

Delta Air Lines, Inc.
Political Contributions & Activity Report (2020)

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 entirely of independent directors, is responsible for overseeing the company's corporate and PAC political contributions and receives annual formal reports that review political giving and policies relating to political giving and activity. 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’s Internal Auditing organization reviews political giving to assess compliance with applicable laws, regulations, and Company policies and procedures. The findings of which are reported to the audit committee of Delta’s Board of Directors, which is comprised entirely of independent directors. In addition, regular trainings and reviews are conducted to ensure political contributions are made in accordance with the law and company policies.

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, as well as a candidate’s ethics and their commitment to working towards racial equality. No single criteria category determines whether a candidate does or does not receive a contribution and contributions are evaluated on an on-going basis.

Candidates take positions on a wide range of issues and DeltaPAC contributions are not an endorsement of a candidate's comprehensive political views. The political contribution process is iterative, and previous contributions does not mean DeltaPAC will contribute to a candidate in the future. 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 states in which Delta has airport hubs. 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. Delta generally does not make contributions to Super PACs and does not make federal independent expenditures itself or through trade associations in which we are members. Any political related 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. Contributions are publicly disclosed as required by applicable federal, state or local law and periodically reviewed with the Board.

Political Contribution Listings

A listing of contributions to federal, state and local candidates, party committees, 527 organizations and ballot measures will be published annually. Below is our giving history for the past four years:

- [2019 – 2020 DeltaPAC and Corporate Contribution Listing](#)
- [2017 – 2018 DeltaPAC and Corporate Candidate Contribution Listing](#)

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. Detailed 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, [click here to view reports](#). 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 that may support our public advocacy efforts and is also a member of various chambers of commerce at the state and local level which may participate in public advocacy matters. Trade associations dues are given with the understanding that they will be used for membership and programming purposes and not for independent campaign expenditures or contributions to federal, state or local candidates or party committees.

Below is a listing of the trade associations with membership dues of \$50,000 or greater in 2020 with the amounts attributed to lobbying, as identified by the organization, as non-deductible expenditures under § 162(e)(1) of the Internal Revenue Code:

- Airlines for America: \$1,271,900
- International Air Transport Association: \$0
- Business Roundtable: \$25,000
- U.S. Chamber of Commerce: \$25,000

As a leader in the aviation industry, participation in these organizations allows us to advocate our policy positions, share our business expertise, and be part of public education efforts regarding issues facing our industry and the business community. Association membership allows Delta the opportunity to influence lobbying conducted through trade organizations and advocate for our values and vocalize our concerns. While we don’t always agree with the views of these groups, we are fully committed to engaging in the collaborative problem-solving process and to working with our industry peers in these political frameworks.

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. Delta’s participation in trade associations, including holding positions on a trade association board, does not mean that we agree with every position a trade association takes and from time to time our corporate positions may differ from that of a trade association of which we are members. However, we believe the associations take positions and address issues in a collective industry manner and focus our efforts on advancing positions consistent with Delta priorities.