

Radius Global
Infrastructure

ESG Report

2021

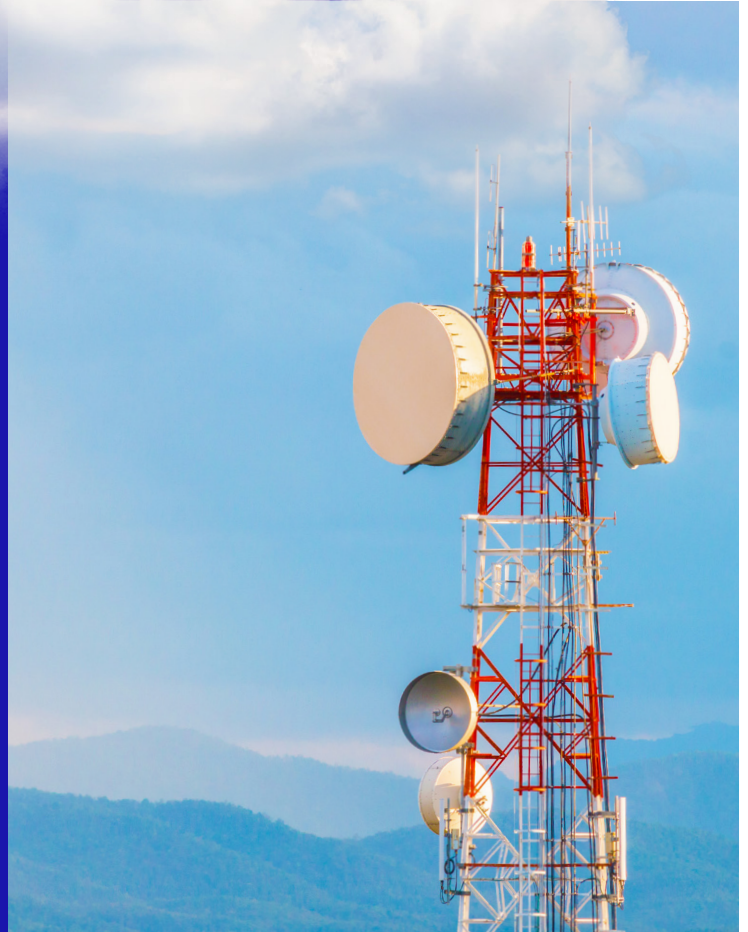




Table of Contents

1. A statement from our CEO	3
1a The purpose of this report	4
2. Environmental	5
2a Our environmental policy	7
2b Actions we will take in 2022/23	7
3. Social	9
3a Centralizing our HR processes	9
3b Diversity, Equity and Inclusion	11
3c Employee engagement and satisfaction	12
4. Governance	15
4a Board composition	16
4b Board evaluation	17
4c Combating data risk	17
4d An evolving and effective approach to compliance	18
4e Acting ethically at all times	19
4f Anti-bribery and corruption	21
5. Looking ahead	22



1. A statement from our CEO

IMPLEMENTING OUR ESG VISION

“Our environmental, social and governance (ESG) goals are an essential part of our corporate strategy and the long-term growth of our business. We are implementing policies and processes that allow us to continually improve our performance in these vital areas so that our employees continue to be proud to be part of Radius Global Infrastructure, Inc. and our shareholders, tenants and other key stakeholders have full confidence in our ability to deliver value in a sustainable way.”

We are one of the world’s largest international aggregators of rental streams underlying wireless and other essential communications infrastructure sites through the acquisition of real property interests and contractual rights. Today, we operate in 21 countries with over 6,300 wireless and communications sites and more than 8,300 lease streams. Our team of over 370 professionals uses data-driven sourcing and underwriting to identify opportunities that allow us to maximize the benefits of our unique business model.

Since 2010, we have established a strong position through our approach to investing in digital infrastructure. Our model is based on acquiring long-duration real property interests and contractual rights to sites that support mission-critical digital infrastructure assets that enable wireless and the next generation of communication.

This approach has many benefits, one of which is that our business has a low carbon footprint. Another is that our business model is aligned with important global trends. The last two decades have seen huge growth in data usage. The ongoing digitalization of business processes, growth of IoT (Internet of Things) and dramatic rise in mobile data traffic all point towards this trend continuing, which we view as positives for Radius because it supports the value of our real estate portfolio.

I believe Radius can be a leader when it comes to operating with the highest standards of ethics as well as creating working environments across the world that are dynamic, inclusive and supportive. Our reputation is one of our most important assets, and it is vital that we continue to demonstrate that our words are backed up by positive and consistent actions. This is especially true when it comes to matters relating to ESG.



