

## FORM OF RADIUS GLOBAL INFRASTRUCTURE, INC.

### SECURITIES TRADING POLICY TO BE EFFECTIVE ON LISTING DATE ON NASDAQ

Dated as of October 2, 2020

#### **Background**

The Board of Directors (the “Board”) of Radius Global Infrastructure, Inc. has adopted this Securities Trading Policy (“Policy”) for the directors, officers, employees, consultants and independent contractors of Radius Global Infrastructure, Inc. and its subsidiaries (the “Company”) and affiliates of the Company (as defined in Rule 405 of the Securities Act of 1933, as amended) with respect to the trading of the securities of Radius Global Infrastructure, Inc., as well as the securities of publicly traded companies with whom we have a business relationship.

Federal and state securities laws prohibit the purchase or sale of a company’s securities by persons who are aware of material information about that company that is not generally known or available to the public. These laws also prohibit persons who are aware of such material nonpublic information from disclosing this information to others who may trade in the relevant securities. Companies and their controlling persons may also be subject to liability if they fail to take reasonable steps to prevent securities trading by company personnel in violation of applicable securities laws. Company personnel who violate the insider trading laws or this Policy are also subject to sanctions by the Company.

This Policy is designed to prevent insider trading or allegations of insider trading, and to protect the Company’s and your reputation for integrity and ethical conduct. It is your obligation to understand and comply with this Policy. Although the Company will assist you in understanding your obligations, the ultimate responsibility for adhering to this Policy and avoiding improper trading rests with you.

An Addendum to this Policy contains additional provisions applicable to directors, executive officers subject to Section 16 of the Securities Exchange Act of 1934, and certain designated employees in groups such as finance, legal, compliance and investor relations who are more likely to be exposed to material nonpublic information on a recurring basis.

#### **Scope of Policy**

*Persons Covered.* As a director, officer, employee, consultant, affiliate or independent contractor of the Company, this Policy applies to you. The restrictions that apply to you also apply to your family members who reside with you, anyone else who lives in your household, and any family members who do not live in your household but whose transactions in securities covered by this Policy are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in such securities) or are financially dependent on you. In addition, the same restrictions that apply to you also apply to trusts or other entities controlled by you or by any member of your household. You are responsible for making sure that the purchase or sale of any security covered by this Policy by any such person complies with this Policy.

*Securities Covered.* The prohibition on securities trading in this Policy is not limited to trading in the Company’s securities. It includes trading in the securities of affiliates of the Company. It also includes trading in securities of other companies about which Company personnel obtain material nonpublic information in the course of their employment or other relationship with the Company, such as customers or business partners of the Company and those with which the Company may be negotiating major transactions, such as an acquisition, investment or sale. Information that is not material to the Company may nevertheless be material to one of those affiliates or other companies.

*Transactions Covered.* Trading includes purchases and sales of common stock, preferred stock, options, warrants, debt securities (debentures, convertible debentures, bonds and notes) and any other securities that the Company (or the other entities described immediately above) may issue from time to time, as well as derivative securities relating to the stock of the Company (or the other entities described immediately above), whether or not issued by the Company (or such other entities), such as exchange-traded put and call options.

*Stock Option Exercises.* This Policy's trading restrictions generally do not apply to the *exercise* of a stock option for cash. The trading restrictions do apply, however, to any sale of the underlying stock or to a *cashless exercise* of the option through a broker, as this entails selling a portion of the underlying stock to cover the costs of exercise. The trading restrictions also apply to situations where an option holder pays the purchase price and/or applicable withholding taxes in Company stock, if this is permitted under the terms of the option.

*Vesting of Restricted Stock Units.* This Policy's trading restrictions generally do not apply to the issuance of shares upon vesting of an award of restricted stock units or the concurrent withholding by the Company of a portion of those units to satisfy applicable withholding taxes. But the trading restrictions do apply to any election (or change of an election) you may make regarding your tax withholding method (e.g., "netting" shares vs. payment in cash) in connection with a vesting of an award of restricted stock units. In addition, the trading restrictions also apply to any sales of Company stock issued upon vesting of restricted stock units.

