects:** In 2024, Lumen completed various projects across our facilities, achieving reduction in utility expenses and secured utility incentives.
- **Ongoing real estate optimization:** Facility consolidations and upgrades further increase our energy efficiency, laying the groundwork to maximize the impact of subsequent renewables investments.

New projects — cooling system retrofits, LED lighting upgrades, server and equipment decommissioning, and facility management via BEMS — are assessed for their electricity-reduction potential before considering offsets or renewable energy procurement.

Our renewable energy use

Electricity use powers the heart of our operations — our data centers, offices and network sites — and accounted for 87% of our total operational (Scope 1 and 2) emissions in 2024. As a result, our efforts to reduce Scope 2 (indirect, purchased electricity) emissions are central to our climate commitment and core to achieving our targets. We prioritize renewable energy sources wherever feasible. In 2024, we procured 34,377 megawatt hours (MWh) of renewable energy, including zero-carbon electricity and biofuels. We currently aim to transition 70% of our U.S. energy to renewables by 2033, a target that will require sustained efficiency gains and expanded clean energy procurement. If successful, these actions would help mitigate transition risks associated with new carbon regulations and shifting market expectations.

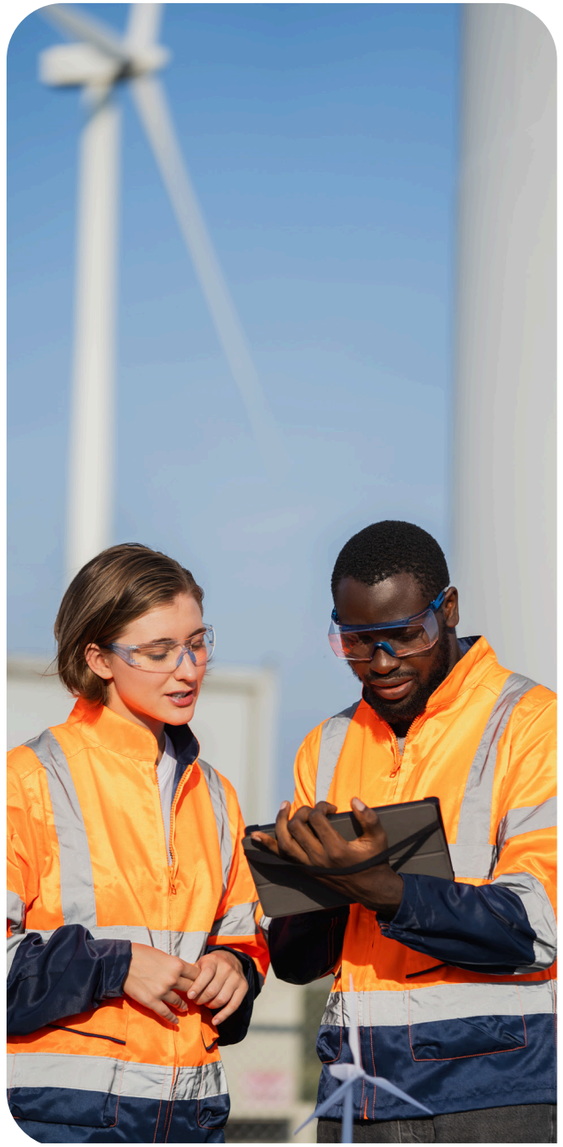
Our current and future actions include:

- **Flexible procurement options:** Our renewable sourcing strategy is under active development, and may include, to the extent feasible, additional utility green power products, virtual power purchase agreements (vPPAs), direct power purchase agreements (PPAs) and high-quality renewable energy certificates (RECs).
- **Solar power project:** Lumen has executed one solar PPA in Arizona, demonstrating a first step toward integrating more renewable electricity into our portfolio.
- **Supplier engagement:** We regularly engage with electricity suppliers in the U.S. to understand their generation mix, emissions goals and renewable offerings — potentially paving the way for green tariffs and renewable transitions.

Our energy procurement (MWh)[5]

	2022	2023	2024	% change 2022 vs. 2024
Renewable energy	28,493	36,164	34,377	21%
Non-renewable energy	4,367,777	4,033,193	3,924,815	(10%)

5 Historical energy procurement figures have been adjusted due to improved data quality.



Scope 3

Scope 3 emissions — those occurring in our value chain outside our direct control — represent a substantial portion of our total carbon footprint. Lumen actively encourages our suppliers to adopt specific practices that align with our environmental and sustainability goals. These practices include implementing environmental management systems, monitoring their performance, and using energy-efficient products and processes. Achieving our near-term target for Scope 3 will require concentrated action across our value chain.

Supplier engagement

Suppliers account for the majority of our Scope 3 emissions. We are launching a robust Supplier Engagement program to extend our climate commitments across our network. By 2033, we currently aim to engage the majority of our suppliers by emissions to:

- Report complete Scope 1, 2 and 3 GHG inventories
- Initiate emission reduction activities
- Set their own renewable energy and science-based targets

We engage suppliers based in part on their emissions impact and current progress on sustainability initiatives. Our Supplier Code of Conduct clearly outlines expectations for environmental management systems, performance monitoring, and the use of energy-efficient products and processes. Lumen also plans to encourage suppliers to adopt renewable energy within their own operations.

Driving climate action through GeSI

Since 2021, Lumen has been an active member of the Global Enabling Sustainability Initiative (GeSI), a member-centric, cross-industry business network dedicated to leveraging digital technology to drive global sustainability progress. Our primary involvement centers on collaborating with other information and communication technology companies on topics related to GeSI's key focus areas including digital solutions, carbon accounting and sustainability reporting.



Water

Lumen recognizes the importance of water as a critical resource and is dedicated to responsible management throughout our operations. We closely monitor water use at our North American sites and work to reduce our consumption of water, especially in areas facing current or future drought risk.

Our water use primarily supports routine operational needs, such as drinking water, irrigation and sewage. In some North American facilities, we also use water for cooling systems. Ongoing monitoring of invoices helps us quickly identify and address potential leaks or unusual increases in usage or costs, which are reviewed monthly and quarterly as part of our due diligence.

We periodically review resources like the World Resources Institute's Aqueduct Water Risk Atlas to assess the vulnerability of our operational sites to future water stress.

We remain committed to responsible water management. We're minimizing our consumption where possible, responding quickly to anomalies and continually reviewing our policies in light of changing conditions.

Our water use in North America (gallons)

	2022	2023	2024	Change in % 2023 vs 2024
Water consumption in North America in gallons	352,970,087	386,661,300	365,406,186	(5)%



Waste

Minimizing waste is essential to protecting the environment, conserving resources and supporting a circular economy. Lumen remains committed to reducing, reusing and recycling materials across our operations to drive both environmental and operational efficiency.

Our waste management programs are designed to prioritize waste reduction through minimization, reuse and recycling. We also seek to ensure the proper disposal of hazardous waste. Our EHS team collaborates across business units to implement and continually improve best practices for waste management. Additionally, we actively seek partnerships with suppliers who share our commitment to these standards. Please refer to the Supply chain management and resiliency section of this report for more information.

