

RADIUS GLOBAL INFRASTRUCTURE, INC.
POLICY FOR PUBLIC DISCLOSURES AND
COMMUNICATIONS WITH THE INVESTMENT COMMUNITY AND MEDIA

Approved November 12, 2020

1. Policy Statement

Radius Global Infrastructure, Inc. (the “Company”) is committed to fair disclosure of material information about the Company on a non-selective basis, consistent with Regulation FD promulgated by the U.S. Securities and Exchange Commission (“SEC”). It is in the Company’s best interests to maintain a dialogue with the investment community, including its own shareholders, regarding the Company’s historical performance and future prospects. Thus, the Company will continue to provide securities analysts and current and potential shareholders access to information that the Company determines appropriate to disclose through channels that comply with Regulation FD. This policy will be reviewed, evaluated and revised by the Company from time to time in light of developments in the Company’s business and the Company’s experience in the marketplace. This policy should be read in conjunction with the Company’s Securities Trading Policy and, where applicable, any reference to the “Company” shall include its subsidiaries.

2. Continuing Compliance with Regulation FD

The Company complies with all reporting and disclosure requirements set forth by the SEC, including Regulation FD. It has been, and will continue to be, the Company’s policy not to make disclosures of material nonpublic information on a selective basis. Regulation FD generally prohibits public companies from disclosing material nonpublic information to market professionals or to shareholders where it is reasonably foreseeable the shareholders will trade on the basis of the information, unless the information is simultaneously disclosed to the public. Under Regulation FD, market professionals include analysts, institutional investors, investment advisers, institutional investment managers and investment companies, and any shareholders of the Company who might be expected to trade on material nonpublic information. In this policy, these market professionals and shareholders of the Company who might be expected to trade on material nonpublic information are referred to collectively as the “investment community.” While communications with the media are not technically subject to Regulation FD, the Company generally will follow this policy when communicating with the media.

3. Authorized Spokespersons

Only the following directors and officers of the Company (collectively, the “Authorized Spokespersons”) are authorized to disclose information regarding the Company to the investment community or the media:

- Chairman or Co-Chairman of the Board of Directors
- Chief Executive Officer
- President
- Chief Operating Officer
- Chief Financial Officer
- Vice President of Investor Relations (when hired)
- Vice President of Public Relations (when hired)

All inquiries from the investment community or the media relating to the Company must be referred to one of the foregoing spokespersons. The Chief Executive Officer may from time to time designate additional

Authorized Spokespersons to speak on behalf of the Company (on an ongoing basis or in specific instances to speak on behalf of the Company at public, Regulation FD-compliant sessions) or revoke the authority of any persons to speak on behalf of the Company. Further, any Authorized Person other than the Company's CEO that speaks on behalf of the Company should coordinate with the Company's CEO before and after such speaking engagement.

No officer or other employee of the Company and no other member of the Board of Directors of the Company is authorized to disclose material nonpublic information about the Company to any member of the investment community or the media, except as provided above.

4. Disclosure of Material Information

A. Material Information. Information is considered "material" if a reasonable investor would consider it important in deciding whether to buy, hold or sell a security. Any information that could reasonably be expected to affect the price of the security is material. While it is not possible to define all categories of material information, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. Common examples of material information include:

- Projections of future growth, capital expenditures, earnings, losses or other earnings guidance.
- Earnings known, or known to a reasonably close approximation, prior to their announcement.
- A pending or proposed merger, acquisition, joint venture or tender offer or an acquisition or disposition of significant assets.
- Liquidity problems or other materially adverse financial developments.
- A change in senior management.
- A change in auditors, or auditor notification that the Company may no longer rely on an auditor's audit report.
- Major events regarding the Company's securities, such as defaults, redemptions, repurchase plans, stock splits, changes in dividend policy or the public or private offering of additional debt or equity securities.
- Changes in the Company's debt ratings.
- Actual or threatened major litigation, or positive or negative developments regarding such litigation.
- New major contracts, customers, tenants, business partners or finance sources, or the loss thereof.
- The pending introduction of major new initiatives.
- Cybersecurity incidents, attacks or breaches.
- Acquisition CAPEX (Originations)
- Acquired Rent
- New debt financings

B. Means of Public Disclosure. Whenever the Company intends to disclose material nonpublic information, its policy is to disclose such information in one of the following methods, as determined by the Authorized Spokespersons on a case-by-case basis:

- Distributing a press release through a widely disseminated news or wire service;

- Filing a Form 8-K with the SEC or, if appropriate, by including the disclosure in a Form 10-Q or Form 10-K or other SEC filing;
- Disclosing such information in a presentation by an Authorized Spokesperson that is publicly accessible by webcast, conference call, posting on the “News & Events” section of the Company’s website, or other means, provided that the fact of and means to access the presentation have been publicly disclosed in advance of the presentation and there has been a reasonable waiting period for the investment community to react to such disclosure; and/or
- Any other means designed to comply with Regulation FD.

