

# Welcome to your CDP Climate Change Questionnaire 2020

## C0. Introduction

### C0.1

#### **(C0.1) Give a general description and introduction to your organization.**

CenturyLink (NYSE: CTL) is a technology leader delivering hybrid networking, cloud connectivity, and security solutions to customers around the world. Through its extensive global fiber network, CenturyLink provides secure and reliable services to meet the growing digital demands of businesses and consumers. CenturyLink strives to be the trusted connection to the networked world and is focused on delivering technology that enhances the customer experience. Learn more at <http://news.centurylink.com/>

CenturyLink is committed to actively making choices to lessen our environmental footprint. Managing our environmental impacts requires balancing the needs of our employees, customers, shareholders, and the environment. This balanced approach means ensuring environmental compliance and sustainability efforts support the financial health of our business, the quality of service we offer our customers, and the value we create for our shareholders and our communities. CenturyLink helps customers reduce their energy consumption with our products and services by enabling smart technologies, dematerialization, and virtualization. We believe being aligned with our customers' climate change mitigation goals and communicating our efforts to support these goals creates a strategic advantage.

While CenturyLink has continued to build upon its sustainability efforts year over year by developing methods and policies to measure, understand, and improve our environmental impact on the communities in which we live and work, it is difficult to accurately quantify potential financial implications due to certain subjective aspects required for future event analysis. Importantly, topics discussed below that may have a "substantive financial or strategic impact on our business" are not necessarily "material" to investors as defined by the U.S. Securities and Exchange Commission ("SEC"), but may have the potential to further our strategic climate-related risk mitigation efforts across our global operations. This submission should not be considered comprehensive, as responses are drafted to meet the criteria and requirements specified CDP.

The inclusion of information contained in this report should not be construed as a characterization regarding the materiality of financial impact for that information. For a discussion of information that is material to CenturyLink please see our Annual Report on Form 10-K ("10-K") filed with the SEC. Given the inherent uncertainty in predicting and modelling future conditions, caution should be exercised when interpreting the information provided. In this report, we have made forward-looking statements. These forward-looking statements, and the assumptions upon which they are based, (i) are not guarantees of future results, (ii) are

inherently speculative and (iii) are subject to a number of risks and uncertainties. Actual events and results may differ materially from those anticipated, estimated, projected or implied by us in those statements if one or more of these risks or uncertainties materialize, or if our underlying assumptions prove incorrect. All of our forward-looking statements are qualified in their entirety by reference to our discussion of factors that could cause our actual results to differ materially from those anticipated, estimated, projected or implied by us in those forward-looking statements. For a list of important factors that could affect future results and could cause those results to differ materially from those expressed in the forward-looking statements, please refer to CenturyLink's 10-K.

## C0.2

**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1, 2019	December 31, 2019	Yes	1 year

## C0.3

**(C0.3) Select the countries/areas for which you will be supplying data.**

- Argentina
- Australia
- Austria
- Belgium
- Brazil
- Bulgaria
- Canada
- Chile
- China
- China, Hong Kong Special Administrative Region
- Colombia
- Costa Rica
- Czechia
- Denmark
- Ecuador
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- India
- Ireland

Israel  
Italy  
Japan  
Luxembourg  
Mexico  
Monaco  
Netherlands  
Norway  
Panama  
Peru  
Poland  
Portugal  
Republic of Korea  
Romania  
Russian Federation  
Serbia  
Singapore  
Slovakia  
Slovenia  
South Africa  
Spain  
Sweden  
Switzerland  
Taiwan, Greater China  
Thailand  
Turkey  
United Arab Emirates  
United Kingdom of Great Britain and Northern Ireland  
United States of America  
Venezuela (Bolivarian Republic of)

## **C0.4**

**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

USD

## **C0.5**

**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

Operational control

## C1. Governance

### C1.1

**(C1.1) Is there board-level oversight of climate-related issues within your organization?**

Yes

#### C1.1a

**(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.**

Position of individual(s)	Please explain
Director on board	<p>As part of its risk and governance oversight responsibilities, the Board of Directors (“Board”) monitors CenturyLink’s environmental management programs, including climate change related issues. The Board believes that Environmental and Social Governance (“ESG”) and risk management expertise are among the essential skills necessary for effective oversight. In 2019, the Board included 3 members with ESG expertise and 4 members with risk management expertise. In 2019, the Board received periodic reports from management and the Board’s 5 standing committees to inform and support the Board with its various risk management, governance, and strategic responsibilities, which include our policies, planning, and compliance with ESG strategic objectives. Generally, for climate change related issues, the Board relies on the Risk and Security Committee (“Risk Committee”) and the Nominating and Corporate Governance Committee (“Nominating Committee”), in each of the two committees respective responsibilities, to monitor issues and report back to the full Board.</p>
Board-level committee	<p>The Nominating Committee which supports the full Board on ESG issues, had 5 members and met 7 times in 2019. Among other things, the Nominating Committee oversees and recommends improvements to governance principles, policies, programs and practices, and advises upon and monitors ESG issues, including issues related to climate change. The Board supports management’s efforts to identify meaningful environmental, product, consumer, financial and other factors to develop metrics material to the business, and communication plans regarding ESG strategy.</p> <p>During the 2019 shareholder engagement process, in which Board members participated, shareholders noted an interest in seeing improved disclosure and better descriptions of CenturyLink’s environmental programs. Based on shareholder feedback, the Board instructed management to expand and improve various ESG-related disclosures in our Proxy and annual ESG report. Updated disclosures included a summary of recent environmental initiatives in our 2020 Proxy under the heading ‘Our Board’s Responsibilities – Commitment to ESG Leadership’ which provides information on our carbon reductions, science-based</p>

	targets to reduce greenhouse gas emissions, and improvements in energy efficiency.
Board-level committee	The Risk Committee is responsible for assisting the full Board with identifying, monitoring and managing risks to the Company's business, properties and employees. The Risk Committee periodically reviews the major risk exposures in the following areas: (i) risks to the Company's properties posed by casualty events (which may include property damage from flooding, hurricanes, wildfires, or other events related to or which may be exacerbated by climate change), terrorism, sabotage or theft, (ii) risks caused by potential or actual regulatory developments or the Company's failure to comply with applicable telecommunications regulations, (iii) risks to the Company's business operations caused by failure to comply with applicable regulations, contractual commitments, and environmental, safety, health or other similar laws, and (iv) risks to the Company's business related to privacy and network management practices. In 2019 the Risk Committee had 6 Board members, including the CEO, and held 4 meetings.

## C1.1b

**(C1.1b) Provide further details on the board's oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Please explain
Scheduled – some meetings	<p>Reviewing and guiding strategy</p> <p>Reviewing and guiding major plans of action</p> <p>Reviewing and guiding risk management policies</p>	<p>As part of its risk and governance oversight responsibilities, the Board of Directors ("Board") monitors CenturyLink's environmental management programs, including climate change related issues. The Board believes that Environmental and Social Governance ("ESG") and risk management expertise are among the essential skills necessary for effective oversight. In 2019, the Board included 3 members with ESG expertise and 4 members with risk management expertise. In 2019, the Board received periodic reports from management and the Board's 5 standing committees to inform and support the Board with its various risk management, governance, and strategic responsibilities, which include our policies, planning, and compliance with ESG strategic objectives. Generally, for climate change related issues, the Board relies on the Risk and Security Committee ("Risk Committee") and the Nominating and Corporate Governance Committee ("Nominating Committee"), in each of the two committees respective responsibilities, to monitor issues and report back to the full Board.</p>

<p>Scheduled – some meetings</p>	<p>Reviewing and guiding strategy Reviewing and guiding major plans of action</p>	<p>The Nominating Committee which supports the full Board on ESG issues, had 5 members and met 7 times in 2019. Among other things, the Nominating Committee oversees and recommends improvements to governance principles, policies, programs and practices, and advises upon and monitors ESG issues, including issues related to climate change. The Board supports management’s efforts to identify meaningful environmental, product, consumer, financial and other factors to develop metrics material to the business, and communication plans regarding ESG strategy.</p> <p>During the 2019 shareholder engagement process, in which Board members participated, shareholders noted an interest in seeing improved disclosure and better descriptions of CenturyLink’s environmental programs . Based on shareholder feedback, the Board instructed management to expand and improve various ESG-related disclosures in our Proxy and annual ESG report. Updated disclosures included a summary of recent environmental initiatives in our 2020 Proxy under the heading ‘Our Board’s Responsibilities – Commitment to ESG Leadership’ which provides information on our carbon reductions, science-based targets to reduce greenhouse gas emissions, and improvements in energy efficiency.</p>
<p>Scheduled – some meetings</p>	<p>Reviewing and guiding strategy Reviewing and guiding risk management policies</p>	<p>The Risk Committee is responsible for assisting the full Board with identifying, monitoring and managing risks to the Company’s business, properties and employees. The Risk Committee periodically reviews the major risk exposures in the following areas: (i) risks to the Company’s properties posed by casualty events (which may include property damage from flooding, hurricanes, wildfires, or other events related to or which may be exacerbated by climate change), terrorism, sabotage or theft, (ii) risks caused by potential or actual regulatory developments or the Company’s failure to comply with applicable telecommunications regulations, (iii) risks to the Company’s business operations caused by failure to comply with applicable regulations, contractual commitments, and environmental, safety, health or other similar laws, and (iv) risks to the Company’s business related to privacy and network management practices. In 2019 the Risk Committee had 6 Board members, including the CEO, and held 4 meetings .</p>

## C1.2

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on climate-related issues
Chief Financial Officer (CFO)	Both assessing and managing climate-related risks and opportunities	Annually
Other C-Suite Officer, please specify Treasurer and SVP	Both assessing and managing climate-related risks and opportunities	Annually
Sustainability committee	Both assessing and managing climate-related risks and opportunities	Annually

### C1.2a

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

The Environmental Sustainability Committee (Sustainability Committee) is a multi-disciplinary team comprised of employee directors and employee managers. CenturyLink believes that an employee committee of senior and seasoned members with subject matter expertise will have the best opportunity to make a meaningful impact on our environmental programs' efficacy and success. The Sustainability Committee is led by the company's Director, Global Environment Health & Safety (EH&S), who is responsible for leading CenturyLink's global EH&S function including establishing, monitoring and managing overall EH&S objectives, performance and regulatory compliance by coordinating with regional EH&S leaders in EMEA and LatAm to design and implement our global vision for environmental sustainability. The Director EH&S reports to an officer of the company (Senior Vice President - Treasurer) who in turn is a direct report of the Chief Financial Officer (CFO). This structure utilizes the organizational hierarchy and reporting channels to link top level oversight to those with high level responsibility for operations that influence our management of climate-change related issues. Sustainability Committee members are directly responsible for company operations that contribute to our carbon emissions as well as other environmental issues such as regulatory compliance and waste management. The Sustainability Committee is responsible for: (i) identifying and assessing the impact of the company's operations on the environment and to develop and implement strategies to mitigate those impacts; (ii) establishing targets pursuant to our ISO 14001 certified Environmental Management System (where relevant) and partners with other stakeholders to meet environmental sustainability objectives that support company objectives; and (iii) implementing processes, through the various individual member authorities, that drive continuous improvement in environmental performance including greenhouse gas emissions reductions.

The Sustainability Committee effectively monitors climate change issues through regular meetings internally as well as engagement with professional organizations and regulatory agencies, and through subscriptions to services that monitor energy and environmental related initiatives and rule-making that may impact our industry.

The Treasurer leads the treasury, risk management, and environment health and safety functions. As regards climate change related issues, the Treasurer is responsible for approving certain environmental sustainability targets and objectives, including CenturyLink's science-based emissions reduction targets. He is also responsible for ensuring adequate processes and systems for evaluating and managing and monitoring regulatory and financial risks related to certain climate change related impacts on the company's operations and assets. The Treasurer reports to the Chief Financial Officer.

The Chief Financial Officer leads the Finance organization and is responsible for supporting company-wide objectives from a finance perspective. The CFO is also the executive responsible for the overall performance of the finance function, which at CenturyLink includes the Treasury/EHS/Risk Management team described above, where assessment and monitoring of climate related issues occurs. The CFO reports to the Chief Executive Officer.

### C1.3

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	

### C1.3a

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Energy manager	Monetary reward	Emissions reduction project	The Energy Manager's annual incentive bonus is partially based on achieving energy efficiency / consumption reduction objectives, which in turn reduces carbon intensity / emissions.
Environment/Sustainability manager	Monetary reward	Other (please specify)	The Environmental Sustainability Manager's



		Overall management of environmental/sustainability program activities	annual incentive bonus is partially based on the continuous improvement of CenturyLink's environmental sustainability program which includes energy and emission reduction projects and the quality of climate change mitigation reporting/communications.
Other C-Suite Officer	Monetary reward	Emissions reduction target	The Treasurer has overall responsibility for achieving carbon emission reduction targets and for the successful performance of our property and business continuity insurance program, including achieving annual loss reduction/control and budgetary targets. The Treasurer's annual incentive bonus is partially based on achieving these targets.

## C2. Risks and opportunities

### C2.1

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

#### C2.1a

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	3	This range is considered appropriate to many transitional risks and opportunities, and some physical impacts.
Medium-term	4	10	This range is considered appropriate to many transitional risks and opportunities, and physical impacts.
Long-term	11	100	This range has been selected to cover many of the physical climate change risks and opportunities, as well as some transitional risks

			and opportunities.
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## C2.1b

### **(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

CenturyLink evaluates financial and strategic risks in both subjective and objective terms including assessing the value creation, vulnerability, and timing of any financial commitments; strategic decisions, and operational programs essential to short term success, medium range opportunity development, and long-term sustainability and value creation. As a U.S. publicly traded company, we disclose in our quarterly and annual financial reports filed with the SEC, which provides financial details and related management discussion and analysis about CenturyLink’s business, strategy, and risks. As part of our financial controls, enterprise risk management, and business continuity planning programs, CenturyLink is constantly assessing, defining, and addressing the substantive financial and strategic impacts the dynamic global economy, environment, and regulatory regimes may present. Balancing these factors, some of which are subjective and cannot be specifically quantified, the Company appropriately allocates resources to mitigate the risk of negative impacts in various ways including maintaining insurance coverage, operational excellence, supplier management, sustainability standards, ethics and compliance standards. While CenturyLink has continued to build upon its sustainability efforts year over year by developing methods and policies to measure, understand, and improve our environmental impact on the communities in which we live and work, it is difficult to accurately quantify potential financial implications due to certain subjective aspects required for future event analysis. As noted previously, topics discussed in this report may have a "substantive financial or strategic impact on our business" are not necessarily "material" to investors as defined by the SEC, but may have the potential to further our strategic climate-related risk mitigation efforts across our global operations. For CDP reporting purposes, we consider risk and opportunities with potential financial implications for our business of in excess of USD 4 million to be “substantive” due to the possibility of positively contribution to our climate-related risk mitigation efforts. Additionally, CenturyLink discloses in its annual report on form 10-K, and updates as necessary, those risks, including those from extreme weather events, which the Company believes could have a material impact on its business and sustainability.