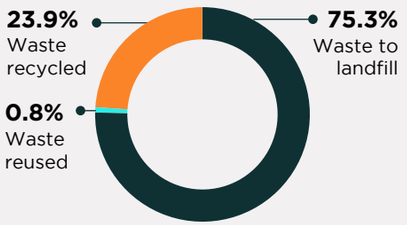
Waste reduction initiatives

Recycling and product end-of-life management: Lumen maintains robust recycling and product takeback programs. Altogether, we diverted 1,936 metric tons of electronic and communications equipment from landfills in 2024. Our U.S. modem and router takeback program continues to offer customers a convenient way to return devices for reuse or secure recycling with partners certified as meeting the R2 Responsible Recycling Standard.

Paper recycling and paperless billing: We have reduced office paper consumption by digitizing records and promoting efficient use of paper. Secure shred programs allow for safe and responsible recycling of documents and media; in 2024, we recycled 367 metric tons of paper. Meanwhile, our active promotion of paperless billing reduced printed invoices again in 2024.

Our 2024 waste performance in the U.S. (metric tons)[6]

We remain focused on reducing, reusing and recycling waste throughout our operations. In 2024, we recycled approximately 5,475 metric tons of waste, reflecting our ongoing commitment to divert materials from landfills. Our waste intensity stood at 1.75 metric tons per million dollars of revenue, underscoring our dedication to resource efficiency and responsible environmental management.



	2022	2023	2024	% change 2022 vs 2024
Waste generated	23,549	23,213	22,898	(3)%
Waste to landfill	17,938	17,547	17,240	(4)%
Waste reused	105	187	183	74%
Waste recycled	5,506	5,479	5,475	(1)%

6 The data above only captures data from sites where Lumen directly manages the waste.

Sustainable packaging

As Lumen strives to address the growing global needs of tomorrow's world, we have reimagined our packaging for Customer Premise Equipment (CPE). We have invested time and resources in rethinking this packaging, developing trend-setting designs, and overhauling the look and feel of our packaging. After introducing sustainable packaging into our Mass Markets products, we are now expanding this initiative into enterprise offerings.

Mass Markets CPE packaging by the numbers:

100%
of CPE manufacturing partners meet Lumen sustainable packaging standards

60%
recycled plastics in new Mass Markets CPE products

70%
non-virgin cardboard used for new overseas shipments

Sustainable products and services

In 2024, we advanced a portfolio of solutions that deliver performance gains for customers while also having the potential to make meaningful reductions in energy use, emissions and waste.

Technology-driven emissions reductions	Lumen technology empowers customers to lower their carbon footprint by reducing the need for business travel and on-site hardware. Unified communications, multi-cloud gateways and small form factor pluggable (SFP) devices can help organizations operate with less energy than legacy setups.	**Lumen solution:** Lumen Cloud Communications supports remote work, reducing travel emissions while enabling collaboration and also ensuring reliability for mission-critical lines for life and safety — such as fire alarm and elevator systems.
Resilient connectivity anywhere	Reliable digital access is mission critical everywhere, from remote rural communities to sites affected by natural disasters. Lumen combines SD-WAN services and satellite connectivity to extend high uptime and resilient coverage anywhere it's needed.	**Lumen solution:** LEO Satellite Service (with Starlink) provides broadband internet to rural areas, disaster-impacted regions and mission-critical field teams — ensuring widespread access with streamlined logistics.
Extending product life and reducing waste	Lumen maximizes equipment lifespan and minimizes waste by leveraging AI-powered diagnostics and proactive refurbishment. Our solutions give end-to-end insight into CPE performance, reducing unnecessary equipment returns and supporting more reliable networks over time. Refurbished units are repackaged using 100% recycled cardboard, further closing the loop on material use.	**Lumen solution:** Real-Time Orchestrator uses Lumen advanced real-time cloud diagnostics to identify and resolve device issues, curbing premature replacements and waste.
Sustainable product design and materials	Designing products with sustainability in mind means selecting materials that are better for the environment without compromising performance. Using recycled materials reduces extraction impacts, while durable, efficient designs mean fewer units are needed over time. Packaging strategies further reduce waste and support a circular economy. Please refer to the Waste section of this report for more information.	**Lumen solution:** Our industry leading WiFi 7 CPE device delivers faster, broader WiFi coverage powered by multi-gig CPE while using 60% non-virgin recyclable plastics, resulting in lower energy consumption and less landfill waste.
Edge computing and platform enablement	Our edge computing brings data processing right to the source, reducing dependence on energy-intensive data centers. Solutions feature built-in security, scalability and platform tools for real-time data and resource optimization, supporting greener outcomes for every application.	**Lumen solution:** Lumen Edge Compute and Storage Solutions reduce latency and boost performance with distributed servers, private cloud, flexible storage and rapid data protection.

Building a sustainable, AI-ready future

In the heart of America's ranch land, next-generation data centers are proving advanced digital infrastructure can align with environmental goals. In 2025, Prometheus Hyperscale partnered with Lumen to deploy Private Connectivity Fabric℠ (Lumen® PCF℠) and build high-performance, secure and flexible connections to support AI-driven data centers powered by clean energy. Together, they upgraded infrastructure, boosted security and delivered lightning-fast connectivity — laying the groundwork for a flagship data center scheduled to launch in 2026.

Prometheus Hyperscale's flagship site shows how digital transformation can transcend traditional boundaries, turning a family ranch into a hub for next-generation data services. To support sustainable and responsible data center innovation, liquid cooling was implemented along with recycled waste heat, expecting to result in 50% reduction in power consumption.

Security and resilience are built in too. Our Distributed Denial of Service (DDoS) mitigation tools help keep critical data accessible yet safe from cyber threats. Blending advanced technology, agricultural tradition and local economic growth, this partnership demonstrates how Lumen solutions enable customers to thrive in the digital era — while accelerating progress toward a more sustainable future.

Our commitment to responsible business

At Lumen, we lead with transparency and trust. We champion responsible decision making and sound risk management to create long-term value for our customers, shareholders, communities and all those we serve. We are committed to responsible digital practices that safeguard data, uphold ethical standards and foster innovation. Our resilient infrastructure and proactive preparedness strategies are designed to ensure continuity and reliability, even in the face of disruption — reinforcing our role as a trusted partner in a rapidly evolving digital landscape.

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North Star

We uphold the highest standards of corporate governance and ethical conduct. Our commitment to transparency is a core element of our North Star culture, reflecting our belief that clear communication and ethical practices are essential for building strong and lasting relationships with everyone connected to Lumen.



Corporate governance

Our commitment to robust corporate governance is reflected in the strong leadership and effective stewardship of our Board of Directors. We aim to ensure that our Board collectively possesses the skills, experiences, perspectives and backgrounds needed to effectively attain the Board's goals and fulfill its responsibilities. As part of these efforts, we have an evergreen approach to board refreshment and assess the composition of the Board and its needs on at least an annual basis.

Our Board has four standing committees — Audit, Human Resources and Compensation, Nominating and Corporate Governance, and Risk and Security — that support the full Board with various risk management, governance and strategic oversight responsibilities.

Our Board and its committees collectively oversee our business and management's development and implementation of our strategies through regular meetings and communications with our Executive Team. We believe our governance policies and practices provide a transparent framework for effective governance and compliance with Securities and Exchange Commission (SEC) and New York Stock Exchange (NYSE) requirements. The Board continually reviews our governance practices for alignment with best practices and stakeholder interests, and acts to enhance our ability to oversee the execution of strategies that drive value for Lumen, our customers, employees and shareholders.

For more information about our corporate governance practices and Board composition and committees, please read our most recent Proxy Statement.