As a business, we actively explore and evaluate what we can do to improve every aspect of our operations. To do this, we incorporate a variety of viewpoints wherever possible to help our leadership make informed decisions and foster a culture of continuous improvement. Our ESG strategy is designed to help us achieve our goals and establish a robust set of measures and policies that we can continue to build on in the years ahead.

[William H. Berkman](#)

Co-Chairman and Chief Executive Officer

1.a. The purpose of this report

This is our inaugural ESG report and it represents the start of an important journey in our evolution as a public company. This report shows the progress we have achieved within our first two years as a public company and demonstrates our ESG goals and ambitions as we continue to grow.





We have a unique business model with an extremely low carbon footprint - but that doesn't mean we can't improve the sustainability of our business further.

2. Environmental

WE HAVE A UNIQUE BUSINESS MODEL WITH AN EXTREMELY LOW CARBON FOOTPRINT - BUT THAT DOESN'T MEAN WE CAN'T IMPROVE THE SUSTAINABILITY OF OUR BUSINESS FURTHER.

Radius Global Infrastructure's business model results in a low carbon footprint. We usually acquire the rights to lease the land underneath a wireless communications tower or a structure supporting other digital infrastructure assets to a mobile network operator or tower company, for which we receive rental payments from tenants at these sites. We purchase, primarily for a lump sum, the right to receive future rental payments generated pursuant to an existing ground, rooftop or other communications infrastructure tenant lease, as well as any subsequent lease or extension or amendment thereof, between a property owner and an owner of a wireless tower, antennae or other essential communications infrastructure.



Typically, we acquire the rental streams through a purchase of a real property interest in the land underlying the wireless tower, antennae or other essential communications infrastructure. This most commonly takes the form of easements, usufructs, leasehold and sub-leasehold interests, or fee simple interests. Each of these give Radius the right to receive all rents related to the property, including the rents from the tenant lease, for a period of time. Additionally, we purchase contractual interests, such as an assignment of rents, either in conjunction with the property interest or as a standalone right.

Triple net leases make up a significant amount of our portfolio, allowing us to collect annual rents while the tax, maintenance and insurance liabilities and, importantly, responsibility for any greenhouse gas emissions related to the utilities used at the site or with respect to the operations of the site remain with the tenant or landlord. Where we do own properties outright, we typically own the building and own the land or have property rights to the underlying land, rather than the communications equipment inside. This all means that our greenhouse gas emissions remain low.

Our business decisions have the potential to create wide-ranging benefits for society. Digital infrastructure is an essential tool for achieving continued sustainable global economic and social development. Access to digital technologies not only helps people access healthcare and financial services without the need to travel, but real-time monitoring and analytics is driving efficiency gains and reducing waste across the global economy. The vital importance of digital infrastructure was widely demonstrated during the Covid-19 pandemic, allowing businesses to continue operating and communities to remain connected. Our assets, and the mission-critical digital infrastructure they host, are playing a central role in expanding 5G connectivity, enabling innovation and helping to reduce emissions in sectors ranging from agriculture to transport and manufacturing.

An example of these benefits in action can be seen in our work with partners to create environmentally friendly and socially driven projects in Mexico. We are developing wireless telecommunications sites that support carrier-based, nationwide developments in rural and underserved areas of the country. Many of these rural sites are considered to be “off-grid” locations with either no access to power infrastructure or poor service reliability. This means alternative energy installations are required to provide local communities with reliable power. To meet these energy needs, we are helping carriers expand their lease areas to accommodate the installation of solar panel systems elevated above the lease area with related equipment and batteries below. This creates a dependable power source for the carrier that also minimizes the environmental impact by eliminating the need for diesel generators and reducing the risk of fuel spills or accidents.

As we grow our global wireless telecommunications portfolio, we will explore more ways we can support carriers to develop sites in rural and underserved areas as well as trying to include renewable energy sources in the projects.



“Operating in an environmentally responsible way is hugely important to our team, leadership and stakeholders. So, as a global business, we are building our visibility of the impacts we have and actively exploring all the options for reducing them.”

Richard Goldstein, Chief Operating Officer

2.a. Our environmental policy

It is important that our company acts in a way that aligns with the values of our employees and the communities we are a part of. We incorporate ESG considerations into our policies and practices where it is consistent with the terms of the triple net lease agreements we undertake with our partners, customers and tenants. You can find our Environmental Policy [here](#).