## C2.2

### **(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

**Value chain stage(s) covered**

- Direct operations
- Upstream
- Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term

Medium-term

Long-term

**Description of process**

Board's Risk and Security Committee

The Board of Director's ("Board") Risk and Security Committee ("Risk Committee") has oversight responsibility of management's efforts for identifying, monitoring and managing major risks to the Company's business, properties and employees including CenturyLink's Enterprise Risk Management team ("ERM") and corporate Compliance. Additionally, the Risk Committee works with ERM to regularly evaluate identified risks and potential impact to the Company's financials, including those related to climate change. The Risk Committee meets at least quarterly and receives regular reports from management including ERM and Compliance. As with any risk or opportunity, CenturyLink evaluates the potential value creation, vulnerability, and timing of the risk or opportunity including reputational, financial, strategic, and operational concerns. Specifically, risks to property include, among others, those such as increased extreme weather events predicted by climate experts, including floods, and their increased frequency as acknowledged in the Company's Annual Report on form 10-K filed with the US Securities and Exchange Commission on 28 February 2020, under Item 1A 'Risk Factors'.

An example of the Risk Committee's effective oversight management's efforts to evaluate and identify risks related to climate change is the ERM's assessment of the strategic and transitional risks and long term value creation in the decision taken to shift (in European countries) to renewable energy use in anticipation of potential policy changes, reporting requirements such as the UK's SECR Regulations, and in order to reduce the impact of carbon taxes. Examples of countries where renewable energy is procured include Germany, Italy and Spain. In addition, Critical infrastructure Teams respond to the identified risks associated with non-compliance with climate change legislation. Business cases are developed with the input of regional managers. After evaluation, these initiatives drive compliance strategies, enhancing power utilization efficiencies, and other energy efficiency projects such as at our 3 major UK Gateway sites. These developments are in turn utilized as opportunities to secure and enhance the organization's reputation (and market share), by communicating our climate change management in publicly available reports such as the CDP questionnaire.

**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

**Description of process**

Business Continuity Planning Team

The Business Continuity Planning Team is responsible for developing, implementing, and maintaining the business continuity risk management framework, and in particular avoiding risks with downstream impacts. This is a continuous process and multi-disciplinary. Throughout the year functional groups within CenturyLink will evaluate the criticality of processes at location or asset level. Critical processes are subject to a Business Impact Analysis which includes criteria for materiality and priorities. Maximum allowable down times are identified which drive recovery time objectives for critical processes and systems. Business continuity plans are created and exercised by plan participants to ensure effective management of identified hazards/threats. The hazards/threats associated with climate change covered in this process are diverse and include those that could potentially impact our direct operations, suppliers, and customers. These include flooding from rising ocean levels or increased severe weather, disruption to our supply chain, loss of people or facilities due to disruptive natural phenomena such as tornadoes, cyclones, tsunamis, hurricanes, drought, wildfires and other extreme weather events, as well as displacement of populations and civil unrest. The overall business continuity strategy, processes and results are communicated to the executive leadership team and made available to all employees.

Identified risks and opportunities are prioritized based upon the immediacy and potential severity of the disruption to the Company's operations. Risks related to impacts of global climate change for example are prioritized based upon disruption of network services that may occur due to physical damage to our network from flooding or severe weather events. Opportunities are generally prioritized based upon a return on investment formula which is informed by the current business environment and financial performance.

An example of a case study that demonstrates how our risk management process has been applied to a physical risk is hurricane preparedness. The Business Continuity Planning team provides the framework and readiness criteria for this process for

potentially impacted divisions/locations in the event of a hurricane event. The focus of hurricane preparedness efforts is prevention and mitigation. Applicable divisions/teams/individuals are instructed and expected to review checklists and training documents, in addition to site-specific business continuity plans, and to ensure they are prepared at all times.

One such example of how physical risk prevention and mitigation was applied within this framework in relation to hurricanes is our response to an October 2015 hurricane-associated flood event at one of our facilities in Corsicana, Texas. Despite being protected by a 10-foot high wall and sumps, the area flooded due to Hurricane Patricia being one of the most intense tropical cyclones on record Worldwide. During such events, loss of service is avoided because our network is designed with redundancy, resiliency and route diversity, enabling alternative routes to be used, itself a preventative measure and also a feature that is also employed during routine maintenance. In terms of mitigation, the facility was relocated to another location of higher elevation and outside of the flood plain.

CenturyLink's hurricane preparedness efforts mitigate physical risks which may result from extreme weather and supports our ongoing efforts to improve our customer experience through dependable network/connectivity services during severe weather events.

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**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

**Description of process**

Risk Management Team

The specialist Enterprise Risk Management team ("ERM") identifies risks to operations and facilities, including those related to physical events associated with climate change, such as floods and hurricanes. ERM is continuously evaluating risks to operations, facilities, strategic opportunities, and financial concerns – the results of which contribute to the Company's Loss Prevention Program. This process identifies potential

operational, financial or strategic risks which may have substantive impacts, establishes costs and presents a business case, which can be reported to the Board. ERM provides quarterly reports to the Board of Director's Risk & Security Committee.

Identified risks and opportunities are prioritized based upon the immediacy and potential severity of the disruption to the Company's operations. Risks related to impacts of global climate change for example are prioritized based upon disruption of network services that may occur due to physical damage to our network from flooding or severe weather events. Opportunities are generally prioritized based upon a return on investment formula which is informed by the current business environment and financial performance.

An example of a case study that demonstrates how our risk management process has been applied to a physical risk is hurricane preparedness. The Business Continuity Planning team provides the framework and readiness criteria for this process for potentially impacted divisions/locations in the event of a hurricane event. The focus of hurricane preparedness efforts is prevention and mitigation. Applicable divisions/teams/individuals are instructed and expected to review checklists and training documents, in addition to site-specific business continuity plans, and to ensure they are prepared at all times.

One such example, in which ERM had input, was a comprehensive preventative Roof Management Program implemented in 2019 in the US , partly designed to mitigate the impacts of hurricanes and extreme weather.

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**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

**Description of process**

Environmental Sustainability Committee

The Environmental Sustainability Committee (Sustainability Committee) is a multi-disciplinary team comprised of employee directors and employee managers.

CenturyLink believes that an employee committee of senior and seasoned members with subject matter expertise will have the best opportunity to make a meaningful impact on our environmental programs' efficacy and success. This enables input from the leaders and subject matter experts who can most directly improve our environmental performance. Sustainability Committee members are directly responsible for Company operations that contribute to our carbon emissions as well as other environmental issues such as regulatory compliance and waste management. The Sustainability Committee is responsible for identifying and assessing the impact of the Company's operations on the environment and to develop and implement strategies to mitigate those impacts.

The Sustainability Committee has various roles relating to risk. It is responsible for monitoring regulatory changes, and therefore identifying transitional risks associated with climate change and carbon tax legislation in the short and medium timeframes. The Sustainability Committee also oversees data collection and reporting regarding greenhouse gas emissions and other environmental and sustainability indicators. In this way it assists CenturyLink in reporting to stakeholders, be they customers or investors, and thereby gain opportunities related to the communication of good performance. CenturyLink's energy management teams lead an active program to improve efficiency, reduce energy consumption, and minimize carbon emissions in our facilities around the world. The Sustainability Committee works with such teams to monitor these initiatives and report on progress towards targets, such as science-based emissions reduction targets.

## C2.2a

### (C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Current regulations are relevant and always included in the Company's processes for identifying and assessing climate-related risks because (1) telecommunications is a highly regulated industry and (2) our operational footprint includes many countries with different regulatory requirements, and the consequences for non-compliance could negatively impact our operations, financial performance, and reputation. See the Company's Annual Report on form 10-K filed with the US Securities and Exchange Commission on 28 February 2020, under Item 1A 'Risk Factors'. An example of a current regulation related to climate change risk that the Company has identified, assessed and is currently managing is the Renewable Energy Standard (RES) in Colorado US. This law/regulation requires investor-owned utilities to generate 30% of their electricity from renewable sources by 2020. This regulation and its revisions have the potential to increase energy costs for the Company's operations in Colorado. Through careful monitoring of the state regulatory environment we were able to identify the potential risks and

		opportunities from this regulation and take action to mitigate the risk. For example, facility energy efficiency projects (equipment optimization, upgrading building control systems, lighting replacement initiatives) were implemented to mitigate the risk of increased energy costs that may arise from this regulation.
Emerging regulation	Relevant, always included	Emerging regulations are relevant and always included in the Company's processes for identifying and assessing climate-related risks due to the potentially significant impact on the Company's ability to meet its objectives that may occur due to the cost of compliance with emerging regulations or the adverse consequences of non-compliance. As example of an emerging regulation related to climate change risk that the Company has identified, assessed and is currently managing is the increasing use of carbon emissions cap and trade or carbon tax systems. These schemes currently impact a small percentage of our operational footprint but the impact may increase if these schemes expand into the telecommunications industry in the US and/or into other geographies with a higher percentage of the Company's carbon emissions. The Company has responded to the potential for this emerging issue to impact our energy spend by implementing energy efficiency projects to reduce consumption and by expanding our procurement of energy from renewable sources.
Technology	Relevant, always included	Technology is relevant and always included in the Company's processes for identifying and assessing climate related risks due to the potential negative impacts of not optimizing energy efficiency at facilities. An example of a technology risk related to climate change that the Company identified and assessed was the potential for increased capital costs as a result of insufficient payback from the installation of Alerton HVAC automation systems at several facilities. The Company evaluated the risk and determined that despite significant upfront costs, the investment would benefit the Company financially on a long-term basis in addition to increasing energy efficiency and reducing carbon emissions.
Legal	Relevant, always included	Litigation and claims are relevant and always included in the Company's processes for identifying and assessing climate-related risks due to the potential negative impact to our financial objectives and reputation that may arise from such litigation and claims. An example of a legal/claims risk related to climate change that the Company has identified, assessed and is currently managing are general liability insurance claims in the US that may arise from severe weather dislodging or damaging our aerial telecommunications plant in a manner that creates a potential hazard to the public, as well as the increasing risk of wildfires in the western US that may involve or be attributed to our outside plant equipment and utility poles that we own or have installed equipment.



Market	Relevant, always included	<p>Shifts in supply and demand are relevant and always included in the Company's processes for identifying and assessing climate related risks due to the potential impact of decreased revenues that could arise from not capitalizing on new market opportunities. CenturyLink always considers ways to help customers reduce energy consumption with our products and services by enabling smart technologies, dematerialization, and virtualization. By being aligned with our customers' climate change mitigation goals and communicating our efforts we create strategic advantage. A failure to do so would expose us to risk.</p> <p>One example is CenturyLink's continued participation in 2019 in the Voluntary Agreement for Ongoing Improvement to Energy Efficiency of Small Network Equipment. This includes items such as modems and routers used by consumers, with the primary objective being to increase energy efficiency while promoting rapid innovation and timely introduction of new features. At least 90 percent of small equipment procured must meet the energy efficiency standards established by the agreement.</p>
Reputation	Relevant, always included	<p>Reputation is relevant and always included in CenturyLink's processes for identifying and assessing climate related risks due to the potential negative impact of lost revenue that may arise from customers dissatisfaction with CenturyLink's lack of participation in various environmental disclosure platforms. CenturyLink discloses climate change and sustainability information to its employees, customers, and investors to protect and enhance our reputation as a good corporate citizen. For example, our response to the CDP climate change and supply chain questionnaires, and Ecovadis, helps ensure transparency and communicate our performance and practices to customers.</p>
Acute physical	Relevant, always included	<p>Acute physical impacts of natural disasters and extreme weather are relevant and always included in CenturyLink's processes for identifying and assessing climate related risks due to the potential negative impact of lost revenue and increased expenses that could arise from damaged infrastructure. For example, a building in York, UK was determined to be at high risk of flood damage. The building was vacated and assets migrated to another location, in order to reduce flood risk and ensure operations could be more reliably maintained. Another example of risk identification and mitigation is the protection of a facility at Colorado Springs. An adjacent creek was suffering severe erosion, which may have been further exacerbated by extreme rainfall events, and by partnering with Federal Agencies funds were secured to eliminate the erosion and therefore any risk to the facility</p>
Chronic physical	Relevant, always included	<p>Chronic physical impacts of natural disasters and extreme weather are relevant and always included in CenturyLink's processes for identifying and assessing climate related risks because network outages due to</p>

		extreme weather could result in lost revenue and increased expenses. An example of an identified chronic physical risk that could impact the Company is rising sea levels
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## C2.3

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

## C2.3a

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

### Identifier

Risk 1

### Where in the value chain does the risk driver occur?

Direct operations

### Risk type & Primary climate-related risk driver

Emerging regulation  
 Carbon pricing mechanisms

### Primary potential financial impact

Increased indirect (operating) costs

### Company-specific description

Changes in regulation affecting fuels, such as carbon taxes, may increase our operating expenses. In the normal course of business, we purchase a variety of fuels resulting in Scope 1 emissions. Changes in regulations that affect fuel costs, specifically regulations related to control of greenhouse gas emissions or other climate change related matters (i.e. a carbon tax), would affect our operating expenses which may increase the costs of providing our services. This may affect business in the medium-term.

### Time horizon

Medium-term

### Likelihood

Unlikely

### Magnitude of impact

Medium

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

12,195,092

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this risk, to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. Carbon tax or cap and trade programs in the US do not currently apply to CenturyLink’s operations. To illustrate the potential future financial implications of emerging regulations, and specifically carbon pricing mechanisms, we have calculated the impact as follows.

In 2019 CenturyLink emitted 243,901.85 tonnes CO<sub>2</sub>e as a result of fuel consumption in the USA. In 2019, CenturyLink would have been liable for a tax of approximately \$12,195,092 in the U.S. if a tax had been imposed on its fuels equal to the Environmental Defence Fund's estimated True Cost of Carbon of \$50/tonne .  
 $243,901.85 \text{ tonnes CO}_2\text{e} \times \$50/\text{tonne} = \$12,195,092$

**Cost of response to risk**

18,170,000

**Description of response and explanation of cost calculation**

CenturyLink monitors changes in regulation/policy and develop plans to manage the financial impact. The financial impact of new carbon taxes and levies would be minimized by the energy efficiency and carbon reduction projects that CenturyLink implements as a matter of course. For example, our response to Question 4.3a identifies the installation of building controls in US properties in 2019. The potential of these projects to avert financial risk is demonstrated through the receipt of rebates and other incentives. For example, in 2019 energy efficiency projects received approximately \$350,000 in utility incentives to help offset the capital costs. For example, we received an incentive of \$46,800 for an energy efficiency project (Variable Frequency Drive) project performed at a facility in Boston, MA.

Regarding the cost of management, we already implement energy / carbon reduction initiatives which would contribute towards the management of this risks. However, we have calculated the cost of management based upon the identified cost of US carbon reduction initiatives in 2019 (which will generate significant cost savings for many years)

being \$18,120,000 and an additional \$50,000 to cover additional tax planning and management.  $\$18,120,000 + \$50,000 = \$18,170,000$ . Note that we have focused on the US with respect to this risk because we are already subject to carbon taxes in EMEA and therefore have not factored this in as an additional (i.e. future potential) risk. Our exposure in LATAM and APAC is relatively limited given the far smaller consumption compared to the USA.

## Comment

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### Identifier

Risk 2

### Where in the value chain does the risk driver occur?

Direct operations

### Risk type & Primary climate-related risk driver

Acute physical

Increased severity and frequency of extreme weather events such as cyclones and floods

### Primary potential financial impact

Increased capital expenditures

### Company-specific description

Climate change brings increased risk of flood from extreme weather events and/or rising sea levels. Our operations depend on our ability to limit and mitigate interruptions or degradation in service for customers. Interruptions in service or performance problems, for whatever reason, could undermine confidence in our services and cause us to lose customers or make it more difficult to attract new ones.

