

CenturyLink Political Contributions Report

July 1, 2018 – December 31, 2018



CenturyLink™

Participation in the Political Process

As one of the nation's leading technology and communications companies, CenturyLink plays a key role advocating for policies and practices that benefit our customers and our company. The communications industry remains asymmetrically regulated with incumbents saddled with state and federal regulatory obligations that do not apply to new, powerful competitors such as Facebook, Amazon, Microsoft and others. Elected and appointed public officials 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 executing a public affairs strategy designed to inform elected and appointed officials of key public policy issues related to the company's business; political giving through employee-funded federal and state political action committees; corporate political giving where legally allowed; and membership in industry and business trade associations which help to 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.

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.

- In general, CenturyLink is supportive of public policies that promote our business operations generally; 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 CenturyLink.
- Political spending by CenturyLink, both with corporate dollars and through our political action committees, will reflect the company’s interests and be used to further our public policy positions and agenda and not the personal agenda 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 prohibits 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 are legally recognized organizations 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.

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

While federal law prohibits CenturyLink from making corporate contributions to federal candidates, CenturyLink makes direct contributions to support 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. In addition to the considerations listed in the "Core Principles for Participation" section above, certain criteria are considered in making corporate political contributions, including, but not limited to, the following:

- Candidate's voting record or announced positions on issues important to CenturyLink and our customers
- Candidate's demonstrated leadership on key committees of importance to our business
- Impact of contribution on the campaign
- Impact of contribution in a state or district where CenturyLink has a large concentration of employees, customers, and/or facilities

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.

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

Ex Officio Trustees of the Board

David C. Bartlett, Chairman

VP Federal Government Relations

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

Sr. Director Regional Regulatory & Legislative Affairs

Non-Voting Treasurer

Richard (“Brian”) B. 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

VP 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 (July 1, 2018 – December 31, 2018)
Arkansas	2,000
Arizona	2,000
California	5,500
Colorado	4,000
Connecticut	1,000
Florida	1,000
Georgia	1,000
Idaho	2,000
Illinois	3,300
Indiana	3,600
Iowa	13,900
Kentucky	1,000
Louisiana	6,500
Maryland	500
Massachusetts	1,000
Michigan	4,260
Minnesota	2,000
Mississippi	3,500
Missouri	12,300
Nebraska	4,000
Nevada	1,000
New Jersey	5,000
New Mexico	2,000
New York	2,500
North Carolina	26,700
North Dakota	5,980
Ohio	3,600
Oregon	1,000
Pennsylvania	2,000
Rhode Island	1,000
South Dakota	5,700
Tennessee	3,850
Texas	29,000
Utah	1,000
Vermont	1,000
Virginia	2,000
Washington	16,500
West Virginia	3,500
Wisconsin	15,850

Wyoming	1,000
Total	204,540

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.

CenturyLink State PAC Contributions by State	Total Contributions (July 1, 2018 – December 31, 2018)
Arizona	4,950
Colorado	26,475
Florida	18,500
Idaho	1,000
Minnesota	500
Missouri	11,150
New Mexico	5,500
Oregon	55,000
Pennsylvania	5,800
Utah	15,500
Washington	17,500
Total	<u>161,875</u>

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”).

Corporate Contributions by State and Category	Total Contributions (July 1, 2018 – December 31, 2018)
Alabama - Candidate Committees	16,000
Arizona - Party Organizations or Other Groups	14,483
Arkansas - PACs	7,500
California - Party Organizations or Other Groups	4,000
Colorado - Party Organizations or Other Groups	30,000
Georgia - Candidate Committees	5,900
Idaho - Candidate Committees	7,500
Iowa - Party Organizations or Other Groups	7,500
Illinois - Party Organizations or Other Groups	150
Illinois - Candidate Committees	1,450
Kansas - Party Organizations or Other Groups	8,000
Kansas - PACs	2,500
Kansas - Candidate Committees	30,350
Louisiana - Party Organizations or Other Groups	15,000
Louisiana -Candidate Committees	36,250
Michigan - Party Organizations or Other Groups	6,000
Minnesota - Party Organizations or Other Groups	12,500
Minnesota - PACs	7,500
Mississippi - Candidate Committee	3,000
Missouri - Party Organizations or Other Groups	4,250
Missouri -PACs	10,250
Nebraska - Candidate Committees	7,999
Nevada - Party Organizations or Other Groups	5,500
Nevada - Candidate Committee	33,500
New Mexico - Party Organizations or Other Groups	500
New Mexico - Candidate Committees	7,400
New York - Party Organizations and Other Groups	2,250
New York - Candidate Committees	1,000
North Carolina - Party Organizations and Other Groups	16,000
South Carolina - Party Organizations or Other Groups	6,500
South Carolina - Candidate Committees	3,750
Tennessee - Party Organizations and Other Groups	2,000
Tennessee - PACs	8,000
Utah - CenturyLink Employee PAC	6,000
Virginia - Party Organizations or Other Groups	6,500

Virginia - Candidate Committees	17,250
Wisconsin - Party Organizations or Other Groups	16,000
Total	<u>\$370,232</u>

Trade Association Memberships and Related Engagements

The following tables list (1) 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; and (2) any contributions, irrespective of amount, made by CenturyLink, from corporate funds, or by the company's federal and/or state employee PACs to 527 groups, 501(c)(4) groups, and other similar tax-exempt organizations whose primary purpose includes political activities.