Governance documents

- Audit Committee Charter
- Corporate Governance Guidelines
- Human Resources and Compensation Committee Charter
- Nominating and Corporate Governance Committee Charter
- Risk and Security Committee Charter



Sustainability and impact oversight

Our Nominating and Corporate Governance Committee plays a central role in overseeing the Board's core governance practices, including oversight of sustainability and impact matters, meeting quarterly to review progress, identify key priorities, and ensure our disclosures and communications remain effective and transparent. These reviews span topics such as cybersecurity, data privacy, political contributions, philanthropy and environmental sustainability.

The full Board conducts an annual review of our overall program, while other committees regularly review and address specific topics within their respective areas of expertise.

Board of Directors

The Board and respective committees, in conjunction with designated management teams, periodically evaluate our programs and seek to identify meaningful opportunities to enhance our programs.

Nominating and Corporate Governance Committee

Has primary responsibility for sustainability and impact oversight with quarterly reviews, and political contributions oversight with annual reviews

Audit Committee

Reviews internal control over financial reporting on a quarterly basis, and investment risks related to treasury activities as needed

Human Resources and Compensation Committee

Reviews human resources, executive compensation and workforce-related risks on a quarterly basis

Risk and Security Committee

Reviews network reliability, cybersecurity/ privacy, enterprise risk management, and ethics and compliance on a quarterly basis

Independent Experts

As needed, Lumen partners with external, independent consultants to provide expertise and guidance on topics such as:

- Assessments
- Benchmarking
- Calculations
- Communications
- Strategy
- Verification

Sustainability Management Committee

- Composed of individuals from across the business, including personnel with expertise in corporate communications, customer experience, data security and privacy, environmental, government relations, human resources, internal audit, investor relations, legal and sourcing/procurement, amongst other fields
- Designs and oversees our Sustainability program
- Provides regular updates to the Nominating and Corporate Governance Committee

Enterprise risk management

Our Board of Directors and its committees actively oversee risk management at Lumen and receive regular updates on our Enterprise Risk Management (ERM) program. This program helps us systematically identify, assess and address key risks and opportunities that could significantly impact our financial or strategic position.

Each year, the Internal Audit and Ethics and Compliance teams conduct a comprehensive enterprise risk assessment. To do so, they draw on insights from executives across our business and analyze external and historical data. The assessment's findings, which highlight the most critical risks to be monitored closely throughout the year, are shared with senior leadership, the Audit Committee and the Risk and Security Committee. The Internal Audit team leverages these findings to develop an annual audit plan and conducts quarterly reviews to track any changes.

Each critical risk is assigned an executive owner who is responsible for defining key indicators and targets. These owners present detailed annual assessments, including quantitative measures, goals and future plans, to the Risk and Security Committee. Each quarter, risk owners provide updates detailing any deviations or corrective actions. This information is tracked via a dashboard, which is regularly reviewed by the Risk and Security Committee and reported to the full Board.

Board of Directors

Audit Committee

- Internal Controls over Financial Reporting (Quarterly)
- Risk Factors included in periodic reports (Annual with Quarterly Reviews)
- Debt Covenant Compliance Risk (Annually)
- Investment Risk related to Treasury Activities (As Needed)

Risk and Security Committee

- Enterprise Risk Management (Quarterly)
- Cybersecurity (Quarterly)
- Ethics and Compliance (Quarterly)
- Data Privacy (Biannually)
- Regulatory (Annually)
- AI (As Needed)

Human Resources and Compensation Committee

- Executive Compensation (Quarterly)
- Human Capital Strategy (Quarterly)
- Workforce-related Risks (Quarterly)
- Risks Arising from Compensation Policies and Practices (Annually)

Nominating and Corporate Governance Committee

- Environmental, Social and Corporate Governance (Quarterly)
- Political Contributions (Annually)
- Independence of Directors and Board Committees (Annually)

Management

- Under our ERM program, management develops a response plan for prioritized risks, including our cyber incident response playbook. Management also develops plans for monitoring and mitigating identified key risks.
- Management provides regular reports on our key risks and risk mitigation strategies to the Risk and Security Committee and assists other committees in monitoring the risks for which they are responsible.

Enterprise Risk Management (ERM) Program

Our ERM program centers on an annual review of key financial, operational, compliance and strategic risks, led by the Internal Audit and the Ethics and Compliance teams in consultation with business leaders. For more information about risk management, please read our most recent Proxy Statement.

Ethics and compliance

Our Ethics and Compliance program

Our Code of Conduct is the cornerstone of our Ethics and Compliance program. This living document evolves alongside our business and is clearly communicated to all officers and directors, and full- and part-time employees. Our comprehensive compliance program requires strict adherence with all applicable laws and regulations, and is led by our Chief Ethics and Compliance Officer and governed by our Board's Risk and Security Committee. We remain dedicated to maintaining an effective, best-in-class Ethics and Compliance program that is well-designed, effectively implemented and continuously improved.

Our program centers on three core priorities — fostering a strong speak-up culture where employees are empowered to report concerns and seek guidance; integrating compliance seamlessly into our business operations; and conducting regular risk assessments to proactively address both existing and emerging compliance risks.

Lumen policies

- Lumen Code of Conduct
- Lumen Anti-Corruption Policy
- Lumen Supplier Code of Conduct
- Lumen Human Rights Policy
- Lumen Whistleblower Policy
- Lumen Integrity Line

We review all key policies at least biannually or as needed to ensure ongoing alignment with legal and regulatory standards.



Audits and monitoring

We conduct ongoing monitoring and annual audits across key components of our Ethics and Compliance program. In 2024, we completed a business conduct audit focused on travel and expense management, conflict of interest disclosures, accounts payable and customer due diligence. External auditors tested our entity-level controls for Code of Conduct training and the Integrity Line, which were complemented by dedicated reviews of hotline reports and report monitoring practices.

We also leverage quarterly analyses of contact and investigation data to extract valuable insights, anticipate potential risks and strategically focus our compliance efforts where they will have the greatest impact.

Our 2024 enterprise-wide compliance risk assessment encompassed leadership interviews and survey responses from leaders across the business to identify our top compliance risks. These risks, and our action plans to proactively address top compliance risk areas, are addressed as part of our quarterly reporting to the Risk and Security Committee.

Training

Our Code of Conduct training is designed to equip every employee with the knowledge and tools they need to uphold our high ethical standards across our business operations. In 2024, we introduced a training program featuring interactive scenarios in an engaging, video game-like format. This update, led by our Learning and Development team, leveraged best-in-class technology and included shorter, scenario-based video modules to drive employee engagement. The feedback was overwhelmingly positive, affirming the effectiveness of our new approach.

Our annual Code of Conduct review covers crucial topics, such as sustainable supply chains and ethical engagement with third parties. It also addresses our speak-up culture, non-retaliation commitment, anti-corruption, harassment and discrimination, insider trading, data privacy and conflicts of interest. The curriculum is updated annually to reflect evolving risks and legal requirements.

Our employees are also assigned mandatory annual compliance training on anti-corruption, anti-harassment and privacy, with people leaders receiving additional training on important compliance topics like the Americans with Disabilities Act.

100%

of employees* are assigned training annually

99.5%

of our employees completed our Code of Conduct training and 99.7% completed our anti-corruption training in 2024

Our Ethics and Compliance team also develops specialized training based on risk areas and compliance priorities identified through risk assessments and data analysis. In 2024, this included targeted programs on sanctions and international trade compliance, E-Rate compliance, detecting candidate fraud and refreshed procurement training for targeted audiences.