C. Unintentional Disclosures. In the event that a Company director, official, employee or consultant inadvertently discloses information that may be material and nonpublic, the Legal Department should be notified immediately. If there is any question as to whether information is material or nonpublic, directors, officials, employees and consultants should consult with the Legal Department.

If it is determined that material nonpublic information was disclosed inadvertently by a Company director, official, employee or consultant whose disclosures are subject to Regulation FD, the Company will make prompt public disclosure of the information in one of the means described in Section 4.B. of this policy. The public disclosure will be made as soon as reasonably practicable (but in no event after the later of 24 hours or the commencement of the next day’s trading on the Nasdaq Global Market (“Nasdaq”)) after the determination by the Company, in consultation with the Legal Department, that the disclosed information is material and nonpublic.

5. Exchange Notification

The Company will notify Nasdaq of its intention to issue a press release within the time frame required by Nasdaq prior to distributing the press release to the media or through a news or wire service, all in accordance with the requirements of the Nasdaq Listing Rules.¹

6. Earnings Releases and Earnings Conference Calls

The Company typically will follow its earnings release with a conference call in which management participates and in which analysts and others may be invited to ask questions. The Company’s policy is to open all earnings conference calls, if any, to the public. Public access to any such calls shall be provided through the following procedures:

- a reasonable time in advance of a scheduled conference call, the Company will issue a press release, in accordance with Nasdaq’s procedure for public release of information, through major news wire services disclosing the scheduling of the conference call and other information required under SEC rules;
- the Company will provide live public access to the conference call through a toll-free number and/or simultaneous webcast; and
- the Company will provide a playback of the conference call on its website after the call and will archive the playback thereafter on the site for a period publicly disclosed by the Company.

¹ Under Nasdaq Listing Rule 5250, companies are required to notify Nasdaq MarketWatch at least ten minutes prior to the release of certain material news announcements when the public release of information is made between 7:00 a.m. – 8:00 p.m. ET. This notification must be provided to MarketWatch through the Electronic Disclosure submission system accessible at <https://www.nasdaq.net/ED/IssuerEntry.aspx>

7. Guidance and Other Forward-Looking Statements

The Company may publicly disclose estimates or projections relating to the Company's future earnings, performance or operations ("Guidance"). To the extent the Company provides Guidance, it will do so only through methods designed to comply with Regulation FD. Any Guidance will be based on management's evaluation of the information actually known by it at the time the Guidance is first publicly disclosed. Guidance constitutes forward-looking statements within the meaning of the federal securities laws, is subject to risks and uncertainties due to factors that the Company discloses in its filings with the SEC and in its press releases, and may differ from the Company's actual results, perhaps materially.

Any Guidance will be made, and will reflect management's and the Company's evaluation, only as of the date it is first publicly disclosed, and the Company does not intend, and disclaims any obligation, to update or even subsequently reaffirm any Guidance. All Guidance will be accompanied by meaningful cautionary statements and disclaimers that satisfy the "safe harbor" rules outlined in the Private Securities Litigation Reform Act of 1995 and that disclaim responsibility to update any forward-looking statements. During the two-week period following the Company's quarterly earnings release and earnings conference call, the Company's Authorized Spokespersons may discuss or answer questions that relate to Guidance or any other forward-looking information provided in the earnings release or conference call, but any update or material change to such information will be provided only through public disclosure in one of the means described in Section 4.B. of this policy. After such two-week period:

- Authorized Spokespersons should generally decline to answer questions about Guidance; and
- if an Authorized Spokesperson determines, in consultation with the Legal Department, that it is necessary to reference Guidance, any reference to Guidance should be made as a matter of historical reference only and clearly stated that such Guidance was an estimate as of the date it was given and it is not intended and should not be viewed or characterized as a reaffirmation or update of the Guidance.

Any revisions to, or subsequent reaffirmation of, the Company's publicly disclosed Guidance will be disclosed only by one of the means described in Section 4.B of this policy.

8. Quiet Periods

Commencing two weeks prior to the end of each quarter and until the quarterly earnings release and earnings conference call, the Company will observe a "quiet period" during which, absent special circumstances, the Company will not participate in conferences attended by, or hold any meetings with, members of the investment community or comment on Guidance or the Company's operational or financial performance for the quarter or the year-to-date. The CEO may change the "quiet period" as appropriate or make exceptions to the "quiet period" policy. During this period, Authorized Spokespersons may continue to discuss the Company's general business, subject to the Company's policy against selectively disclosing material nonpublic information.