While our carbon footprint is small, and will likely remain that way for the foreseeable future, we are still taking steps to ensure we operate as sustainably as possible, such as aligning with the UN Global Compact. We also aim to acquire assets with Tier 1 tenants such as Telecom Italia, American Tower, Cellnex, Vantage Towers, MBNL, CTIL and Crown Castle. These companies are increasingly adopting more sustainable practices across our portfolio of sites. We are also making environmental factors a more prominent part of our underwriting decision-making and due diligence process.

Our largest office in San Diego, California meets high energy efficiency standards and is LEED-certified. When leasing offices, we look for landlords that maintain high energy efficiency and low waste standards. On top of this, reviewing opportunities for increasing our space and energy efficiency is an ongoing priority. We will continue to evaluate our physical locations and the environmental impact of our physical footprint, as well as examine ways we can help our employees reduce theirs too. This ranges from reducing the environmental impact of individual's daily commutes to increasing the use of video conferencing and technology in order to reduce corporate travel. We are also minimizing waste and promoting recycling as well as more efficient energy usage throughout all of our offices globally. For example, we shred and recycle paper and have increasingly transitioned to digital paperless solutions. We also provide centralized recycling bins for paper, plastic, aluminum cans and empty printer ink cartridges in our offices.

2.b. Actions we will take in 2022/23

We will continue to explore ways to improve the environmental sustainability of our operations. As part of this effort, we are focusing on enhancing the visibility of the environmental footprint of our day-to-day activities as well as surveying our assets to explore the ways we can enhance the sustainability of our operations.



Across the next year, we will:

- Continue to develop an appropriate strategy for measuring and minimizing our emissions
- Encourage our global offices to adopt more sustainable practices
- Examine the feasibility of reporting on the environmental impact and energy usage of the individual offices across our geographic footprint as well as considering the sustainability features of new corporate office space
- Conduct thorough environmental due diligence for any properties we acquire
- Work with our tenants to ensure they are operating the digital infrastructure at our properties in an environmentally friendly manner
- Explore additional ways of utilizing our real estate assets to create increased environmental benefits and carbon offsetting as well as potentially open up new revenue streams





3. Social

3.a. Centralizing our HR processes

OUR NEW GLOBAL HR SYSTEM BRINGS TOGETHER DISPARATE SYSTEMS AND GIVES US MUCH MORE INSIGHT AND VISIBILITY.

We view our people as our most valuable asset, and our success depends on being able to attract and retain the best talent. Therefore we have invested in upgrading our HR systems to improve our candidate and employee experience and help keep our people engaged and support them as they build a rewarding career at Radius.

We are a data-driven business. Across the globe, we use detailed market information and local insight to identify the best opportunities. However, operating with such a wide geographic footprint can also create challenges when managing some of the business'



central processes. Driving improvements in ESG performance requires enterprise-wide visibility and insight in addition to the ability to provide targeted training, but as a business too much of our data was siloed in disparate systems. Bringing these data streams and workflows together into a centralized global platform was an important step in building a strong foundation for our ESG strategy.

IMPLEMENTING A NEW HR SYSTEM

The new core HRIS system was rolled out in June 2021 after a period of due diligence that began in 2020. Phased implementation ensured that all business units and teams were onboarded properly. This included centralizing our global payroll function – a process which was completed in five-phases across 19 countries throughout 2021.

The new HR system creates multiple benefits for our business, and will facilitate continued improvement to both our commercial and ESG performance moving forward:

Automating processes

The new system removes a number of manual processes from our HR workflows by automating applicant tracking and the onboarding of new employees. Previously, these processes had varied substantially across different geographies. The new system removes the need for multiple, manual touchpoints and allows candidates to access and complete information themselves.

The new applicant tracking solution is GDPR and LGPD compliant, with candidates having to opt in. A new data privacy system also ensures employee data can be safely removed if needed.

The system also brings consistency to our performance management processes. Moving forward, every team member receives a formal, annual performance review, with the sales team undergoing a quarterly review. This will provide people with further opportunities to develop their careers, which we view as a key factor in boosting engagement and retention.

Optimizing training

Automating our employee training helps us maintain 100% uptake with a reduced need for manual intervention from our HR and training teams. New hires are automatically assigned compliance training during their onboarding to the new HR system, which they then complete directly within the system. The integrated process for compliance training in the new system will make it easier for us to evolve and adapt our training so that we are confident our entire workforce has the tools and knowledge they need to act in line with our mission and values.

Empowering more informed decisions

With a central bank of high-quality and reliable HR data driving improved reporting, our leadership team has more accurate insight into the business. This is driving a better understanding of our workforce, particularly relating to compensation across different markets as well as gaps in our skills and capabilities. We believe this will have the long-term impact of increasing productivity and operational performance, as well as reducing opportunity costs.