We also released all-employee communications and targeted communications in 2024 to support awareness and understanding of key compliance issues. Through our annual Ethics and Compliance Month, we featured Ethics Files, anonymized investigations highlighting key risk areas, information on our reporting process and a quiz incentivizing compliance.

Ethics and compliance survey

Our annual ethics and compliance survey helps us assess trust in our processes, employee comfort in reporting concerns and opportunities for improvement. In 2024, 38% of our workforce participated, a rate consistent with 2023 and industry benchmarks for similar surveys. We achieved an average positive score of 90.9%, a 1.4% increase year over year. Building on these results, we worked with business leaders to identify growth opportunities and continue strengthening our culture of trust, teamwork and transparency.



* Including FTEs, PTEs and interns.

Global Integrity Line

At Lumen, we encourage employees, officers, partners and suppliers to raise ethical concerns without fear of retaliation. The Lumen Integrity Line — a confidential, third-party managed hotline, available 24/7 — offers dedicated country lines and interpreting services to ensure reporting is accessible in local languages. Individuals can seek guidance or report concerns via telephone, email or online form.

All allegations are promptly assessed and investigated, where appropriate, by Human Resources, Corporate Investigations or Corporate Security. The Ethics and Compliance team is responsible for ensuring each matter is addressed appropriately based on legal risk and severity. We maintain a zero-tolerance policy for retaliation. Our Whistleblower Policy outlines the protections provided under our Code of Conduct and the law, including safe and confidential reporting options for all employees.

We are committed to continuously improving the Integrity Line. Two dedicated employees handle intake, and our reporting process is periodically audited by the Internal Audit team and in quarterly quality reviews led by our Manager of Investigations.

We continuously analyze Integrity Line data — tracking issue types and substantiation rates — and share these insights with the Risk and Security Committee each quarter. This feedback shapes ongoing enhancements to our program priorities and ensures our processes are trusted, transparent and effective.

Our speak-up culture remains strong and actively embraced across the organization and by our leaders. In 2024, we experienced a year-over-year increase in Integrity Line contacts and guidance requests from the business. The rate of anonymous reporting remained very low compared to industry benchmark, reflecting a high level of confidence in our reporting process.

Commitment to human rights

Lumen is dedicated to upholding human rights issues across our operations and throughout our third-party relationships. Our Code of Conduct, Supplier Code of Conduct and Human Rights Policy clearly stipulate our expectations for ethical behavior, and we provide training to help employees recognize and report concerns in these areas. We enforce a strict zero-tolerance policy for forced labor, child labor and any form of human rights abuse.

Anti-bribery, anti-corruption and anti-money laundering policies

Lumen maintains a strict zero-tolerance policy against bribery, corruption, money laundering and engagement with prohibited entities or sanctioned countries. Our Anti-Corruption Policy and Supplier Code of Conduct require all employees and third-party partners to comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws, including the Foreign Corrupt Practices Act and the U.K. Bribery Act. In February 2024, we updated our code to explicitly include anti-money laundering provisions. Our Supplier Code of Conduct and supplier agreements include stringent provisions on anti-corruption compliance and prohibitions of payments to government officials or other corrupt behavior. We also vet our suppliers for any history of violations as part of our diligence processes.

Compliance is reinforced through targeted annual training and clear policy communication, with a 99.7% completion rate for our anti-corruption training course in 2024. Our policies define expected conduct in dealings with government officials, government customers and other non-government third parties, and we strictly prohibit financial crimes such as money laundering, facilitation of tax evasion, terrorist financing, securities fraud and market manipulation.

We back our ethical commitments with robust controls, including regular reviews of flagged gifts, entertainment and travel expenses. In 2024, we introduced enhanced compliance reviews for any channel partner supporting our government business in line with our updated Anti-Corruption Policy. Our Procurement team uses AI-powered controls to proactively identify potential issues related to travel and expense violations. Additionally, pre-approval is required for all courtesies exceeding $150 and all courtesies of any value offered to government officials. Compliance with these requirements is regularly audited.

The Lumen anti-corruption framework integrates periodic compliance risk assessments, audits and enterprise risk management reviews to ensure compliance with relevant laws and regulations, including those pertaining to anti-corruption. Leveraging data analytics, we pinpoint and prioritize the most critical risks, focusing anti-corruption efforts where they matter most. This data-driven approach strengthens our business integrity and reinforces our standing as a trusted partner.

Anti-competitive behavior

Lumen supports fair competition and opposes anti-competitive behavior. Our policies mandate full compliance with all antitrust and fair competition laws, and we reinforce these standards through training, communication initiatives and scenario-based examples that help employees apply these principles in real-life situations.

Responsible artificial intelligence

AI is transforming innovation and efficiency, but it also raises ethical risks. To address these, Lumen is implementing a multi-layered governance framework that combines technical rigor, organizational oversight and cultural alignment.

AI governance bodies

The following components form the foundation of our AI governance structure:

- **Board Risk & Security Committee:** Oversees AI governance and receives regular updates on AI strategy, risk and responsible deployment
- **AI governance team:** Embeds ethical principles, promotes transparency and empowers responsible AI use
- **AI Advisory Board:** Reviews initiatives and escalates issues to the AI Executive Board (led by the Chief Technology and Product Officer); established in 2024
- **AI ambassadors:** Liaise with governance, own use cases and receive weekly updates on approved initiatives; assigned by each AI-deploying group

AI Governance Framework

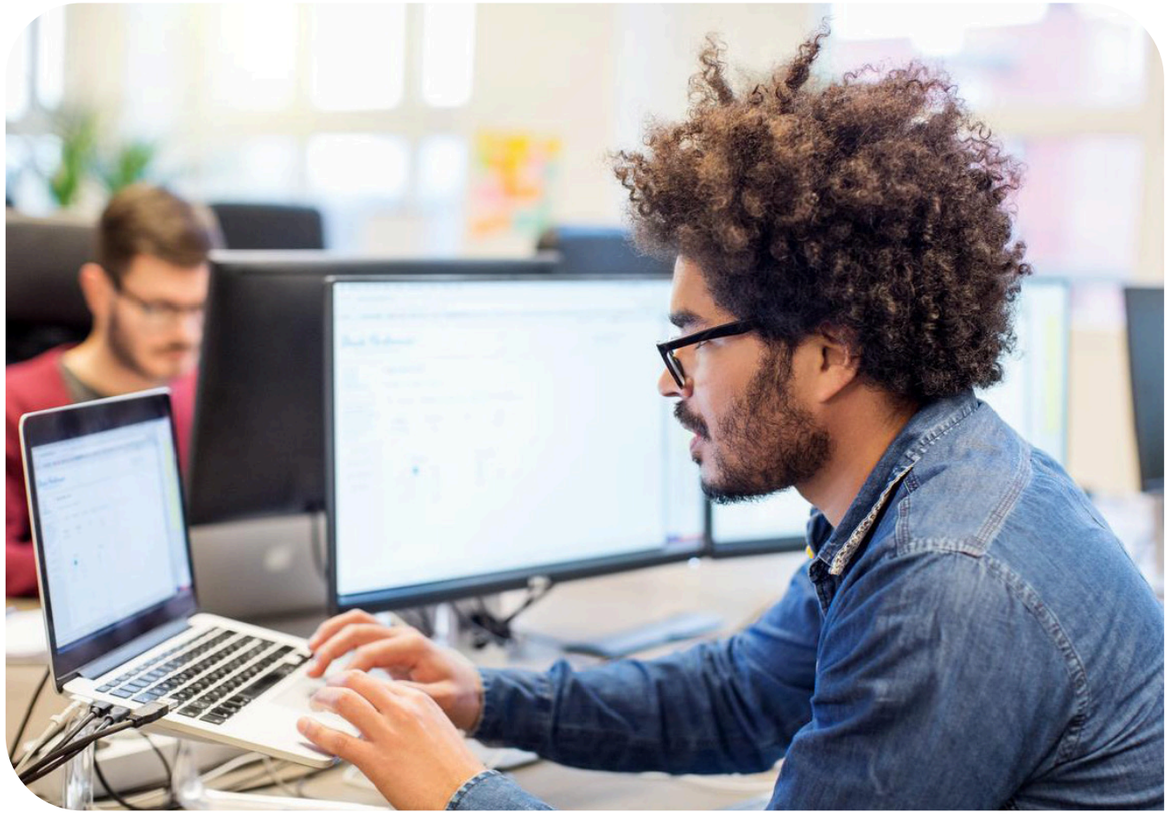
Our AI Governance Framework is operationalized through an AI Governance Policy, anchored in the European Union's AI Act, the National Institute of Standards and Technology (NIST) Cybersecurity Framework and UNESCO Recommendations on the Ethics of Artificial Intelligence. Additionally, we have implemented an AI Use Policy that defines permitted and prohibited AI practices, required safeguards and incident response protocols.