*Employee Stock Purchase Plans.* This Policy's trading restrictions do not apply to *purchases* of Company stock in any employee stock purchase plan resulting from an employee's periodic payroll contributions to a plan under an election made at the time of enrollment in the plan. In contrast, the trading restrictions do apply to *sales* of Company stock purchased under such a plan.

## **Statement of Policy**

*Trading on Inside Information.* You may not trade in the securities of the Company, directly or through family members or other persons or entities, if you are aware of material nonpublic information relating to the Company. Similarly, you may not trade in the securities of any other company if you are aware of material nonpublic information about such company that you obtained in the course of your employment or engagement with the Company.

You are prohibited from trading while in possession of material nonpublic information, even where you are not motivated to trade based on this information. For example, you may wish to sell securities to raise money for an emergency expenditure. Regardless of your reasons for trading, you may not do so if at the time you are aware of material nonpublic information.

*No Tipping.* You may not pass material nonpublic information on to others or recommend or express opinions to anyone as to the purchase or sale of any securities when you are aware of such information. This practice, known as "tipping," also violates the securities laws and can result in the same civil and criminal penalties that apply to insider trading, even if you do not trade. Because even a casual remark recommending or expressing an opinion as to a purchase or sale of the Company's securities could be misconstrued as being based upon material nonpublic information, you should exercise caution in making any such recommendation or expressing any such opinions.

**Blackout and Pre-Clearance Procedures.** To help prevent inadvertent violations of the federal securities laws and to avoid even the appearance of trading on the basis of inside information, the Company's Board has adopted an Addendum to this Policy that applies to directors, executive officers subject to Section 16 of the Securities Exchange Act of 1934, and certain designated employees of the Company who have regular access to material nonpublic information about the Company. The Company will notify you if you are subject to the Addendum.

The Addendum generally prohibits persons covered by it from trading in the Company's securities during quarterly blackout periods and during certain event-specific blackouts. Some of the persons subject to blackout periods must also pre-clear all transactions in the Company's securities, as provided in the Addendum.

### **Definition of Material Nonpublic Information**

Inside information has two important elements – materiality and public availability.

*Material Information.* Information is 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 earnings or 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.

Both positive and negative information can be material. Because trading that receives scrutiny will be evaluated after the fact with the benefit of hindsight, questions concerning the materiality of particular information should be resolved in favor of materiality, and trading should be avoided.

*Nonpublic Information.* Nonpublic information is information that is not generally known or available to the public. One common misconception is that material nonpublic information loses its "nonpublic" status as soon as a press release is issued disclosing the information. In fact, information is considered to be available to the public only when it has been released broadly to the marketplace (such as by a press release or a filing with the Securities and Exchange Commission ("SEC")) and the investing public has had time to absorb the information fully. As a general rule, information should be considered nonpublic until one full trading day has elapsed

following the release of the information. For example, if the Company announces financial earnings after the market closes on a Thursday, the first time you can buy or sell Company securities is the opening of the market on the following Monday (assuming you are not aware of other material nonpublic information at that time).

### **Additional Guidance: Anti-hedging Policy**

The Company considers it inappropriate for those employed by or associated with the Company to engage in short-term or speculative transactions in the Company's securities or in other transactions in the Company's securities that may lead to inadvertent violations of the securities trading laws. Accordingly, your trading in Company securities is subject to the following:

*Short Sales.* You may not engage in short sales of the Company's securities (sales of securities that are not then owned), including a "sale against the box" (a sale with delayed delivery).

*Publicly Traded Options.* You may not engage in transactions in publicly traded options in the Company's securities, such as puts, calls, collars or other derivative securities, on an exchange or in any other organized market.

*Hedging.* You may not enter into hedging or monetization transactions or similar arrangements designed to hedge or offset any decrease in the market price of the Company's securities.

