

## **Radius Global Infrastructure, Inc. and its Subsidiaries**

### **Code of Business Conduct and Ethics Policy**

Originally Approved October 2, 2020 (Updated as of December 9, 2021)

#### **Introduction**

This Code of Business Conduct Policy (the “Policy” or the “Code”) covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees, officers and directors of Radius Global Infrastructure, Inc. and its subsidiaries (collectively, the “Company”). All of the Company’s employees, officers and directors must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the Company’s agents and representatives. In addition, Company policies apply to various Company operations and you need to know and follow those policies that apply to your work.

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about these conflicts, you should ask your supervisor, the General Counsel of Radius Global Infrastructure, Inc. or the Chief Financial Officer of Radius Global Infrastructure, Inc., or such other appropriate officer or personnel as designated by the General Counsel or Chief Financial Officer, how to handle the situation. Employees, officers and directors are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this Code, or Company policy.

Those who violate the standards in this Code will be subject to disciplinary action, including possible dismissal. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or the Company. If you are in a situation which you believe may violate or lead to a violation of this Code, follow the procedures set out in Section 19 of this Code.

The basic principles discussed in this Code are subject to any Company policies covering the same issues.

#### **1. Compliance with Laws, Rules and Regulations**

Obedying the law, both in letter and in spirit, is the foundation on which this Company’s ethical standards are built. All employees, officers and directors must respect and obey the laws, rules and regulations of the cities, states and countries in which the Company operate. Although employees, officers and directors are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers, the General Counsel, the Chief Financial Officer, a committee of the Board of Directors of the Company (the “Board”) or other appropriate personnel.

#### **2. Conflicts of Interest**

A “conflict of interest” exists when a person’s private interest interferes in any way, or even appears to interfere, with the interests of the Company. A conflict situation can arise when a director, officer or employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when a director, officer or employee (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company, Company property or Company information. Loans to, or guarantees of obligations to, employees, officers and directors and their family members by the Company may create conflicts of interest and in certain instances are prohibited by law.

It is a conflict of interest for a Company director, officer or employee to work for a competitor, customer or supplier. You should avoid any direct or indirect business connection with customers of the Company, suppliers or competitors, except as required on the Company’s behalf.

Conflicts of interest are prohibited as a matter of Company policy, except as approved by the board of directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor, the General Counsel or the Chief Financial Officer. Any director, officer or employee who becomes aware of a conflict or potential conflict should bring it to the attention of their supervisor, the General

Counsel, Chief Financial Officer, a committee of the Board or other appropriate personnel or consult the procedures provided in Section 19 of this Code.

### **3. Insider Trading**

All non-public information about the Company should be considered confidential information. Employees, officers and directors who have access to confidential information about the Company or any other entity are not permitted to use or share that information for trading purposes in the Company, the other entity's securities, or for any other purpose except for the conduct of the Company's business. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical, but also illegal. If you have any questions, please consult the Share Dealing Code, and, when adopted, the Company's Insider Trading Policy.

### **4. Corporate Opportunities**

Employees, officers and directors are prohibited from taking opportunities that are discovered through the use of corporate property, information or their position for themselves without the consent of the Board. No director, officer or employee may use corporate property, information or position for personal gain and no director, officer or employee may compete with the Company directly or indirectly. Employees, officers and directors owe a duty to the Company to advance the Company's interests when the opportunity to do so arises.

### **5. Competition and Fair Dealing**

The Company seeks to outperform its competitors fairly and honestly. The Company seeks competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each director, officer and employee should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

No director, officer or employee is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal activities.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Company director, officer or employee, family member of a director, officer or employee, or agent unless it: (1) is not given or accepted with the intention or expectation of influencing a party or otherwise in exchange for favors or benefits, (2) is customary to the industry, (3) does not violate any local laws, (4) is provided in the name of the Company and not in the name of the individual, (5) is reasonable in value, (6) would be considered appropriate by an independent third-party bystander, (7) is given or accepted openly and not secretly and (8) otherwise does not violate any laws, regulations or applicable policies of the other party's organization. Refer to the Company's Gift and Hospitality Policy and consult with your supervisor regarding any gifts or proposed gifts that you are not certain are appropriate.

### **6. Political Contributions**

Except as approved in advance by the Chief Executive Officer or Chief Financial Officer, the Company prohibits political contributions (directly or through trade associations) by the Company or its business units. This includes: (a) any contributions of Company funds or other assets for political purposes; (b) encouraging individual employees to make any such contribution; or (c) reimbursing an employee for any contribution.

Individual employees are free to make personal political contributions as they see fit.