The feedback from our employees has been universally positive. Many have specifically drawn attention to the enhanced transparency the system offers – it is now easy to view organizational charts and contact team members from across the business through the system. The new system replaces multiple logins and passwords with a single platform that contains all the information our employees need to work effectively.

Throughout the rest of 2022 and 2023 we will continue to explore ways that we can use this system to drive improvements in the ESG performance of our business.

3.b. Diversity, Equity and Inclusion

CREATING A SUPPORTIVE AND INCLUSIVE WORKPLACE THAT REFLECTS THE GLOBAL NATURE OF OUR BUSINESS.

We aim to ensure employees of all backgrounds and demographics work in an environment that provides equitable opportunities for career advancement. Our success depends on the team we are able to build – and we want to ensure we have the best and brightest talent by making sure everyone sees Radius as a place they can develop their career. You can read our Diversity, Equity and Inclusion statement in full [here](#).

Our new Diversity, Equity and Inclusion (DEI) steering committee met for the first time in April 2022. This group, comprised of employees from diverse backgrounds and different functional areas at Radius, will meet regularly to oversee existing initiatives and evaluate new ones. Initiatives under review include implementing a formal mentorship program and rolling out employee affinity groups globally. The Compensation Committee oversees the DEI steering committee, which regularly reports to the Radius Executive team.

We are at the beginning of our DEI journey and this area will be a strategic priority moving forward. We will be implementing several important measures relating to DEI in 2022/23.

INTRODUCING DEI TRAINING

We have introduced two new modules relating to DEI as part of our compulsory employee compliance training. This training must be completed as part of the onboarding process and then at regular intervals. Modules are assigned to employees through the new HR system, where individuals can complete them during an allotted timeframe.

The rollout of this additional training was completed for all existing employees in the second quarter of 2022. The completion rate for new hires is 100%.

EMPOWERING OUR EMPLOYEES

An important part of our DEI strategy is using Radius' global scale and resources to enable our employees to help drive positive change across our working environments. We believe employee affinity groups are a beneficial way of doing this. These groups also provide



a safe space for our employees to share ideas with like-minded people. This local representation and insight on factors like pay, working conditions and any job-related issues that arise helps our leadership continue to improve the employee experience at Radius.. Overseen by the DEI committee, we will be looking to further embrace the diversity of thought, background and perspective offered by these groups over the coming years.

In 2022/23, we will continue to strengthen our processes around DEI. One of our key areas of improvement with achieving our DEI goals is alignment with the different reporting requirements in the countries we operate in. We are investigating the best way to approach reporting on DEI as well as setting up a central steering committee to coordinate sub-groups in all regions.

Meeting our DEI goals means critically examining our recruiting processes to make sure we are building as diverse a pipeline as possible. To help us achieve this, we have engaged a new recruiter that specializes in diversity and who will begin working with our HR team in June 2022. We will also continue to monitor our reporting and disclosure obligations, particularly in regard to Securities and Exchange Commission (SEC) guidance, relating to this area.

“We are a global company, and it is important that our workforce reflects this. We are strengthening our DEI processes and strategy so that we bring in the skills and perspectives of the best and brightest talent from across the markets we operate in.”

Verne Vetrulli, Vice President of Human Resources

3.c. Employee engagement and satisfaction

FOSTERING A CULTURE WHERE PEOPLE CAN BE THEMSELVES AND SHARE IDEAS TO HELP US DRIVE CONTINUOUS IMPROVEMENT.

As a global business, we have a responsibility to make sure our employees are valued and involved in the success of our company. Making sure we have the right level of insight is crucial to achieving this. Our new, centralized HR platform is helping us improve our processes in this area in a number of ways.

MEASURING ENGAGEMENT

The introduction of our global HR platform not only gives our employees a single place to access all the information relating to the company and their employment that they might need, but also provides us the opportunity to take our engagement and satisfaction tracking to the next level.

Using our central platform, Employee Voice, we are conducting quarterly employee engagement surveys. Previously, this process was managed and implemented by a third party, but now we can tailor it to fit our needs much more closely. Moving forward, each survey will feature a different set of questions so that we can capture more targeted



insights and keep track of how organizational changes are impacting employees. The results from these surveys will be used to inform decisions relating to culture, training, tools, resources, roles and feedback structures.

