

MEMORANDUM

TO: All Qwest Supervisors of Occupational Employees
FROM: Kimberly Strong
DATE: January 15, 2001
RE: Supervisor Instructions for Code of Conduct distribution to Occupational Employees

2001 Compliance Training for Occupational Employees

As part of the 2001 compliance training, supervisors will distribute individual copies of the Qwest Code of Conduct to their occupational employees. Copies of the Code of Conduct are enclosed for distribution. A code of conduct receipt is attached for your personal use to record your code distribution. Additional copies of the Code can be printed from the Compliance department intranet site by clicking on the Code of Conduct Booklet icon from the Compliance home page. Please provide each of your occupational employees with a copy of the Code and sufficient work time to review it.

Topics to Emphasize when Distributing the Code

Upon request, you will be able to provide your employees with the full text of Qwest's Compliance policies and additional copies of the code by accessing and printing the documents from the Corporate Compliance department intranet site.

Upon distributing the Code to your occupational employees, in addition to any job specific compliance topics you may wish to address, you must communicate the following items to your occupational employees as part of the Code acknowledgment process:

- the full text of the Qwest Corporate Policies supporting the Code are available through you (their supervisor), Corporate Compliance 1-800-333-8938, or the Corporate Compliance Intranet home page
- the Safety Loss Prevention Program Manual, technical assistance and information on Industrial Hygiene, Ergonomics, Fire Protection and relevant medical or exposure records may be obtained by contacting Safety at 303-672-2925
- all employees are individually responsible for understanding and complying with the Code and policies and may contact you (their supervisor) or Corporate Compliance with questions,
- all employees are required to submit a conflict of interest questionnaire, where appropriate, for review to Corporate Compliance
- all employees are obligated to handle third-party proprietary information in a confidential manner consistent with any Qwest agreements or laws and any obligations to confidentiality owed to the third party whether obtained through a prior employment relationship or other means
- all employees must comply with the requirement to report concerns or suspected violations regarding the code or policies

Completing the Code Acknowledgement

You are responsible for completing the on-line acknowledgement for those of your occupational employees who do not have intranet access. Upon accessing the Corporate Compliance department intranet site found on the "Q" under departments, click on "Acknowledgment." You will need to log-in with your CUID and LDAP password. Instructions on obtaining an LDAP password or resetting your current password can be found on the "Acknowledgment" page. The end of the acknowledgment will be populated with your name and a list of your employees. Complete the acknowledgment by clicking on the box next to your name, once you have read the code, and the box next to the name of each of your employees who have received and read the Code. Once the boxes next to the names have been checked click on "yes" to submit the acknowledgment. You will receive a thank-you notice upon making a successful acknowledgment submission.

You may instruct your occupational employees on how to access the Compliance intranet site and complete the individual acknowledgment available to them from the Compliance home page. In the alternative, you can complete the acknowledgment for all of your occupational employees as you distribute the Code.

Management employees' 2001 second quarter bonuses will be withheld if either a supervisor or his/her direct reporting employees fail to complete their code acknowledgment.

New Hire Employees in 2001

All new hire employees will receive and be given the opportunity to review the Code in occupational new hire orientation. Following orientation, you should review the key points under the **Topics to Emphasize** above and either instruct your new hire on how to access the Corporate Compliance department home page to complete the acknowledgment form or as their supervisor complete the acknowledgment on their behalf. The acknowledgment for new hires must be completed within fourteen days of their first day of employment. This will be part of the ongoing processing of new hires during 2001.

Video Training in 2001

Further instructions regarding completing video compliance training for 2001 will be provided later in the year in conjunction with the release of the video.

Supervisor Reports

Through the electronic acknowledgment process you will now be able to verify completion of your employees' Code compliance acknowledgment by simply clicking "Acknowledgment" on the Corporate Compliance Home Page and logging on with your CUID and LDAP. A checked box next to an individual employee's name indicates that they have received and read the Code. You will no longer need to contact Corporate Compliance to verify completion of the acknowledgment process by your individual employees.

Questions regarding completing the acknowledgment form or the Code can be forwarded to Brian Burke at bjburke@qwest.com.