

Introduction

Crown Castle International Corp. (“Crown Castle”) and its subsidiaries (collectively, “Crown Castle”) strive to conduct their business with honesty and integrity in accordance with legal and ethical standards. Crown Castle and its teammates (for purposes of this policy, “teammates” refers to officers, directors, and other employees, including interns, of Crown Castle) should comply with all applicable legal requirements in any jurisdiction in which Crown Castle operates or holds assets.

This Proper Business Practices and Ethics Policy (“Policy”) provides guidance in specific situations that may arise; however, this Policy is not a comprehensive manual that covers every situation that Crown Castle and its teammates might encounter. Teammates who are unsure about an issue or topic covered by this Policy should ask their manager or supervisor, a member of the Legal Department, a member of Internal Audit, or contact Your Connection for guidance. For information on how to communicate any concerns regarding this Policy or any other Crown Castle policy, please see “Reporting Violations or Concerns” below.

All teammates should comply with the spirit, as well as the letter, of this Policy. Teammates should not attempt to achieve indirectly, through the use of agents or other intermediaries, that which is prohibited directly. Teammates who violate the law, regulations, or this Policy are subject to disciplinary action, up to and including termination, and potentially legal action.

All teammates are responsible for reading, understanding, and complying with this Policy and for exercising good judgment. Failure to read this Policy, or any amendment or revision of this Policy, does not exempt teammates from their responsibility to comply with this Policy or applicable laws and regulations. A copy of this Policy, and any amendments or revisions of this Policy, can be found on the [Policies and Guidelines](#) page of Crown Castle’s website.

Fair Dealing and Interactions with Third Parties

Crown Castle teammates who interact with third parties (including vendors, suppliers, contractors, lawyers, and accountants) on Crown Castle business, should conduct such interactions in accordance with the provisions of this Policy and any applicable laws and regulations. Teammates who become aware of, or have any reason to believe, that any other teammate has violated this Policy or any applicable law or regulation should report such violations. For information on how to report violations, see “Reporting Violations or Concerns” below.

In connection with Crown Castle's business, all teammates are expected to deal fairly with other teammates and third parties. Customers, suppliers, vendors, and other entities conducting business with Crown Castle should be dealt with at arm's length and have fair opportunities to compete for Crown Castle's business. Competitive bidding policies, where and when applicable, should be followed to ensure fair competition. In furtherance of fair competition, teammates should seek to avoid actions that are in violation of laws and regulations governing competitive practices in the marketplace.

All arrangements with third parties, such as distributors or agents, should be evidenced or memorialized in a written contract, order, or other document which describes the goods or services that are in fact to be performed or provided and for reasonable fees or costs.

Crown Castle may periodically notify its vendors, suppliers, and contractors (including via Crown Castle's Supplier Code of Conduct) that, among other things, (a) it is against Crown Castle policy for teammates to accept gifts or entertainment of more than nominal or modest value from entities which do business with Crown Castle, (b) the provision of gifts and entertainment is not a condition of doing business with Crown Castle, and (c) Crown Castle requests such entities to identify any Crown Castle teammate or representative who pressures or solicits them for gifts, entertainment, or other special favors.

Protection and Proper Use of Crown Castle's Assets

Teammates should seek to protect Crown Castle's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on Crown Castle's profitability. Crown Castle's assets should be used for legitimate business purposes and are not maintained for use by teammates for non-business-related purposes. An employee's occasional personal use of items such as stationery, supplies, copying facilities or telephone, when the cost to Crown Castle is insignificant, is permissible. Each employee should consult and abide by Crown Castle's other policies and guidelines relating to the use of specific assets, such as Crown Castle's email system and automobiles.

The use of Crown Castle funds or assets for any unlawful or improper purpose is not permitted. Further, no payment on behalf of Crown Castle may be made or approved with the intention or understanding that any part of such payment is to be used for any unlawful purpose.