### Time horizon

Medium-term

### Likelihood

More likely than not

### Magnitude of impact

Medium

### Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

### Potential financial impact figure (currency)

16,300,000

### Potential financial impact figure – minimum (currency)

**Potential financial impact figure – maximum (currency)****Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this risk to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. To illustrate the potential future financial implications of an increased severity and frequency of extreme weather events, we have tracked hurricane associated losses, and the figure of \$16,300,000 is the average combined losses from hurricanes over the past 3 years. In 2017 Hurricanes Maria, Irma and Harvey cost \$22.7 million, with Hurricanes Florence and Michael causes losses of \$26.2 million in 2018. There were no hurricane damage losses in 2019.  $(\$22,700,000 + \$26,200,000 + \$0) / 3 = \$16,300,000$

**Cost of response to risk**

10,300,000

**Description of response and explanation of cost calculation**

Operational management strategy is to undertake a review of sites and establish which are at risk then commence a prioritization process in order to address those locations at high risk. Risk is then managed by investing in network and buildings to protect against flood and other extreme weather events. For example, one building in York (UK) was vacated and assets migrated to another location, in order to reduce exposure to flood risk. Other locations have been upgraded or redesigned to prevent flood damage. A further location at Colorado Springs was protected by working with Federal Agencies by securing funding to prevent the erosion of a creek that could have affected the facility if allowed to continue.

It is also important to note that route diversity is incorporated into the network, meaning the temporary closure of one site during routine maintenance or during an extreme event, does not lead to loss of service.

Regarding the cost of management: The figure provided in 'cost of response to risk' is the element of our Loss Prevention Program that addresses hurricane risk through the inspection of roofs and their enhancement to withstand extreme winds. The cost is comprised of: - \$1,000,000 inspection costs + \$9,300,000 enhancement costs = \$10,300,000 total cost of protection.

**Comment**

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**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Upstream

**Risk type & Primary climate-related risk driver**

Reputation

Increased stakeholder concern or negative stakeholder feedback

**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Company-specific description**

CenturyLink understands that part of its duty as a business partner and a ‘good corporate citizen’ is that of ensuring our customers can rely on the positive reputation of the Company. The risk of breaching such trust by adverse actions in respect of climate change protocols could result in reduced sales opportunities with existing or prospective customers. The relevance of such a risk is demonstrated by the high level of importance attached to the value attached to GHG emissions management by our customers, many of whom request our submission of the CDP’s Supply Chain Questionnaire.

**Time horizon**

Medium-term

**Likelihood**

Very likely

**Magnitude of impact**

Medium-low

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

4,075,985

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this risk to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications.

If CenturyLink fails to meet the expectations of our customers and other stakeholders as it relates to climate change mitigation activities the potential exists for those customers

to reduce their spend with CenturyLink in favour of our competitors who are more closely aligned with their environmental sustainability objectives. To illustrate the potential future financial implications of this risk, we have estimated the impact based on the loss of one customer, using the median annual revenue (2019) of those customers who request that CenturyLink participate in the CDP Supply Chain.

22 customers request our CDP disclosure. Those with revenue ranked in positions 11 and 12 in 2019 procured services worth \$3,594,465 and \$4,557,505, a total of \$8,151,970.  $\$8,151,970 / 2 = \$4,075,985$ .

### **Cost of response to risk**

200,000

### **Description of response and explanation of cost calculation**

Management of the issue is part of the business as usual processes; honesty and Integrity being unifying principles of the Company. No additional management cost is expected. As explained in Risk 1 above, CenturyLink routinely implements projects to enhance energy efficiency, and in Europe sources electricity from renewable sources. We have identified a variety of energy and carbon reduction initiatives that were active in 2019 in our answer to question 4.3b, for example the enhancement cooling systems at US sites. Further projects were under investigation in 2019 and are now being rolled out. One such example, from LATAM, is the 2019 installation of solar panels on some of our POPs.

The cost of management is based upon the cost of reporting our response to climate change and sustainability, in part through the calculation of our carbon footprint and reporting to CDP, as well as other sustainability reports. This is based upon internal hours and the cost of external third-party support. Some associated costs in respect of Environmental and Energy Management Systems (ISO 14001, ISO 50001) are included, the majority however being considered Business as Usual. We have not included the cost of the energy efficiency initiatives as this is considered part of our business-as-usual cost. The cost comprises; \$50,000 internal hours CDP + \$150,000 consultancy hours CDP = \$200,000 total cost

### **Comment**

#### **Identifier**

Risk 4

#### **Where in the value chain does the risk driver occur?**

Upstream

#### **Risk type & Primary climate-related risk driver**

Reputation

Increased stakeholder concern or negative stakeholder feedback

**Primary potential financial impact**

Decreased access to capital

**Company-specific description**

If CenturyLink were not managing risks associated with climate change, nor communicating its performance in this respect, investors could choose not to contribute or reduce the amount they investment in the Company.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

45,037,898

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this risk to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications.

To illustrate the potential future financial implications of increased stakeholder concern were CenturyLink's climate change management to be insufficient, we have estimated a loss in capital should one investor withdraw 5% of their investment. We have used the average stock holding of CenturyLink's top 5 investors, and the stock price current on the day of our 2020 AGM.

Average number of stocks held of top 5 investors = 91,726,880 stocks.  $91,726,880 \times \$9.82 = \$900,757,969.46$ .  $\$900,757,969.46 \times 0.05 = \$45,037,898$

**Cost of response to risk**

200,000

**Description of response and explanation of cost calculation**



Management of the issue is part of the business as usual processes; honesty and Integrity being unifying principles of the Company. As explained in Risk 1 above, CenturyLink routinely implements projects to enhance energy efficiency, and in Europe sources electricity from renewable sources. We have identified a variety of energy and carbon reduction initiatives that were active in 2019 in our answer to question 4.3b, for example the enhancement of cooling systems at US sites. Further projects were under investigation in 2019 and are now being rolled out. One such example, from Latin America, is the 2019 installation of solar panels on some of our POPs.

The cost of management is based upon the cost of reporting our response to climate change and sustainability, in part through the calculation of our carbon footprint and reporting to CDP, as well as other sustainability reports. This is based upon internal hours and the cost of external third-party support. Some associated costs in respect of Environmental and Energy Management Systems (ISO 14001, ISO 50001) are included, the majority however being considered Business as Usual. We have not included the cost of the energy efficiency initiatives as this is considered part of our business-as-usual cost. The cost comprises; \$50,000 internal hours CDP + \$150,000 consultancy hours CDP = \$200,000 total cost

### Comment

## C2.4

**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

## C2.4a

**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.**

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### Identifier

Opp1

### Where in the value chain does the opportunity occur?

Upstream

### Opportunity type

Products and services

### Primary climate-related opportunity driver

Shift in consumer preferences

### Primary potential financial impact

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Increased business – as customers wish to reduce costs, improve efficiency, and reduce the environmental impact of their operations their increased use of telecommunications products to enhance virtualization, and reduce travel and communications cost will be part of that strategy. Customers also increasingly wish to retain within their supply chain business partners with positive credentials in respect of climate-change. CenturyLink’s challenge to meet the opportunity is to A: ensure that we bring to market products which will enable businesses to achieve the aforementioned objective and B: continue to mitigate our impacts on the environment including achieving carbon emissions reduction targets.

**Time horizon**

Short-term

**Likelihood**

Likely

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

22,401,000

**Potential financial impact figure – minimum (currency)****Potential financial impact figure – maximum (currency)****Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this opportunity to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. To illustrate the potential future financial implications on our products and services as a result of a shift in consumer preferences, we have made the following evaluation.

In line with the description above, we consider that businesses are incentivized to adopt telecommunications as a substitute for travel and physical products, and networked services such as Cloud storage where these provide further efficiencies. In this respect we consider that our provision of these services, and our own adoption of low carbon energy sources, could generate additional revenue for the business. The Climate Risk Study for Telecommunications and Data Centre Services Prepared for the General Services Administration by Riverside Technology, Inc and Acclimatise (2014) estimated

the annual growth within the industry to be 1.1%. The \$22,401,000 figure identified above is a conservative estimate, estimated purely for the purposes of this questionnaire, and being approximately 0.1% of our 2019 revenue (\$22,401,000,000), as being attributable wholly to improved reputation of utilizing lower emission products and services thereby affecting environmental climate change.  $\$22,401,000,000 \times 0.1\% = \$22,401,000$  a

### **Cost to realize opportunity**

30,000

### **Strategy to realize opportunity and explanation of cost calculation**

CenturyLink's core business is built around providing telecommunications and networked solutions. We are therefore able to generate business advantage, whilst meeting customers' needs with sustainable solutions; telecommunications and online solutions can reduce their footprint. An example is our service to Info Mart Corporation. Info Mart needed a secure reliable platform to make certain their 300,000 customers would have access to their business applications 24/7/365. A custom private cloud solution proved to be the answer to keep their buyer' and suppliers' connections uninterrupted. Cloud computing data centres require less infrastructure and space compared with on-site servers, because they can optimize servers based on storage requirements. The server utilization enhances energy efficiency directly, but also reduces the demand for energy for ancillary servers such as cooling, thereby reducing an organization's carbon footprint.

Regarding cost, the provision of telecommunications solutions is our core service, therefore the additional cost is small and this represents the additional cost of quantifying the energy efficiency of our products and services. The cost of \$30,000 is that of joining with Information Communication Technology (ICT) consortiums to quantify the environmental impact of ICT services.

### **Comment**

#### **Identifier**

Opp2

#### **Where in the value chain does the opportunity occur?**

Upstream

#### **Opportunity type**

Resilience

#### **Primary climate-related opportunity driver**

Other, please specify

Provision reliable communication during climate-related extreme events

#### **Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Climate changes that increase severe weather events including changes in precipitation extremes and droughts will likely disrupt business travel, transportation of goods, and the provision of services by businesses. As businesses seek to mitigate these impacts on their operations they will increasingly turn to ICT and virtual solutions to avoid the potential disruptive effect of climate change. As a provider of ICT services this change in physical climate parameters provides CenturyLink an opportunity through an increased demand for our network/connectivity services.

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

22,401,000

**Potential financial impact figure – minimum (currency)****Potential financial impact figure – maximum (currency)****Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this opportunity to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. To illustrate the potential future financial implications of our ability to provide ‘resilience’ and the increased use of our telecommunications services, as a result of disruption of travel due to extreme climate change-induced weather events, we have used a 0.1% increase in revenue. The \$22,401,000 figure identified above is approximately 0.1% of the 2019 revenue of \$22,401,000,000.

$\$22,401,000,000 \times 0.1\% = \$22,401,000$

**Cost to realize opportunity**

200,000

### Strategy to realize opportunity and explanation of cost calculation

The provision of CenturyLink's core service itself can be viewed as the 'management method', since greater uptake of this service will occur during disruption of transportation or displacement of households due to physical change brought about by climate change. For example, research indicates that use of social media spikes during natural disasters which could increase in frequency and severity due to climate change. For example, 75% of New Orleans residents responding to one survey visited online sites specific to their neighbourhoods after Hurricane Katrina. For the American public, mainstream media sites dominated, with 73% of online Hurricane Katrina news consumers turning to websites of major news organizations. One survey revealed that almost 50% of respondents communicated with those that they had not been in contact with for more than a year. The Internet was an important outlet for relief donations with 13 million Americans (9% of Internet users) going online to donate. (Source: Fraustino, Julia Daisy, Brooke Liu and Yan Jin. "Social Media Use during Disasters: A Review of the Knowledge Base and Gaps," Final Report to Human Factors/Behavioral Sciences Division, Science and Technology Directorate, US DHS. College Park, MD: START, 2012

The cost of \$200,000 represents the cost of ensuring business continuity plans are updated and tested. \$100,000 to test plans + \$100,000 to update plans = \$200,000 total cost.

### Comment

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#### Identifier

Opp3

#### Where in the value chain does the opportunity occur?

Upstream

#### Opportunity type

Products and services

#### Primary climate-related opportunity driver

Shift in consumer preferences

#### Primary potential financial impact

Increased revenues resulting from increased demand for products and services

#### Company-specific description

It is believed that CenturyLink may benefit directly from changing customer preferences in response to the stance we are taking on climate-related issues. Our business customers already demonstrate a high level of awareness, and request information on our management and reduction of carbon emissions. We engage in several voluntary and customer driven reporting initiatives, including CDP, many of which are publicly

available, and serve to demonstrate our good corporate citizenship in this respect. Since performance regarding climate change mitigation is often requested in the procurement process and monitored by existing customers, we anticipate we will see revenue increase to some degree, as a result, both through the expansion of existing contracts and new business.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-low

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

4,075,985

**Potential financial impact figure – minimum (currency)****Potential financial impact figure – maximum (currency)****Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this opportunity to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. To illustrate the potential future financial implications attributable to a shift in consumer preferences, we have made the following evaluation.

The estimated increase of \$4,075,985 is the annual median revenue received from those customers who request our CDP disclosure, being a representative sample of those who attach a high degree of importance to our management of these issues. 22 customers request our CDP disclosure. Those with revenue ranked in positions 11 and 12 in 2019 procured services worth \$3,594,465 and \$4,557,505, a total of \$8,151,970.  $\$8,151,970 / 2 = \$4,075,985$ .

**Cost to realize opportunity**

200,000

**Strategy to realize opportunity and explanation of cost calculation**

Management of the issue is part of the business as usual processes; honesty and Integrity being part of the unifying principles of the Company. No additional management cost for energy efficiency is expected. As explained in Risk 1 above, CenturyLink routinely implements projects to enhance energy efficiency, and in Europe sources electricity from renewable sources. We have identified a variety of energy and carbon reduction initiatives that were active in 2018 in our answer to question 4.3b, for example the enhancement cooling systems at US sites. Further projects were under investigation in 2018 and are now being rolled out. One such example, from Latin America, is the installation of solar panels on many of our POPs.

The cost of management is based upon the cost of reporting our response to climate change, in part through the calculation of our carbon footprint and reporting to CDP, as well as other reports. This is based upon internal hours and the cost of external third party support. We have not included the cost of the energy efficiency as this is considered part of our business-as-usual cost. However, we have included the cost of some of our energy efficiency and carbon reduction projects in our answer to question 4.3b. Included also are elements relating to the cost of our energy management system registration (ISO50001). The cost comprises; \$50,000 internal hours CDP + \$150,000 consultancy hours CDP = \$200,000 total cost.

## Comment

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### Identifier

Opp4

### Where in the value chain does the opportunity occur?

Upstream

### Opportunity type

Markets

### Primary climate-related opportunity driver

Access to new markets

### Primary potential financial impact

Increased access to capital

### Company-specific description

By being a sustainable business and addressing climate change, and communicating its performance in this respect, CenturyLink could attract investment from companies that favour such performance. This could extend to both those that positively select on sustainability criteria, as well as avoiding potential deselection from funds that filter out unsustainable businesses. In 2019 CenturyLink was ranked 43rd among Barron's Top 100 Sustainable Companies, of which environmental policies are a ranking criterion.

