

# CenturyLink Political Contributions Report

January 1, 2019 – June 30, 2019



CenturyLink™

As one of the nation's premier technology and communications companies, CenturyLink plays a key role advocating for policies and practices that benefit our customers and our company. The communications industry still remains asymmetrically regulated with many policies that are based on outdated assumptions about competition. Policymakers also face new content-related consumer issues such as privacy, net neutrality and cybersecurity and must make challenging decisions that directly affect our ability to provide quality communications services and compete in a rapidly evolving marketplace.

Our active participation in the political process is essential to ensure that we have a voice in those decisions. At CenturyLink, we are committed to advocating public policy solutions that best serve our customers, our shareholders, our employees, and the communities we serve. CenturyLink believes that participation in the political process is critical to our core business because legislative and regulatory decisions made at all levels of government – federal, state and local – have a direct impact on our ability to make key business decisions and compete for Enterprise and Consumer customers. Advocacy is an important means of maintaining a viable operating environment, electing business-minded candidates and enhancing shareholder value. We also believe it better serves our business interests by creating a more informed and balanced policy-making process.

CenturyLink participates in the political process in several ways, including educating elected and appointed officials about the real-world impacts of policy decisions; political giving through employee-funded federal and state political action committees; corporate political giving where permitted; and membership in industry trade associations that help advance our overall business objectives.

CenturyLink also values transparency in this process and appreciates the need for disclosure of our political activity to promote ethical corporate governance and confidence in the democratic process. The company's corporate political contributions and those of its political action committees are disclosed in accordance with applicable federal and state campaign finance laws, and this Political Contributions Report contains additional information which is not otherwise required to be disclosed.

We also file quarterly reports regarding our U.S. federal lobbying activities, as well as mid-year and year-end reports regarding our U.S. federal political contributions, with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These reports are available by searching for "CenturyLink" as a "Registrant" on the U.S. Senate's website below:

[http://www.senate.gov/legislative/Public\\_Disclosure/LDA\\_reports.htm](http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm).

## Core Principles for Participation

CenturyLink's participation in the political process is guided by a set of core principles that govern our corporate policies on lobbying, political spending and general engagement in the process.

- CenturyLink works with members of government, others in our industry, the broader business community, our customers and the public to advocate public policies that support our customers' interests and our business goals. The company's public policy positions and agenda are guided each year by our company's Vision and Unifying Principles.
- CenturyLink supports public policies that eliminate unnecessary obstacles to our business operations; promote competition, choice and free markets in the delivery of communications services; and are in the best long-term interest for our customers, shareholders and employees.

- Political contributions by CenturyLink, will reflect the company’s interests not the preferences of individual directors, officers or employees.
- CenturyLink will not make political contributions based upon party affiliation or client pressure. No campaign contribution will be given in anticipation of, in recognition of, or in return for an official act. Similarly, CenturyLink will not make political contributions for the purpose of influencing or attempting to influence the award of business to the company.
- CenturyLink adheres to all federal, state and local laws and regulations governing the political process and has established internal policies, personnel and procedures to ensure compliance with these requirements.

## Political Action Committee Contributions

CenturyLink has established voluntary, nonpartisan employee-funded political action committees (“PACs”) that accept employee contributions and make expenditures to support candidates for elected office. These employee PACs allow eligible employees, as defined by federal and state law, to pool their resources to support candidates for office who generally, but not always, support the public policies supported by the Company. Eligible employees are encouraged to make contributions to a CenturyLink-sponsored PAC; however, CenturyLink does not require participation, carry out retaliatory actions against employees who do not participate, or attempt to influence employee contributions or political activities in any manner.

The CenturyLink, Inc. Employees’ Political Action Committee (“CenturyLink PAC”) is a federal political action committee, registered and monitored by the Federal Elections Commission, established to encourage employee participation in the political process, and to make contributions to qualified candidates for public office. The CenturyLink PAC provides company employees with a convenient and meaningful way to participate in the electoral process, learn more about key issues, as well as collectively support public policy positions that are important to CenturyLink, regardless of political party affiliation.