*Standing Orders.* Standing orders regarding the Company's securities should be used only for a very brief period of time. A standing order placed with a broker to sell or purchase stock at a specified price leaves you with no control over the timing of the transaction. A standing order transaction executed by the broker when you are aware of material nonpublic information may result in unlawful securities trading even if you were not aware of material nonpublic information at the time you placed the order. This restriction does not apply to purchase and sales under a Rule 10b5-1 trading plan that is approved by the Company's general counsel ("General Counsel"). Rule 10b5-1 trading plans are discussed immediately below.

### **Rule 10b5-1 Trading Plans**

A Rule 10b5-1 trading plan is a written program for trading securities designed to gain the protections of the defenses against insider trading under Rule 10b5-1 of the Securities Exchange Act of 1934. A plan of this type establishes parameters for purchases and/or sales of the Company's securities by a broker or other independent fiduciary, or places discretion in another person who has no access to material nonpublic information. Once the plan agreement is executed, the person who creates the trading plan retains no discretion over purchases or sales of the Company's securities under the plan. This includes the amount of the securities being traded, the trading prices and the timing of the trades. For example, a trading plan may simply instruct a broker to sell 1,000 shares on the first of every month, or it may involve a complex trading formula. A trading plan permits trading at any time, so long as the trading was established at a time when the person establishing the plan was not aware of any material nonpublic information.

Because the rules governing trading plans can be complex, anyone considering entering into a Rule 10b5-1 trading plan should first consult the General Counsel. Only trading plans approved in advance in writing by the General Counsel are permitted under this Policy. By approving the plan, however, the Company does not incur any obligation to assure that the plan complies with Rule 10b5-1 or assume any liability if it does not. Each director, officer, employee, consultant or independent contractor who adopts a Rule 10b5-1 trading plan should consult with his or her own legal counsel.

### **Reporting to the Board of Directors**

The General Counsel will report any waivers granted under this Policy (including permission to trade during a blackout period) to the Board at the next regularly scheduled meeting of the Board.

## **Post-Employment Transactions**

This Policy continues to apply to your transactions in Company securities for so long as you continue to possess or have access to material nonpublic information, even after you have ended employment or other services to the Company. If you are aware of material nonpublic information when your employment or service relationship ends, you may not trade in Company securities until that information has become public or is no longer material.

## **Unauthorized Disclosure**

Maintaining the confidentiality of Company information is essential for competitive, security and other business reasons, as well as to comply with securities laws. You should treat all information you learn about the Company or its business plans in connection with your employment or service as confidential and proprietary to the Company. Inadvertent disclosure of confidential or inside information may expose the Company and you to significant risk of investigation and litigation.

*Disclosures to Outsiders.* The timing and nature of the Company's disclosure of material nonpublic information to outsiders is subject to legal rules, the breach of which could result in substantial liability to you, the Company and its management. Also, individuals who talk directly to reporters without going through the proper channels risk providing incorrect information, revealing proprietary strategies or creating an affirmative disclosure obligation. Accordingly, it is important that responses to inquiries about the Company by the press, investment analysts or others in the financial community be made on the Company's behalf only by authorized individuals. Unless responding to such inquiries is among your specifically authorized responsibilities, you should politely refer all media representatives to the Company's Investor Relations Department, and if none exists, to the Company's Chief Financial Officer or General Counsel. In addition, you should avoid communicating or posting material nonpublic information of the Company or its business (or of another company that is doing business with the Company) on the Internet, including to your own or someone else's web page or blog (e.g. WordPress, Tumblr), journal or diary, personal web site, social networking or affinity web sites (e.g., Facebook, Twitter, Instagram, Snapchat), business networking websites (e.g., LinkedIn), online media (e.g., YouTube), wikis, virtual worlds and financial message boards (e.g., Yahoo Finance), bulletin board or a chat room (e.g., Reddit), voice-controlled devices (e.g., Amazon Echo, Google Home), whether or not associated or affiliated with the Company, as well as any other form of electronic communication.

*Disclosure to Company Personnel.* You should consider the consequences of disclosure of material nonpublic information even in discussions with Company personnel. For example, these individuals would be prohibited from trading in the Company's securities until the material nonpublic information is publicly disclosed or, as a result of your communication, they could inadvertently engage in a violation of the securities laws or this Policy. Accordingly, even within the Company, you should restrict dissemination of material nonpublic information on a need to know basis.