### Time horizon

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

45,037,898

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact figure**

While it is difficult to accurately quantify potential financial implications, and as applicable – costs of responding to the risk or realizing the opportunity, we estimate the potential future impact of this opportunity to be more than our threshold for “substantive” for CDP reporting purposes. Estimates are based on several factors including: professional judgement by our subject matter experts within the business, guidelines or requirements provided by governmental agencies, and non-profit publications. To illustrate the potential future financial implications arising from accessing increased capital, due to being a sustainable business and addressing climate change, we have made the following evaluation.

The financial impact is based upon the estimated additional capital should one investor increase their investment by 5%. We have used the average stock holding of CenturyLink's top 5 investors, and the stock price current on the day of our 2020 AGM. Average number of stocks held of top 5 investors = 91,726,880 stocks.  $91,726,880 \times \$9.82 = \$900,757,969.46$ .  $\$900,757,969.46 \times 0.05 = \$45,037,898$

**Cost to realize opportunity**

200,000

**Strategy to realize opportunity and explanation of cost calculation**

CenturyLink recognises the importance of responsible Corporate Social Governance and of the particular need to extend this to environmental issues such as climate change. CenturyLink has set emissions reduction targets approved by the science-based targets Initiative and has implemented a number of measures toward achieving these. We support the implementation of energy management systems certified to ISO 50001, have programs of energy efficiency improvements across our portfolio, and but renewable energy in several of the regions in which we operate.

The cost of management is based upon the cost of reporting our response to climate



change and sustainability, in part through the calculation of our carbon footprint and reporting to CDP, as well as other sustainability reports. This is based upon internal hours and the cost of external third-party support. Some associated costs in respect of Environmental and Energy Management Systems (ISO 14001, ISO 50001) are included, the majority however being considered Business as Usual. We have not included the cost of the energy efficiency initiatives as this is considered part of our business-as-usual cost. However, we have included the cost of some of our energy efficiency and carbon reduction projects in our answer to question 4.3b. The cost comprises; \$50,000 internal hours CDP + \$150,000 consultancy hours CDP = \$200,000 total cost.

### Comment

## C3. Business Strategy

### C3.1

**(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?**

Yes

### C3.1a

**(C3.1a) Does your organization use climate-related scenario analysis to inform its strategy?**

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

### C3.1c

**(C3.1c) Why does your organization not use climate-related scenario analysis to inform its strategy?**

CenturyLink has a corporate contingency planning process that extends to specific risks arising from climate change. This process manages the risks we have identified in the short and medium time frames, and therefore we have not yet implemented a Scenario Analysis process to inform our business strategy.

However, we recognize that climate change will bring about a range of physical and transitional risks to our business, and that as time progresses these will be of heightened impact. For example, our 10-K Annual Report acknowledges that extreme weather can disrupt our operations, and that such events are predicted to increase in the future. We therefore anticipate the implementation of a Scenario Analysis process in the next 2 years. To date, the Environmental Sustainability & Compliance Team have investigated Scenario Analysis and have discussed options for its implementation within CenturyLink with partner organizations. We would anticipate that such a process would supplement and inform our existing contingency planning processes and would be developed and implemented with the oversight of both the

Environmental Sustainability & Compliance Team and the Business Continuity Planning Team, and also other interested parties within CenturyLink. Therefore, the risks identified by the various modelled climate scenarios would inform and integrate with processes already existing within the business.

Our current processes are explained more fully elsewhere in sections 1, 2 and 3 of this CDP disclosure. These are developed to account for specific risks, including flooding, hurricanes, wildfires and other extreme weather resulting in the potential for loss of facilities, suppliers, and employees. Our prime objective is the protection of services to ensure that critical national infrastructures are protected during such events, and extensive plans are in place to ensure that our services to governmental (and commercial) customers are maintained. The Business Continuity Planning Team and the business continuity process identifies key risks that could impact the business and requires teams across the business to identify continuity plans for their areas. Other processes include the review of major risks by the Board level Risk and Security Committee, and the identification, monitoring, planning and response to risk events, as supported by our Risk Management Team and Environmental Sustainability Committee.

### C3.1d

**(C3.1d) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	CenturyLink's strategy of Operational Excellence is focused on customers as well as investors and employees. Our customer focused objectives can only be fully realized if we provide an uninterrupted, reliable service. Climate change risk has influenced our customer service provision at various levels, and in the short term. For example, our Business Continuity Planning Teams recognize the risk of service interruption from extreme weather events associated with climate change, and the Enterprise Risk Management team ("ERM") reports this and similar risk management issues to the Board of Director's Risk and Security Committee in ERM's quarterly briefings. As a result there is a high level recognition of the need to protect our locations from events such as river floods, and heightened erosion due to extreme rainfall, as in the example of the re-location of the York office, and protection of the Colorado Springs office, as provided in our answer to 2.2a.
Supply chain and/or value chain	Yes	CenturyLink monitors risks associated with its supply chain including those arising from climate change. In response to an increase in carbon taxes and legislation a strategy was

		<p>adopted in EMEA whereby we have switched our procurement of electricity to renewable-sourced supplies in countries with significant presence. This is a short-term strategy change in the sense that it is operational, but procurement is also planned on an ongoing basis.</p> <p>In other markets we have anticipated the potential introduction of carbon taxes and legislation. For example, we have anticipated a potential increase in energy costs in Colorado due to the forthcoming Renewable Energy Standard (RES) requiring utilities to generate 30% of their electricity from renewable sources. Our strategic response has been to authorize programs supporting energy efficiency improvements across much of our property portfolio, thus reducing our consumption with immediate effect, in response to this short-term transitional risk.</p>
Investment in R&D	Yes	<p>Climate related risks and opportunities have prompted a strategic approach to our investment in R&amp;D. By the nature of the business/industry, CenturyLink is continually investing to optimize our products and services. By boosting efficiency of our products and services and decreasing energy consumption, CenturyLink can become more resilient to climate change, and enhance its reputation for good corporate governance.</p> <p>One short term example is CenturyLink’s strategic participation in 2019 in the Voluntary Agreement for Ongoing Improvement to Energy Efficiency of Small Network Equipment. This includes items such as modems and routers used by consumers, with the primary objective being to increase energy efficiency while promoting rapid innovation and timely introduction of new features. At least 90 percent of small equipment procured must meet the energy efficiency standards established by the agreement.</p>
Operations	Yes	<p>A major short and medium-term response to climate-related risks and opportunities has been a high level decision to support a wide range of energy efficiency and emissions reduction programmes that alleviate the transitional risks associated with carbon taxes and regulations, reduce our impact, and also realize the opportunities associated with a high level of performance as expected by our customers.</p> <p>Examples include our adoption of a global science-based emissions reduction target, certification to the ISO 50001 Energy Management Systems standard at some facilities, and procurement of renewables in EMEA, investment in solar panel projects in Brazil, and in the USA and EMEA</p>

		significant investment in energy efficiency in buildings and processes.
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### C3.1e

**(C3.1e) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Direct costs	CenturyLink recognizes that in the short and medium term the business may be faced by additional costs associated with the introduction of new carbon taxes, in particular within the USA. As explained above, part of our response is to enhance the energy efficiency of our processes and buildings to minimize exposure to such taxes should they be introduced, with project lifetimes spanning the short, medium and (early) long term time horizons. The business has therefore pursued a strategy of authorizing major improvement programs aimed at energy and emissions reduction, with \$18,120,000 being invested at US facilities in 2019. A decision was taken to seek utility incentives to support these projects, enabling its expansion. For example, in 2019 several locations collectively received \$350,000 in utility incentives to help offset capital costs. One location benefiting from this is a Boston, MA facility which received \$46,800 of incentive, supporting the installation of energy efficient drives.

### C3.1f

**(C3.1f) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).**

## C4. Targets and performance

### C4.1

**(C4.1) Did you have an emissions target that was active in the reporting year?**

Absolute target

### C4.1a

**(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.**

---

**Target reference number**

Abs 1

**Year target was set**

2019

**Target coverage**

Company-wide

**Scope(s) (or Scope 3 category)**

Scope 1+2 (market-based)

**Base year**

2018

**Covered emissions in base year (metric tons CO<sub>2</sub>e)**

2,325,303.65

**Covered emissions in base year as % of total base year emissions in selected Scope(s) (or Scope 3 category)**

100

**Target year**

2025

**Targeted reduction from base year (%)**

18

**Covered emissions in target year (metric tons CO<sub>2</sub>e) [auto-calculated]**

1,906,748.993

**Covered emissions in reporting year (metric tons CO<sub>2</sub>e)**

2,139,851.1

**% of target achieved [auto-calculated]**

44.3078453192

**Target status in reporting year**

Underway

**Is this a science-based target?**

Yes, this target has been approved as science-based by the Science-Based Targets initiative

**Please explain (including target coverage)**

This is a Company-wide science-based target and covers all Scope 1 & Scope 2 emissions. We have re-baselined the 2018 data as we have reclassified some categories. For example, we are now classifying emissions related to equipment at third-party co-location facilities as Scope 2 whereas in 2018 these had been classed as Scope 3 and were therefore excluded from the base year data at this time.

---

**Target reference number**

Abs 2

**Year target was set**

2019

**Target coverage**

Company-wide

**Scope(s) (or Scope 3 category)**

Scope 3 (upstream)

**Base year**

2018

**Covered emissions in base year (metric tons CO<sub>2</sub>e)**

1,776,301.92

**Covered emissions in base year as % of total base year emissions in selected Scope(s) (or Scope 3 category)**

100

**Target year**

2025

**Targeted reduction from base year (%)**

10

**Covered emissions in target year (metric tons CO<sub>2</sub>e) [auto-calculated]**

1,598,671.728

**Covered emissions in reporting year (metric tons CO<sub>2</sub>e)**

1,520,888.59

**% of target achieved [auto-calculated]**

143.7893677444

**Target status in reporting year**

Achieved

**Is this a science-based target?**

Yes, this target has been approved as science-based by the Science-Based Targets initiative

**Please explain (including target coverage)**

This target covers all upstream Scope 3 categories. The base year emissions have undergone re-baselining and therefore differ from those submitted in our 2019 CDP disclosure. This target is now achieved and ahead of schedule.

## C4.2

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

No other climate-related targets

## C4.3

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

### C4.3a

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO<sub>2</sub>e savings.**

	Number of initiatives	Total estimated annual CO <sub>2</sub> e savings in metric tonnes CO <sub>2</sub> e (only for rows marked *)
Under investigation	308	
To be implemented*	1	0.08
Implementation commenced*	14	418.98
Implemented*	296	73,109.44
Not to be implemented	44	

### C4.3b

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

---

**Initiative category & Initiative type**

Energy efficiency in buildings  
Building Energy Management Systems (BEMS)

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

9,572

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1,286,154

**Investment required (unit currency – as specified in C0.4)**

4,180,000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This comprises 55 energy efficiency projects in th USA at which Building Management systems were installed or enhanced.

---

**Initiative category & Initiative type**

Energy efficiency in buildings

Lighting

**Estimated annual CO2e savings (metric tonnes CO2e)**

6,897

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

926,708

**Investment required (unit currency – as specified in C0.4)**

3,730,000

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This comprises 30 projects in the USA enhancing the energy efficiency of lighting at our facilities.

---

**Initiative category & Initiative type**

Energy efficiency in buildings

Heating, Ventilation and Air Conditioning (HVAC)



**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

9,099

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1,222,581

**Investment required (unit currency – as specified in C0.4)**

3,790,000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This comprises 20 projects in the USA enhancing the energy efficiency of air conditioning and air handling units.

---

**Initiative category & Initiative type**

Energy efficiency in buildings

Other, please specify

Airflow Management

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

453

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

60,914

**Investment required (unit currency – as specified in C0.4)**

120,000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

3-5 years

**Comment**

This comprises 10 projects in the USA improving the airflow around telecommunications equipment and thereby enhancing the efficiency of cooling and associated energy inputs.

---

**Initiative category & Initiative type**

Energy efficiency in production processes  
Process optimization

**Estimated annual CO2e savings (metric tonnes CO2e)**

8,433

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1,133,202

**Investment required (unit currency – as specified in C0.4)**

1,000,000

**Payback period**

<1 year

**Estimated lifetime of the initiative**

3-5 years

**Comment**

This comprises projects enhancing the energy efficiency of 29 switch rooms in the USA (29 projects).

---

**Initiative category & Initiative type**

Company policy or behavioral change  
Site consolidation/closure

**Estimated annual CO2e savings (metric tonnes CO2e)**

10,801

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1,451,330

**Investment required (unit currency – as specified in C0.4)**

1,800,000

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

>30 years

**Comment**

35 non-technical / administrative sites in the USA were vacated, with functions consolidated at other properties, thereby reducing energy consumption.

---

**Initiative category & Initiative type**

Company policy or behavioral change  
Site consolidation/closure

**Estimated annual CO2e savings (metric tonnes CO2e)**

27,478

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

3,692,196

**Investment required (unit currency – as specified in C0.4)**

3,500,000

**Payback period**

<1 year

**Estimated lifetime of the initiative**

>30 years

**Comment**

85 technical sites in the USA were vacated, with functions consolidated at other properties, thereby reducing energy consumption.

---

**Initiative category & Initiative type**

Energy efficiency in buildings  
Heating, Ventilation and Air Conditioning (HVAC)

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

359.72

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

291,898

**Investment required (unit currency – as specified in C0.4)**

2,154,250

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This comprises projects at 26 locations (16 in the UK, 5 in Spain, 3 in Germany and 2 in The Netherlands) involving the replacement of air conditioning, chiller and direct expansion (DX) air conditioning systems with more efficient alternatives.

---

**Initiative category & Initiative type**

Energy efficiency in production processes  
Process optimization

**Estimated annual CO<sub>2</sub>e savings (metric tonnes CO<sub>2</sub>e)**

16.72

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

13,065

**Investment required (unit currency – as specified in C0.4)**

174,500

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

This comprises projects at 6 locations (3 in the UK, 1 in Spain, 1 in Italy and 1 in Switzerland) comprising power factor correction and upgrading rectifiers. This is classified as process optimization as it enhances the efficiency at which our processes are utilizing electricity.

**C4.3c**

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Dedicated budget for energy efficiency	Reduction of energy usage is a top priority to meet budget goals. Potential improvements are assessed by our Energy Management teams who develop a cost benefit analysis for approval.
Dedicated budget for other emissions reduction activities	The procurement of zero carbon renewable-sourced electricity is used to reduce emissions of CO2e throughout locations in Europe. We procure renewable electricity for most of our consumption in the following countries: - UK, France, Germany, Spain, Italy, The Netherlands and Belgium.
Employee engagement	Through our Corporate Social Responsibility program we seek to engage our employees in a variety of "Cause" areas including environmental sustainability. Employees are encouraged and provided with resources through a variety of communication platforms to enact numerous small-scale actions to promote energy efficiency, cost savings and carbon reduction. One example, in the USA is the provision of free-to-operate charging stations for electric and plug-in hybrid vehicles used by employees. In the UK, there is an incentive for car sharing and cycle-to-work schemes.

**C4.5**

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?**

Yes

**C4.5a**

**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.**

**Level of aggregation**

Company-wide

**Description of product/Group of products**

Our business-to-business telecommunications services enable businesses of all kinds to replace business travel with the use of telecommunications, thus reducing emissions of

CO<sub>2</sub>e. We have provided an example in the 'Comments' box below.

