

Radius Global Infrastructure, Inc. and its Subsidiaries
Anti-Fraud Policy
Approved October 2, 2020

Purpose

The corporate Anti-Fraud Policy is established to facilitate and promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations, which will aid in the prevention and detection of fraud.

Scope of Policy

This policy applies to any irregularity, or suspected irregularity, involving employees as well as shareholders, directors, officers, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Radius Global Infrastructure, Inc. or any of its subsidiaries (collectively, the "Company").

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

Policy

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. There is no need for the fraud to be successful to be viewed as corrupt; the attempt can be enough to amount to a violation of Company policy or a criminal offense in certain jurisdictions. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity.

Any irregularity that is detected or suspected must be reported immediately to the Legal Department, who has the primary responsibility to coordinate all investigations. The other options are to report to Internal Audit or report the allegation using the whistleblower procedures set forth in the Company's Code of Business Conduct and Ethics Policy.

Actions constituting fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act or omission
- Misappropriation, manipulation, falsification or alteration of funds, securities, accounting records, documents, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the company
- Subject to the exceptions and limits in the Company's Gifts and Hospitality Policy, accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or

- Any similar or related irregularity

Other Irregularities

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by departmental management and the Human Resources rather than the Legal Department.

If there is any question as to whether an action constitutes fraud, contact the Legal Department for guidance.

Investigation Responsibilities

The Legal Department has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Legal Department will issue reports to appropriate designated personnel and, if appropriate, to the Board of Directors through the Audit Committee.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with the Legal Department and senior management, as will final decisions on disposition of the case.

Confidentiality

All information received shall be treated confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Legal Department immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see Reporting Procedure section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know or as may be required by applicable law. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.

Authorization for Investigating for Suspected Fraud

Members of the Legal Department will have:

- Free and unrestricted access to all Company records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will *contact the Legal Department immediately*. The employee or other complainant may remain anonymous, except as may be required by applicable law. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the to the Legal Department. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." *Under no circumstances* should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Legal Department.

Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the designated representatives from Human Resources and the Legal Department and, if necessary, by outside counsel, before any such action is taken. The decision to terminate an employee is made by the employee's management. Should the Legal Department believe that management's decision is inappropriate for the facts presented, the facts will be presented to executive level management for a decision.

Administration

The General Counsel is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

**Your Personal Commitment to the Radius Global Infrastructure, Inc. and its Subsidiaries
Anti-Fraud Policy**

I acknowledge that I received a copy of the Anti-Fraud Policy dated _____ (“the Policy”), that I have read the Policy, and that I understand it. I will comply with the Code. If I learn that there has been a violation of the Policy, I will contact the General Counsel or Chief Financial Officer or my supervisor, if appropriate. I understand that Radius Global Infrastructure, Inc. (together with its subsidiaries) expressly reserves the right to change, modify or delete the Policy’s 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)

Fraud Policy Decision Matrix

Action Required	Legal	Internal Audit	Finance/ Accounting	Executive Mgmt	Line Mgmt
1. Controls to Prevent Fraud	S	S	SR	SR	P
2. Incident Reporting	P	S	S	S	S
3. Investigation of Fraud	P	S			
4. Referrals to Law Enforcement	P				
5. Recovery of Monies due to Fraud	P				
6. Recommendations to Prevent Fraud	SR	SR	SR	SR	SR
7. Internal Control Reviews		P			
8. Handle Cases of a Sensitive Nature	P	S		S	
9. Publicity/Press Releases		S			
10. Civil Litigation	P	S			
11. Corrective Action/Recommendations To Prevent Recurrences	P	SR		S	SR
12. Monitor Recoveries	P		S		S
13. Pro-active Fraud Auditing	S	P			
14. Fraud Education/Training	P	S			S
15. Risk Analysis of Areas of Vulnerability	SR	S		SR	SR
16. Case Analysis	P	S			
17. Hotline, if available	P	S			
18. Ethics Line, if available	P	S			

P (Primary Responsibility) S (Secondary Responsibility) SR (Shared Responsibility)