9. Analyst, Investor and Industry Conferences

Company officials will participate in conferences oriented toward the investment community. Only Authorized Spokespersons are authorized to speak on behalf of the Company at any such conference. The Company, including its Authorized Spokespersons, may disclose material nonpublic information at such

conferences when that information is made broadly publicly available through one of the means described in Section 4.B. of this policy. In situations where information presented at such a conference is not publicly available through Regulation FD-compliant means, the Company intends not to disclose material nonpublic information at that conference. If the conference is one at which it is expected that representatives from the investment community or the media will be present, a reasonable time prior to the conference (ideally, at least two (2) business days in advance), a Company press release should be issued setting forth the time and date of the conference and access information, if any, during which webcast replays or other public broadcast will be available. All presentations or speeches that are intended to be made at a conference should be screened and approved in advance by the President, the Legal Department and the Chief Financial Officer, unless the presentation is the Company's then-current, management-approved investor presentation and no substantive changes have been made to it since it was last reviewed by the appropriate party(ies). Breakout sessions at conferences will be handled in the same manner as one-on-one and small-group meetings, as discussed below.

10. One-on-One and Small-Group Meetings and Telephone Calls

One-on-one and small-group meetings with the investment community (whether conducted in person or telephonically) may constitute valuable components of the Company's investor relations program. Only Authorized Spokespersons are authorized to speak on behalf of the Company at such meetings. In advance of any scheduled one-on-one or small-group meetings with the investment community, the Company may request an agenda and/or a list of questions or topics to be discussed. The Company does not intend to disclose material nonpublic information during such meetings. Discussions during such meetings will be subject to the restrictions set forth under this policy, in particular those under Sections 2, 7 and 8. In the event of an unintentional disclosure of material nonpublic information, a confidentiality agreement (preferably written) covering the information should be sought before the discussion concludes. The Authorized Spokesperson should make a written record, if possible, of any express, oral confidentiality agreement and give a copy to the Legal Department. The Legal Department should be notified of the unintentional disclosure in accordance with Section 4.C. of this policy. In the case of unanticipated questions, Authorized Spokespersons will feel free to decline to answer questions that they determine could involve or lead to the disclosure of material nonpublic information.

When participating in on-one-one or small-group meetings with the investment community, Authorized Spokespersons will decline to answer questions about:

- Guidance or internal financial projections;
- the Company's operational or financial performance for the quarter or the year-to-date, to the extent such information has not been previously publicly disclosed; and
- other material nonpublic information.

11. Responding to Questions and Commenting on Information

Although the Company recognizes that Regulation FD does not apply to communications with the media, it is the Company's policy to disclose material nonpublic information only through the means described under Section 4.B. of this policy. The Company generally will follow this policy when communicating with the media.

Comments on certain types of information about the Company will be made only in accordance with the following guidelines:

Market rumors. The Company will not comment on market rumors absent unusual circumstances, in which case it will make any disclosures through one of the means set forth in Section 4.B. of this policy.

Analyst reports or projections. The Company will not assist in the preparation of analyst projections regarding the Company. The Company's Chief Financial Officer, Vice President of Finance or Chief Accounting Officer may review analyst reports for accuracy of historical statements, and any commentary on such reports will be subject to the same limitations as apply to one-on-one and small-group meetings. The Company will not generally endorse or adopt analysts' projections. When Company spokespersons make corrections to, or comment on, analyst reports or projections, it will be done with the understanding that the spokesperson is not intending to disclose material nonpublic information and is not endorsing or adopting the report or projections.

12. Use of Website and Social Media

Special SEC requirements must be satisfied before the Company may use its website or social media channels, such as Twitter, Facebook, LinkedIn, YouTube, Google, Instagram, Snapchat and similar means of communication, to disclose material nonpublic information in a manner that is deemed to comply with Regulation FD. Until such time, if any, as the Legal Department has determined that the Company's website and specified social media channels are "recognized channels of communication" within the meaning of SEC requirements, the Company will not disclose material nonpublic information on its website or through such social media channels unless it has previously disclosed such information by one of the means described in Section 4.B of this policy.

Any use of social media channels to communicate corporate information that does not constitute material nonpublic information shall comply with Company guidelines applicable to those communications.

Use of personal social media channels by authorized representatives to communicate material Company information is prohibited. Notwithstanding the foregoing, nothing in this policy prohibits Company employees from engaging in any activities protected by Section 7 of the National Labor Relations Act.

13. Other Communications

This policy does not apply to communications of information made:

- to employees of the Company (even if they also hold securities such as options or stock of the Company);
- to other persons who owe the Company a duty of trust or confidence, such as attorneys, investment bankers or accountants who are engaged by the Company; and
- in connection with certain registered securities offerings, as provided under Regulation FD.

Notwithstanding the foregoing exceptions, due care should be taken whenever material nonpublic information is disclosed, including within the Company.

The communications included in the list above may be subject to restrictions in accordance with other applicable rules and policies, such as those related to insider trading and securities offerings registered under the Securities Act of 1933.

14. Violation of this Policy

Violations of Regulation FD and this policy may result in SEC enforcement actions, which could impose civil monetary penalties as well as injunctive or other relief. In addition, if an employee violates this policy the Company may take its own disciplinary actions, up to and including dismissal for cause.

Questions about this policy should be directed to the Legal Department.