FTSE Russell launched the first global model of companies whose goods, products and services are driving the industrial transition to a Green Economy. This model provides the data for index families such as FTSE Green Revenues. The FTSE Green Revenues has classified CenturyLink's products / services related to its Cloud Hosting services and Video Conferencing services to meet their criteria to drive the transition to a Green Economy.

**Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Evaluating the carbon-reducing impacts of ICT

**% revenue from low carbon product(s) in the reporting year**

69

**Comment**

An example of how we have evaluated the carbon reduction impacts of using ICT is provided below.

For example, (using 2012 DEFRA emission factors) a hypothetical company with 20 office workers and 20 maintenance engineers (primary drivers), may have vehicle (car and van) emissions of 145 tonnes CO<sub>2</sub>e/pa in 2012. (2800 litres of gasoline at 2012 DEFRA emission factor of 2.2423 kg CO<sub>2</sub>e/litre AND 53500 litres diesel at 2.584 kg CO<sub>2</sub>e/litre). By reducing mileage and fuel use by 10% through increased use of telecommunications, emissions would be reduced by 14.5 tonnes pa. Such an example is transferable to other companies but would vary according to the nature of their business. CenturyLink is not planning to originate any credits for this.

FTSE Russell launched the first global model of companies whose goods, products and services are driving the industrial transition to a Green Economy. This model provides the data for index families such as FTSE Green Revenues. The FTSE Green Revenues has classified CenturyLink's products / services related to its Cloud Hosting services and Video Conferencing services to meet their criteria to drive the transition to a Green Economy.

## C5. Emissions methodology

### C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

#### Scope 1

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

277,725.23

**Comment**

These are our re-baselined emissions and correspond to those re-stated in question 6.1

#### Scope 2 (location-based)

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

2,105,876.15

**Comment**

These are our re-baselined emissions and correspond to those re-stated in question 6.3

#### Scope 2 (market-based)

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

2,047,578.42

**Comment**

These are our re-baselined emissions and correspond to those re-stated in question 6.3

## C5.2

**(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

## C6. Emissions data

### C6.1

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO<sub>2</sub>e?**

#### Reporting year

---

**Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)**

263,918.29

**Start date**

January 1, 2019

**End date**

December 31, 2019

**Comment**

#### Past year 1

---

**Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)**

277,725.23

**Start date**

January 1, 2018

**End date**

December 31, 2018

**Comment**

This is a restatement. We have included additional countries and made some other minor changes, and have therefore re-baselined.

### C6.2

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

#### Row 1

---

Scope 2, location-based



We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

**C6.3**

**(C6.3) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

---

**Scope 2, location-based**

1,951,337.18

**Scope 2, market-based (if applicable)**

1,875,932.81

**Start date**

January 1, 2019

**End date**

December 31, 2019

**Comment**

**Past year 1**

---

**Scope 2, location-based**

2,105,876.15

**Scope 2, market-based (if applicable)**

2,047,578.42

**Start date**

January 1, 2018

**End date**

December 31, 2018

**Comment**

We are restating our Scope 2 location-basis and Scope 2 market-basis emissions for the calendar year 2018. This is because we have reclassified third-party co-locations as Scope 2 whereas we previously classified them as Scope 3. We have also included additional countries in this year's response, although their contribution to total Scope 2 emissions is insignificant.

## C6.4

**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

No

## C6.5

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

### Purchased goods and services

---

#### Evaluation status

Relevant, calculated

#### Metric tonnes CO<sub>2</sub>e

708,217.51

#### Emissions calculation methodology

Company spend on purchased goods and services is aggregated by functional category and then multiplied by sectoral cradle to gate emission factors provided by UK DEFRA, "Table 13 – Indirect emissions from the supply chain," March 2014. Specifically, emissions totals include purchased telecommunications services (354,401.20 tCO<sub>2</sub>e), legal services (305,433.76 tCO<sub>2</sub>e), advertising services (17,183.82 tCO<sub>2</sub>e), printing / publishing services (1,217.95 tCO<sub>2</sub>e), other administrative, office and business support services (477.19 tCO<sub>2</sub>e), and other services (29,503.59 tCO<sub>2</sub>e). Global warming potentials (GWP) are from the IPCC Second Assessment, 100 year average.

#### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

#### Please explain

### Capital goods

---

#### Evaluation status

Relevant, calculated

#### Metric tonnes CO<sub>2</sub>e

380,486.38

#### Emissions calculation methodology

Company spend on purchased capital goods is aggregated by functional category and then multiplied by sectoral cradle to gate emission factors provided by UK DEFRA, "Table 13 – Indirect emissions from the supply chain," March 2014. specifically,

emissions totals include purchased construction related (176,788.73 tCO<sub>2</sub>e), and office machinery / computer related (203,697.65 tCO<sub>2</sub>e) capital goods. Global warming potentials (GWP) are from the IPCC Second Assessment, 100 year average.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

378,205.12

**Emissions calculation methodology**

These comprise electricity transmission and distribution losses (108,938.81 tonnes), electricity well-to-tank emissions from generation (190,886.31 t), electricity well-to-tank emissions from transmission & distribution (11,326.34 t), natural gas well-to-tank emissions (7,367.92 t), heat & steam WTT losses, distribution losses & WTT distribution losses (2,246.03 t), chilled water WTT and T&D (5,353.48 t), emergency generators & other minor uses of fuels WTT (14,264.25t), air travel WTT (3,032.09 t), and road fuels WTT including in company cars, employee cars & commuting (34,789.89t).

Electricity, gas and heat/steam kWhs are obtained from invoices. Air travel is obtained from purchasing records and distance calculated from software, road vehicle fuel consumption is calculated from purchasing invoices or expenses claims, and emergency generator and other fuel use is from invoices.

Activity data is then multiplied by the relevant upstream emission factors for the activities included in this category. Emission factors for upstream emissions of purchased fuels are based on life-cycle analysis software. Emission factors for upstream emissions of purchased electricity are based on life-cycle analysis software for the U.S., and on U.K. Defra Guidelines for other countries. Emission factors for transmission and distribution losses are location-based and taken from EPA's eGRID database for the U.S., and on U.K. Defra Guidelines for other countries. GWPs are IPCC Fourth Assessment Report (AR4 - 100 year). For example, 1,297,390 kWhs of UK natural gas consumption multiplied by the Defra WTT emission factor of 0.02391 kg CO<sub>2</sub>e/kWh gives 31.02 tonnes CO<sub>2</sub>e WTT in the UK.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain****Upstream transportation and distribution**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO2e**

6,951.07

**Emissions calculation methodology**

Company spend on purchased upstream transportation services is obtained for our partnership in the US EPA SmartWay program. Spend data is aggregated by functional category and then multiplied by sectoral cradle to gate emission factors provided by UK DEFRA, "Table 13 – Indirect emissions from the supply chain," March 2014. Specifically, total emissions for road transport related services (6,951.07 tCO<sub>2</sub>e) via US EPA SmartWay carriers are included. Global warming potentials (GWP) are from the IPCC Second Assessment, 100-year average.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain****Waste generated in operations**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO2e**

18,840.84

**Emissions calculation methodology**

The waste figure represents emissions from waste disposed via landfilling (18,407.04 tCO<sub>2</sub>e) and recycling (433.80 tCO<sub>2</sub>e). Data on waste quantity, composition, and disposal method are obtained from our facilities management operations. Emissions from waste are calculated using methodologies and emission factors from the EPA's Office of Resource Conservation and Recovery. Emissions calculations are based on a lifecycle analysis, including emissions from the long-term decomposition of waste in a landfill or from upstream sources/sinks. Global warming potentials (GWP) are from the IPCC Fourth Assessment Report, 100-year average.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain****Business travel**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO2e**

17,945.02

**Emissions calculation methodology**

This comprises travel in employee owned vehicles and short term rental cars (3,078.98 tonnes CO2e) and air travel in commercial aircraft (14,866.04t). Car travel is calculated from expenses claims or other internal records which show either distance traveled or fuel consumption. Air travel is calculated using the booking agents' data including distances, or calculating these using software. The distance is then multiplied by the appropriate emissions factor to quantify emissions. Emissions were calculated using emission factors and methodologies from the Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting and EPA Emission Factors for Greenhouse Gas Inventories. GWPs are IPCC Fourth Assessment Report (AR4 - 100 year). For example, in Argentina records show company cars consumed 1060 litres of diesel. This was multiplied by the DEFRA conversion factor (diesel average biofuel blend) of 2.59411 kg CO2e/litre, giving 2.75 tonnes CO2e from this category in Argentina.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain****Employee commuting**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO2e**

10,242.65

**Emissions calculation methodology**

Fuel consumption, commuting distances and modes of travel were based on survey results from our employee operations in Latin America. Total emissions by fuel type and mode of transportation were calculated using emission factors and methodologies from the US EPA Emission Factors for Greenhouse Gas Inventories. Total emissions from employee commuting were extrapolated to CenturyLink employees to determine the comprehensive global total of 10,242.65 t CO2e. Global Warming Potentials (GWP) are from the IPCC Fourth Assessment Report (AR4 – 100 year).

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

5

**Please explain**

**Upstream leased assets**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

CenturyLink follows the Operational Control approach and because it has control of its leased buildings and equipment at 3rd party co-location facilities these emissions are included in the Scope 1 and Scope 2 totals.

**Downstream transportation and distribution**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

CenturyLink includes the emissions from 'downstream transportation and distribution' within its 'purchased goods & services' Scope 3 category, as reported above. Therefore, these comprise a proportion of the 708,217.51 tonnes reported in that category.

**Processing of sold products**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

At present CenturyLink does not sell any intermediate products for processing by downstream companies. Therefore, this category represents 0 tonnes CO<sub>2</sub>e of the Scope 3 total of 1,793,925.58 tonnes CO<sub>2</sub>e

**Use of sold products**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

271,897.99

**Emissions calculation methodology**

This category includes emissions wholly associated with customer use of modems (271,897.99 tCO<sub>2</sub>e) sold by CenturyLink in the reporting year. Activity data are based on nameplate equipment power ratings and units sold by equipment type. Total annual electricity consumption is quantified using estimated customer use time and equipment utilization. US average eGRID location-based emissions factors were used to calculate the emissions total. GWPs are IPCC Fourth Assessment Report, 100-year average.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**End of life treatment of sold products**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

893.81

**Emissions calculation methodology**

This category wholly comprises emissions associated with customer disposal of modems 893.81 tCO<sub>2</sub>e sold by CenturyLink in the reporting year. Activity data are based on the total mass and composition of product units sold. Emissions from waste disposed by landfilling were calculated using emission factors from the EPA's Office of Resource Conservation and Recovery. GWPs are IPCC Fourth Assessment Report, 100-year average.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Downstream leased assets**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

245.19

**Emissions calculation methodology**

This category is largely not applicable however there is an exception in the UK where CenturyLink leases equipment and space to a customer. The agreement between CenturyLink and its customer shows 959,262.46 kWhs of electricity attributed to the

customer which, at a DEFRA electricity emission factor of 0.25560 kg CO<sub>2</sub>e/kWh gives 245.19 tonnes CO<sub>2</sub>e, comprising all Scope 3 emissions in this category.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Franchises**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

At present CenturyLink does not have franchise operations. Therefore, this category represents 0 tonnes CO<sub>2</sub>e of the Scope 3 total of 1,793,925.58 tonnes CO<sub>2</sub>e.

**Investments**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

CenturyLink's balance sheet value of investments is low compared to its total market capitalization. This category will become relevant if CTL owns stock or other ownership in a company exceeding a reasonable significant threshold. Therefore, at present this category is not relevant and does not contribute towards the Scope 3 total 1,793,925.58 tonnes CO<sub>2</sub>e.

**Other (upstream)**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

There are no other relevant upstream scope 3 emissions. Therefore, this category does not contribute to the calculated Scope 3 carbon footprint of 1,793,925.58 tonnes CO<sub>2</sub>e.

**Other (downstream)**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

There are no other relevant downstream scope 3 emissions. Therefore, this category does not contribute to the calculated Scope 3 carbon footprint of 1,793,925.58 tonnes CO<sub>2</sub>e.



## C6.7

**(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?**

Yes

## C6.7a

**(C6.7a) Provide the emissions from biogenic carbon relevant to your organization in metric tons CO2.**

	CO2 emissions from biogenic carbon (metric tons CO2)	Comment
Row 1	5,120.04	These comprise emissions from the combustion of the biofuel portion of fuels.

## C6.10

**(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Intensity figure**

0.00009889

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

2,215,255.47

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

22,401,000,000

**Scope 2 figure used**

Location-based

**% change from previous year**

2.74

**Direction of change**

Decreased

**Reason for change**

The 2.74% decrease in tonnes CO2e per unit revenue compared to 2018 is due to a decline in absolute emissions. In the period, Scope 1 & 2 emissions (location-based)

emissions declined by 168,345.92 tonnes CO<sub>2</sub>e. In the same period revenue fell by \$1,042,000,000, nevertheless the decline in absolute emissions was sufficient to reduce the emissions intensity.

The reduction in emissions is due in part to CenturyLink's emissions reduction projects as described in our answer to question 4.3b. These accounted for a reduction of 73,109.44 t CO<sub>2</sub>e, and therefore account for a significant proportion (43.43%) of the overall absolute decline in GHG emissions. A reduction in the number of staff is also likely to be a contributing factor, as is the change in the carbon intensity of electricity production in some of the countries in which we operate.

**Intensity figure**

52.12

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO<sub>2</sub>e)**

2,215,255.47

**Metric denominator**

full time equivalent (FTE) employee

**Metric denominator: Unit total**

42,500

**Scope 2 figure used**

Location-based

**% change from previous year**

1.6

**Direction of change**

Decreased

**Reason for change**

The 1.60% decrease in tonnes CO<sub>2</sub>e per Full Time Employee (FTE) compared to 2018 is due to a decline in absolute emissions. In the period, Scope 1 & 2 emissions (location-based) emissions declined by 168,345.92 tonnes CO<sub>2</sub>e. In the same period the number of FTEs fell from 45,000 to 42,500, nevertheless the decline in absolute emissions was sufficient to reduce the emissions intensity.

The reduction in emissions is due in part to CenturyLink's emissions reduction projects as described in our answer to question 4.3b. These accounted for a reduction of 73,109.44 t CO<sub>2</sub>e, and therefore represent a significant proportion (43.43%) of the overall absolute decline in GHG emissions. A change in the carbon intensity of electricity production in some of the countries in which we operate is also a contributing factor.