## **Company Assistance**

Your compliance with this Policy is of the utmost importance both for you and for the Company. If you have any questions about this Policy or its application to any proposed transaction, you may obtain additional guidance from the Legal Department. Do not try to resolve uncertainties on your own, as the rules relating to securities trading are often complex, not always intuitive and carry severe consequences.

## **Suspected Violations**

Company personnel are expected to report actual or suspected violations of Company policies, laws and regulations. If you know or have reason to believe that any person has engaged in securities trading in violation of this Policy, you should bring the relevant facts and circumstances to the attention of the Company's General Counsel or Chief Financial Officer. Please refer to the Company's Code of Business Conduct under Section 20, "Reporting Violations."

## **Consequences of Violation**

Insider trading and tipping cases have been brought involving employees trading through off-shore accounts, trading by family and friends based on information obtained from company employees, and trading involving a relatively small number of shares or dollar amounts. The SEC, the stock exchanges and the Financial Industry Regulatory Authority use sophisticated electronic surveillance techniques to uncover insider trading and tipping. Violations of this Policy may result in both civil and criminal penalties under applicable securities laws, including substantial fines and imprisonment. You may also be subject to Company sanctions that could include termination of your relationship with the Company. Supervisors who fail to take steps to prevent insider trading or tipping or who ignore it despite having a reason to believe that someone has engaged in securities trading in violation of this Policy may also be liable under applicable securities laws and may be subject to discipline by the Company.

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## RADIUS GLOBAL INFRASTRUCTURE, INC.

### ADDENDUM TO SECURITIES TRADING POLICY REGARDING

#### BLACKOUT AND PRE-CLEARANCE PROCEDURES

(Dated as of October 2, 2020)

To help prevent inadvertent violations of the federal securities laws and to avoid even the appearance of trading on inside information, the Company's Board has adopted this Addendum to the Company's Securities Trading Policy. This Addendum applies to "Covered Persons," which consists of all directors and executive officers of the Company who are subject to Section 16 of the Securities Exchange Act of 1934 and certain other employees of the Company, in groups such as finance, legal, compliance, and investor relations, who are designated "Covered Persons" by the General Counsel because such employees are likely to have access to material nonpublic information about the Company. Covered Persons will be notified that they are subject to this Addendum and the General Counsel shall maintain on file a list of such individuals.

This Addendum supplements the Company's Securities Trading Policy (the "Policy"). Covered Persons subject to this Addendum must also comply with the Policy.

#### **Blackout Procedures**

Covered Persons are subject to the following blackout procedures.

*Quarterly Blackout Periods.* The Company's announcement of its quarterly financial results almost always has the potential to have a material effect on the market for the Company's securities. Therefore, to avoid even the appearance of trading on the basis of material nonpublic information, you may not trade in the Company's securities during the period beginning at the end of the quarter and ending after the first full trading day following the release of the Company's earnings for that quarter.

*Exceptions to Quarterly Blackout Periods.* A Covered Person who is subject to a quarterly earnings blackout period may be permitted to purchase or sell securities during a quarterly blackout period in exceptional circumstances with the prior written consent of the General Counsel. Exceptional circumstances may include the sale of securities in the case of financial hardship or where the timing of the sale is critical to complete a planned tax-minimizing strategy initiated prior to the beginning of the blackout period. Exceptions may be granted only by the General Counsel and should generally be requested in writing at least two business days in advance of the proposed trade in accordance with the procedure or other instructions set forth by the General Counsel from time to time. An exception will not be granted if the General Counsel concludes that the Company's earnings information for the applicable quarter constitutes material nonpublic information or if there is an event-specific blackout.

*Event-Specific Blackouts.* The Company may on occasion issue potentially material information by means of a press release, SEC filing on Form 8-K, or other means designed to achieve widespread dissemination of the information. You should anticipate that trading will be blacked out while the Company is in the process of assembling the information to be released and until the information has been released and fully absorbed by the market.

