

Radius Global Infrastructure, Inc. and its Subsidiaries
Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy

Approved October 2, 2020

1. Introduction

Applicability. This Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy (this “*Policy*”) covers the worldwide operations of Radius Global Infrastructure, Inc. and its subsidiaries (collectively, the “*Company*” or “*we*”) and applies to the following people and entities (collectively, “*Company personnel*” or “*you*”):

- All of the Company’s directors, officers and employees; and
- All distributors, consultants, joint venture partners and other third parties that have or are likely to have contact with foreign governments officials on the Company’s behalf.

Please note that this Policy applies in addition to (not in lieu of) the Company’s other applicable policies and codes, including the Company’s code of conduct and ethics and its compliance code.

Combating Bribery and Corruption. The Company operates in a wide range of legal and business environments, many of which pose challenges to our ability to conduct our business operations with integrity. We strive to conduct ourselves according to the highest standards of ethical conduct. Throughout its operations, the Company seeks to avoid even the appearance of impropriety in the actions of Company personnel.

Accordingly, this Policy reiterates our commitment to integrity, and explains the specific requirements and prohibitions applicable to our operations under the anti-corruption provisions of the U.S. Foreign Corrupt Practices Act (“*FCPA*”) and other international anti-bribery laws, including the U.K. Bribery Act (the “*UKBA*”), that prohibit unlawful payments related to business advantages. The Policy contains information intended to prevent corruption and bribery from occurring in the Company’s activities. The Company strictly prohibits all forms of bribery and corruption and will take all necessary steps to ensure that it does not occur in its business activities.

The Legal Framework. Under the FCPA, it is illegal for U.S. persons (including U.S. companies and their subsidiaries, directors, officers, employees and agents) to bribe foreign public officials.

The concept of prohibiting bribery is simple. However, understanding the full scope of the FCPA is essential, as this law directly affects everyday business interactions between Company personnel and foreign governments and government-owned or government-controlled entities.

Violations of the FCPA can also result in violations of other U.S. laws as well, including laws relating to anti-money laundering, mail and wire fraud and conspiracy. The penalties for violating the FCPA are severe. In addition to being subject to Company disciplinary policies, individuals who violate the FCPA may also be subject to fines and imprisonment.

Aside from the FCPA, the Company may also be subject to other foreign anti-bribery laws, in addition to being subject to the local laws of the countries in which the Company conducts business. For instance, under the UKBA, it is illegal for U.K. persons (including U.S. companies carrying on business in the U.K.) to bribe any person (note this is not limited to only foreign public officials) or to accept bribes from any such person. This Policy generally sets forth the expectations and requirements for compliance with those laws.

2. Compliance with Law

In conducting their work for the Company, Company personnel are required to comply with all applicable laws and regulations, including those relating to anti-bribery, anti-corruption and recordkeeping.

3. Prohibited Payments

Company personnel are prohibited from directly or indirectly making, promising, authorizing, accepting or offering “anything of value” (as defined below) on behalf of the Company (including to a “foreign government official,” as defined below) to secure an improper advantage, obtain or retain business or direct business to any other person or entity. This prohibition includes payments to third parties knowing that the third-party will use any part of the payment for bribes. Company personnel are also prohibited from accepting any bribes.

(a) *Anything of Value.* Payments that violate the FCPA may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. The FCPA prohibits giving “anything of value” for an improper purpose. This term is very broad and includes, for example, the following:

- Payment of or reimbursement for travel, meals, lodging and entertainment;
- Gifts and gift cards;
- Loans;
- Non-arm’s length transactions;
- Offers of employment or internships;
- Political contributions;
- Charitable donations and sponsorships;
- Facilitation payments; and
- Solicitation and extortion.

(b) *Foreign Government Official.* The FCPA broadly defines the term “foreign government official” to include:

- Officers or employees of a foreign government or any department, agency or instrumentality of a foreign government;
- Officers or employees of a company or business owned in whole or in part by a government;
- Officers or employees of a public international organization (such as the United Nations, World Bank or the European Union);
- Foreign political parties or officials of foreign political parties; and
- Candidates for political office.

Importantly, the term also includes the spouse, children and other immediate family members of a foreign government official.

Contributions to candidates for foreign political office are prohibited unless the General Counsel of Radius

Global Infrastructure, Inc. pre-approves them in writing.

Donating to or sponsoring any charitable organization headed by any foreign government official are prohibited unless the General Counsel of Radius Global Infrastructure, Inc. pre-approves them in writing.

Cash payments of any kind to a third-party (other than documented petty cash disbursements or other valid and approved payments complying with all the Company's policies) are strictly prohibited. Company checks shall not be written to "cash," "bearer" or anyone other than the party entitled to payment.

4. Permitted Payments

The FCPA does not prohibit all payments to foreign government officials. In general, the FCPA permits three categories of payments:

- (a) *Facilitating Payments.* The FCPA does not prohibit nominal payments made to low-level government officials to ensure or speed the proper performance of a government official's routine, non-discretionary duties or actions.
- (b) *Promotional Hospitality and Marketing Expenses.* The Company may pay for the reasonable cost of a foreign government official's meals, lodging or travel if, and only if, the expenses are bona fide, reasonable and directly related to the promotion, demonstration or explanation of Company products or services, or the execution of a contract with a foreign government or agency.
- (c) *Promotional Gifts.* Promotional gifts of nominal value may be given as a courtesy in recognition of services rendered or to promote goodwill. These gifts must be nominal in value and should generally bear the trademark of the Company or one of its products.