AI systems are managed using best practice processes known as Machine Learning Operations (MLOps) for traditional AI models and Large Language Model Operations (LLMOps) for advanced generative AI systems, helping to ensure life cycle monitoring and added protections against bias and misinformation. Our AI Ethics Library provides the code necessary to scan models for harmful content and provides instructions on how to resolve any issues identified.

Compliance with legal, regulatory and ethical standards is documented for audit and accountability.

AI literacy training

Lumen deployed an AI literacy training program for our employees during the fourth quarter of 2024. Refer to the Learning and development section of this report for more information.



Cybersecurity and privacy

We recognize the evolving and persistent cyber threats facing our assets, systems and data. Protecting our organization and our customers remains a top priority, so cybersecurity, privacy and risk management are embedded at every level of our operations.

Our Cybersecurity program undergoes regular assessments to evaluate the strength of our controls, identify and respond to emerging threats, and implement enhancements. The Risk and Security Committee of the Board receives quarterly updates on our cybersecurity posture and strategic initiatives.

We collaborate closely with both public and private partners to share threat intelligence and contribute to initiatives that strengthen critical infrastructure security and resilience. We also contribute to the nation's resilience in communications through strategic partnerships. We collaborate with the Cybersecurity and Infrastructure Security Agency (CISA) as an Alliance partner in CISA's Joint Cyber Defense Collaborative and a resident member in CISA's National Coordinating Center for Communications. We are proud to be a part of safeguarding critical infrastructure.

Our cybersecurity strategy is guided by the NIST Cybersecurity Framework and supported by a multi-year roadmap that advances our capabilities. Key priorities include:

- Strengthening Board and executive cybersecurity knowledge through targeted education and training
- Expanding security training for employees to foster a security-first mindset
- Integrating security by design into business processes
- Deploying a dedicated analytics and innovation team to enhance detection and response
- Advancing cloud and hybrid hosting strategies
- Continuously enhancing and modernizing security controls and technology

We have embarked on a multi-year initiative to strengthen our security controls. This work helps Lumen secure our network and rigorously protect customer and employee data. All such information is encrypted in accordance with industry leading practices and legal requirements.

In 2024, Lumen did not file any Form 8-K disclosing 2024 security incidents.

Certifications

In June 2025, Lumen was awarded an updated certification in accordance with **ISO 27001:2022**, the globally recognized standard for establishing, implementing and maintaining an information security management system. This certification covers our global managed services, colocation services, IP VPN services, Edge Compute and managed security offerings, including Distributed Denial of Service mitigation.

We also maintain **ISO 27701** certification — an extension of ISO 27001 — focused on privacy information management systems as a personally identifiable information processor. This certification aligns with ISO 27701:2019 and control guidance.

Cybersecurity training

Our employees and contractors are our first line of defense in protecting company information, systems and data. That's why we maintain a comprehensive training and awareness program that reaches individuals with access to Lumen assets.

Our training portfolio includes:

- Scenario-based onboarding and annual awareness courses
- Regular phishing simulations to reinforce safe email practices
- Monthly security articles on emerging threats and best practices
- An online security community for knowledge sharing, Q&A and engagement
- Ongoing events designed to strengthen cybersecurity skills and build awareness

These programs extend to the Board of Directors and cover essential topics such as data protection, hacking techniques, malware, personal information handling and phishing. We require training for all employees, contractors and partners with access to Lumen information, systems and applications. We're also developing specialized role-based training for key groups such as help desk personnel, senior leadership and the Board.

In October 2024, our Cybersecurity Awareness Month featured interactive training on incident reporting, suspicious emails and safe web use.

Real-world security scenarios and responses were highlighted in the Tales from the Trenches video series. A guest speaker provided guidance for staying safe online, and a virtual escape room challenged teams to practice problem solving and threat identification. Company-wide communications throughout the month reinforced key cybersecurity themes, making security awareness an engaging part of everyday work at Lumen.

2024 cybersecurity training completion

99%
completed security awareness training

99.9%
completed privacy awareness training

100%
completed Customer Proprietary Network Information (CPNI) training

Simulated response and continuous threat monitoring

Our commitment to cybersecurity readiness is demonstrated through a structured program of tabletop exercises, tailored for every level and function — from senior leadership to technical specialists — and in collaboration with external partners. Drawing on real-world incidents in some cases, these exercises help ensure our teams and stakeholders are equipped to respond swiftly and effectively to evolving threats.

Internal cybersecurity exercises

We conduct quarterly tabletop exercises involving our Cybersecurity, Privacy and IT teams. Insights and lessons from these sessions directly inform the continuous enhancement of our response playbooks, ensuring our frameworks remain proactive and at the forefront of industry best practices.

AUDIENCE
Senior Leadership Team and Board

KEY FOCUS AREA
- Resilience strategies in cyber incidents
- Data protection and enterprise restoration
- Ransomware decision protocols
- Role clarity and escalation

AUDIENCE
Management

KEY FOCUS AREA
- Materiality determinations
- SEC compliance and reporting
- Coordinated internal and customer communications

AUDIENCE
Technical teams

KEY FOCUS AREA
- Live incident response
- Threat detection and analysis
- Containment and recovery
- Escalation procedures

External cybersecurity exercises

External exercises are held regularly, following schedules established by regulatory and industry requirements. These engagements support ongoing preparedness and alignment with the latest standards.

AUDIENCE
External cross-sector security partners

KEY FOCUS AREA
- Escalation and coordination for cybersecurity and physical threats

AUDIENCE
National-level collaboration

KEY FOCUS AREA
- Escalation and coordination exercises with the U.S. government to support national and economic preparedness

Continuous attack surface testing

Lumen performs continuous attack surface testing to proactively identify, assess and remediate vulnerabilities, helping to detect new and evolving threats before they can impact operations.

Segment 1: Internal Red Team
Our internal Red Team conducts regular penetration tests and adversarial emulation exercises across critical assets, including an annual enterprise-wide assessment.



