

Delta Air Lines, Inc.
Political Contributions & Activity Report
(2019)

Delta Air Lines (“Delta”) actively participates and engages in the political process. Political participation takes many forms, including lobbying, making political contributions, and participating in trade associations. In conducting these activities, Delta conducts its business ethically and in compliance with the law. Management regularly consults with outside counsel to ensure political activities undertaken are reported as required by applicable federal, state and local.

Delta is subject to extensive regulation internationally and at the federal, state and local levels of government in the U.S. which have a significant impact on our business. Therefore, engagement in the legislative and regulatory process is necessary to our success and is in the best interest of stockholders.

Our Executive Vice President, Chief Legal Officer and Corporate Secretary; the Senior Vice President – Government Affairs; and the Vice President – State Government Affairs, in consultation with outside counsel, oversee all political activity. This includes any use of funds to further our public policy and political interests.

Political Contributions

The Corporate Governance Committee of the board of directors, comprised of independent directors, is responsible for overseeing the company's corporate and PAC political contributions and receives annual formal reports that review political giving. Management of our participation in such activities is the responsibility of the Executive Vice President, Chief Legal Officer and Corporate Secretary in conjunction with the Senior Vice President – Government Affairs, and the Vice President – State Government Affairs. Delta’s political spending is aligned to a set of giving criteria and not the political preferences of any individual director, officer or employee.

Delta Air Lines Political Action Committee (“DeltaPAC”)

Pursuant to federal election law, Delta does not make political contributions to candidates for a federal office or to third party federal political committees, such as political parties or political action committees whose purpose is to help elect federal candidates. However, we provide an opportunity for eligible employees to participate in the political process by joining our non-partisan political action committee, DeltaPAC. Employee participation in DeltaPAC is completely voluntary.

DeltaPAC makes contributions to federal candidates and committees which are funded solely by the voluntary contributions from PAC eligible employees. Delta does not favor or disadvantage any employee by reason of the amount of their contribution or the decision not to contribute to DeltaPAC. Coercive DeltaPAC solicitations are strictly prohibited. DeltaPAC offers employees an opportunity to speak with a unified voice on issues important to our company.

DeltaPAC has its own board of directors, which approves all PAC contributions. The DeltaPAC board of directors has established in its operating guidelines the following criteria to support candidates on a bipartisan basis - their position on Delta’s priority issues, leadership position, committee assignments, representation of Delta operations/people and likelihood of election success. Candidates take positions on a wide range of issues and DeltaPAC contributions are not an endorsement of a candidate’s comprehensive political views. DeltaPAC does not make contributions to presidential, state, or local candidates and does not make independent expenditures in support or opposition to a candidate.

DeltaPAC is registered with the Federal Election Commission (“FEC”) and files monthly reports with the FEC. These reports are publicly available and provide an itemization of the DeltaPAC receipts and disbursements, including its contributions to candidates, party committees and any other organizations. Year to date and historic DeltaPAC contribution information may be found on the FEC website at: <https://www.fec.gov/data/committee/C00104802>.

State/Local Political Contributions

Individual state and local laws govern contributions to candidates running for election to state and local offices. The guidelines for determining whether a corporate political contribution should be made to a candidate are the same as the PAC contribution criteria above (their position on Delta’s priority issues, leadership position, committee assignments, representation of Delta operations/people and likelihood of election success) and giving is focused on Delta Hub states. The Vice President - State Government Affairs, in consultation with outside counsel, approves requests for state and local corporate contributions.

Delta files reports reflecting corporate political contributions to state/local candidates, parties and committees as required by relevant state and local laws. We have made contributions in the following states and year to date and historic contribution information can be found using the following links. (Note, where possible links are provided directly to company filings, however some states require the use of a search tool to locate the filings.)

- [California](#)
- [Florida](#)
- [Georgia](#)
- [Michigan](#)
- [Utah](#)
- [Washington](#)

Other Politically-Related Requests

Delta periodically contributes to ballot initiatives, get-out-the-vote activities and partisan organizations, such as the Democratic and Republican governors’ associations. Delta also participates in state or federal political party conventions, as well as inaugural events. Any such contribution requires the review and approval of the Executive Vice President, Chief Legal Officer and Corporate Secretary, the Senior Vice President – Government Affairs or the Vice President – State Government Affairs, in consultation with counsel, and contributions are publicly disclosed as required by applicable federal, state or local law.

Advocacy

Delta is committed to being a positive voice on public policy issues that not only impact the airline industry but also impact our customers, our people and the communities we serve. Delta cares about a wide range of issues including fair trade, competition, policy, safety and security, workforce development and energy and the environment. More information about Delta priority issues is located on our public policy website – deltatakingaction.com.

Management of our advocacy activities contained in this section is the responsibility of the Executive Vice President, Chief Legal Officer and Corporate Secretary in conjunction with the Senior Vice President – Government Affairs, and the Vice President – State Government Affairs. Delta’s Leadership Committee and Board regularly receive formal reports on advocacy activity and priorities.

Lobbying

Federal, state and local statutes govern the definitions of lobbying activities, corporate engagement in such activities, and reporting requirements. Delta complies with all applicable federal, state and local statutes.

On a quarterly basis, Delta submits reports, pursuant to the requirements of the Lobbying Disclosure Act, reporting on federal lobbying activities and expenses as well as semi-annual reports on federal contributions. The reports may be found on the House and Senate websites, under the Public Disclosure links. Delta also files reports with state and local agencies reflecting lobbying activities as required by relevant state and local laws.

Employees engaged in lobbying activity receive regular training on lobbying and ethics regulations.

Trade Associations

Delta participates in trade and industry associations, such as the International Air Transport Association, and the United States Chamber of Commerce that may support our public advocacy efforts. In addition, Delta has rejoined the U.S. trade association Airlines for America in January 2020, Delta is also a member of various chambers of commerce at the state and local level which may participate in public advocacy matters. As a leader in the aviation industry, participation in these organizations allows us to share our business expertise and to be part of public education efforts regarding issues facing our industry and the business community.

Trade association membership is subject to senior management approval and oversight and comes with the understanding that we may not always agree with all positions of the organizations or other members.