## C7. Emissions breakdowns

### C7.1

**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

No

### C7.2

**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO <sub>2</sub> e)
United States of America	258,513.33
Canada	237.34
United Kingdom of Great Britain and Northern Ireland	1,557.93
France	128.54
Germany	221.19
Spain	23.6
Italy	22.83
Netherlands	255.9
Belgium	73.17
Sweden	45.01
Argentina	262.75
Brazil	1,226.1
Colombia	139.66
Chile	454.69
Costa Rica	0
Ecuador	26.21
Mexico	21.16
Panama	101.76
Peru	305.83
Venezuela (Bolivarian Republic of)	213.54
Singapore	0
China, Hong Kong Special Administrative Region	0
Japan	0
Ireland	4.17
United Arab Emirates	0

Austria	0
Poland	11.06
Bulgaria	0
Greece	0
Switzerland	11.29
Luxembourg	0
Norway	10.04
Denmark	11.19
Russian Federation	0
Turkey	0
Czechia	0
Estonia	0
Finland	0
Hungary	0
Israel	0
Iceland	0
Monaco	0
Portugal	0
Romania	0
Serbia	0
Slovenia	0
South Africa	0
Slovakia	0
India	0
Australia	0
China	0
Republic of Korea	0
Taiwan, Greater China	0
Thailand	0

### C7.3

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

- By business division
- By facility
- By activity

## C7.3a

**(C7.3a) Break down your total gross global Scope 1 emissions by business division.**

Business division	Scope 1 emissions (metric ton CO <sub>2</sub> e)
North American Business division	258,750.67
Global Accounts Management (EMEA, LATAM, APAC)	5,167.62

## C7.3b

**(C7.3b) Break down your total gross global Scope 1 emissions by business facility.**

Facility	Scope 1 emissions (metric tons CO <sub>2</sub> e)	Latitude	Longitude
As many of our technical locations form part of the critical national infrastructure, due to security considerations we are unable to disclose locations (including grid references) or therefore report on associated emissions. An example is provided of a facility in Wokingham UK, which comprises emissions from natural gas consumption.	136.53	51.4373	-0.88468

## C7.3c

**(C7.3c) Break down your total gross global Scope 1 emissions by business activity.**

Activity	Scope 1 emissions (metric tons CO <sub>2</sub> e)
Heating of administrative and technical buildings (natural gas combustion for space heating).	36,053.79
Travel, comprising use of company cars (141,925.30 tCO <sub>2</sub> e) and company jets (3,762.81 tCO <sub>2</sub> e)	138,363.8
Maintenance of technical buildings - testing of back-up generators	68,304.42
Other fuel consumption used in maintenance of network, including use of portable generators and forklift trucks.	257.48
Cooling of technical and administrative buildings (fugitive refrigerant emissions)	20,938.79

## C7.5

**(C7.5) Break down your total gross global Scope 2 emissions by country/region.**

Country/Region	Scope 2, location-based (metric tons CO <sub>2</sub> e)	Scope 2, market-based (metric tons CO <sub>2</sub> e)	Purchased and consumed electricity, heat,	Purchased and consumed low-carbon electricity, heat, steam or
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			steam or cooling (MWh)	cooling accounted for in Scope 2 market- based approach (MWh)
United States of America	1,780,148.78	1,765,974.25	4,020,737.91	42,541.82
Canada	3,435.13	3,340.07	34,268.07	731.22
United Kingdom of Great Britain and Northern Ireland	29,925.21	12,128.09	117,140.29	85,197.74
France	1,095.62	338.42	18,683.81	12,799.58
Germany	29,764.71	3,656.18	63,084.89	58,067.42
Spain	1,751.65	1,782.57	6,059.39	2,106.12
Italy	1,071.27	615.09	2,684.95	1,591.47
Netherlands	14,207.68	1,643.79	35,612.67	32,718.93
Belgium	1,609	252.66	8,494.78	7,158.4
Sweden	85.83	168.93	4,087.54	0
Argentina	8,373.64	8,373.64	34,879.01	0
Brazil	9,374.5	9,374.5	66,071.81	0
Colombia	11,883.41	11,883.41	26,050.06	0
Chile	4,512.99	4,512.99	19,690.75	0
Costa Rica	191.73	191.73	79.36	0
Ecuador	3,911.77	3,911.77	5,851.6	0
Mexico	7,960.4	7,960.4	5,256.1	0
Panama	733.92	733.92	3,022.53	0
Peru	7,733.76	7,733.76	14,100.11	0
Venezuela (Bolivarian Republic of)	3,495.08	3,495.08	7,435.37	0
Singapore	5,649.71	4,766.79	11,185.76	1,748
China, Hong Kong Special Administrative Region	4,019.12	3,269.44	5,221.36	974
Japan	4,567.79	2,397.21	8,628.5	4,100
Ireland	409.28	652.13	976.23	0
United Arab Emirates	230.29	230.29	344	0

Austria	472.04	472.04	2,171.08	0
Poland	1,611.78	1,833.96	2,082.6	0
Bulgaria	917.09	743.8	1,501.31	0
Greece	3.41	3.31	4.75	0
Switzerland	94.06	94.06	2,984.97	0
Luxembourg	374.89	346.43	959.07	0
Norway	36.89	754.13	2,688.62	0
Denmark	689.66	1,198.79	2,353.48	0
Russian Federation	44.59	44.59	99.14	0
Turkey	40.03	40.03	83.82	0
Czechia	702.47	726.64	1,186.74	0
Estonia	236.55	226.71	217.3	0
Finland	216.06	214.95	1,129.11	416.5
Hungary	91.31	108.72	286.88	0
Israel	56.17	56.17	76.07	0
Iceland	0.02	50.21	104.13	0
Monaco	6.96	6.31	118.66	0
Portugal	16.17	18.04	57.19	0
Romania	396.34	313.82	779.5	0
Serbia	170.63	170.63	361.69	0
Slovenia	182.84	266.24	530.11	0
South Africa	245.12	245.12	285.93	0
Slovakia	127.99	126.16	650.48	0
India	5,811.58	5,811.58	7,009.5	0
Australia	1,697.02	1,697.02	2,085.81	0
China	165.02	165.02	219.31	0
Republic of Korea	401.22	401.22	727.06	0
Taiwan, Greater China	385.02	385.02	652.31	0
Thailand	2	2	3.81	0

## C7.6

**(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.**

- By business division
- By facility
- By activity

## C7.6a

**(C7.6a) Break down your total gross global Scope 2 emissions by business division.**

Business division	Scope 2, location-based (metric tons CO <sub>2</sub> e)	Scope 2, market-based (metric tons CO <sub>2</sub> e)
North American Business division	1,783,583.91	1,769,314.32
Global Accounts Management (EMEA, LATAM, APAC)	167,753.27	106,618.5

## C7.6b

**(C7.6b) Break down your total gross global Scope 2 emissions by business facility.**

Facility	Scope 2, location-based (metric tons CO <sub>2</sub> e)	Scope 2, market- based (metric tons CO <sub>2</sub> e)
As many of our technical locations form part of the critical national infrastructure, due to security considerations we are unable to disclose locations (including grid references) or therefore report on associated emissions. An example is provided of a facility in Islington UK, which comprises emissions from electricity consumption.	10,678.63	0

## C7.6c

**(C7.6c) Break down your total gross global Scope 2 emissions by business activity.**

Activity	Scope 2, location-based (metric tons CO <sub>2</sub> e)	Scope 2, market-based (metric tons CO <sub>2</sub> e)
Power provision to telecoms, IT, heating & cooling	1,927,245.6	1,851,841.23
Imported heat & steam used for heating	5,252.73	5,252.73
Chilled Water	18,838.85	18,838.85

## C7.9

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Decreased



## C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	<p>We have used a location-basis approach when answering this question, therefore because under this approach zero-carbon renewables are nevertheless reported at a grid-average emission factor, the increase in the proportion of renewable consumption that we achieved in 2019 does not produce a change in emissions. We have therefore shown zero change in CO2e in this category.</p> <p>2,383,601.38 tonnes CO2e were emitted by (re-baselined) Scope 1 &amp; 2 activities in 2018. Therefore: -</p> <p><math>(0/2,383,601.38) * 100 = 0</math></p>
Other emissions reduction activities	73,109.44	Decreased	3.07	<p>Emissions reduction projects accounted for a reduction of 73,109.44 tonnes CO2e (location basis), as described more fully in our answer to question 4.3a. These comprise projects in the USA and Europe. This category accounts for a 3.07% reduction in Scope 1 &amp; 2 emissions compared to (rebaselined) 2018 emissions of 2,383,601.38 t CO2e, as follows: -</p> <p><math>(73,109.44/2,383,601.38) * 100 = 3.07\%</math></p>
Divestment				
Acquisitions				
Mergers				
Change in output				
Change in methodology				

Change in boundary				
Change in physical operating conditions				
Unidentified	95,236.48	Decreased	4	<p>We have been unable to identify 4.00% of the reduction against the 2018 (re-baselined) Scope 1 &amp; 2 tonnes CO2e. There was an overall reduction in emissions of 168,345.92 t CO2e between 2018 and 2019 (i.e. 2,383,601.38 – 2,215,225.47) and 73,109.44 t CO2e is attributable to emissions reduction activities. Since the other categories are not applicable, or cannot be calculated, the remaining reduction (i.e. 168,345.92 – 73,109.44) is 95,236.48 t CO2e. This is 4.00% of the 2018 Scope 1 &amp; 2 emissions CO2e, calculated as follows: -</p> $(95,236.48 / 2,383,601.38) * 100 = 4.00\%$ <p>In 2019 there were no divestments, acquisitions or mergers. Although we have made minor changes to the methodology and boundary compared to 2018, we have re-baselined our 2018 emissions so these changes do not account for the reduction in emissions, and nor is a change in output applicable. It is possible that changes in physical operating conditions, such as mean annual temperatures, had an impact, although we are unable to quantify these.</p>
Other				

### C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Location-based

## C8. Energy

### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 0% but less than or equal to 5%

### C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	Yes
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	No

### C8.2a

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	350.18	1,042,797.6	1,043,147.78
Consumption of purchased or acquired electricity		279,838.81	4,211,911.76	4,491,750.57
Consumption of purchased or acquired heat		0	11,627.51	11,627.51

Consumption of purchased or acquired steam		0	11,627.51	11,627.51
Consumption of purchased or acquired cooling		0	36,051.4	36,051.4
Total energy consumption		280,188.99	531,401.79	5,594,204.78

## C8.2b

**(C8.2b) Select the applications of your organization’s consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

## C8.2c

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

**Fuels (excluding feedstocks)**

Natural Gas

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

199,085.46

**MWh fuel consumed for self-generation of electricity**

188.99

**MWh fuel consumed for self-generation of heat**

198,896.47

**Emission factor**

53.06

**Unit**

kg CO2 per million Btu

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

NOTE: we are also calculating the CH4 and N2O emissions, using separate emission factors, and therefore report upon CO2e

---

**Fuels (excluding feedstocks)**

Motor Gasoline

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

547,700.37

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

8.78

**Unit**

kg CO2 per gallon

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

NOTE: we are also calculating the CH4 and N2O emissions, using separate emission factors, and therefore report upon CO2e

---

**Fuels (excluding feedstocks)**

Diesel

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

10,754.9

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

10.21

**Unit**

kg CO2 per gallon

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

NOTE: we are also calculating the CH4 and N2O emissions, using separate emission factors, and therefore report upon CO2e

---

**Fuels (excluding feedstocks)**

Jet Kerosene

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

14,397.66

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

9.75

**Unit**

kg CO2 per gallon

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

NOTE: we are also calculating the CH4 and N2O emissions, using separate emission factors, and therefore report upon CO2e

---

**Fuels (excluding feedstocks)**

Fuel Oil Number 2

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

267,956.36

**MWh fuel consumed for self-generation of electricity**

267,956.36

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

73.96

**Unit**

kg CO2 per million Btu

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

NOTE: we are also calculating the CH4 and N2O emissions, using separate emission factors, and therefore report upon CO2e

---

**Fuels (excluding feedstocks)**

Other, please specify  
Ethanol85

**Heating value**

LHV (lower heating value)

**Total fuel MWh consumed by the organization**

350.18

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

1.32

**Unit**

kg CO<sub>2</sub> per gallon

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

---

**Fuels (excluding feedstocks)**

Compressed Natural Gas (CNG)

**Heating value**

LHV (lower heating value)

**Total fuel MWh consumed by the organization**

586.69

**MWh fuel consumed for self-generation of electricity**

0

**MWh fuel consumed for self-generation of heat**

0

**Emission factor**

444.96

**Unit**

kg CO<sub>2</sub>e per m<sup>3</sup>

**Emissions factor source**

2019 DEFRA UK Government GHG Emission Factors for Company Reporting (Full Set for Advanced Users), Fuels, Gaseous Fuels.

**Comment**

To be precise the emission factor is kg CO<sub>2</sub>e per Nm<sup>3</sup>

---

**Fuels (excluding feedstocks)**

Propane Gas

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

2,316.15

**MWh fuel consumed for self-generation of electricity**

882.13

**MWh fuel consumed for self-generation of heat**



0

**Emission factor**

5.72

**Unit**

kg CO2 per gallon

**Emissions factor source**

EPA Emission Factors for Greenhouse Gas Inventories, March 2018

**Comment**

**C8.2e**

**(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero emission factor in the market-based Scope 2 figure reported in C6.3.**

**Sourcing method**

Unbundled energy attribute certificates, Guarantees of Origin

**Low-carbon technology type**

Other, please specify  
Solar, wind, hydropower

**Country/region of consumption of low-carbon electricity, heat, steam or cooling**

Europe

**MWh consumed accounted for at a zero emission factor**

200,056.16

**Comment**

This consumption comprises electricity use at many of our major facilities and 3rd party co-location facilities in the UK (85,197.74 MWhs), France (12,799.58 MWhs), Germany (58,067.42 MWhs), Spain (2106.12 MWhs), Italy (1,591.47) The Netherlands (32,718.93 MWhs) and Belgium (7,158.40 MWhs), and Finland (416.50MWhs). All renewable energy consumption is supported by Guarantees of Origin (GOs) or Renewable Energy Guarantees of Origin (REGOs). We also purchase renewable electricity in Belgium, Norway and Sweden, although we do not calculate these emissions as low carbon as we are unable to obtain GOs or REGOs at these locations.

**Sourcing method**

Unbundled energy attribute certificates, Renewable Energy Certificates (RECs)

**Low-carbon technology type**

Wind

**Country/region of consumption of low-carbon electricity, heat, steam or cooling**

North America

**MWh consumed accounted for at a zero emission factor**

43,273.04

**Comment**

We have reported 42,541.82 MWhs at the zero carbon emission factor in the USA and 731.22 MWhs in Canada. This comprises electricity consumption by CenturyLink equipment located at 3rd party co-location facilities, and for which RECs are available.

**Sourcing method**

Unbundled energy attribute certificates, Renewable Energy Certificates (RECs)

**Low-carbon technology type**

Low-carbon energy mix

**Country/region of consumption of low-carbon electricity, heat, steam or cooling**

Asia Pacific (or JAPA)

**MWh consumed accounted for at a zero emission factor**

6,822

**Comment**

We have reported 1,748 MWhs at the zero carbon emission factor in the Singapore, 974 MWhs in Hong Kong and 4100 MWhs in Japan. This comprises electricity consumption by CenturyLink equipment located at 3rd party co-location facilities, and for which International Renewable Energy Certificates (I-RECs) are available.

## C9. Additional metrics

### C9.1

**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

**Metric value**

**Metric numerator**

**Metric denominator (intensity metric only)**

**% change from previous year**

**Direction of change**

**Please explain**

## C10. Verification

### C10.1

**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

### C10.1a

**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

**Page/ section reference**

See pages 1-8, and pages 6 & 7 for Scope 1 emissions figures

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

## C10.1b

**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

---

**Scope 2 approach**

Scope 2 location-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

**Page/ section reference**

See pages 1-8, and pages 6 & 7 for Scope 2 figures

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

**Page/ section reference**

See pages 1-8, and pages 6 & 7 for Scope 2 figures

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

## C10.1c

**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

---

**Scope 3 category**

Scope 3: Downstream leased assets

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

**Page/section reference**

1-8. See the table on page 6 of the Report and 'Electricity - in sublets - downstream leased assets' in Appendix D.