Segment 2: Vulnerability Management
Our Vulnerability Management program continuously scans, assesses and prioritizes remediation of security weaknesses, keeping our infrastructure resilient against evolving cyber threats.



Segment 3: External advisory
We partner with an external advisor, gaining an independent perspective to validate our security measures and provide a fresh layer of testing.



Segment 4: Bug Bounty program
Our Bug Bounty program incentivizes responsible third parties to report potential security issues. If a reported flaw is deemed a material risk, Lumen compensates the researcher, which extends our detection reach across the global security community.



Incident response

Our Cyber Defense team follows tested incident response procedures to respond to data privacy or security incidents. Critical Security Watch Team (CSWAT) is activated during critical incidents. This coordinated, high-priority protocol focuses on:

1. Immediate threat isolation and containment
2. Forensic analysis
3. Full system rebuild of impacted environments

We adhere to strict chain of custody practices throughout the process and, when necessary, engage a retained third-party forensics partner for added expertise.

This approach involves cross-functional teams. Weekly after-action reviews ensure lessons learned are captured, processes are refined and any needed technical controls are implemented.

Black Lotus Labs

Harnessing the power of AI, our threat intelligence arm, Black Lotus Labs, works to safeguard people, businesses and critical infrastructure from malicious online activity. Our advanced AI and machine learning systems analyze telemetry from our interconnected global IP backbone, identifying early warning signs of cyber threats — often before they have a chance to cause harm. Beyond detection, Black Lotus Labs takes immediate action to disrupt threats at their source, improving the overall health of the internet.

Lumen Defender, powered by Black Lotus Labs, is our latest AI-driven threat defense tool designed to proactively block sophisticated cyberattacks before they can compromise business operations. Lumen first deployed Defender across our own digital infrastructure to safeguard critical assets, demonstrating its effectiveness. Now available for businesses, Lumen Defender provides an easy-to-use web portal for managing and viewing threats, offering an elevated first line of defense to help customers stay ahead of risks in an increasingly complex threat landscape.

200 billion

NetFlow sessions monitored daily to help secure the internet

1 billion

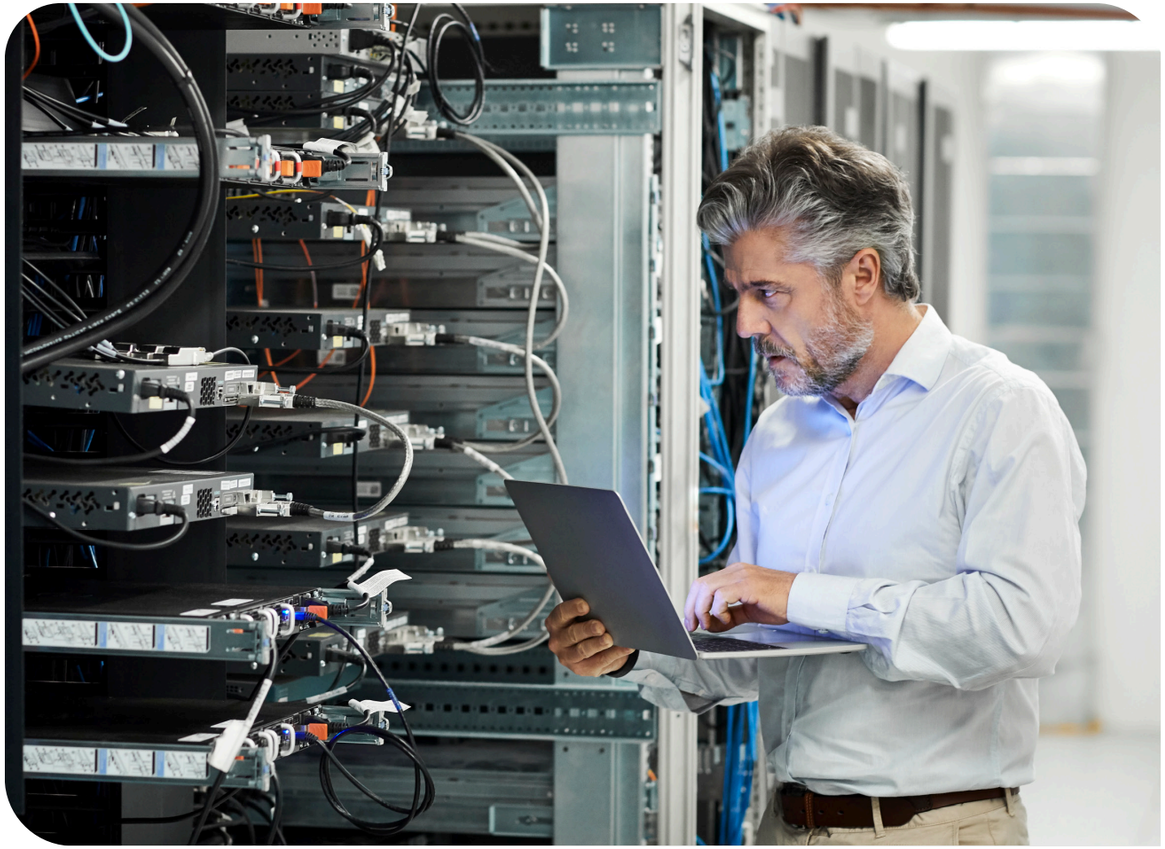
DNS queries monitored daily

Threat intelligence highlights

In 2024, Black Lotus Labs research illuminated and disrupted threats, ranging from the discovery of state-sponsored, zero-day exploits in critical infrastructure, to networks supporting the cybercrime ecosphere.

Refer to the following for further information:

- Versa Director Zero-Day Exploit
- Flax Typhoon 's stealth rail system
- The NSOCKS botnet proxy networks



Lumen received the 2024 Cybersecurity Breakthrough Award for Threat Intelligence Company of the Year.

Data privacy

At Lumen, we prioritize compliance with all applicable laws and strong safeguards when sharing information with third parties. We take a layered defense approach to privacy. Every Lumen employee serves as the first line of defense against privacy risks. The Global Privacy Office and Chief Privacy Officer form the second layer, providing oversight and specialized expertise. Lumen also conducts annual reviews of our privacy policies and processes.



Privacy governance

Lumen maintains a robust governance structure. Multiple committees work together to provide oversight, reporting and coordinated decision making.

The Technology Security Privacy Council, which meets regularly, evaluates and communicates risk decisions to the Risk Oversight Committee. In turn, this committee reports to the Board's Risk and Security Committee, which is our ultimate authority on issues including privacy, security and technology.

Customer privacy

Like many companies, Lumen accesses certain customer information to support our products and services. We share data only when necessary — either to meet business needs or comply with legal obligations — and take rigorous measures to protect it. We expect our partners to uphold the same standards.

The Lumen Trust Center serves as a centralized resource for understanding our approach to privacy, security and transparency. Through this platform, we provide customers and stakeholders with easy access to our policies, notices, documentation, compliance reports and self-service tools. In 2024, the Trust Center was accessed more than 7,500 times — a testament to its value as a go-to source of information.

Our Lumen Privacy Notice explains how we handle customer information and outlines the privacy choices available to them.