Trade Associations	Total Payments (July 1, 2018 – December 31 2018)
Louisiana Telecom Association	\$13,405.20
US Telecom Assoc. (Total \$1,422,386 for year)	711,193.00
Total	\$724,598

Note: 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.

Other Organizations	Total Contributions (July 1, 2018 – December 31, 2018)
American Legislative Exchange Council	2,000
Arizonans for a great Schools and a Strong Economy	10,000
Arizona State University	483
Arizona Free Enterprise Club	2,000
House Leadership PAC	2,500
Arkansas State Chamber of Commerce PAC	2,500
ARKPAC	2,500
CALTEL	4000
Our Colorado Values	10,000
Senate Majority Fund	5,000
Coloradans For Fairness	10,000
Values First Colorado	5,000
Iowa Growth Project	2,500
Republican Governors Association	2,500
Leading Upward	2,500
Democratic Majority	150
Kansas Republican Senatorial Committee	2,500
Kansas Senate Democrats	1,000
Kansans for a Democratic House	1,000
Kansas Republican House Campaign Committee	2,500
Kansas Chamber PAC	2,500
Kansas Senate Democrats	1,000
Republican Attorneys General Association	15,000
Michigan Citizens for Fiscal Responsibility	6,000

Republican State Leadership Committee	7,500
GOPAC	7,500
Freedom Foundation of Minnesota	5,000
House Republican Campaign Committee	500
House Republican Campaign Committee	250
House Republican Campaign Committee	2,500
Missouri Chamber PAC	1,000
Missouri Senate Campaign Committee	750
House Republican Campaign Committee	250
Uniting Missouri PAC	2,500
Senate Republican Leadership Conference	2,000
Assembly Republican Caucus	1,000
Nevada Senate Democratic	2,500
New Mexico Senate Democrats	500
NYS Senate Republican Campaign Committee	1,500
Republican Assembly Campaign Committee	750
SC House Democratic Caucus	1,500
South Carolina Senate Democratic Caucus	1,500
SC House Republican Caucus	3,500
TN House Republican Caucus	1,000
Senate Republican Caucus	1,000
Tennessee Chamber of Commerce PAC	500
CenturyLink Utah Political Action Committee	6,000
Virginia Senate Democratic Caucus	500
Virginia Senate Republican Caucus	1,000
Virginia Senate Republican Caucus	500
Commonwealth Victory Fund	1,000
Colonial Leadership Trust PAC	500
Virginia Senate Democratic Caucus	500
Assembly Democratic Caucus	2,500
The Jobs First Coalition	6,000
Republican State Leadership Committee	5,000
Republican Governors Association	5,000
Total	\$168,633

† These amounts are included in, and are not in addition to, the amounts shown in the “CenturyLink Federal PAC Contributions,” “CenturyLink State PAC Contributions” and “CenturyLink Corporate Contributions” tables above, as applicable.

Funding Sources by State

State	Corporate	FED PAC	State PAC	Total
Alabama	16,000	-	-	16,000
Arizona	14,483	2,000	4,950	21,433
Arkansas	7,500	2,000	-	9,500
California	4,000	5,500	-	9,500
Colorado	30,000	4,000	26,475	60,475
Connecticut	-	1,000	-	1,000
Florida	-	1,000	18,500	19,500
Georgia	5,900	1,000	-	6,900
Hawaii	-	-	-	-
Idaho	7,500	2,000	1,000	10,500
Illinois	1,600	3,300	-	4,900
Indiana	-	3,600	-	3,600
Iowa	7,500	13,900	-	21,400
Kansas	40,850	-	-	40,850
Kentucky	-	1,000	-	1,000
Louisiana	51,250	6,500	-	57,750
Maryland	-	500	-	500
Massachusetts	-	1,000	-	1,000
Michigan	6,000	4,260	-	10,260
Minnesota	20,000	2,000	500	22,500
Mississippi	3,000	3,500	-	6,500

Missouri	14,500	12,300	11,150	37,950
Montana		-	-	-
Nebraska	7,999	4,000	-	11,999
Nevada	39,000	1,000	-	40,000
New Jersey		5,000	-	5,000
New Mexico	7,900	2,000	5,500	15,400
New York	3,250	2,500	-	5,750
North Carolina	16,000	26,700	-	42,700
North Dakota	-	5,980	-	5,980
Ohio	-	3,600	-	3,600
Oklahoma	-	-	-	-
Oregon	-	1,000	55,000	56,000
Pennsylvania	-	2,000	5,800	7,800
Rhode Island	-	1,000	-	1,000
South Carolina	10,250	-	-	10,250
South Dakota	-	5,700	-	5,700
Tennessee	10,000	3,850	-	13,850
Texas	-	29,000	-	29,000
Utah	6,000	1,000	15,500	22,500
Vermont	-	1,000	-	1,000
Virginia	23,750	2,000	-	25,750
Washington	-	16,500	17,500	34,000
West Virginia	-	3,500	-	3,500

Wisconsin	16,000	15,850	-	31,850
Wyoming	-	1,000	-	1,000
Total	370,232	204,540	161,875	736,647