

# Lumen Political Contributions Report

January 1, 2024 through June 30, 2024



At Lumen, we are committed to advocating for public policy solutions that best serve our customers, our employees, shareholders, and the communities we serve. Federal, state and local policymakers make critical decisions that directly affect our ability to invest in our network and deliver transformational digital services to enterprise, government and mass-market customers.

Our active participation in the political process is essential to ensure that we have a voice in those decisions. Electing pro-innovation policymakers who understand Lumen's mission of connecting people, data and apps - quickly, securely and effortlessly.

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

Lumen 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 we disclose voluntarily.

We file quarterly reports with the U.S. House and Senate regarding our U.S. federal lobbying activities, as well as mid-year and year-end reports regarding our U.S. federal political contributions. These reports are available by searching for "Lumen Technologies, Inc." as a "Registrant" on the U.S. Senate's website:  
[http://www.senate.gov/legislative/Public\\_Disclosure/LDA\\_reports.htm](http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm).

We also file periodic reports, in accordance with applicable state law, regarding our State Political Action Committee contributions, with State Ethics Commissions or their equivalent organizations.

### **Core Principles for Participation**

Lumen'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.

- Lumen supports public policies that empower our business operations, promote competition, and are in the best long-term interest for our customers, employees and shareholders.
- Political contributions by Lumen do not reflect the interests of individual directors, officers or employees.

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- Lumen does not make political contributions based upon party affiliation.
  - No campaign contribution will be given in anticipation of, in recognition of, or in return for an official act.
  - Lumen will not make political contributions for the purpose of influencing or attempting to influence the award of business to the company.
  - Lumen 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

Lumen has established voluntary, nonpartisan employee-funded political action committees (“PACs”) that accept contributions from eligible employees 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.

The Lumen Technologies, Inc. Political Action Committee (“Lumen PAC”) is a federal political action committee, registered and monitored by the Federal Election Commission, established to encourage participation by eligible employees in the political process, and to make contributions to qualified candidates for public office.

The Lumen 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 Lumen PAC disbursements. Throughout the year, members of the company’s Public Policy organization and associate PAC members offer recommendations for Lumen PAC disbursements. Lumen PAC contributions are approved by the Lumen PAC’s Board of Trustees, which is composed of management employees from various Lumen business units and management levels within the company.

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

Lumen also operates three separate state employee PACs, and one employee conduit fund which are funded by a combination of voluntary employee contributions, or transfers from the Lumen PAC.

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## Corporate Political Contributions

Lumen makes direct contributions to support certain state candidates, political parties, and political action committees 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. It is not Lumen's normal practice to make independent expenditures to directly support or oppose political candidates,<sup>1</sup> or to make corporate contributions to support or oppose ballot measures or ballot initiatives (including to ballot measure committees); however, if we do make such independent expenditures or contributions, we will disclose them and identify the candidate, measure or initiative being supported or opposed, and the amounts given. Lumen did not make any such independent expenditures or contributions in the first half of 2024.

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 Affairs must approve each corporate contribution. Lumen does not make corporate political contributions to candidates for federal office.

Lumen makes corporate political contributions on a nonpartisan basis to help elect candidates that support pro-business policies and private sector investment in broadband network infrastructure, cybersecurity and data privacy, while being mindful of the Lumen Unifying Principles, our Code of Conduct and our commitment to Environmental, Social and Governance best practices. We do not base our political contributions on the personal political preferences of any Lumen executive, officer or employee.

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<sup>1</sup> As defined in 52 USC Section 30101(17).

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## Trade Association Memberships and Related Engagements

Like most major corporations, Lumen is a member of a number of national and state industry and business trade associations (organized under section 501(c)(6) of the Internal Revenue Code) to help advance our public policy agenda and related business goals. Lumen 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. Lumen also understands that not all members of an association will come to agreement on every issue. Even when Lumen 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, Lumen 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.

Lumen 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). Each proposed contribution must be approved by the Senior Vice President, Public Policy and Government Affairs.

## Lobbying Activities

Lumen engages in lobbying activities to advocate for our positions 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, shareholders and, most importantly, our customers. The company's Senior Vice President, Public Policy and Government Affairs has oversight of all lobbying activities and expenditures, working with the Vice President of Government Affairs and his team.

Lumen complies with all disclosure requirements as prescribed by state and federal law. Lumen 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. Lumen 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 Lumen 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

Lumen values responsible corporate governance and participates in the political process to formulate policies that benefit our employees, customers, shareholders, and the communities we serve. In making political contributions, Lumen is committed to complying with laws and regulations governing the political process including campaign finance and disclosure rules. Management of Lumen’s participation in the political process is the responsibility of the Senior Vice President, Public Policy and Government Affairs. This position reports directly to Lumen’s Executive Vice President, and Chief Legal Officer.

Public policy updates are provided periodically to Lumen’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.

The Nominating and Corporate Governance Committee reviews and approves the company’s political policies, practices and expenditures on a periodic basis. The Nominating and Corporate Governance Committee is composed of outside directors that meet the independence requirements of the New York Stock Exchange.

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.

## Lumen Federal PAC Contributions

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

<b>Lumen Federal PAC</b>	<b>Total Contributions January 1 through June 30, 2024</b>
California	7,000
Colorado	6,000
Illinois	2,000
Louisiana	10,000
Michigan	3,500
Minnesota	1,000
Missouri	1,000

Nebraska	7,500
Nevada	2,500
Ohio	2,500
Oregon	1,000
Washington	3,500
<b>Total</b>	<b>47,500</b>

## Lumen State PAC Contributions

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

<b>Lumen State PAC Contributions</b>	<b>Total Contributions January 1 through June 30, 2024</b>
Oregon	15,345
<b>Total</b>	<b>15,345</b>

## Lumen Corporate Contributions

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

<b>Lumen Corporate Contributions by State and Category</b>	<b>Total Contributions January 1 through June 30, 2024</b>
Idaho - Candidate Committees	6,750
Idaho - Party Organizations or Other Groups	8,000
Minnesota - Party Organizations or Other Group	5,000
Utah - Candidate Committees	5,000
<b>Total</b>	<b>24,750</b>

## Association Memberships and Related Engagements

The following tables list national and state business and trade associations ("Associations") to which Lumen has made annual payments (i.e., annual dues, assessments and/or contributions) from corporate funds in excess of \$25,000, together with the amount of the total payments made to each Association attributable to non-deductible lobbying and political expenditures, as determined by such Association and computed pursuant to I.R.C. § 162(e).

<b>Lumen Trade Association Memberships</b>	<b>Total Contributions January 1 through June 30, 2024</b>	<b>Amount Used for Non- Deductible Lobbying Expense</b>
Center of Cybersecurity	25,000	2,500
Minnesota Telecom Alliance	65,000	13,000
Oregon Telecommunications Association	25,250	3,030
State Privacy and Security Coalition	50,000	47,500
The Business Roundtable	200,000	48,000
US Council for International Business	35,600	712
USTelecom	527,503	121,326
<b>Total</b>	<b>928,353</b>	<b>236,068</b>

## Other Organizations

The following table lists Lumen's donations in the reporting period to Section 527 political organizations registered with the Internal Revenue Service. The following table also lists Lumen's donations of more than \$25,000 in the reporting period to social welfare organizations operating under section 501(c)(4) of the Internal Revenue Code.

<b>Other Organizations Non-Profit Over \$25,000</b>	<b>Type</b>	<b>Total Contributions January 1 through June 30, 2024</b>
Democratic Governors Association	527	25,000
Republican Governors Association	527	25,000
<b>Total</b>		<b>50,000</b>