In some U.S. states and in many countries worldwide, customers may request access to their personal information and ask that we correct, delete or limit its use. The Lumen Global Privacy Office provides tools and resources to support these rights, including a Data Subject Request Portal. This portal allows customers, former customers, job applicants, former employees and other individuals to:

- Submit requests to access, correct or delete personal data
- Restrict or object to certain types of data use
- Raise privacy-related concerns or questions

All of these resources are accessible through the Lumen Privacy Center, a centralized hub for everything related to privacy at Lumen. The Privacy Center consolidates information on how we collect, use, share and safeguard personal information, provides clear guidance on applicable privacy laws and offers direct links to self-service tools like the Data Subject Request Portal.

The Global Privacy Office manages all requests submitted through the Privacy Center, ensuring they are addressed promptly and in compliance with relevant laws. Lumen also closely monitors U.S. and international privacy regulations to provide stakeholders with accurate, up-to-date information on our data handling practices — both internally and when working with trusted third parties.

Our customers can also contact the Lumen Global Privacy Office at Privacy@lumen.com. Our team members review these inquiries and strive to respond within eight business days.

Enhanced security and data protection solutions

Enabling Agile, Secure Connectivity

Lumen® Network-as-a-Service (NaaS) enables organizations to configure and scale network resources in real time. Designed for agility and operational efficiency, it offers self-service controls and consumption-based billing to support evolving infrastructure needs.

Current offerings include Lumen® Internet On-Demand, which delivers secure, high-performance internet connectivity within minutes. It supports hybrid cloud environments and rapid deployment across distributed locations — without long-term commitments.

To enhance network protection, Lumen DDoS Essentials is available as an add-on to Internet On-Demand. This feature provides automated defense against volumetric DDoS attacks, leveraging global threat intelligence from Black Lotus Labs® to help maintain uptime and meet cybersecurity standards.

Together, these services support:

- Reliable, scalable connectivity for cloud-based and distributed operations
- Simplified infrastructure management with rapid provisioning
- Strengthened security posture through integrated threat mitigation

Lumen NaaS is built for organizations that prioritize speed, resilience and secure access in a constantly shifting digital landscape.

Trust Center reports

Transparency Reports

Privacy Center Notice

Data retention and disposition

Lumen maintains a comprehensive Information and Records Compliance Policy that governs how information assets are retained and securely dispositioned. Personal information and business records are kept only as long as necessary to meet legal, regulatory and operational requirements, including during legal or tax holds.

Employees and contractors are expected to support compliance efforts and manage records appropriately. Lumen imposes our information governance and privacy standards on suppliers and partners who manage or store Lumen data, including additional requirements for handling international personal data. Compliance is mandatory and subject to audit.

Industry collaboration

Lumen partners with leading privacy and data protection organizations to strengthen industry standards, share best practices and promote responsible data stewardship. Our annual participation includes the National Cybersecurity Alliance, Future of Privacy Forum, Centre for Information Policy Leadership, International Association of Privacy Professionals and the Information Accountability Foundation.



Lumen was named 2024 Network-as-a-Service Service Provider of the Year for delivering best-in-class, on-demand connectivity, cybersecurity and multi-cloud-based services.

Business resiliency and preparedness

Lumen is committed to ensuring network and business resiliency in the face of incidents or disruptions. Our Business Continuity Management (BCM) program is designed to uphold uninterrupted service and rapid recovery through a framework of prevention, collaboration, communication, and response. Annual evaluations of process-critical operations and infrastructure recovery plans ensure our ability to serve customers, shareholders, and employees with resilience and reliability.

Our preparedness capabilities and resiliency strategies include, but are not limited to:



Network and IT

Network footprint: Lumen operates globally, connecting approximately 163,000 on-net buildings via 340,000 route miles of fiber to deliver global capacity and reliable connectivity.

Network reliability: 24/7 Network Operations Centers continuously monitor, isolate and resolve network disruptions to maintain service performance.

Network security: A round-the-clock expert team protects the company's information and networks from cyber threats using technical skills in areas like forensics and cryptography.

IT operations: Geographically dispersed data centers support processing and critical business functions, with restricted access, backup power and disaster recovery planning.



Facilities and security

Facilities: All critical facilities maintain recovery plans for infrastructure loss and conduct regular inspections and evacuation drills.

Fire and life safety: Location-specific fire and safety procedures protect employees, guests and assets while meeting regulations.

Corporate security: Global Security Services manages policies, access controls, and a 24/7 security command center for threat monitoring and response.

Infrastructure modernization: Lumen invests in upgrading critical infrastructure through life cycle replacement of aging assets, enhanced preventive maintenance, and improved reporting tools to reduce outages and strengthen operational resiliency.



Workforce and operational continuity

Alternate work arrangements: In emergencies, Lumen enables alternate workspaces and remote access to maintain operations and reduce customer impact.

Personnel: Global workforce continuity planning ensures mission-critical functions remain operational during staffing disruptions with contingency and awareness strategies.

Health and safety: Integrated health, safety and pandemic preparedness protect employees, customers and communities during significant disruptions.



Stakeholder engagement

Suppliers and vendors: Rigorous contracting and oversight of suppliers and partners ensure resilience, accountability and continuity of operations.

Customers: Business continuity focuses on critical internal processes, with service disruption management handled through established trouble-ticket procedures and service-level objectives.

Exercises and collaboration: Lumen participates in emergency exercises such as Emergency Support Function (ESF) conferences led by CISA, regional drills and cross-sector events to strengthen resiliency, foster communication and build critical relationships before they're needed.

Emergency communications: In 2024, Lumen launched AlertMedia for North America employees, enabling multi-channel emergency alerts via email, text, voice call and app push, with two-way communication to confirm safety and provide help during critical events.

Activating incident management teams

Our Incident Management teams operate 24/7 and convene virtually whenever a potential or actual situation arises in their areas of responsibility. Incident Commanders assess whether activation thresholds are met and, if so, coordinate team activation, notifications and ongoing status meetings to track recovery progress, resource needs and logistics.

To learn more, view the Lumen Business Continuity Management Plan. Please also refer to the Climate risk management, Enterprise risk management, and Simulated response and continuous threat monitoring sections of this report for more information.

Training and awareness

Our Business Continuity Management training is a mandatory annual global compliance course designed to ensure employees understand their roles and responsibilities in maintaining business resiliency. The refreshed curriculum, launched in 2024, covers the program's purpose, key requirements and incident management procedures. Role-based training ensures participants are equipped to respond effectively during disruptions, reinforcing our commitment to preparedness and continuity.

99.9%

completed Business Continuity Management training



Public policy

At Lumen, we're committed to advancing public policy initiatives that support the interests of our shareholders, customers, employees and the communities we serve. Decisions made by federal, state and local policymakers have a direct impact on our ability to invest in our infrastructure and deliver innovative digital solutions to enterprise, government and consumer markets. Active engagement in the political process is essential to ensure our perspective is represented in these critical discussions. We advocate for thoughtful, forward-looking policies, especially those that promote broadband expansion, strengthen cybersecurity, protect data privacy and foster fair competition.

Lumen participates in the political process in several ways, including educating individuals about the real-world impacts of policy decisions; empowering our colleagues to give through federal and state political action committees (PACs); corporate political giving where permitted; and membership in trade associations that help advance our overall business objectives.

Lumen is a member of a number of national and state industry and business trade associations (organized under section 501(c)(6) of the Internal Revenue Code) to help advance our public policy agenda and related business goals. While we may not always agree with every association's stance, we value the collective industry voice and essential policy dialogue these groups foster. We regularly review our industry association memberships to ensure continued alignment with our goals. Lumen has a rigorous approval process, and each proposed contribution must be approved by the Senior Vice President, Public Policy and Government Affairs.