Business entertainment and transportation that is reasonable in nature, frequency, and cost is permitted. Subject to the provisions of this Policy and Crown Castle's other policies, reasonable business entertainment or transportation includes, without limitation, a lunch, dinner, or occasional athletic or cultural event; gifts of nominal value; entertainment at Crown Castle or other authorized facilities; or authorized and reasonable transportation in Crown Castle's vehicles. In addition, reasonable business entertainment covers traditional promotional events sponsored by Crown Castle. For more information, see Crown Castle's "Business, Travel and Entertainment Expense Reimbursement Policy."

Political Contributions

Except as otherwise approved in advance by the Chief Executive Officer or any Executive Vice President and in compliance with applicable laws and regulations, Crown Castle generally does not make political contributions or independent political expenditures, directly or indirectly, in support of, or in opposition to, any party, candidate, U.S. tax exempt organization organized under Section 527 of the U.S. Internal 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 International Corp. (“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” 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 Company's public policy objectives and promote the interests of the Company, without regard for the private political preferences of its executives. When required by applicable laws and regulations, Crown Castle files public reports with the U.S. Congress and state and local regulatory bodies disclosing its political contributions.

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

Conflicts of Interest

Teammates should always act in the best interest of Crown Castle and not permit outside interests to interfere with their job duties. Crown Castle prohibits all teammates from using their position with Crown Castle or Crown Castle’s relationship with its customers, vendors, or suppliers for private gain or to obtain benefits for themselves or a Family Member¹.

For purposes of this policy, a potential conflict of interest occurs when a teammate’s outside interests (for example, financial or personal interests) interfere with Crown Castle’s interests or the teammate’s work-related duties. For example, a conflict of interest can occur when a teammate is in a position to influence a

¹ As used herein, “Family Member” includes a spouse, child, domestic partner, son-in-law, daughter-in-law, step-child, parent, step-parent, parent-in-law, grandparent, grandchild, brother, sister, brother-in-law, sister-in-law, step-sibling, aunt, uncle, cousin, nephew or niece of a teammate.

decision that may result in a personal gain for the teammate or a Family Member as a result of Crown Castle's business dealings.

The following are common examples of situations that may involve conflicts of interests:

- A teammate holding a position or interest, direct or indirect, with any supplier, customer or competitor of Crown Castle (except for an investment in publicly traded securities as described below).
- Acceptance by a teammate or a Family Member of gifts or favors of more than nominal value from an actual or prospective customer or supplier of Crown Castle, or any governmental official or employee (except as otherwise permitted in this Policy).
- A teammate's disclosure or use of confidential information gained by reason of employment or other business relationship with Crown Castle for profit or advantage for the teammate or anyone else.
- A teammate's competition with Crown Castle in the acquisition or disposition of rights or property.

The following situations should not be considered conflicts of interest:

- Ownership of an insignificant percentage of the publicly traded securities of a supplier, vendor, customer or competitor of Crown Castle.
- A transaction with one of Crown Castle's banks, which transaction is customary and conducted on standard commercially available terms, such as a home mortgage or bank loan.
- A transaction or relationship disclosed in accordance with this Policy or Crown Castle's Related Party Transaction Policy and determined by Crown Castle's General Counsel (or any internal or external legal counsel designated by the General Counsel) or the Board (or a committee thereof) not to be a prohibited conflict of interest or transaction.
- A transaction involving a member of the Board deemed not to impact or impair such director's independence by the disinterested members of the Board (or a committee thereof).

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 for 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 vendors 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 of Internal Audit (currently, Amy Donachy at 724-416- 2387), (b) any Vice President – Legal designated by Crown Castle's General Counsel (currently, Teddy Adams at 713-570-5112), (c) the Associate General Counsel and Corporate Secretary (currently, Don Reid at 713-570-3147), or (d) the following [Connect link](#).

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 of 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 and is incorporated herein by reference.

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.

Crown Castle's relationship with governmental agencies and their officials and personnel in each jurisdiction and country in which Crown Castle conducts business should be maintained in accordance with high ethical standards, in compliance with applicable legal requirements, and such that a public disclosure of such relationship would not be expected to impugn or jeopardize Crown Castle's integrity or reputation.