As a business, increasing our employee retention is an ongoing priority. The market is highly competitive and while offering an attractive salary and benefits package is important, so is our culture. The insight gathered from these surveys will be invaluable, but we are implementing other measures too. In particular, we have introduced 30/60/90-day checks for all new hires. These check-ins take the following structure:

30 day

onboarding experience, role clarity, resources, socializations

60 day

goals and objectives, role related to mission of company

90 day

training, job satisfaction, relationship with manager

As a global company, we want to make sure everyone that works for us feels connected and supported. We believe these measures will help new hires feel valued long after the initial onboarding process.

COMPENSATION AND BENEFITS

Another core part of our engagement and retention strategy is to align pay and benefits across all the geographies we operate in. In 2021, we reviewed our benefit offerings globally. In the United States and some of our select global markets, we have moved to 100% employer paid healthcare insurance coverage, while in others we currently offer a range of statutory and company-paid benefits including health insurance and meal vouchers. Throughout 2022 and 2023, we will continue to explore how our benefits packages can be improved to offer more value to our existing employees and improve our employer proposition for potential new hires.

As we continue to build our bank of global data around employee satisfaction and engagement as well as local job market conditions, we will explore strategies to make our employee offerings more attractive.

COMMUNITY INVOLVEMENT

We want to have a positive impact on the communities we live and work in every day. Achieving this means harnessing the passion, local insight and ingenuity of our workforce around the world. We encourage our employees to give back to their communities and volunteer with non-profit organizations. In 2022/23, we plan to introduce a global employee volunteering day to allow local teams to choose how to use Radius' scale and resources to benefit their communities.



The new, global employee volunteering day will build on some of the great projects and initiatives that have been spearheaded by our offices in recent years. We will coordinate these activities centrally in order to ensure they are properly resourced and supported.

Feed San Diego Day

In 2021, the team at our San Diego office came together to provide food packages to those in need across the city. The day was a great success, and our team packed almost 10,000 pounds of food ready in a few hours. The day was organized by colleagues from across our business and benefited a large number of people from the local community. This kind of activity is what we hope to support on a larger scale by introducing global employee volunteering days.



Donating laptops

Radius is donating refurbished laptops instead of disposing of them to bridge the digital divide by improving connectivity. Several of our offices have begun collecting and donating laptops and other equipment to local charities, churches, schools and colleges to help enable, empower and encourage people to learn and develop their digital skills. Activities like this also help us further reduce our waste and operate more sustainably. We are exploring the feasibility of creating a more centralized, company-wide impact program around this activity.





4. Governance

A SOLID AND ROBUST GOVERNANCE STRUCTURE ALLOWS OUR LEADERSHIP TO DRIVE THE LONG-TERM COMMERCIAL SUCCESS AND ESG PERFORMANCE OF RADIUS GLOBAL INFRASTRUCTURE.

At the end of 2021, our Board was made up of nine directors, eight of whom were independent. Our Board members represent a variety of experience, tenure, diversity, leadership, skills and qualifications that are helping to underpin our ESG goals with commercial experience. Our Board structure complies with all Nasdaq and SEC requirements, including those relating to diversity.

The Board evaluates the business' leadership structure annually to ensure it remains appropriate for the continued success of our company. Currently, this structure provides for two Co-Chairmen (one of whom is the CEO and one independent) supported by a



majority of independent directors. We believe this enables open communication between the Board and the management team, and provides the oversight and safeguards necessary to operate our business in line with our mission and values.

We believe that the Board of Directors functions most effectively with the following operating principles in place:

- Independent directors chair all our Board committees
- The majority of Board members are independent directors
- Directors are elected annually by stockholders
- Stock ownership guidelines for directors and executive officers are in place — this is specifically addressed in our [Stock Ownership Policy](#)
- We complete annual Board and committee self-assessments
- A majority vote is standard for the election of directors in uncontested elections

4.a. Board composition

TO MAKE SURE OUR ESG STRATEGY IS INFORMED, FEASIBLE AND APPROPRIATE, OUR LEADERSHIP TEAM NEEDS THE RIGHT INFORMATION, PERSPECTIVES AND SKILLSETS.

The diverse backgrounds of our Directors bring a mix of skills, experiences and perspectives necessary that can guide our ESG strategy and ensure it is implemented effectively. The Board includes two female directors and two directors from underrepresented minorities. This brings a range of perspectives and expertise to the existing depth of institutional knowledge and operational experience of the Board.

Our ESG goals are pushing us to look at every part of our business to identify areas where we can improve our performance. Even where we are meeting our requirements, there will always be more we can do. The composition of our Board is one such area. We meet the Nasdaq requirements on Board diversity with two female directors and two directors from underrepresented minorities. But as part of our broader DEI goals, we will continue to explore ways to introduce further diversity in terms of skillsets, age, gender and ethnicity.

