

Political Spending Policy & Disclosure

Disclosure of Political Activity

Windstream's Policy on Oversight and Transparency for Political Spending

Windstream's Board of Managers oversees corporate political spending. At least annually, Windstream will brief its Audit Committee on the company's corporate political activity, including the spending of treasury funds and/or funds from the Windstream political action committee(s).

Windstream is committed to transparency in its political activities. The Company complies with federal and state regulatory reporting requirements, including required filings made with the Federal Election Commission (FEC) and analogous state entities. This information is supplemented by voluntary disclosures in the Investors section of its web site, offering a comprehensive, public view of Windstream's political activity.

Windstream has not funded independent expenditures and does not plan to fund independent expenditures as part of its political program. Consistent with its commitment to transparency, Windstream will be fully transparent if it funds future independent expenditures. Further, prior to funding any independent expenditure, Windstream shall obtain the approval of the Audit Committee of its Board of Managers.

Windstream also provides transparency on its major trade association memberships. The Company will post on its website the name of all trade associations receiving more than \$50,000 a year in Windstream membership dues. In addition, for trade associations that are not primarily engaged in telecommunications regulatory matters, Windstream will provide the annual payment amount for the preceding year.

Windstream is active in the governance of its major trade associations and encourages them to provide transparency for their political campaign contributions and to decline to make independent expenditures. The Company does not, however, condition membership in a group or association based on the group or association's policy on reporting independent expenditures.

Disclosure of Political Activity

Windstream is committed to transparency in its political activity. The following information is an accounting of the company's efforts in 2021.

Campaign contributions – Windstream made no corporate contributions to candidates or political parties in 2021.

During 2021, Windstream had two political action committees (PACs), each funded 100% with voluntary contributions from employees. The Arkansas PAC operates exclusively in that state. The Windstream Corporation PAC contributes to candidates for the U.S. Senate and House of Representatives, and also makes contributions to state and local candidates, where permitted. During 2021, the two PACs contributed approximately \$13,000 to federal candidates, \$116,800 to state and local candidates and political party organizations, and \$2,650 to the PACs of state telecom associations and chambers of commerce. Detailed information on the activity of both PACs is available online:

- [Federal Election Commission](#)

- [Arkansas Secretary of State](#)

Windstream made no independent expenditures in 2021.

Trade associations – Outside of telecom, Windstream has no major memberships. A major membership is defined as at least \$50,000 in annual dues.

In 2021, Windstream paid at least \$50,000 to two organizations that focus on telecom regulatory and policy issues:

- the United States Telecom Association, and
- INCOMPAS.

These organizations focus narrowly on telecom regulatory matters. For competitive reasons, Windstream does not itemize its dues payments to such groups. Windstream is active in the governance of its major trade associations and encourages them to provide transparency for any political campaign contributions and to decline to make independent expenditures.