The CenturyLink PAC’s disbursement of funds is made in accordance with a budget, and the same contribution criteria identified in the “Core Principles for Participation” section above are considered in determining CenturyLink PAC disbursements. Throughout the year, members of the company’s Public Policy organization and associate PAC members offer recommendations for CenturyLink PAC disbursements. CenturyLink PAC contributions are approved by the CenturyLink PAC’s Board of Trustees, which is comprised of management employees from various CenturyLink business units and management levels within the company. A listing of the Board of Trustees and officers of the CenturyLink PAC follows this discussion.

The CenturyLink PAC operates pursuant to all relevant state and federal laws, and complies with all public disclosure requirements. Information about the CenturyLink PAC’s contributions may be found on the Federal Election Commission’s website, [www.fec.gov](http://www.fec.gov).

CenturyLink also operates 10 separate state employee PACs, which are funded by a combination of voluntary employee contributions, transfers from the CenturyLink PAC, and corporate political contributions. These state PACs are governed in a manner similar to that of the CenturyLink PAC, each having a board of trustees or similar governing body.

## Corporate Political Contributions

CenturyLink makes direct contributions to support certain state candidates, political parties, political action committees, and ballot measures in those states where such corporate contributions are allowed by law and may make in-kind contributions, such as hosting a reception and paying expenses associated with the event.

Each year, the company's Board of Directors reviews and approves a maximum limit on the aggregate amount of corporate political contributions that may be made, and authorizes only political contributions that are permitted by, and in strict compliance with, applicable law. Throughout the year, members of the company's Public Policy organization make recommendations for corporate contributions. The Senior Vice President, Public Policy and Government Relations must approve each corporate contribution. Advance approval must be obtained for cash contributions to individuals or organizations able to receive corporate contributions, use of corporate facilities, discounts, or other items having monetary value. CenturyLink does not make corporate political contributions to candidates for federal office.

## Trade Association Memberships and Related Engagements

Like most major corporations, CenturyLink is a member of a number of national and state industry and business trade associations (organized under section 501(c)(6) of the Internal Revenue Code) to help advance our public policy agenda and related business goals. CenturyLink believes that membership in these associations is generally consistent with the company's interests and plays a valuable role in bringing a collective voice to the political process. CenturyLink also understands that not all members of an association will come to agreement on every issue. Even when CenturyLink does not share the view of one of these associations, we still believe that membership is worthwhile because these associations encourage dialogue and help to move the industry to a consensus on important policy issues. However, CenturyLink does take these situations into consideration when determining annual membership. Payments to industry and business trade associations are subject to the same criteria listed in the "Core Principles for Participation" section above.

CenturyLink has a rigorous approval process for contributions to industry and business trade associations and similar organizations (for example, 527 groups, 501(c)(4) groups, and other similar tax-exempt organizations whose primary purpose includes political activities). Each proposed contribution must be approved by the Senior Vice President, Public Policy and Government Relations. Finally, CenturyLink would note that a portion of the total payments made to each trade association may be allocated to non-deductible lobbying and political expenditures, as determined by such trade association and computed pursuant to I.R.C. § 162(e) and Treas. Reg. § 1.162.29.

## Lobbying Activities

CenturyLink engages in lobbying activities to advocate our position on public policy, business and tax issues with elected officials and others in federal and state government. These are issues that affect our company, our employees and, most importantly, our customers. The company's Senior Vice President, Public Policy and Government Relations has oversight of all lobbying activities and expenditures. Other members of the company's Public Policy organization involved with lobbying include the Vice Presidents, Regional Regulatory and Legislative Affairs personnel and their respective direct reports.

CenturyLink complies with all disclosure requirements as prescribed by state and federal law. CenturyLink employees who are registered as lobbyists on behalf of the Company must also comply with company procedures for tracking and reporting activities and related expenses involving dealings with public officials and employees. CenturyLink lobbyists also are required to behave in a manner that meets or exceeds generally accepted standards of conduct of the profession. In their dealings with public officials and employees, all CenturyLink employees are required to comply with applicable federal and state laws, as well as the Company's policies on political activities, lobbying, and the exchange of business courtesies such as gifts, meals and entertainment.

