

# Radius Global Infrastructure, Inc.

## Vendor Code of Conduct Policy

(Approved February 25, 2022)

Radius Global Infrastructure, Inc. and its subsidiaries (collectively, the “Company”) remain focused on driving long-term shareholder value through good corporate citizenship and encourage all of our vendors to join us in working towards a more sustainable and connected future.

Our Vendor Code of Conduct describes our ethically sound business practices that our vendors, suppliers and other third parties are expected to follow. The Company expects all our vendors to abide by our standards regarding human rights, fair labor practices, diversity and inclusion, health and safety, business ethics, confidentiality and data protection, and environmental management and compliance. We also expect all of our vendors to conduct business in accordance with the highest ethical and legal standards, promote socially responsible practices and diversity, and mitigate the environmental impact and carbon footprint of their operations.

This Vendor Code of Conduct should be read in conjunction with our Code of Business Conduct and Ethics Policy, Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy, Related Party Policy, Anti-Money Laundering Policy, Anti-Fraud Policy and any existing contracts or agreements that a vendor may have with the Company. Vendors must comply with all applicable laws, regulations and standards in the countries in which they operate. Vendors must ensure that adequate management systems and controls are in place to ensure compliance with this Vendor Code of Conduct. It is the responsibility of our vendors to ensure that their employees, sub-contractors or suppliers are informed and uphold the requirements of this Vendor Code of Conduct.

If a vendor is found to be in violation of any policy set forth in this Vendor Code of Conduct, the Company may review our relationship with the respective vendor. Upon review, the Company may take corrective action, including, but not limited to termination of any and all contracts, agreements or relationships.

### 1. **Diversity and Inclusiveness**

The Company is dedicated to promoting diversity, equity, and inclusion in our workforce. Our vendors should understand that the Company is an equal opportunity employer and echo these similar practices within their own organizations. Vendors should adopt a zero-tolerance policy for harassment and discrimination on the basis of gender, race, ethnicity, minority group, nationality, origin, age disability, veteran and service member, LGBTQI+, other self-identifications, or any other protected status in accordance with the requirements of federal, state, and local laws and regulations.

### 2. **Health and Safety**

The Company maintains a safe work environment by noted within our Code of Business Conduct and Ethics Policy and a systematic approach to incident reporting, investigation, inspections and corrective actions. Our vendors should take adequate measures to document injury, accident and fatality rates and to adopt policies and safeguards to mitigate such occurrences. We expect our vendors to be compliant with all applicable health and safety laws and regulations. In addition, our vendors should require all partners, subcontractors or other businesses or persons with which our vendors may engage to comply with all related laws and regulations.

### 3. **Fair Labor Practices**

Our vendors should pay fair wages for labor and should comply with all applicable wage and compensation laws. If there are other legally mandated benefits outside of wage and compensation, our vendors should also comply with those regulations. Our vendors should also adhere to regulatory requirements for maximum working hours and minimum living wages.

- **Freedom of Association**

Our vendors should abide by all applicable laws governing the rights of employees to join or participate in collective bargaining, trade or labor unions.

- 4. **Human Rights**

- **Forced Labor, Human Trafficking, and Slavery.**

The Company is strictly against the trafficking of persons, slavery and forced labor and expect our vendors to uphold the same ethical principles. Our vendors should not conduct business operations with any partners, subcontractors or other businesses or persons who engage in, or are suspected of engaging in, any forms of human trafficking, slavery, or forced labor.

- **Child Labor**

Our vendors should comply with all minimum age laws and regulations, including with respect to minimum age for hazardous work. The Company believes in and adheres to all applicable laws to ensure the safety and fundamental rights of children. The Company prohibits child labor, trafficking or exploitation of children and require our vendors to abide by these standards.

- 5. **Ethical Business Practices**

- **Anti-Bribery and Anti-Corruption**

Our vendors should be familiar with and understand the requirements of all applicable U.S. and non-U.S. anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. Our vendors should not directly or indirectly give, offer to give, promise to give, or authorize bribes, or any other form of improper or illegal payment to induce the recipient, including government officials and their families, to take or refrain from taking any action that would give a commercial benefit or advantage, or to receive anything of value in return.