From time to time, an event may occur that is material to the Company and is known by only a few directors or executives. So long as the event remains material and nonpublic, the persons who are aware of the event, as well as Covered Persons subject to pre-clearance, may not trade in the Company's securities. The existence of an event-specific blackout will not be announced, other than to those who are aware of the event giving rise to the blackout. If, however, a person whose trades are subject to pre-clearance requests permission to trade in the Company's securities during an event-specific blackout, the General Counsel will inform the requesting person of the existence of a blackout period, without disclosing the reason for the blackout. Any person made aware of

the existence of an event-specific blackout should not disclose the existence of the blackout to any other person and should not trade in the Company's securities. The failure of the General Counsel to designate a person as being subject to an event-specific blackout will not relieve that person of the obligation not to trade while aware of material nonpublic information.

### **Pre-clearance Procedures**

Covered Persons are subject to pre-clearance procedures.

Covered Persons, together with their immediate family members and other members of their household, may not engage in any transaction involving the Company's securities without first obtaining pre-clearance of the transaction from the General Counsel.<sup>1</sup> This includes stock plan transactions such as option exercises, gifts, loans, contributions to a trust or any other transfers. A request for pre-clearance should generally be submitted in accordance with the procedures set forth by the General Counsel from time to time at least two business days in advance of the proposed transaction. The General Counsel will evaluate a pre-clearance request in light of the Policy and the relevant facts and circumstances, and will determine whether to approve or disapprove the request for clearance.

Unless the General Counsel specifies otherwise, a pre-clearance for a trade or other activity involving the Company's securities will be valid for a period of five business days from the date on which the pre-clearance is given.

Receiving pre-clearance for a trade or other activity involving the Company's securities does not relieve Covered Persons from their own legal obligation not to trade on the basis of material nonpublic information and does not constitute legal advice.

### **Exception for Approved 10b5-1 Trading Plans**

Trades by Covered Persons in the Company's securities that are executed pursuant to an approved Rule 10b5-1 trading plan are not subject to the prohibition on trading on the basis of material nonpublic information contained in the Policy or to the restrictions set forth above relating to pre-clearance procedures and blackout periods. As stated in the Policy, however, all Rule 10b5-1 trading plans must be approved in advance in writing by the General Counsel.

### **Post-Employment Transactions**

If you are aware of material nonpublic information when you terminate employment or services, you may not trade in the Company's securities until that information has become public or is no longer material.

In all other respects, the procedures set forth in this Addendum will cease to apply to your transactions in Company securities upon the expiration of any blackout period that is applicable to your transactions at the time of your termination of employment or services.

### **Compliance with Section 16 and Rule 144**

Directors and executive officers are responsible for compliance with Section 16 of the Securities Exchange Act (including provisions related to disgorgement of "short-swing profits" and restrictions on short sales of the Company's securities) and Rule 144 of the Securities Act in connection with their transactions in the Company's

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<sup>1</sup> The General Counsel may not trade in Company securities unless the Chief Executive Officer, the President or the Chief Financial Officer has approved the trade(s) in accordance with the procedures set forth in this Addendum.



securities. The requirements of the Policy and this Addendum do not supersede the required compliance with your obligations under Section 16 or Rule 144.

*Section 16.* Directors and executive officers should be aware that most transactions in Company stock are subject to the accelerated two business day reporting requirements under Section 16. It is the responsibility of each director and officer to file their Section 16 reports. The Company may assist in filing Section 16 reports, so it is important that the Company's legal department receive prompt notice of reportable transactions.

*Rule 144.* Directors and executive officers are required to file Form 144 before making open market sales of Company stock. This form is generally prepared and filed by your broker but you must ensure that a copy is delivered to the General Counsel.

### **Company Assistance**

Your compliance with this Addendum and the Policy is of the utmost importance both for you and for the Company. If you have any questions about this Addendum, the Policy or their application to any proposed transaction, you may obtain additional guidance from the Company's legal department.

### **Certification**

All individuals, upon notification that they are Covered Persons, must acknowledge they are a Covered Person and certify as to their understanding of, and intent to comply with, the Policy and this Addendum. This acknowledgment and certification may be provided via email to the General Counsel.

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