# Radius Global Infrastructure, Inc. and its Subsidiaries Related Party Policy Approved October 2, 2020

## **Policy Statement**

It is the policy of the Radius Global Infrastructure, Inc. Board of Directors (the "Board") that all Related Party Transactions, as that term is defined in this Policy, shall be subject to review in accordance with the procedures set forth below. The Board has determined that the Audit Committee (the "Committee") is best suited to review all Related Party Transactions. This Related Party Policy shall apply to Radius Global Infrastructure, Inc. and its subsidiaries (collectively, the "Company").

## **Definitions**

A "Related Party Transaction" is (i) any financial transaction, arrangement or relationship in which (a) the aggregate amount exceeds \$120,000, (b) the Company is a participant, and (c) any Related Person has or will have a direct or indirect material interest and (ii) any material amendment or modification to an existing Related Party Transaction regardless of whether such transaction has previously been approved in accordance with this policy. Notwithstanding the foregoing, the following shall not be deemed a Related Party Transaction:

- Any transaction that involves the providing of compensation to a director or Executive Officer in connection with his or her duties to the Company or any of its subsidiaries or affiliates, including the reimbursement of reasonable business and travel expenses incurred in the ordinary course of business;
- Indemnification and advancement of expenses made pursuant to the Company's Certificate of Incorporation, By-Laws or pursuant to any agreement;
- Contributions by the Company or any of its affiliates to a charitable organization, foundation or university at which a Related Party is a trustee, director or employee other than an officer (or comparable position), *provided* that the contribution does not exceed the lesser of \$1 million or 2% of the organization's annual total revenues including contributions; and
- Any transaction in which the Related Party's interest arises solely from ownership of securities issued by the Company and all holders of such securities receive the same benefits pro rata as the Related Party.

A "Related Party" is any director of the Company, any Executive Officer of the Company, any nominee for director, any shareholder owning in excess of 5% of any class of the Company's voting securities, and any "Immediate Family Member" of any such person.

An "Executive Officer" of the Company includes any individual who has been appointed an officer of the Company and is subject to Section 16 of the Securities Exchange Act of 1934, as amended (the "Exchange Act").

An "Immediate Family Member" means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of a person, and any person (other than a tenant or an employee) sharing the household of such person.

#### **Procedure**

The Related Party shall disclose all material information with respect to (a) any Related Party Transaction prior to entering into such transaction; (b) any new conflict of interest that arises in an ongoing Related Party Transaction and (c) any other information requested by the Committee regarding the Related Party Transaction. Each person who is a Related Party with respect to a particular Related Party Transaction shall disclose such information and his or her interest in the Related Party Transaction to the General Counsel or Chief Financial Officer of Radius Global Infrastructure, Inc. if the Related Party is an Executive Officer and to the Committee if the Related Party is a director. If the Related Party is the Chief Financial Officer, he or she shall disclose the

information to the Committee.

Transactions involving a Related Party cannot be presumed to be carried out on an arm's- length basis, as the requisite conditions of competitive, free-market dealings may not exist. Representations about Related Party Transactions, if made, may not imply that the Related Party Transaction was consummated on terms equivalent to those that prevail in arm's-length transactions unless those representations can be substantiated.

In determining whether to approve or ratify a Related Party Transaction or any new conflict of interest in an ongoing Related Party Transaction, the Committee shall use any process and review any information that it determines is reasonable in light of the circumstances in order to determine if the Related Party Transaction is fair and reasonable, including the following:

- The terms of such transaction;
- The Related Party's interest in the transaction;
- The purpose and timing of the transaction;
- Whether the Company is a party to the transaction, and if not, the nature of the Company's participation in the transaction;
- If the transaction involves the sale of an asset, a description of the asset, including date acquired and costs basis;
- Information concerning potential counterparties in the transaction;
- The approximate dollar value of the transaction and the approximate dollar value of the Related Party's interest in the transaction;
- Description of any provisions or limitations imposed as a result of entering into the proposed transaction;
- Whether the proposed transaction includes any potential reputational risk issues that may arise as a result of or in connection with the proposed transaction; and
- Any other relevant information regarding the transaction.

Where advance Committee review of a Related Party Transaction is not feasible or has otherwise not been obtained, then the Related Party Transaction shall be reviewed subsequently by the Committee (and such transaction may be ratified subsequently by the Committee). The Committee may also disapprove of a previously entered into Related Party Transaction and may require that the Related Party take all reasonable efforts to terminate, unwind, cancel or annul the Related Party Transaction.

The Committee may, but shall not be required to, seek bids, quotes or independent valuations from unaffiliated third parties sufficient to enable the Committee to assess the fairness of the Related Party Transaction to the Company.

In addition, directors, officers and nominees for director may be required to make certain disclosures regarding any current, past and proposed Related Party Transactions pursuant to applicable laws and regulations, including disclosures in the Company's annual proxy statement.

## Disclosure

All Related Party Transactions are to be disclosed in the Company's applicable filings as required by the Securities Act of 1933, as amended, and the Exchange Act and related rules and regulations. All Related Party Transaction will be disclosed to the Audit Committee and any material Related Party Transaction will be disclosed to the Board of Directors.

### Your Personal Commitment to the Radius Global Infrastructure, Inc. and its Subsidiaries Related Party Policy

I acknowledge that I received a copy of the Related Party Policy dated \_\_\_\_\_\_ ("the Policy"), that I have read the Policy, and that I understand it. I will comply with the Policy. If I learn that there has been a violation of the Policy, I will contact my direct supervisor or the General Counsel or the Chief Financial Officer. I understand that Radius Global Infrastructure, Inc. (together with its subsidiaries) expressly reserves the right to change, modify or delete the Policy provisions without notice. I acknowledge that the Policy is not a contract and that nothing in the Policy is intended to change the traditional relationship of employment-at-will.

Dated: \_\_\_\_\_

Employee's Signature

Employee's Name (Please Print)