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

**Scope 3 category**

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

**Page/section reference**

1-8. See the table on page 6 of the report and Appendix D. The WTT, T&D and distribution entries correspond to the sub-categories that have been verified, and these comprise 98.93% of our total 'fuel and energy-related activities (not included in Scopes 1 and 2).'

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

98.93



## C10.2


**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

## C10.2a

**(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C6. Emissions data	Other, please specify Out-of-Scope emissions	ISO14064-3, Limited Assurance	<p>Out-of-Scope (OOS) emissions are calculated and verified. This includes the 5,120.04 tonnes of OOS CO2e from biogenic sources identified in our answer to question 6.7a. Further emissions from OOS refrigerants are also verified, although these not included in the CDP disclosure.</p> <p>These emissions are verified on a company-wide basis annually. We have chosen to include them as a matter of good-practice as they fall within our operational control boundary.</p> <p>Please see page 6 of our Verification Report and the entry, 'biogenic road fuel.'</p> <p> 1, 2</p>
C7. Emissions breakdown	Other, please specify Scope 1 and 2 emissions by country	ISO14064-3, Limited Assurance	<p>The allocation of emissions by country has also been verified, and the figures in the Verification Report's Appendix D correspond to those declared in questions 7.2 and 7.5 of the CDP questionnaire.</p> <p>These emissions are verified on a company-wide basis annually. We calculate and disclose these as this is integral to the carbon footprint calculation process and adds value and transparency.</p> <p> 1, 2</p>

 <sup>1</sup>Appendix D - CenturyLink Inc 2020 CDP 2019 footprint LOCN & MKT basis 220720 FINAL to Lucideon.pdf

 <sup>2</sup>CenturyLink Inc - 2019 CDP Verification Report FINAL - 20200728 REV 1.pdf

## C11. Carbon pricing

### C11.1

**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

Yes

## C11.1a

**(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.**

- EU ETS
- Other carbon tax, please specify
- UK Climate Change Levy
- Other ETS, please specify
- UK Climate Change Agreements

## C11.1b

**(C11.1b) Complete the following table for each of the emissions trading schemes you are regulated by.**

### EU ETS

**% of Scope 1 emissions covered by the ETS**

0.07

**% of Scope 2 emissions covered by the ETS**

0

**Period start date**

January 1, 2019

**Period end date**

December 31, 2019

**Allowances allocated**

0

**Allowances purchased**

193

**Verified Scope 1 emissions in metric tons CO<sub>2</sub>e**

192.73

**Verified Scope 2 emissions in metric tons CO<sub>2</sub>e**

0

**Details of ownership**

Facilities we own and operate

**Comment**

The Islington Gateway site in the UK is the only site covered by the EU ETS. Only Scope 1 emissions are relevant to this site under EU ETS. The verifier's report identifies 192.73 tonnes CO<sub>2</sub>e (Scope 1) emitted in 2019, arising from natural gas combustion (70.077 t CO<sub>2</sub>e) and diesel oil combustion in generators (122.65 t CO<sub>2</sub>e). Total global Scope 1 emissions are 263,918.29 tonnes CO<sub>2</sub>e, therefore those covered by the EU ETS are 0.07% of the total.



Scope 2 emissions are not covered by the scheme and therefore not verified , so we have entered '0' in this field above.

**Other ETS, please specify**

---

**% of Scope 1 emissions covered by the ETS**

0.1

**% of Scope 2 emissions covered by the ETS**

0.81

**Period start date**

January 1, 2019

**Period end date**

December 31, 2020

**Allowances allocated**

0

**Allowances purchased**

0

**Verified Scope 1 emissions in metric tons CO2e**

0

**Verified Scope 2 emissions in metric tons CO2e**

0

**Details of ownership**

Facilities we own and operate

**Comment**

We have Climate Change Agreements (CCAs) at 3 major sites in London, of which 2 are owned and 1 which is leased.

The targets at these sites take the form of Power Utilization Efficiencies (PUEs) and therefore kWhs are reported and verified rather than allowances and emissions of CO2e. We have therefore entered zeros in the fields above. The target period for the CCAs is 01/01/2019 to 31/12/2020. 2019 is not a reporting year, therefore no allowances have been allocated or purchased.

A Target Period Performance PUE of 1,560.265 was set and based on 2019 performance, should the PUE remain constant, the facilities are projected to exceed this with a collective PUE of 1,616.782. If the projection is correct, this would require CenturyLink to purchase 2,261 Allowances, equivalent to 2,261 tonnes CO2e. No allowances are allocated or purchased.

The Scope 2 emissions percentage reported above was calculated on a location basis.

## C11.1c

**(C11.1c) Complete the following table for each of the tax systems you are regulated by.**

### Other carbon tax, please specify

**Period start date**

January 1, 2019

**Period end date**

December 31, 2019

**% of total Scope 1 emissions covered by tax**

0.09

**Total cost of tax paid**

267,614

**Comment**

The cost of the UK's Climate Change Levy (CCL) was \$261,999 for electricity (some sites are exempt) and \$5,615 for natural gas, a total of \$267,614. Some sites are exempt from the tax because they hold Climate Change Agreements.

## C11.1d

**(C11.1d) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?**

Presently emissions trading systems do not affect our facilities in the USA. If future regulations are enacted and require that CenturyLink develop a program in the United States, CenturyLink will develop a procedure to assess applicability and a process to ensure compliance.

Such systems do affect a few of our facilities in the UK, as identified above. Our strategy for complying with both the EU ETS and our Climate Change Agreements is to continually enhance the energy efficiency (including the power utilization efficiency) of our major sites to meet the targets. If targets are not met, then we purchase allowances to ensure compliance. The 3 Company sites covered by Climate Change Agreements (CCA) consume approximately 74% of UK electricity, whereas the most significant of these, in Islington, dominates UK natural gas consumption. All three have back-up power sources which are reportable but are not significant sources of CO<sub>2</sub>e. These sites are monitored using a portal that allows remote viewing of current and all historic kWhs and CO<sub>2</sub>e. The sites are half hourly metered and can be monitored at the same frequency. This allows analysis of trends and provides the opportunity to identify any unusual consumption. CenturyLink has EU Code of Conduct Participant Status and is certified to the international standard in Energy Management Systems ISO50001. CenturyLink uses power smoothing devices (power factor correction) and implements a variety of projects to enhance Power Utilization Efficiencies, covering lighting and cooling systems. For example, in the last 3 years the Islington facility has had chiller fan upgrades, UPS replacements, LED lighting upgrades and the installation of ultrasonic

humidification. Energy efficiency is also delivered through selecting equipment based on its lifetime power consumption, switch-offs and consolidation projects to avoid excessive demand. The impact of energy reduction initiatives is shown in monthly Utility Reports, whereas the predicted savings from infrastructure related projects (i.e. power provision, cooling, lighting etc) are illustrated. The 3 major sites identified above are exempt from the Climate Change Levy because they are covered by Climate Change Agreements.

Regarding our other sites, affected only by the Climate Change Levy, these too undergo improvements for energy efficiency, with further examples shown in our response to question 4.3b.

## C11.2

**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

## C11.3

**(C11.3) Does your organization use an internal price on carbon?**

No, but we anticipate doing so in the next two years

## C12. Engagement

### C12.1

**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, our suppliers

Yes, our customers

Yes, other partners in the value chain

### C12.1a

**(C12.1a) Provide details of your climate-related supplier engagement strategy.**

---

**Type of engagement**

Information collection (understanding supplier behavior)

**Details of engagement**

Collect climate change and carbon information at least annually from suppliers

**% of suppliers by number**

0.5

**% total procurement spend (direct and indirect)**

0.6

## **% of supplier-related Scope 3 emissions as reported in C6.5**

8.75

### **Rationale for the coverage of your engagement**

Our rationale is to better understand our electricity suppliers' generation portfolio and goals in limiting and/or reducing greenhouse gas emissions. This allows CenturyLink to better evaluate our own opportunities for switching to renewable/green tariffs. We decided to approach our power suppliers because of the considerable impact this could have upon our emissions of CO<sub>2</sub>e; note that although this accounts for 8.75% of Scope 3 emissions, it also represents engagement with companies that supply power that accounts for 45.00 % of our global Scope 2 (location-based) emissions.

### **Impact of engagement, including measures of success**

The impact of engagement has been to improve our own understanding of opportunities for potentially switching to renewable/ green tariffs.

Measures of success include being able to quantify reductions in our Scope 2 electricity (market-based) emissions of CO<sub>2</sub>e that would arrive with such a switch, and being able to present this as part of a business case.

### **Comment**

We have engaged with electricity suppliers representing an estimated 50% of our US supply. US Scope 3 electricity emissions are 263,931.92 tonnes CO<sub>2</sub>e, of which 50% is 131,965 tonnes CO<sub>2</sub>e. The engagement therefore represents 8.75 % of our Scope 3 supplier-related emissions of 1,507,566.96 tonnes CO<sub>2</sub>e (i.e. Purchased Goods & Services, Capital Goods, Fuel & Energy related activities, Upstream Transportation, Waste generated in Operations, and Business Travel commercial flights). Please note however, that these suppliers also supply power responsible for Scope 2 emissions of 878,056.20 tonnes CO<sub>2</sub>e (i.e. 50% of USA Scope 2 electricity, location-based). This is equivalent to 45.00% of our total global Scope 2 (location-based) emissions.

Please be aware that the CDP guidance states that we should base our answer to the question element above requesting '% of supplier related scope 3 emissions as reported in C6.5' on the data in column 5 of our answer to question 6.5. However, column 5 relates not to emissions data but to the percentage of data obtained from suppliers. We have therefore used the emissions data in our answer as explained above.

## **C12.1b**

**(C12.1b) Give details of your climate-related engagement strategy with your customers.**

---

### **Type of engagement**

Education/information sharing

### **Details of engagement**

Share information about your products and relevant certification schemes (i.e. Energy STAR)

**% of customers by number**

100

**% of customer - related Scope 3 emissions as reported in C6.5**

99.67

**Please explain the rationale for selecting this group of customers and scope of engagement**

In 2019, CenturyLink continued its participation in the Voluntary Agreement for Ongoing Improvement to the Energy Efficiency of Small Network Equipment with other residential broadband Internet service providers and manufacturers of small network equipment. This equipment includes items such as modems and routers used by CenturyLink consumers to access such services; the rationale in selecting this group being that they are the end consumer of these products. The primary objective of the agreement is to increase the energy efficiency of small network equipment while promoting rapid innovation and timely introduction of new features. At least 90 percent of small network equipment procured, must meet the energy efficiency standards established by the agreement. Information is presented to the end-consumer customers to ensure they're aware of the modem's energy efficiency details.

**Impact of engagement, including measures of success**

The 2019 report issued by independent auditor D+R International showed that "the average idle mode energy usage of SNE relative to average broadband speed has decreased by 66% since the agreement was ratified in 2015. We believe that through our work with these customers this reduction in energy consumption is applicable to modems supplied by CenturyLink.

The impact of engagement is that we have engaged with 100% of our consumer customers, and the measure of success is that the energy consumption of their devices is believed to have reduced by 66%, as explained above.

## C12.1d

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

CenturyLink has also established an engagement strategy with our employees who are also partners in the value chain. The Environmental Sustainability team provides periodic updates (written correspondence) to employees on climate change mitigation and other environmental sustainability performance measures and accomplishments. We also hold collaborative events with our employees sponsored by functional groups within the Company with direct responsibility for programs that improve environmental sustainability. Our "Going Green" initiative allows employees to make suggestions to the EHS Team, whereas our Green Tip Board, an internal platform, allows employees to share sustainability ideas. Another example of engaging our employees is the expansion of our electric vehicle charging infrastructure. The number of charging ports at our Broomfield CO US location was doubled in late 2018, allowing the simultaneous charging of up to 8 cars. As a direct result of the doubled charging capacity,

the number of employees utilizing the stations increased by 41% and twice as many GHG emissions were avoided in 2019 compared with 2018. CenturyLink also seeks to collaborate with employees through offers on commuter transport. We support schemes in Seattle, Portland, Phoenix and Denver. For example, we work with the Denver Regional Transport District to offer commuting employees discounted monthly travel.

CenturyLink actively engages with investors by participating in various ESG questionnaires in order to communicate our Company's efforts and initiatives pertaining to material ESG topics. Additionally, CenturyLink maintains an Investor Relations webpage, where we provide current/relevant information and resources on ESG initiatives and more.  
<https://ir.centurylink.com/esg/default.aspx>

A further way that CenturyLink helps customers reduce their energy consumption with our products and services is by enabling smart technologies, dematerialization, and virtualization. We believe being aligned with our customers' climate change mitigation goals and communicating our efforts to support these goals creates a strategic advantage. Examples of how CenturyLink can assist our customers in reducing their impact include: connector of IoT (Internet of Things) solutions, VOIP (voice over internet protocol) and Zoom, etc. CenturyLink is also actively involved in responding to customer ESG questionnaires to provide information on ESG topics.

## C12.3

### (C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

- Direct engagement with policy makers
- Trade associations
- Other

## C12.3a

### (C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
Other, please specify Legislation	Support with minor exceptions	In the UK CenturyLink makes comment on proposed environmental legislative changes via a professional body (i.e. the Institute of Environmental Management & Assessment). This enables a collective voice to be expressed to government sources which can have the effect of mitigation on matters relating to climate change, a recent example of which is the Environmental	CenturyLink considers that the UK exit from the EU has implications for both the overall environment and specifically for climate change impacts. Comment in respect of proposed legislation was designed to ensure that mitigation of climate change can be encompassed within primary legislation. Particular concern was expressed in respect of mitigation for flood risks and also temperature deviations.

		Principles and Governance Bill which is set to take effect following the UK exit from the EU.	
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## C12.3b

**(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?**

Yes

## C12.3c

**(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.**

### **Trade association**

The Telecommunications Industry Association (TIA) Corporate Sustainability Working Group (CSWG)

### **Is your position on climate change consistent with theirs?**

Consistent

### **Please explain the trade association's position**

The TIA CSWG is working on ways the telecommunications industry can identify and integrate energy-efficient technologies and equipment into the supply chain. The group prioritizes sustainability and corporate social responsibility and focuses on engaging best practices in benchmarking Company and supply chain performance.

### **How have you influenced, or are you attempting to influence their position?**

As an active member and contributor to the TIA CSWG CenturyLink works alongside other industry leaders to support the team's goals and objectives

## C12.3e

**(C12.3e) Provide details of the other engagement activities that you undertake.**

Through the CenturyLink Foundation, CenturyLink and its employees provide funding to non-profit organizations that support the protection of human health and the environment including those that advocate for climate change mitigation with policy makers.

## C12.3f

**(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?**

Involvement in organizations such as trade associations is assessed prior to active participation and is relevant across the organization in all countries. CenturyLinks' Public Policy Group is

also engaged if changes or new initiatives may have an impact on regulatory or public policy for the Company.

A further means of ensuring actions that can influence policies remain consistent with our climate change strategy is achieved through the Environmental Sustainability Team. This Team includes the functional groups across the organization that would be involved directly or indirectly in influencing public policy related to climate change. Consistency is achieved, in part, through consultation with our Chief Compliance Officer and General Counsel (as needed). In general, public policy activities are geared towards increasing and expanding the adoption of broadband internet which can significantly reduce the carbon footprint of our customers and their business partners.

