

# Lumen Political Contributions Report

---

July 1, 2020 through December 31, 2020



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 business-minded policymakers who understand Lumen's role in delivering the fastest, most secure services to customers and communities is critical to maintaining a competitive operating environment.

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.
- 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 comprised of management employees from various Lumen business units and management levels within the company. A listing of the Board of Trustees and officers of the Lumen PAC follows this discussion.

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 10 separate state employee PACs, which are funded by a combination of voluntary employee contributions, transfers from the Lumen PAC, and corporate political contributions.

---

## Corporate Political Contributions

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

## 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 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, 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. 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.

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, General Counsel & Secretary.

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.

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.

Lumen Federal PAC	Total Contributions: July 1 - December 31, 2020
Alaska	1,000
Arizona	3,000
California	6,000
Colorado	6,000
Florida	1,000
Georgia	2,500
Illinois	4,500
Iowa	10,250
Louisiana	8,000
Massachusetts	2,000
Michigan	5,500
Minnesota	11,247
Missouri	4,000
Nebraska	3,000
Nevada	1,000
New Jersey	9,200
New Mexico	2,000
New York	5,000
North Carolina	23,750
North Dakota	1,000
Ohio	8,350
Pennsylvania	2,500
Rhode Island	1,000
South Carolina	1,000
South Dakota	500
Texas	20,500
Utah	1,000
Virginia	2,000
Washington	3,500
West Virginia	2,500
Wisconsin	7,935
National	5,000
<b>Total</b>	<b>165,732</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.

Lumen State PAC Contributions by State	Total Contribution: July 1 - December 31, 2020
Arizona	900
Colorado	7,400
Florida	25,000
Minnesota	100
Missouri	12,850
Pennsylvania	2,500
Washington	5,000
<b>Total</b>	<b>53,750</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, ballot measure groups or other groups (referred to collectively as “Party Organizations or Other Groups”); and (3) political action committees (referred to as “PACs”).

Lumen Corporate Contributions by State and Category	Total Contributions: July 1 - December 31, 2020
California - Candidate Committees	4,700
Colorado - Party Organizations or Other Groups	19,000
Florida - Party Organizations or Other Groups	30,000
Georgia - Candidate Committees	2,500
Illinois - Candidate Committees	8,075
Illinois - Party Organizations or Other Groups	1,275
Iowa - Party Organizations or Other Groups	6,150
Indiana - Candidate Committees	7,500
Indiana - Party Organizations or Other Groups	2,000
Kansas - Candidate Committees	10,600
Kansas - Party Organizations or Other Groups	3,500
Louisiana - Candidate Committees	15,500
Louisiana - Party Organizations or Other Groups	10,000
Michigan - Party Organizations or Other Groups	4,000
Minnesota - Party Organizations or Other Groups	10,000

Missouri - Candidate Committees	1,000
Missouri - Party Organizations or Other Groups	9,000
Mississippi - Candidate Committees	5,000
Nebraska - Candidate Committees	17,000
New Mexico - Candidate Committees	19,100
New Mexico - Party Organizations or Other Groups	2,200
New York - Candidate Committees	2,500
New York - Party Organizations or Other Groups	3,500
South Carolina - Party Organizations or Other Groups	5,000
Tennessee - Candidate Committees	1,000
Tennessee - Party Organizations or Other Groups	2,000
Utah - Candidate Committees	20,000
Virginia - Candidate Committees	14,750
Virginia - Party Organizations or Other Groups	6,500
<b>Total</b>	<b>243,350</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>Trade Association Payments: July 1 through December 31, 2020</b>	<b>Total Dues</b>	<b>Amount Used for Non-Deductible Expenses</b>
Telecommunications Association of Michigan	\$87,000	\$10,440
United States Telecom Association	\$661,716	\$92,640
<b>Total</b>	<b>\$748,716</b>	<b>\$103,080</b>



## Other Organizations

The following table lists Lumen's giving to tax exempt 501(C)(4) social welfare organizations and 527 political organizations registered with the Internal Revenue Service.

Other Organizations - Non-Profit	Type	Total Contributions: July 1- December 31, 2020
Carolina Partnership for Reform	501(c)(4)	7,500
Carolina Leadership Coalition	501(c)(4)	5,000
Greater Carolina	501(c)(4)	5,000
Republican Governors Association	527	25,000
Democratic Governors Association	527	25,000
<b>Total</b>		<b>67,500</b>