

Crown Castle Supplier Code of Conduct

Issuing Dept.: Supply Chain
June 2020

Crown Castle is committed to conducting business with honesty and uncompromising integrity. This commitment applies with equal vigor to Crown Castle's supply chain. This Supplier Code of Conduct ("Code of Conduct") contains principles to promote ethical business practices among entities, including their subcontractors and agents, providing products, people or services to Crown Castle ("Suppliers"). Crown Castle expects its Suppliers to: (a) comply with applicable laws and regulations; (b) conform to or exceed industry best practices; and (c) meet or exceed the expectations set forth in this Code of Conduct and any agreements between Crown Castle and the respective Supplier.

As used in this Code of Conduct, "Crown Castle" refers to Crown Castle International Corp. ("CCIC") and its subsidiaries. References to "Crown Castle teammates" are to Crown Castle employees and contingent workers performing services for Crown Castle. In this Code of Conduct, the term "including," and any variation of such term, means "including without limitation." The use of the word "or" in this Code of Conduct is not exclusive. This Code of Conduct is deemed to supplement, but not to supersede, any contract between Crown Castle and the Supplier ("Master Agreement"). In the event of a conflict between the Master Agreement and this Code of Conduct, the more restrictive terms shall apply.

Labor and Human Rights

Crown Castle expects its Suppliers to demonstrate a commitment to human rights, which includes, at a minimum, the following:

Fair Treatment. Provide equal opportunity in all aspects of employment and ensure a workplace free of harassment, abuse, coercion, and other inhumane treatment of workers. Strictly prohibit discrimination against workers and any other covered individual based on any class protected under applicable federal, state or local law, including race, color, religion, national origin or ancestry, ethnicity, sex, gender (including gender identity and expression, and status as a transgender individual), sexual orientation, age, physical or mental disability, citizenship, past, current or prospective service in the uniformed services, genetic information, and marital status.

Involuntary and Child Labor. Prohibit trafficking in persons or using any form of slave, forced, bonded, indentured or involuntary prison labor. Do not use child labor. Comply with all applicable minimum working age laws, regulations and industry best practices, including with respect to the minimum age for performance of hazardous work.

Compensation, Benefits and Working Hours. Provide all workers with at least the minimum wage, compensation for overtime hours, and benefits, in each case as mandated by applicable laws and regulations. Limit the number of working hours to the maximum legally allowed under applicable laws.

Freedom of Association. Abide by applicable law governing the rights of employees to join or not join trade or labor unions.

Health and Safety

Crown Castle expects its Suppliers to maintain a safe work environment for its workers and Crown Castle's teammates, as well as the general public and others with access to job sites or surrounding areas. Suppliers must establish and observe safety protocols that, at a minimum, address the following:

Occupational Safety. Take appropriate precautionary measures to protect the health and safety of workers by: (a) implementing, maintaining and enforcing safety management practices that conform to or exceed legal and industry standards, including those mandated by the Occupational Safety and Health Act of 1970; (b) supplying workers with requisite, well-maintained personal protective equipment and mandating its use when performing work for Crown Castle; (c) providing regular safety training to workers and monitoring and enforcing their compliance with safety standards, procedures and industry best practices; (d) familiarizing workers with Crown Castle's safety expectations and procedures and enforcing their compliance with Crown Castle's safety requirements, including those specified in the Master Agreement; (e) ensuring workers are, at all times, properly qualified to perform their job responsibilities and designated tasks; (f) obtaining and keeping current all required health and safety permits, worker training certifications and credentials; (g) promptly reporting to Crown Castle all incidents and near misses; (h) preparing and implementing corrective action plans to manage risks and promote safe practices; and (h) prohibiting workers from performing services for, or on behalf of, Crown Castle while under the influence of any substance, including drugs or alcohol, which may impair their ability to work safely and effectively.

Occupational Injury and Illness. Maintain procedures and systems to manage, track and report: (a) occupational injuries and illnesses and (b) violations and fines from the Occupational Safety and Health Administration or equivalent state and local regulatory agencies. Such procedures and systems must be designed to: (i) encourage reporting; (ii) classify and record injury and illness cases; and (iii) investigate cases and implement corrective actions.

Emergency Preparedness. Implement emergency plans and procedures that, at a minimum, address: (a) emergency preparedness, reporting and notification (including to Crown Castle); (b) evacuation and rescue procedures, training and drills; (c) appropriate hazard detection and mitigation procedures; and (d) adequate exit facilities from job sites.

Information and Property

Crown Castle takes great care of its assets and expects its Suppliers to extend the same level of care for the assets entrusted or made available to the Suppliers. Accordingly, Crown Castle expects Suppliers to comply with the following:

Confidentiality. Safeguard confidential and proprietary information entrusted to the Supplier by Crown Castle and its customers. Such information includes all non-public information that, if disclosed, might be of use to competitors, or harmful to Crown Castle or its customers, including business plans, financial or competitive information, strategies, information systems and other business, operational, financial and performance data. That data is valuable to Crown Castle, and it is secret. Limit disclosure of Crown Castle information as legally mandated or expressly authorized by law, this Code of Conduct, the Master Agreement and any other applicable agreements. Any documents, papers, records or other tangible items that contain confidential and proprietary information relating to Crown Castle are the property of Crown Castle.

