

Introduction

Crown Castle strives to conduct its business with honesty and integrity in accordance with legal and ethical standards.

Crown Castle Proper Business Practices and Ethics Policy

February 2021
Version No. 2
Legal Department

Revenue Code or ballot measure at any time, including in connection with any U.S. or foreign election whether federal, state or local. To the extent permitted by law and approved by the Board of Directors of Crown Castle Inc. (Board) in advance, Crown Castle's resources may be used to establish and administer a political action committee or separate segregated fund.

In countries where corporate political contributions are permitted by law and encouraged by local custom, contributions may be appropriate and are only permitted where approved by the proper corporate officer, with the concurrence of the Board. Please refer to Foreign Corrupt Practices and Anti-Corruption below for certain prohibitions relating to foreign payments.

To the extent permitted by this Policy, if Crown Castle makes a political contribution, it should do so to support the Crown Castle's public policy objectives and promote its interests, without regard for the private political preferences of its executives and directors. When required by applicable laws and regulations, Crown Castle has an obligation to publicly report with the U.S. Congress and state and local regulatory bodies disclosing its political contributions.

Team members have the right to support political candidates and issues of their own choosing. While engaged in such activities, team members should make clear that their views are not those of Crown Castle.



Business decisions should be made in the best interests of Crown Castle. Crown Castle prohibits teammates from seeking or accepting any gifts, favors, entertainment, payment or loans for themselves or their Family Members from any customer, vendor, supplier, or other party doing business with Crown Castle, except gifts of nominal or modest value if (a) the gifts are consistent with the giver's rules, (b) the acceptance of the gift is in compliance with this Policy, and (c) open disclosure of the gift would not embarrass or reflect poorly on Crown Castle, the giver, or the teammate recipient. These rules should be communicated to customers and suppliers. Teammates who violate this policy are subject to discipline, up to and including termination.

Any actual, potential or apparent conflict of interest involving a teammate, including a teammate's Family Member, should promptly be reported to Crown Castle by such teammate. To facilitate such reporting, Crown Castle has adopted a Conflict of Interest Disclosure Form, a copy of which can be obtained from (a) the Vice President Audit & Security (currently Amy Donachy), (b) Senior Vice President and General Counsel (Interim) (currently, Teddy Adams), (c) the Associate General Counsel and Corporate Secretary (currently, Don Reid), or (d) the following [link](#)

In addition, teammates may be required to complete the Conflict of Interest Disclosure Form on an annual basis. Failure to disclose a conflict or potential conflict of interest may constitute grounds for disciplinary action.

Foreign Corrupt Practices and Anti-Corruption

Teammates may not authorize or undertake any activity that violates the provisions of the U.S. Foreign Corrupt Practices Act (FCPA), federal and state election laws, bribery, or other applicable domestic or foreign anti-corruption laws. Generally, the FCPA prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Making illegal payments to government officials in any country is prohibited. Additional provisions relating to the FCPA are set forth in Crown Castle's FCPA Policy, which forms a part of this Policy.

Crown Castle will not indemnify any teammate or agent for any fine or penalty which may be imposed on such teammate or agent upon conviction for violation of the FCPA.



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Reporting Violations or Concerns

Crown Castle proactively promotes ethical behavior. Teammates should report integrity or ethical concerns including violations or potential violations.