ESG REPORTING TO THE BOARD

The ESG steering committee was created in 2021. Comprising employees from different levels and functions across the business, the committee meets bi-monthly to discuss issues relating to ESG and make recommendations for further actions. The committee reports to the Executive Management team, which reports to the Nominating and Corporate Governance committee of the Board of Directors of Radius. In 2021 we also launched our DEI steering committee, which reports to the Executive Management team and is overseen by the Compensation Committee of the Board.



Over the next year we will work to get a clearer picture of how we can measure and report our ESG performance and react appropriately to changes in the regulatory environment. This will be in addition to the annual review of our 10-K, Proxy and other SEC reporting, so that we can be confident we are providing the right level of information for our stakeholders.

4.b. Board evaluation

Annual self-assessments allow the Board to evaluate whether its members have the experience, education, diversity and skills necessary to carry out their responsibilities effectively. The Board also regularly assesses the process for selecting board members, as well as whether current membership brings diverse perspectives and experiences to the Board. These evaluations demonstrate a commitment to effective governance as well as a desire to incorporate a range of perspectives into our strategic thinking and decision making. This is especially valuable as we look to strengthen our policies and processes relating to ESG over the coming years.

We recognize the importance of understanding, evaluating and monitoring ESG-related opportunities and risks as part of our vision and strategy. The Nominating and Corporate Governance Committee has overall oversight of our ESG activities and is responsible for periodically reviewing our ESG strategies, activities and policies including our [ESG Policy](#) and [Environmental Policy](#). Our Compensation Committee, meanwhile, is responsible for periodically reviewing our strategies, activities and policies, including our DEI progress and Human Rights statement and human capital management initiatives.

4.c. Combating data risk

WE ARE ACTIVELY STRENGTHENING OUR CYBERSECURITY CAPABILITIES AND BUSINESS RESILIENCE.

We have a duty of care towards the company, our customers and our employees – making sure we are as prepared as possible in the face of an ever-evolving cyber threat landscape helps us ensure we are operating as safely as possible. To that end, we are in the process of obtaining the ISO27001 certification. We have implemented a [Data Protection, Privacy and Cybersecurity Policy](#) and continue to look for ways to improve how we handle and protect our third-party data and systems.

We aim to follow best practice when it comes to data privacy and cybersecurity. Our current policies and procedures include:

- Annual vulnerability and penetration testing performed by external experts
- Use of AI-based products that monitor email behavior and flag suspicious activity that could include phishing, malicious URLs and attachments
- A 24/7 security operations center that monitors all systems



- Anti-virus, anti-ransomware, 2-factor authentication for all company systems
- Compulsory training for all full-time and part-time employees

ISO27001

Obtaining ISO27001 will demonstrate the maturity and evolution of our organization's security and show our ability to protect the company, our employees, our customers and their data. Having the certification also proves to third parties that we are a partner they can trust. This will also help the organization by lowering our cybersecurity insurance premiums and attracting potential investors. Finally, attaining ISO27001 certification demonstrates compliance with privacy legislations and regulations such as GDPR and the California Consumer Privacy Act.

As well as driving improvements in our security policies and procedures, there are a number of additional benefits to successfully gaining this certification:

- Optimize every step of our incident response policies
- Continuous improvement of tools as technologies change
- Supplier risk management
- Lower acceptable risk tolerance over time
- Compliance with new regulations as they emerge

Importantly, ISO27001 shows our stakeholders that we are creating the structures, policies, procedures (such as our existing mandatory cybersecurity training) and consistent approach needed to effectively mitigate risks and fulfill our compliance obligations. It shows our commitment to operating to the highest standards and always looking to improve the way we work both internally and with all external parties. For a company like ours, our reputation is a key asset, and this will strengthen it along with the resilience and credibility of every part of the business.

As we work towards ISO27001, we will also continue to update our compulsory employee training so that our workforce has the tools and insight they need to operate safely and effectively at all times.

4.d. An evolving and effective approach to compliance

GIVING OUR EMPLOYEES THE TOOLS AND KNOWLEDGE THEY NEED TO ACT ETHICALLY AT ALL TIMES.

Our compliance training is constantly evolving to ensure it effectively equips our teams to operate ethically and in a way that aligns with our values and standards. The training we offer is an important part of our ability to operate ethically and effectively as well as to foster organizational change in line with our ESG goals. It ensures our processes are aligned, that all employees are aware of our policies, knowledge is retained, and our teams are always working with credibility and purpose.