Protection and Proper Use of Assets; Improper Payments. Use best efforts to protect from loss, theft, abuse and unauthorized use any physical assets that Crown Castle made available to the Supplier. Ensure that Crown Castle's assets are used only for legitimate Crown Castle business purposes and are not maintained for use for non-business related purposes. Prohibit payment on behalf of Crown Castle that is made in furtherance of any unlawful or improper purpose. Respect Crown Castle's intellectual property rights and comply with Crown Castle's intellectual property licensing arrangements.

Privacy and Information Security. Exercise caution when collecting, storing and distributing confidential information regarding Crown Castle's customers, teammates and shareholders. Abide by all applicable privacy, data protection and information security laws and regulations, and with Crown Castle's privacy, data protection and information security policies (as they may be updated by Crown Castle from time to time).

Integrity and Compliance

Crown Castle is committed to operating ethically and responsibly and expects its Suppliers (including its workers and subcontractors) to share in Crown Castle's commitment, including with respect to the following areas:

Conflict of Interest. Avoid relationships with or situations involving any of Crown Castle's teammates, customers and other business partners that compromise or could compromise or otherwise reasonably appear to compromise the ability of that party or the Supplier to perform his or her work objectively and effectively. Conflicts of interest occur when a person (or such person's immediate family member) or entity has a private interest (including financial interest) that interferes with the interests of Crown Castle as a whole or when improper personal benefits (including gifts) are conveyed to or solicited by individuals in a position to make a decision on behalf of Crown Castle. Refrain from offering or giving Crown Castle teammates any gifts or entertainment that could undermine or influence their good business judgment or that might appear to have that result. On occasion, a Crown Castle teammate may accept gifts of nominal or modest value if (a) the gifts are consistent with the giver's rules, (b) such teammate has determined and confirmed with the appropriate internal parties that the acceptance of the gift is in compliance with Crown Castle's Proper Business Practices and Ethics Policy (as in effect at such time), and (c) open disclosure of the gift would not embarrass or reflect poorly on Crown Castle, the giver or the recipient. Crown Castle teammates are prohibited from soliciting gifts or favors from any person or entity with whom Crown Castle does business. Crown Castle teammates serving in a sourcing or procurement role or engaged in sourcing or procurement activities, and their immediate family members, are prohibited from receiving from Suppliers any gifts or gratuities, including those of nominal or modest value. Suppliers are expected to promptly report through the Ethics Alert System any situation, relationship or conduct that would give rise to actual, potential or the appearance of a conflict of interest.

Books and Records. Maintain accurate and complete books and records. Create, and ensure accuracy of, a record of all transactions, and retain, for a reasonable amount of time, all documentation pertaining to services rendered or goods delivered to, or on behalf of, Crown Castle.

Competition and Fair Dealing. Prohibit any activity, including bribes, kickbacks and extortion, designed to improperly or illegally advance any interest associated with Crown Castle. Monitor and enforce compliance with such restriction. Implement business practices designed to promote fair competition. Abide by anti-trust and anti-corruption laws.

Insider Trading. Refrain and prohibit Supplier's workers from (a) buying, selling or otherwise trading, directly or indirectly, in CCIC or another company's stock or other securities while in possession of material, non-public information relating to Crown Castle or such other company ("MNPI"), which is entrusted to the Supplier or which the Supplier obtains in the course of performing services for or on behalf of Crown Castle and (b) engaging in any other action to take advantage of, or pass on to others, such MNPI. Material information is information that a reasonable investor would consider important in making a decision to buy, hold or sell stock or other securities of CCIC or such other company. Avoid disclosing MNPI about Crown Castle or such other company to a third party, unless that party has a reasonable need to know such information to render services for, or on behalf of, Crown Castle.

Responsible Sourcing. Implement a policy designed to reasonably ensure that the products such Suppliers manufacture or contract to manufacture for Crown Castle do not contain conflict minerals, such as tin, tantalum, tungsten and gold, that directly or indirectly finance or benefit the perpetration of human rights abuses. Exercise due diligence in determining the source of these minerals and retain documentation of such efforts for inspection by Crown Castle upon request.

Environmental Protection. Establish, maintain, and enforce rules, guidelines, and standards regarding environmental protection, including restrictions on materials, labeling, information obligations, re-use, environmentally compatible product use, maintenance and disposal and, where applicable, measures for protection against hazardous substances.

Reporting Concerns

Crown Castle expects its Suppliers (including its workers) to promptly report any situation or relationship involving Crown Castle that is perceived as a violation of law, regulations or this Code of Conduct. Suspected violations and concerns should be reported by calling the Ethics Alert Line at 1-866-480-6138 or navigating to the following link: <https://secure.ethicspoint.com/domain/media/en/gui/57844/index.html>. The Ethics Alert System is managed by an outside vendor and is available around-the-clock. Suspected violations and concerns can be reported anonymously and confidentially. Crown Castle maintains a strict, non-retaliation policy for concerns raised in good faith.