## **7. Discrimination and Harassment**

The Company is committed to seeking an inclusive and diverse work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment. The Company values diversity and prohibits unlawful discriminatory practices and harassment on the basis of sex, age, race, color, national origin, marital status, military or veteran status, sexual orientation, gender identity or gender expression, religion, sexual orientation, disability, pregnancy, genetic information, or any other factor or status protected by law. This policy applies to all areas of employment including recruitment, hiring, placement, training, promotion, compensation, benefits, transfer, layoff and termination.

## **8. Health and Safety**

The Company strives to provide each director, officer and employee with a safe and healthy work environment. Each director, officer and employee have the responsibility for maintaining a safe and healthy workplace for all employees, officers and directors by following environmental, safety, and health rules and practices and by reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted.

Employees, officers and directors are expected to perform their Company-related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

## **9. Environmental and Social Responsibility**

The Company seeks to do business in a manner that is environmentally responsible. In doing so, the Company is careful to follow environmental standards and makes an effort to follow sustainable business practices and use resources wisely. The Company takes responsibility for the impact of its activities on the environment and strives to improve the Company's relevant processes in this regard where possible. As such, the Company expects its employees, officers and directors to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation, you should check with your supervisor for guidance.

The Company supports and respects the protection of all human rights around the world, and is committed to upholding the fundamental human rights of its employees. The Company expects its partners to adhere to these same high standards. Employees, officers and directors are expected to act in a manner consistent with promoting applicable human rights laws wherever the Company does business.

## **10. Record-Keeping, Financial Controls and Disclosures**

The Company requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions and to make full, fair and, accurate, timely and understandable disclosure in reports and documents the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in its other public communications.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, must be promptly disclosed in accordance with any applicable laws or regulations, and must conform both to applicable legal requirements and to the Company's system of internal controls.

Business records and communications often become public and the Company and its employees, officers and directors should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos and formal reports. Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the corporate vice president, administration.

## **11. Confidentiality**

Employees, officers and directors must maintain the confidentiality of proprietary information entrusted to them by the Company or its customers or suppliers, except when disclosure is authorized in writing by the General Counsel or Chief Financial Officer or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

## **12. Protection and Proper Use of Company Assets**

All employees, officers and directors should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets are to be used for legitimate Company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Company assets should not be used for non-company business.

The obligation of employees, officers and directors to protect the Company's assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and result in civil or criminal penalties.

## **13. Payments to Government Personnel**

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value (directly or indirectly) to officials of foreign governments or foreign political candidates in order to obtain or retain business. In business transactions and operations in foreign countries, companies are sometimes asked to make payments to expedite or "facilitate" routine government actions. Facilitating payments are unlawful under the FCPA (and other applicable anti-corruption laws in the jurisdictions we operate (i.e., the U.K. Bribery Act)) and not permitted by the Company. If you are asked to make a facilitating payment related to the Company's business, immediately inform an attorney in the Legal Department.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities, which may be accepted by U.S. government personnel. The promise offers or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but will also commit a civil or criminal offense. State and local governments, as well as foreign governments, often have similar rules. Refer to the Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy and/or consult the General Counsel or Chief Financial Officer for any additional questions.

## **14. Trade Issues**

From time to time, the United States, foreign governments and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed. Advice regarding the current status of these matters must be obtained from the General Counsel.

## **15. Waivers of the Code of Business Conduct and Ethics**

Any waiver of this Code for executive officers or directors may be made only by the Board and will be promptly disclosed as may be required by applicable law or regulation.

## **16. Reporting Any Illegal or Unethical Behavior**

Employees are encouraged to talk promptly to supervisors, managers or other appropriate personnel about observed behavior that they believe may be illegal or a violation of this Code or Company policy or when in doubt about the best course of action in a particular situation. It is the policy of the Company not to allow retaliation for reports made in good faith by employees of misconduct by others. Employees are expected to cooperate in internal investigations of misconduct.

## **17. Improper Influence on Conduct of Auditors**

It is prohibited to directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors for the purpose of rendering the financial statements of the Company materially misleading. Prohibited actions include those actions taken to coerce, manipulate, mislead or fraudulently influence an auditor: (1) to issue or reissue a report on the Company's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards, or other professional or regulatory standards); (2) not to perform an audit, review or other procedures required by generally accepted auditing standards or other professional standards; (3) not to withdraw an issued report; or (4) not to communicate matters to the Company's audit committee.

## **18. Financial Reporting**

As a public Company, it is necessary that the Company's filings with the SEC be accurate and timely. The Company expects employees, officers and directors to take this responsibility very seriously and provide prompt and accurate answers to inquiries related to the Company's public disclosure requirements.