- **Money Laundering**

Our vendors should take reasonable measures to prevent money-laundering.

- **Sanctions**

Our vendors should comply with all applicable political and economic sanctions by countries against states or organizations. Vendors should not engage in any transactions with individuals against whom, or entities or jurisdictions against which the U.S. government has imposed sanctions.

- **Fair Competition and Anti-Trust**

Our vendors should comply with all national and international competition laws. Our vendors should operate with ethical business practices that are consistent with the promotion of fair competition by not participating in price fixing, market or customer allocation, market sharing, or bid rigging with competitors.

- **Insider Trading**

Our vendors, their employees, and sub-contractors should not trade in our or another company's securities while in possession of material non-public information. Material non-public information is information not available to the investing public that a reasonable investor would consider important in making a decision to

trade such securities.

- **Conflicts of Interest**

The Company recognizes that our vendors may take part in legitimate financial, business and other activities outside of the relationship we have with them. Nevertheless, our vendors should avoid business, financial, or other direct or indirect interest, relationships or activities that would:

- Be or have the appearance of being unlawful, hostile or adverse with the Company
- Result or have the appearance of resulting in a conflict with the interests of the Company
- Divide or have the appearance of dividing its loyalty to the Company

Moreover, vendors should not take personal advantage of opportunities that they become aware of through their relationship with the Company.

## 6. **Confidentiality and Data Protection**

- **Confidential Information**

Our vendors must not disclose our confidential information to anyone outside of their organization, nor anyone within their organization, who does not have a business reason with respect to our relationship to know such information.

- **Intellectual Property Rights**

Our vendors must aim to protect all the Company intellectual property. Our vendors may not use the Company's intellectual property or information for personal gain.

- **Data Privacy Laws**

Our vendors should comply with all applicable privacy and data protection laws and maintain protections for personal information.

- **Data Breach**

If our vendors are victims of a data breach that could potentially result in the destruction, loss, alteration, accessibility, or disclosure of confidential information or personal information, they must notify the Company immediately upon reasonable suspicion of such breach.

- **Records Retention**

Our vendors should create and maintain complete and accurate records. Vendors must retain and delete records in accordance with applicable law.

## 7. **Environmental Management and Compliance**

- **Environmental Laws and Permits**

The Company is committed to long-term, environmentally responsible operations. We consider environmental protection, conservation and other impacts during our site selection, acquisitions, and development. Our vendors should take necessary steps to ensure they are compliant with applicable environmental laws and regulations, as well as conservation, permitting and land management regulations.

- **Responsible Resource Usage – Minimization of Waste, Energy and Water**

The Company recognizes the importance of minimizing our environmental impact of our extended value chain. We expect our vendors to have programs and processes in place to manage, mitigate and reduce their fuel and electricity consumption, which are key drivers of greenhouse gas emissions. Vendors are also expected to adopt environmentally responsible business practices for water conservation, hazardous waste and recycling.

8. **Monitoring and Compliance**

Beyond our operations, the Company views the sustainability of our vendors as an integral aspect of our overall strategy and business success. We evaluate our vendors on various criteria, including social and environmental factors, and ask that all vendors adhere to our ethical standards and business practices. Our engagement with our vendors helps us determine the environmental impact of our extended supply chain and improve our responsible procurement practices.

- **Grievance Mechanism**

Complaints and concerns on matters relating to this Vendor Code of Conduct may be submitted through the Company's anonymous, confidential whistleblower hotline at <https://secure.ethicspoint.com/domain/media/en/gui/75671/index.html>.

The Company will not undertake any efforts to determine the identity of individuals making anonymous submissions. Anonymous submissions should contain as much detailed information as possible regarding the complaint or concern to permit the matter to be properly investigated.

The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any director, officer or employee in the terms and conditions of service or employment based upon any lawful actions of such director, officer or employee with respect to good faith reporting of violations of this Vendor Code of Conduct.