## C12.4

**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

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### Publication

In mainstream reports

### Status

Complete

### Attach the document

 CenturyLink-2019-Annual-Report-and-2020-Proxy-Statement.pdf

 CenturyLink-2019-Annual-Report-and-2020-Proxy-Statement.pdf

### Page/Section reference

Page 21

- Board Commitment to Environmental, Social and Governance (ESG) Leadership

Page 22

- Board's commitment to ESG Reporting . 'Science based targets, reducing carbon emissions and intensity, purchasing renewable energy, investing in efficiency improvements and quantified CO2e savings
- Partnerships with energy efficiency of equipment
- Energy Management Systems and Environmental Management Systems
- Environmental Social Governance Report

### Content elements

Governance

Emissions figures

Emission targets



**Comment**

The annual Report 2019 and Proxy Statement 2020 is attached. This is the report that relates to he 2019 reporting year.

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**Publication**

In mainstream reports

**Status**

Complete

**Attach the document**

 CenturyLink 10-K.pdf

**Page/Section reference**

Page 45 of the Form 10-K refers to risks from natural disasters and extreme weather, and acknowledges the impact of climate change on extreme weather events in the future.

**Content elements**

Risks & opportunities

**Comment**

The 10-K Report is attached.

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**Publication**

In voluntary sustainability report

**Status**

Complete

**Attach the document**

 CenturyLink-2019-ESG-Report.pdf

**Page/Section reference**

3,6-8,10,11,19-20,23-25

**Content elements**

Governance  
Strategy  
Risks & opportunities  
Emissions figures  
Emission targets  
Other metrics

**Comment**

The 2019 Environmental Social Governance Report is attached.

## C15. Signoff

### C-FI

**(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

Please note that we are taking this opportunity to explain an apparent, but not an actual, contradiction in our answers. In our answer to question 8.2, regarding energy-related activities the organization has undertaken, we have stated that CenturyLink does not generate electricity, heat, steam or cooling. In our answer to question 8.2b, regarding the applications of the organization's use of fuel, we have selected 'yes' for the consumption of fuel for the generation of electricity. CenturyLink maintains back-up generators at all our critical facilities which can be used for the provision of electricity should there be a power loss on the grid. This, along with other resiliency measures, ensures continuity of our service. However, while fuel is consumed when testing these generators, except in some very limited instances, the power generated is directed to a load bank and lost as heat by resistors. We are therefore not generating electricity for use in our buildings, nor for export to the grid, but we are in effect consuming fuel to test our potential to generate electricity should it be required. We have therefore answered 'yes' to the 'consumption of fuel for the generation of electricity' as this is necessary to fully allocate all of our fuel use to the options available in the questionnaire.

### C15.1

**(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

	Job title	Corresponding job category
Row 1	Environment/Sustainability Manager	Environment/Sustainability manager

## SC. Supply chain module

### SC0.0

**(SC0.0) If you would like to do so, please provide a separate introduction to this module.**

CenturyLink highly values its customers and looks for ways to partner with its customers to have a greater impact on how our services can reduce climate change and environmental impact.

### SC0.1

**(SC0.1) What is your company's annual revenue for the stated reporting period?**

	Annual Revenue
Row 1	22,401,000,000

## SC0.2

**(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?**

Yes

## SC0.2a

**(SC0.2a) Please use the table below to share your ISIN.**

	ISIN country code (2 letters)	ISIN numeric identifier and single check digit (10 numbers overall)
Row 1	US	1567001060

## SC1.1

**(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.**

### Requesting member

Accenture

### Scope of emissions

Scope 1

### Allocation level

Company wide

### Allocation level detail

### Emissions in metric tonnes of CO<sub>2</sub>e

123.18

### Uncertainty (±%)

2

### Major sources of emissions

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates consistent with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Amdocs Ltd

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

2.94

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

AT&T Inc.

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

10,166.18

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Banco do Brasil S/A

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

9.71

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited

instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Bank of America

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

614.34

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are



gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

BT Group

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

798.22

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Caesars Entertainment

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

0.03

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been

verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Caixa Econômica Federal

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

37.05

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Cellnex Telecom SA

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

3.65

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Deutsche Telekom AG

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

217.3

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited

instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Grupo Santander Brasil

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

42.35

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are

gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Mastercard Incorporated

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

53.69

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased



**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

MetLife, Inc.

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

15.71

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been

verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Microsoft Corporation

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

1,467.84

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Moody's Corporation

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

3.31

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Prudential Financial, Inc.

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

21.69

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited

instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Stanley Black & Decker, Inc.

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

4.83

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are

gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

The Allstate Corporation

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

74.23

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

U.S. General Services Administration - OMB ICR #3090-0319

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

2,237.32

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been



verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

VMware, Inc

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

18.52

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Vodafone Group

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

485.65

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Walmart, Inc.

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

217.23

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited

instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Wells Fargo & Company

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

668.15

**Uncertainty (±%)**

2

**Major sources of emissions**

Scope 1 emissions are generated from fuel combustion in company cars (51.07%), natural gas combustion in buildings (13.66%), refrigerant losses from buildings (6.68%) and refrigerant losses from cars (1.25%), fuel combustion in company jet aircraft (1.36%) and the combustion of fuel for other uses, predominantly in emergency generators (25.98%).

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

An operational control boundary was selected according to the Greenhouse Gas Protocol methodology. Therefore, all fuel combustion and refrigerant loss under the organization's direct control are included in Scope 1. Fuel consumption was predominantly taken from invoices and is therefore accurate for natural gas combustion in buildings and for road vehicles. We have also used this approach for fuel combustion in back-up generators and other uses. Data on refrigerant losses from buildings are

gathered from maintenance records, with guidance given to engineers to ensure accurate reporting. Losses from company cars are estimated based upon the capacity of the cooling/air conditioning system and loss rates in line with EPA guidance. The limitations associated with these techniques have been quantified as a percentage uncertainty, being approximately 2%. This uncertainty allows for some inaccuracy in calculating refrigerant losses. It also includes uncertainty associated with calculating emissions based on fuel consumption records, and the need for extrapolation in limited instances, and a recognition that some fuel may remain not combusted in the reporting period.

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**Requesting member**

Accenture

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

875.6

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Amdocs Ltd

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

20.9

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

AT&amp;T Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**



**Emissions in metric tonnes of CO<sub>2</sub>e**

72,261.27

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

**Requesting member**

Banco do Brasil S/A

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

69.04

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of

our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Bank of America

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

4,366.7

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

BT Group

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

5,673.73

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use

of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Caesars Entertainment

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

0.21

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with

annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Caixa Econômica Federal

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

263.33

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other

techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Cellnex Telecom SA

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

25.95

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased



**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Deutsche Telekom AG

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

1,544.58

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use

of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Grupo Santander Brasil

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

301.01

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with

annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Mastercard Incorporated

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

381.66

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other

techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

MetLife, Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

111.67

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Microsoft Corporation

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

10,433.4

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use

of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Prudential Financial, Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

154.14

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with



annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Stanley Black & Decker, Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

34.3

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other

techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

The Allstate Corporation

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

527.6

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

U.S. General Services Administration - OMB ICR #3090-0319

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

15,902.87

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use

of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

VMware, Inc

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

131.65

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with

annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Vodafone Group

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

3,452.03

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other

techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Walmart, Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

1,544.09

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Wells Fargo & Company

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

4,749.2

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use



of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Moody's Corporation

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

23.55

**Uncertainty (±%)**

2

**Major sources of emissions**

The CO<sub>2</sub>e figures reported in this answer are generated using a market-based approach. Electricity consumption accounts for 98.72% of the reported CO<sub>2</sub>e, the use of supplied heat & steam accounts for 0.28%, whereas chilled water accounts for 1.00%.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

We have classified as scope 2 electricity consumption in all equipment and buildings over which we have operational control. This includes consumption at owned and leased locations, as well as at third-party co-locations. A market-based approach was used for the allocation in this question. Electricity accounts for vast majority (98.72%) of our Scope 2 (market-based) emissions. Of this the majority (79.31%) is directly metered and consumption is recorded in our energy management systems and accountancy management systems, facilitating the interpretation of consumption and, if required, normalization to calendar year i.e. annualization. For unmetered sites we use other techniques to estimate kWh consumption. Sites representing 6.33% of electricity-related emissions have consumption calculated based on their floor area and a kWh/m<sup>2</sup> metric, which is dependent upon the site's function, and generated by a knowledge of our sites including kWh/unit area design specifications for technical sites. A further 8.36% of electricity-related emissions are from sites where floor area is not known. Therefore, we allocate kWhs based upon their function and our knowledge of consumption across the portfolio. Electricity consumption at third-party co-location sites accounts for 5.99% of our electricity-related Scope 2 emissions and is calculated based on knowledge of the power consumption of the equipment and estimated hours of use. These techniques are identified in a procedure, ensuring their consistent application. We therefore consider the overall uncertainty associated with Scope 2 (market-based) emissions to be approximately 2%. This covers the uncertainties associated with

annualization and the calculations for sites without recorded consumption, including estimates associated with equipment at third-party co-locations.

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**Requesting member**

Accenture

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

837.32

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Amdocs Ltd

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

19.99

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these

were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

AT&T Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

69,102.33

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified.

However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Banco do Brasil S/A

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

66.02

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational



Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Bank of America

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

4,175.81

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods

category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

BT Group

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

### **Allocation level detail**

#### **Emissions in metric tonnes of CO<sub>2</sub>e**

5,425.7

#### **Uncertainty (±%)**

4

#### **Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

#### **Verified**

No

#### **Allocation method**

Allocation based on the market value of products purchased

#### **Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2)

corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Caesars Entertainment

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

0.2

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Caixa Econômica Federal

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

251.82

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3

emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Cellnex Telecom SA

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

24.82

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories

are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.



**Requesting member**

Deutsche Telekom AG

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

1,477.06

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Grupo Santander Brasil

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

287.85

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related

activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included

in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Mastercard Incorporated

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

364.98

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

MetLife, Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

106.79

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Microsoft Corporation

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

9,977.3

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Moody's Corporation

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

22.53

**Uncertainty (±%)**



4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these

were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Prudential Financial, Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

147.4

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

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The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

Stanley Black & Decker, Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

32.8

**Uncertainty ( $\pm\%$ )**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

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The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

The Allstate Corporation

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

504.53

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

The products comprising the Scope 3 category, use of sold products (15.16% of Scope 3), were identified using sales data, which was straightforward given that in 2019 these were wholly comprised of modems.

Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

U.S. General Services Administration - OMB ICR #3090-0319

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

15,207.67

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

The category, fuel and energy related activities (not included in Scopes 1 & 2) corresponds to the WTT, T&D and distribution emissions associated with activities that

are categorized as Scope 1 & 2, and therefore the identification of the associated Scope 3 activities was straightforward, and determined by the selection of an Operational Control boundary. The activities comprising this category account for 21.08% of Scope 3 emissions.

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Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

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**Requesting member**

VMware, Inc

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

125.9

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services,



legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

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Other categories collectively comprise only 3.07% of Scope 3 emissions.

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**Requesting member**

Vodafone Group

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

3,301.13

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3 emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to

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**Requesting member**

Walmart, Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail****Emissions in metric tonnes of CO<sub>2</sub>e**

1,476.59

**Uncertainty (±%)**

4

**Major sources of emissions**

CenturyLink is reporting all relevant Scope 3 categories in accordance with the Greenhouse Gas Protocol. Emissions from purchased goods and services is the most important, comprising 39.48% of our Scope 3 emissions. Fuel and energy related activities not otherwise accounted for in Scope 1 & 2 (which comprises WTT and T&D emissions from electricity, heat & steam and chilled water, as well as WTT emissions from fuel used in buildings and vehicles) comprises 21.08%. The use of sold products comprises 15.16% and capital goods 21.21% of emissions. Other Scope 3 categories are less significant, with waste generated in operations accounting for 1.05% of Scope 3

emissions, and all other categories collectively accounting for just 2.02% of Scope 3 emissions.

The purchased goods category comprises: - purchased telecommunications services, legal services, advertising services, printing / publishing services, other administrative, office and business support services, and various other services. The capital goods category comprises office machinery and computers, as well as construction.

Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

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**Requesting member**

Wells Fargo & Company

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

4,541.59

**Uncertainty (±%)**

4

**Major sources of emissions**

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Our Scope 1 and 2 emissions, and some categories of Scope 3, have been verified. However, our technique for allocating emissions to requesting customers has not been verified.

**Verified**

No

**Allocation method**

Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Scope 3 categories were identified in accordance with the Greenhouse Gas Protocol and therefore conform to those in this questionnaire. As a result, we report upon all relevant Scope 3 categories. The activities that fall within the categories, purchased goods & services, and capital goods, which together comprise 60.69% of Scope 3 emissions, were identified using procurement data. This required analysis of spend to ensure use of the correct categorization and emissions factors.

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Other categories collectively comprise only 3.07% of Scope 3 emissions.

As explained in Section 10, the Scope 3 category, downstream leased assets, has been verified, as has 98.93% of the category, fuel and energy related activities (not included in Scopes 1 & 2). However, our technique for allocating emissions to requesting customers has not been verified.

## SC1.2

**(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).**

No published information has been used.

## SC1.3

**(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?**

Allocation challenges	Please explain what would help you overcome these challenges
Customer base is too large and diverse to accurately track emissions to the customer level	Because CenturyLink is a service provider and customers may utilize their own equipment etc. an exact number based on the numerous products used to provide services would be difficult. We have allocated emissions based on revenue for those customers that have requested.

## SC1.4

**(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?**

Yes

## SC1.4a

**(SC1.4a) Describe how you plan to develop your capabilities.**

We currently complete customer questionnaires related to CenturyLink's GHG emissions and sustainability initiatives. If requested customers can obtain their allocated emissions.

## SC2.1

**(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.**

## SC2.2

**(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?**

Yes

## SC2.2a

**(SC2.2a) Specify the requesting member(s) that have driven organizational-level emissions reduction initiatives, and provide information on the initiatives.**

---

**Requesting member**

**Initiative ID**

**Group type of project**

**Type of project**

**Description of the reduction initiative**

CenturyLink undertakes a wide range of emissions reduction and energy efficiency initiatives, as described elsewhere in this CDP response. Part of the incentive for this is the high level of interest shown by all of our requesting customers and investors with regard to the Carbon Disclosure Project.

**Emissions reduction for the reporting year in metric tons of CO<sub>2</sub>e**

**Did you identify this opportunity as part of the CDP supply chain Action Exchange?**

**Would you be happy for CDP supply chain members to highlight this work in their external communication?**

### SC3.1

**(SC3.1) Do you want to enroll in the 2020-2021 CDP Action Exchange initiative?**

No

### SC3.2

**(SC3.2) Is your company a participating supplier in CDP’s 2019-2020 Action Exchange initiative?**

No

### SC4.1

**(SC4.1) Are you providing product level data for your organization’s goods or services?**

No, I am not providing data

## Submit your response

**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	<b>I am submitting to</b>	<b>Public or Non-Public Submission</b>	<b>Are you ready to submit the additional Supply Chain Questions?</b>
I am submitting my response	Investors Customers	Public	Yes, submit Supply Chain Questions now

**Please confirm below**

I have read and accept the applicable Terms