## Management and Oversight

CenturyLink values responsible corporate governance and participates in the political process to formulate policies that benefit our customers, shareholders and the communities we serve. In making political contributions, CenturyLink is committed to complying with laws and regulations governing the political process including campaign finance and disclosure rules.

CenturyLink encourages its employees' voluntary, personal participation in the political process, whether by voting, volunteering time, contributing money to the candidates of their choice or holding public office. When participating in the political process, however, CenturyLink employees must comply with the company's ethics and compliance requirements identified in the company's "Code of Conduct" and related corporate policies. The Code of Conduct, which is available on our website, sets forth the guidelines for appropriate employee conduct relating to political activity and contributions, as well as interaction with government officials and agencies. Employees are advised that personal political activities must never occur on company time and no company resources can be used. Additionally, CenturyLink does not reimburse employees, directly or indirectly, for political donations or expenses. Furthermore, CenturyLink adheres to a strict policy that no employee will be subject to any form of pressure, coercion or intimidation related to participation in political activities, nor shall any employee receive compensation or benefits for participating in personal political activities.

Management of CenturyLink's participation in the political process is the responsibility of the Senior Vice President, Public Policy and Government Relations. This position reports directly to CenturyLink's Executive Vice President, Chief Administrative Officer and General Counsel.

Public policy updates are provided periodically to CenturyLink's Board of Directors and/or its designated board committees, including periodic reviews of the company's political strategy, contributions and activities. The risks associated with political and lobbying activities are managed in accordance with the company's enterprise risk management framework. In that regard, the Board of Directors and/or its designated board committees oversee compliance with the Company's policies and procedures regarding political contributions and activities.

In addition, the company's Internal Audit personnel and Corporate Ethics and Compliance Department assess the risk related to political activities, including spending, in connection with the company's annual risk assessment process.

# CenturyLink, Inc. Employees' Political Action Committee

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## Ex Officio Trustees of the Board

**David C. Bartlett, Chairman**

VP Federal Government Affairs

**William (Bill) C. Hanchey – Vice Chairman**

VP Regional Regulatory & Legislative Affairs

**Garland (Clay) C. Bailey, Board Member**

SVP Public Policy & Government Affairs

**Stacey W. Goff – Board Member**

Executive Vice President, Chief Administrative Officer, General Counsel & Secretary

**Mark S. Reynolds – Board Member**

VP Regional Regulatory & Legislative Affairs

**Melissa H. Mann, Board Member**

VP Regional Regulatory & Legislative Affairs

## Non-Voting Treasurer

**Brian Adkins – Non-Voting Treasurer**

VP Federal Government Relations

## At Large Trustees

**Paul Cooper – At Large Member**

VP National Public Access

**Craig Davis – At Large Member**

SVP Wholesale

**Andrew Dugan – At Large Member**

SVP Technology Planning & Network Architecture

**Kathy Lutito – At Large Member**

SVP Finance

**Stephanie Polk – At Large Member**

VP Customer Advocacy

**Paul Savill – At Large Member**

SVP Core Network & Technology Solutions

**Tim Walden – At Large Member**

SVP Local Network Implementation

**David Young – At Large Member**

Regional VP Federal

## CenturyLink Federal PAC Contributions

The following table lists, on an aggregated state-by-state basis, the contributions made by the CenturyLink, Inc. Employees' Political Action Committee, including those made to federal and state candidates, national and state party committees, and leadership PACs and other committees.

CenturyLink Federal PAC Contributions by State	Total Contributions (January 1, 2019 – June 30, 2019)
Arizona	1,000
California	6,000
Colorado	3,500
Delaware	500
Florida	2,000
Georgia	1,000
Hawaii	2,000
Illinois	2,500
Iowa	2,300
Kentucky	1,000
Louisiana	3,500
Maryland	1,000
Michigan	4,000
Minnesota	1,000
Missouri	23,610
Montana	4,500
Nebraska	4,000
New Hampshire	500
New Jersey	7,500
New York	6,500
North Carolina	6,500
North Dakota	1,000
Ohio	5,250
Oregon	3,500
Pennsylvania	2,500
Texas	1,000
Utah	1,000
Virginia	3,000
Washington	500
Washington, D.C.	60,000
Wisconsin	1,000
Wyoming	1,000
<b>Total</b>	<b>164,160</b>

## CenturyLink State PAC Contributions

The following table lists, on an aggregated state-by-state basis, the contributions made by CenturyLink state PACs, including those made to candidate committees, state or local party committees or other groups, and political action committees.