Our compliance training is conducted annually, with all full-time and part-time employees required to complete each module. In 2021 we expanded our core curriculum of six modules to eight, with the inclusion of two new modules relating to general Diversity and Inclusion and global DEI respectively. The latter aims to help people understand bias and how it can impact performance in the workplace.

For 2022, we expect all new employees to complete the training. The training materials are created by a third party, but we administer them through our new central HR system. This makes it simpler for us to update the training along with the continued evolution of our policies.

Our training offering impacts nearly every part of our business. It helps people identify risks and act on them quickly, and it ensures all our employees understand the standards they are expected to work to. But it is also an important part of demonstrating to new starters that we are serious about our mission and values. As individuals become more concerned with the ESG credentials of businesses, our training helps set us apart in a competitive market and demonstrates our credibility and purpose.

SEEKING COMMITMENTS FROM OUR SUPPLY CHAIN

Our commitment to acting to the highest ethical standards extends to every part of our ecosystem. We seek to work with vendors that align with our values, so we always look for confirmation that any third party's policies are consistent with our goals. This means carefully reviewing and performing due diligence on a potential vendor's business continuity, security programs and SLAs, ensuring they are compliant with all applicable laws and regulations in their markets. As a company that understands the importance of reputation, we always aim to work with vendors with high levels of credibility in their sectors. This helps us mitigate risk and continue to operate with confidence. We have implemented a Vendor Code of Conduct Policy and continue to look for ways to improve our supply chain relations to help ensure our supply chain partners are following high ethical, environmental and human capital standards consistent with our goals and operations.

Throughout 2022, we will continue to monitor the effectiveness of our compliance training to make sure it reflects the needs of our business and wider ecosystem.

4.e. Acting ethically at all times

WE AIM TO ACT ETHICALLY, RESPECT OUR LEGAL OBLIGATIONS AND PROVIDE OUR EMPLOYEES WITH THE TOOLS THEY NEED TO DO THE RIGHT THING, EVERY TIME.

We don't just talk about acting ethically – we put in place the processes, policies and accountability structures to make it a reality. By listening closely to our employees and stakeholders we can address issues quickly. It is our aim to make sure every individual associated with our business respects and obeys all laws, policies and procedures. Our



compulsory compliance training is an important part of confirming that our employees are well-informed about the potential challenges they face, fully understand their roles and responsibilities and feel they are always supported.

The training we offer not only helps us mitigate risk, but also gives us a commercial advantage too. Our reputation as a compliant, lawful and fair dealer is an essential part of our ability to acquire new sites and grow our business. When potential clients are confident that we have the experience, insight and capabilities to complete deals in a timely manner, we are more likely to achieve our business goals.

Our reputation in the market is supported by the positive feedback we receive through professional service advisory firms we use, which we believe are well regarded and ethical organizations. The feedback we have received has particularly emphasized the “tone from the top” and how our leadership helps to instill a culture of ethics and values. We will continue to monitor our business closely and update our policies and code of conduct if needed to adapt to any changes in the operating environment.

OUR CODE OF CONDUCT

Our [Code of Business Conduct and Ethics Policy](#) covers a wide range of business practices and sets out the principles that our employees must always follow. Every employee also completes training modules related to these policies annually. This is particularly important because we operate across countries with different cultures, norms and accepted business practices. We regularly review the code to ensure it remains relevant and reflective of the commercial environment and any changes to laws and technology. Where appropriate, we also consult with external stakeholders to seek input into ways we can improve our policies.

WHISTLEBLOWER PROGRAM

Our ability to react quickly to any issues that do arise relies on our employees being able to disclose concerns in a discreet manner. We encourage all employees to speak to their supervisors, managers or other senior leaders if they witness or become aware of any activities that are illegal or go against our policies.

Our whistleblower program includes a 24/7 hotline that allows employees to share information or complaints confidentially when they believe other forms of disclosure are not appropriate. Our policies do not allow retaliation for reports made in good faith by employees of misconduct by others. A new process for whistleblower complaints was launched on our website in 2020, and we have adapted our onboarding material to proactively make our employees aware of this new process and our Ethics training includes instructions on how to go to the whistleblower site and properly use it. We regularly review the evaluation criteria for effective whistleblowing programs to ensure ours continues to meet the needs of our employees and the company. Our online whistleblower process also allows outside third parties to present any issues or complaints to us.



4.f. Anti-bribery and corruption

WE HAVE PROCESSES IN PLACE TO HELP US ACT QUICKLY TO ADDRESS ISSUES AND ENSURE WE ALWAYS COMPLY WITH RELEVANT LAWS AND REGULATIONS.