For situations in which it applies, however, the UKBA is stricter and prohibits these types of payments. Moreover, local laws could be stricter than the FCPA and must be followed. For these reasons, in order to confirm the propriety of any payment intended to meet any of the exceptions above, the General Counsel of Digital Landscape Group, Inc. must be consulted and must pre-approve the payment, reimbursement or gift in writing.

5. Record Keeping

All transactions involving Company funds or assets must be recorded in reasonable detail and accurately and completely reflect the transactions and asset dispositions of the Company, regardless of the country in which the transaction takes place. Further, the purpose and amount of the expenditure for any transaction involving a foreign government official must be recorded.

Direct or indirect participation in any such "improper transaction" or deviation from established Company policies or accounting practices, including omitted or falsified expense reports, is strictly prohibited.

The Company will maintain a system of internal accounting controls, including periodic audits, in compliance with applicable law.

6. Due Diligence and Monitoring of Third-Party Company Personnel

Each of the Company's agents and joint venture partners, as well as any other third-party representatives that have or are likely to have contact with foreign governments officials on the Company's behalf, must:

- Be vetted through the Company's risk-based FCPA due diligence process and procedures (which, for example, may include appropriately tailored written questionnaires, third party due diligence investigations, reference checks, interviews and/or on-site inspections);
- Certify or represent that it complies with the FCPA, other relevant anti-bribery laws and this

Policy;

- Commit in its contract with the Company to comply with the FCPA, other relevant anti-bribery laws and this Policy;
- Not allow work to be subcontracted to another party without the Company's written approval; and
- Be monitored by the Company (which, for example, may include third party audits, screenings and reviews of publicly available information) for FCPA and anti-bribery compliance.

The level of scrutiny applied in, and the extent of, the Company's due diligence and monitoring efforts will consider, as appropriate:

- The territory involved and its risk and reputation for corruption and bribery;
- The expected level and frequency of the third party's interactions with various types and levels of government officials;
- The third party's relevant industry;
- The degree to which the third party is subject to government oversight and inspection; and
- The volume and importance of inputs or products clearing customs.

7. Duty to Comply

Company personnel must be familiar with, and perform their duties according to, the requirements set out in this Policy. Any Company personnel who suspects that this Policy may have been violated must immediately notify the Company as specified in section entitled "Reporting Policy Violations" below. Any person who, in good faith, reports suspected legal, ethical or Policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential FCPA, UKBA or similar liability.

8. Duty to Cooperate

The Company may at times undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all Company personnel to cooperate with the Company, outside legal counsel, outside auditors or other similar parties. The Company views failure to cooperate in an internal review as a breach of your obligations to the Company and will deal with this failure severely in accordance with any local laws or regulations.

9. Questions About the Policy

If you have any questions relating to this Policy, please contact a member of the Legal Department.

10. Reporting Policy Violations

Potential violations of this Policy should be immediately reported to the officers set forth below of Radius Global Infrastructure, Inc. and as otherwise as follows:

- By calling a third-party confidential reporting system at such contact information or in such manner provided by the General Counsel or Chief Financial Officer;
- In writing to the General Counsel via mail (to Radius Global Infrastructure, Inc., Attention:

General Counsel or Chief Financial Officer, 3 Bala Plaza East, Suite 502, Bala Cynwyd, PA, 19004 U.S.A. or via email (to the General Counsel or Chief Financial Officer); or

- To a member of the Company's Audit Committee (or such other applicable Board committee having jurisdiction over such matters).

In the event of any report received by a member of the Audit Committee (or such other applicable Board committee having jurisdiction over such matters), an employee's supervisor or a member of management under this Policy, the recipient must promptly forward that report to the General Counsel.

11. Company Response

The Company will investigate, respond to, and take appropriate action to remediate the underlying causes and effects of (including, when required or appropriate, by reporting misconduct to governmental authorities), any actual or alleged violations of this Policy to the extent determined to be necessary by the Company's executive officers or their designees (acting in consultation with, or at the direction of, the Board of Directors and/or Audit Committee, if and as appropriate). If necessary, such action will include assessing and/or modifying internal controls, policies and procedures.

12. Consequences of Policy Violations

Company personnel who violate this Policy (or otherwise violate any applicable laws) are subject to disciplinary action, up to and including dismissal, in accordance with the Company's employee handbook, its code of conduct and ethics and its other policies and procedures (or, in the case of third-party representatives, up to termination of all commercial relationships with the Company). Company personnel may also be subject to civil or criminal prosecution.

* * *

**Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy
Certification**

I acknowledge that I received a copy of the Radius Global Infrastructure, Inc. and its Subsidiaries Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy (“the Policy”) and understand its contents and agree to comply with all of its requirements. 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)