Our public policy activities are overseen by the Board and the Nominating and Corporate Governance Committee, which conduct annual reviews and budget assessments.

We believe in full transparency. Lumen publishes a semi-annual Political Contributions report detailing political and PAC giving, plus trade association and tax-exempt organization contributions.

Learn more

Public Policy at Lumen

Political Contribution reports

January 1 - June 30, 2024

July 1 - December 31, 2024



Supply chain management and resiliency

Delivering service excellence and maintaining a resilient network depends on strong partnerships with a community of suppliers who share our commitment to quality and integrity. Our Procurement team develops and manages a global supply base that enhances our competitiveness while helping us manage a range of risks, including those related to human rights, labor and the environment. Lumen is committed to sourcing responsibly, guided by a robust Supplier Code of Conduct, advanced risk management protocols and ongoing collaboration throughout our supply chain.

Supplier Code of Conduct

Suppliers working with Lumen must comply with our Supplier Code of Conduct and implement robust policies and procedures designed to prevent illegal activities, including corruption, extortion, embezzlement and bribery. Supplier agreements include provisions for audit and assessment rights — such as information security and control reviews — to validate compliance with contractual obligations, including adherence to the Supplier Code of Conduct. In addition, suppliers must meet BCM standards and maintain up-to-date plans to help ensure resilience throughout our supply chain.

The Supplier Code strictly prohibits child labor and forced labor, safeguards employees' rights to freedom of association and collective bargaining in compliance with local laws, and forbids discrimination on any basis prohibited by applicable law. The code was most recently updated in 2024. These enhancements build on more substantial 2023 revisions addressing gifts and entertainment, whistleblowing protections and supplier training requirements.

How Lumen ensures responsible supply chains

Step 1	Step 2	Step 3	Step 4	Step 5
Prospective supplier accesses vendor portal and reviews and commits to comply with the Supplier Code of Conduct	Supplier risk and compliance assessment	Onboarding and role/ channel specific training requirements where required	Ongoing monitoring, audits and Tier 2 reporting	Continuous improvement (feedback, program enhancements and industry engagement)



Supplier Engagement program

The Lumen Supplier Engagement Portal gives current and prospective suppliers streamlined access to the Supplier Code, policy documents and relevant compliance resources. We are currently transitioning this portal to a new internal system with a goal to automate core processes, enhance responsiveness, and establish a centralized hub for compliance documentation and monitoring. Once fully implemented, the portal is expected to simplify vendor registration, intelligently route new requests to the appropriate Procurement teams and streamline Master Service Agreement onboarding.

Lumen is committed to enabling fair supplier opportunities through enhanced engagement, including mentoring, partnerships and event participation. We participate in various events to ensure robust outreach, including with associations like the National Veteran-Owned Business Association.

Our Tier 2 Supplier program broadens our commitment to responsible engagement by requiring direct suppliers to report on their own supplier relationships. This helps us track direct engagement and the practices of second-tier, or subcontracted vendors, capturing both direct and indirect spend across our supply chain.

Supplier selection, risk management and due diligence

Before contracting, Lumen performs risk-based, third-party reviews, typically including security, privacy, legal, ethics, corporate intel and industrial security, and AI governance where applicable. Our vendor risk management process is rigorous and collaborative, with Vendor Risk Management, Procurement, Ethics and Compliance teams all playing key roles.

Certain higher-risk suppliers may be subject to extra scrutiny. These suppliers may be required to complete targeted questionnaires and participate in environmental, security and sustainability assessments through our automated diligence platform.

Ethics in our supply chain

To encourage ethical and responsible conduct, Lumen requires agents and certain supplier personnel to complete required compliance training and acknowledgments of the Supplier Code of Conduct and Sales Agent Standards. We support a strong culture of compliance by offering clear channels for reporting potential concerns, including a confidential hotline. In 2024, we also introduced gamified procurement training to make learning more engaging for employees in high-impact roles.

The integrity of our business extends to all our sales agents, who must sign and comply with our zero-tolerance pledge. This document spells out required standards of behavior, legal compliance and customer expectations. We conduct periodic audits or reviews to affirm alignment with these standards.



Disclaimer

The information in this report is subject to change, and Lumen will not necessarily disclose such changes. This 2024 Impact Report covers Lumen's operations and performance from January 1 through December 31, 2024, unless otherwise noted, and reflects the most accurate information available at the time of publishing. In this report, Lumen (which includes Lumen Technologies, Inc and its consolidated subsidiaries) is at times referred to in as "we," "our," "us" or "the company." The information presented herein may be updated, amended, supplemented, or otherwise altered by subsequent reports or filings by Lumen. The contents of this voluntary Impact Report are informed by various frameworks, including standards and recommendations. These various frameworks define significant concepts differently, and we have not attempted to reconcile such differences in our overarching approach. We plan to continue enhancing our impact-related disclosures and increasing alignment with the referenced frameworks, even as such frameworks continue to rapidly evolve. As disclosure frameworks or reporting requirements change worldwide, the information we share and the way it is shared may change over time. While selected metrics receive limited assurance from an independent third party, this is inherently a less rigorous process than reasonable assurance sought in a typical auditing engagement.

References in this Impact Report to certain data points should not be construed as a characterization regarding the "materiality" of such information, as evaluated in the context of U.S. securities laws. Except for historical and factual information, the matters set forth in this Impact Report identified by words such as "will," "should," "expects," "anticipates," "believes," "plans," "intends," and similar expressions are forward-looking statements within the meaning of the "safe harbor" provisions of the Private Securities Litigation Reform Act of 1995. Such statements may include, without limitation, expectations regarding our future performance, innovation and efficiencies, the adequacy and strengths of our systems and protocols, our attainment of key performance indicators, commitments, initiatives and goals, including emissions and other sustainability targets, and value creation, which are subject to risks and uncertainties that could cause actual results to differ materially. These forward-looking statements are subject to a number of risks, uncertainties, and assumptions, many of which are beyond our control. Actual events and results may differ materially from those anticipated by us in those statements for several reasons, including those discussed in this Impact Report and under Item 1A, "Risk Factors," and elsewhere in our Annual Report on Form 10-K for the year ended December 31, 2024, as updated by Part I, Item 1A, "Risk Factors" in our subsequently filed Quarterly Reports on Form 10-Q and other documents we file from time to time with the U.S. Securities and Exchange Commission. You should not place undue reliance on these forward-looking statements, which speak only as of the date of this Impact Report. Unless legally required, Lumen undertakes no obligation and expressly disclaims any such obligation to update publicly any forward-looking statements, whether as a result of new information, future events, or otherwise. All financial figures are quoted in U.S. dollars unless otherwise noted. Some figures and percentages may not add up to the total figure or 100% due to rounding.

Continuous improvements to our data collection systems and measurement methodologies may lead to restatements of previously reported data. We plan to provide restatements when we determine that a change in measurement methodology or an error in previously reported information has the potential to significantly impact a users' decision-making. Restatements will also be provided in cases of significant changes in reporting parameters (such as those caused by mergers, acquisitions, divestments). We reserve the right to determine whether, when and how such restatements will be presented. In the event that third-party websites have been cited, references are for convenience only, are not incorporated into this report and we expressly disclaim any responsibility for content or information connected thereto.


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