Our Code of Business Conduct and Ethics Policy ensures all our representatives work to the highest standards and our stakeholders can always be confident in working with us. Anti-bribery, fraud and money laundering policies are included in our [Code of Business Conduct and Ethics Policy](#), [Anti-Money Laundering Policy](#), [Foreign Corrupt Practices Act](#) and [Anti-Bribery Compliance Policy](#) and covered in our annual compliance training. Anti-bribery and corruption is included in the training modules that are completed by 100% of the workforce.

ANTI-FRAUD AND MONEY LAUNDERING

As a company, we are subject to anti-money laundering (AML) laws and regulations. Our Anti-Money Laundering Policy is designed to ensure full compliance with these laws and enables us to detect any suspicious transactions quickly. Our standalone Anti-Fraud policy, Code of Business Conduct and Ethics Policy, Anti-Money Laundering Policy and Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy are structured to identify and mitigate the impact of any irregularity or suspected irregularity involving employees as well as shareholders, directors, officers, consultants, vendors, contractors and any other parties with a business relationship with Radius Global Infrastructure.

“We are continually examining the way we operate, listening to stakeholders and monitoring the wider context in which we work — and we are willing to go beyond what is expected of us to maximize our positive impact.”

Scott Bruce, President

RIGOROUS FINANCIAL PROTECTIONS

Our internal controls help us identify and manage potential instances of fraud quickly. All material purchases made by our regional offices are reviewed by multiple individuals in senior management. We operate a centralized approach to accounting, which gives us clear visibility and oversight of the movement of funds into, out of and throughout the business. Any cash movement is verified by multiple parties. Our business model means we do not hold large quantities of money outside our central accounts and we do not hold cash in advance of deals. From a loss prevention standpoint, we are insured against cybercrime and social engineering as well.

Operating in several countries means we work with many vendors in a wide range of jurisdictions. In 2021, we strengthened our vendor approval process to increase our oversight. We introduced a new, centralized review of our entire vendor list by multiple parties in our accounting function through our corporate offices.

Moving forward, we will regularly review both our policies and training so that they remain effective and help us to meet the standards we set for ourselves.





5. Looking Ahead

THIS IS ONLY THE BEGINNING OF OUR ESG JOURNEY.

The measures outlined in this report demonstrate our commitment to embedding ESG into every part of our business and show the progress that we have been able to make in a relatively short amount of time. We have laid the groundwork and established good momentum, and we will continue building on it throughout 2022/23 and beyond.

Our ESG policies and activities cover the entirety of our global operations. Our mission and values state that we want to be a leader when it comes to acting ethically and creating working environments that allow individuals to perform at their best. To do this, we are always looking for ways we can do better. There are always actions we can take, whether that is incorporating environmental factors into our underwriting processes,



empowering our employees to support the causes that matter most to them or adapting our training to the changing market environment.

As part of our long-term focus on ESG, we will continue to examine how we can increase the visibility of the environmental performance of our business. We will also continue to evolve our governance structures and policies to ensure our leadership has the insights needed to cement our position as an ESG leader.

For our full set of relevant ESG policies, please visit our [Governance website](#).

CONTACT US FOR MORE INFORMATION

If you would like to discuss any of the measures listed in this report, you can speak to a member of our Investor Relations team.

[Jason Harbes](#)

Senior Vice President - Investor Relations

jharbes@radiusglobal.com

CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

Certain statements made in this report are forward-looking statements subject to risks and uncertainties. These forward-looking statements include, among other things, statements about possible or assumed future ESG performance, development of environmental strategies and adoption of sustainable practices, diversity and human capital initiatives, our evolving approach to governance and compliance, and other plans and objectives. In some cases, these forward-looking statements can be identified by the use of forward-looking terminology, including the terms “believe,” “expect,” “anticipate,” “estimate,” “plan,” “continue,” “intend,” “should,” “may,” or similar expressions, their negative or other variations or comparable terminology.

Any forward-looking statement speaks only as of the date on which it is made. Except as required by law, we are not obligated to, and do not intend to, update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. Forward-looking statements are subject to various risks and uncertainties that may cause actual results to differ materially from those set forth in the forward-looking statements, including factors related to the availability of funding for the programs described in this report, our ability to achieve our sustainability and other ESG goals and objectives, the future effect of legislation, rule making and changes in policy, the competitive environment, our ability to attract and retain personnel, and the factors described in our Annual Report on Form 10-K for the fiscal year ended December 31, 2021. In addition, new risks and uncertainties emerge from time to time and it is not possible for management to predict all such risks and uncertainties or how they may affect us. You should not place undue reliance on forward-looking statements.

