

**Radius Global Infrastructure, Inc. and its Subsidiaries**  
**Gifts & Hospitality Policy**  
Approved October 2, 2020

**1. Purpose**

The Gifts and Hospitality Policy (the “Policy”) formalizes and provides the procedure to ensure that Radius Global Infrastructure, Inc. and its subsidiaries (collectively, the “Company”), together with its and their directors, officers, employees, consultants and contractors, may provide or receive gifts and/or hospitality, in compliance with high standards of integrity and all relevant laws and regulations applicable.

**2. Scope**

This Policy applies to all directors, officers, employees, consultants, and contractors of the Company. This Policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the member of the Company or a public official on behalf of the Company or a member of the Company.

**3. Policy Statement**

You must declare all offers of gifts and hospitality worth over US\$100 made to or by you in your role as a member of the Company. All such offers must be declared whether accepted or declined. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation. You must make a declaration if you provide or receive multiple gifts or acts of hospitality in relation to the same or related persons within a six-month period that are individually of insignificant value but are reasonably likely collectively to be worth over US\$100 (not including those that are declined).

Declarations must be recorded on the Company’s Gifts and Hospitality Register (the “Register”). The Register is maintained by the Controller of Radius Global Infrastructure, Inc. and is publicly available.

It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or the Company’s public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an “official capacity”.

In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

**4. Standards in Providing or Accepting Gifts or Hospitality**

Directors, officers, employees, consultants and contractors, and their families, will not give or accept gifts, gratuities or entertainment in relation to the Company or its business that may conflict with the provisions of this Policy. For clarity, all directors, officers, employees, consultants and contractors of the Company, and their families, must ensure that:

- a) The gift / hospitality is not given or accepted with the intention or expectation of influencing a party to obtain or retain business or a business advantage, or as a reward for the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b) The gift or hospitality is customary to the industry;
- c) The gift or hospitality does not violate any local laws;
- d) Any gift or hospitality given is provided in the name of the Company and not in the name of the individual;

- e) The gift or hospitality does not include cash or a cash equivalent (e.g. vouchers, gifts certificates);
- f) The gift or hospitality is of an appropriate type and value and given or accepted at an appropriate time, taking into account the business relationship with the counterparty, any pending action expected of the counterparty and the reason for the gifts / hospitality;
- g) The gift or hospitality would be considered as being appropriate by an independent third-party bystander in all the circumstances and in hindsight; and
- h) The gift / hospitality is given or accepted openly and not secretly.

Directors, employees, consultants and contractors, and their families, are generally permitted to offer and accept gifts and hospitality without prior approval under paragraph 6, where all of the above-listed conditions apply and the value is less than the limits notified internally, subject to the declaration requirements under paragraph 3.

## **5. Gifts & Hospitality to Public Officials**

The Company requires all directors, officers, employees, consultants and contractors to exercise great care when interacting with public officials and demands that they act with the highest level of integrity.

Prior approval must be obtained from the President, Chief Operating Officer, Chief Financial Officer, General Counsel, or otherwise the Chief Executive Officer of Radius Global Infrastructure, Inc. for the making of any gift or the provision of any hospitality to a public official. Gifts or hospitality of an insignificant value such as promotional items (e.g. pens, notepads, diaries and calendars) or refreshments offered during a meeting are not covered by this rule.

## **6. Approval for Other Gifts & Hospitality**

Gifts or hospitality to those other than public officials should never be offered or accepted without the prior approval of the President, Chief Operating Officer, Chief Financial Officer, General Counsel, or otherwise the Chief Executive Officer of Radius Global Infrastructure, Inc. where the value of the gift or the hospitality per person is more than the limits notified internally or where one or more of the conditions listed in paragraph 4 do not apply.

Care should also be taken that several smaller gifts or lower levels of hospitality are not provided to the same recipient thereby breaching the overall internal limits. When providing prior approval under this Policy, the aggregate value of gifts and hospitality provided to the particular individual over the past 12 months must be considered, as recorded in the Register, and approval may be refused if the value of the gifts and hospitality is deemed excessive on this basis.

Where a gift is received of a value in excess of the amount established by the President, Chief Operating Officer, Chief Financial Officer, General Counsel, or otherwise the Chief Executive Officer of Radius Global Infrastructure, Inc. from time to time and it would be impractical or offensive to return it (e.g. due to local customs), the President, Chief Operating Officer, Chief Financial Officer, General Counsel, or otherwise the Chief Executive Officer of Radius Global Infrastructure, Inc. will decide whether it is appropriate to keep the gift or whether it should be donated to charity.

Further, there may be occasions where directors, officers, employees, consultants and contractors of the Company and their families are provided with more generous hospitality and it will be necessary to obtain approval from the President, Chief Operating Officer, Chief Financial Officer, General Counsel, or otherwise the Chief Executive Officer of Radius Global Infrastructure, Inc. before accepting. If acceptance of the hospitality would leave any director, officer, employee, consultant or contractor of the Company in a position of obligation, it should be politely declined.

## **7. Gifts & Hospitality Register**

All gifts and hospitality worth over US\$100 (whether alone or by virtue of the aggregation principle under paragraph 3) provided, received or declined must be recorded in the Register, which is maintained by the Controller.

## **8. Monitoring**

The Register will be maintained by the Controller and reviewed quarterly by Chief Financial Officer for Compliance with this Policy.

Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.

## **9. Consequences of Non-Compliance with the Policy**

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice. Violation of this Policy may also violate or constitute a criminal offense. If it appears in the opinion of the Board that any director, officer, employee, consultant or contractor of the Company may have violated such laws, then the Company may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for the Company and/or the responsible person.

**Your Personal Commitment to the Radius Global Infrastructure, Inc. and its Subsidiaries Gifts and Hospitality Policy**

I acknowledge that I received a copy of the Gifts and Hospitality 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 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)