The Company's policy is to comply with all financial reporting and accounting regulations applicable to the Company. If any employee or officer has concerns or complaints regarding accounting or auditing matters of the Company, then he or she is encouraged to submit those concerns by one of the methods described in Section 20.

## **19. Compliance Policy and Procedures**

The Company and its employees, officers and directors must all work to ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know right from wrong. Since you cannot anticipate every situation that will arise, it is important that there is a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor, you can talk to the General Counsel or Chief Financial Officer.
- Report violations in accordance with the Company's whistleblower policy, described in Section 20.

Additionally, the Company shall:

- Always uphold, and as a minimum comply with, all US and international laws and regulations relevant to the Company's activities.
- Assess the Company's leadership tone and ethical culture and ensure that the highest ethical standards are followed.
- Set expectations for effective Company ethics program elements, including frameworks, standards, process, systems, tools, training and communications, including annual training of all part-time and full-time employees.
- Support the Company's businesses and functions to implement programs to meet their ethical and legal obligations and effectively manage/mitigate identified ethics and compliance risks.

- Take prompt action to respond to any actual or potential unlawful or unethical conduct including by implementing corrective actions.
- Work with its external auditors and internal teams and applicable Board committees to quarterly and annually review any ethics complaints and the process for which ethics issues are handled by the Company.
- Provide information and guidance to employees on how to recognize and deal with actual or potential non-compliance with legal requirements or other inappropriate behaviors.

## **20. Reporting Violations**

- Potential violations of this Code or any Company policy, including any complaints regarding accounting, internal accounting controls, or auditing matters, may be reported in accordance with the Company's whistleblower procedures:
  - By calling our third-party confidential reporting system at such contact information or in such manner provided by the General Counsel, Chief Financial Officer or the Human Resources Department, which as of the date of the adoption of this Code is by mobile at [radiusglobalmobile.ethicspoint.com](https://radiusglobalmobile.ethicspoint.com), by online at [radiusglobal.ethicspoint.com](https://radiusglobal.ethicspoint.com), or by phone at 1-844-938-1679;
  - In writing to the General Counsel via mail (to Radius Global Infrastructure, Inc., Attention: General Counsel or Chief Financial Officer, 3 Bala Plaza East, Suite 502, Bala Cynwyd, PA, 19004 U.S.A. or via email (to the General Counsel or Chief Financial Officer); or
  - To a member of the Company's Audit Committee (or such other applicable Board committee having jurisdiction over such matters).
- In the event of any report received by a member of the Audit Committee (or such other applicable Board committee having jurisdiction over such matters), an employee's supervisor or a member of management under this Policy, the recipient must promptly forward that report to the General Counsel.
- You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected except as may be required per Company policy or applicable law. The Company does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations, and acts in accordance with applicable whistleblower protection laws.
- The Company maintains a log of all reports, tracking their receipt, investigation and resolution. Copies of the log and all documents obtained or created in connection with any investigation and resolution will be maintained in accordance with applicable Company document retention policies and applicable law.
- All employees, officers and directors are subject to the Code, which describes procedures for the internal reporting of violations of the Code. All employees, officers and directors must comply with those reporting requirements and promote compliance with them by others. This Code will be strictly enforced and prompt action will be taken in light of violations. Failure to adhere to this Code by any employee or officer will be subject to disciplinary action up to and including termination and referral of the matter to the appropriate authorities.

## **21. Annual Acknowledgement**

To help ensure compliance with this Code, the Company requires that all exempt salaried employees, officers and directors review the Code and acknowledge their understanding and adherence in writing on an annual basis on the attached form.

## **22. Amendment**

Any amendment to this Policy shall be made only by the Board or the appropriate committee thereof. If an amendment to this Policy is made, disclosure will be made as may be required by applicable law or regulation.

This Code supersedes any previous Codes and remains in effect subject to any amendments. It will be reviewed by the Company's Audit Committee at least annually to assure continuing compliance with applicable laws and stock exchange regulations.

**Your Personal Commitment to Radius Global Infrastructure, Inc.'s and its Subsidiaries' Code of Business Conduct and Ethics Policy**

I acknowledge that I received a copy of the Code of Business Conduct and Ethics Policy dated December 9, 2021 ("the Code"), that I have read the Code, and that I understand it. I will comply with the Code. If I learn that there has been a violation of the Code, I will contact the General Counsel or Chief Financial Officer or my supervisor, if appropriate. I understand that Radius Global Infrastructure, Inc. (together with its subsidiaries) expressly reserves the right to change, modify or delete the Code's provisions without notice. I acknowledge that the Code is not a contract and that nothing in the Code is intended to change the traditional relationship of employment-at-will.

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

\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Employee's Name (Please Print)