<b>CenturyLink State PAC Contributions by State</b>	<b>Total Contributions (January 1, 2019 – June 30, 2019)</b>
Colorado	2,500
Minnesota	300
Missouri	1,500
New Mexico	912
Pennsylvania	1,500
Utah	9,000
Washington	19,250
<b>Total</b>	<b>34,962</b>

## CenturyLink Corporate Contributions

The following table lists, on an aggregated state-by-state basis, the corporate contributions made by CenturyLink to (1) candidate committees (referred to as “Candidate Committees”); (2) party organizations, ballot measure groups or other groups (referred to collectively as “Party Organizations or Other Groups”); and (3) political action committees (referred to as “PACs”).

<b>CenturyLink Corporate Contributions by State and Category</b>	<b>Total Contributions (January 1, 2019 - June 30, 2019)</b>
Arizona - Party Organizations or Other Groups	10,000
Colorado - Party Organizations or Other Groups	3,500
Florida - Party Organizations or Other Groups	60,000
Idaho - Party Organizations or Other Groups	1,000
Idaho- PACs	5,000
Kansas - Party Organizations or Other Groups	500
Louisiana - Party Organizations or Other Groups	30,000
Louisiana -Candidate Committees	12,000
Missouri - Party Organizations or Other Groups	3,500
Missouri - PACs	1,000



Nebraska - Candidate Committees	3,349
New York - Party Organizations and Other Groups	1,500
New York - Candidate Committees	3,000
Oregon - CenturyLink Oregon Employees PAC	30,000
Virginia - Party Organizations of Other Groups	6,000
Virginia - Candidate Committees	5,750
Washington - CenturyLink Employee PAC	40,000
	<b>216,099</b>

## Trade Association Memberships and Related Engagements

The following tables list national and state business and trade associations to which CenturyLink has made annual payments (i.e., annual dues, assessments and/or contributions) from corporate funds in excess of \$50,000. A portion of the total payments made to each trade association may be allocated to non-deductible lobbying and political expenditures, as determined by such trade association and computed pursuant to I.R.C. § 162(e) and Treas. Reg. § 1.162.29.

Trade Associations Dues over 50K	Amount of Dues
Louisiana Telecommunications Association	104,332
Minnesota Telecom Alliance	65,000
Pennsylvania Telephone Association	55,000
Telecommunications Association of Michigan	87,000
ITTA (The Independent Telephone & Telecommunications Alliance)	220,000
USTelecom Association (Total 2019 Invoice is \$1,422,386 - Paying Quarterly)	711,193
ATIS (Alliance for Telecommunications Industry Solutions)	236,000
<b>Total</b>	<b>1,478,525</b>

## Other Organizations

The following table lists, on an aggregated basis, CenturyLink’s giving to tax exempt 501(C)(4) entities and “unregulated” 527 entities, to the extent such organizations are not regulated under state or federal campaign finance laws. These amounts are included in, and are not in addition to, amounts shown in the “CenturyLink Federal PAC Contributions,” “CenturyLink State PAC Contributions” and “CenturyLink Corporate Contributions” tables above, as applicable.

<b>Other Organizations - Non-Profit</b>	<b>Total Contributions (January 1, - June 30, 2019)</b>
Maricopa County Republican Committee	10,000
Values First Colorado	1,000
Colorado Senate Majority Fund	2,500
Florida Republican Senatorial Campaign Committee	30,000
Republican Party of Florida	30,000
Idaho Democratic Legislative Campaign Committee	1,000
Kansas Shawnee County Democratic Legislative Committee	500
Rebuild Louisiana	15,000
Securing Louisiana's Future	15,000
Missouri House Republican Campaign Committee	3,500
Missouri Chamber PAC	1,000
New York State Republican Assembly Campaign Committee	500
NYS Senate Republican Campaign Committee	1,000
Virginia House Republican Campaign Committee	3,500
Virginia Commonwealth Victory Fund	2,500
<b>Total</b>	<b>117,000</b>