No payments or gifts from Crown Castle's funds or assets may be made, directly or indirectly, to or for the benefit of a representative of any domestic or foreign² government (or subdivision thereof), labor union, or any current or prospective customer or supplier for the purpose of improperly obtaining a desired government action, or any sale, purchase, contract or other commercial benefit. Nothing of value (for example, gifts or entertainment) may be provided to government personnel unless permitted by applicable laws and regulations. The foregoing prohibitions apply to direct or indirect payments made through third

² As used herein, "foreign" means of or relating to countries other than the United States.

parties and employees as well as bribes, kickbacks or any other form of payoff. In addition, Crown Castle teammates may not accept payments or gifts of the kinds described above.

Books and Records

Crown Castle's books, records and accounts should accurately and fairly reflect the transactions of Crown Castle in reasonable detail and in accordance with Crown Castle's accounting practices and policies, including generally accepted accounting principles and Crown Castle's system of internal controls, as applicable. The following examples are given for purposes of illustration and are not intended to limit the generality of the foregoing in any way:

- No false, misleading or deliberately inaccurate books, records, accounts or entries should be made or caused to be made.
- No payment should be made with the intention or understanding that all or any part of it is to be used for any purpose other than that described by the documents supporting the payment.
- No undisclosed, unrecorded or "off-book" funds or assets should be established.
- No false or misleading statements (or omissions), written or oral, should be intentionally made to any internal or external accountant or auditor with respect to Crown Castle's financial statements or documents to be filed with the U.S. Securities and Exchange Commission ("SEC") or other governmental authority.
- No action to fraudulently influence, coerce, manipulate or mislead Crown Castle's internal or independent auditors should be made or taken.

Teammates should exercise due diligence in order to comply with the standards described above. Teammates who believe that Crown Castle's books and records are not being maintained in accordance with these requirements, must report the matter pursuant to the reporting procedures described below.

Confidentiality

Teammates should maintain the confidentiality of information entrusted to them by Crown Castle and its customers, suppliers, vendors, or any other entity conducting business with Crown Castle, except when disclosure is properly authorized or legally mandated. Confidential information includes all non-public information that if disclosed might be of use to competitors or harmful to Crown Castle or the entity to which the information belongs. Non-public information that is learned about entities conducting business with Crown Castle that is not in the public domain should also be treated as confidential information. The obligation to preserve confidential information continues even after any employment or other business

relationship with Crown Castle ends. Any documents, papers, records, or other tangible items that contain confidential information, trade secrets, or proprietary information relating to Crown Castle are the property of Crown Castle.

Corporate Opportunities

Teammates should not (a) personally take for themselves opportunities, including business and investment opportunities, that are discovered through the use of corporate property, information, or position; (b) use corporate property, information, or position for personal gain; or (c) compete with Crown Castle, including directly or indirectly bidding for, buying, leasing or acquiring rights to any property or materials if the teammate believes Crown Castle may also be interested in pursuing such opportunity. Crown Castle teammates owe a duty to Crown Castle to advance Crown Castle's legitimate interests when the opportunity to do so arises.

Compliance with Laws and Regulations (including Insider Trading Laws)

Obeying the law both in letter and in spirit is the foundation upon which Crown Castle's ethical standards are built. Teammates must comply with the laws and regulations applicable to Crown Castle's business. It is important that teammates ask questions and seek advice from a manager, supervisor, or the Legal Department if they have any doubt regarding the legality of an action taken, or not taken, on behalf of Crown Castle.

In general, purchasing or selling securities of Crown Castle, either directly or indirectly, while in possession of material non-public information is both unethical and illegal. Teammates may not disclose material non-public information to others who might use such information to directly or indirectly place trades in Crown Castle securities. Teammates should read and comply with Crown Castle's Policy Statement on Insider Trading.

Pursuant to Section 16 of the Securities Exchange Act of 1934, substantially all purchases or sales of securities of Crown Castle by directors, executive officers, and 10% stockholders should be disclosed within two business days of the transaction. Each officer, director and stockholder who is subject to these reporting procedures should comply with such laws and regulations and the applicable provisions of Crown Castle's Policy Statement on Insider Trading.

Crown Castle endeavors to provide full, accurate, timely and understandable disclosure in all public communications and reports and documents that Crown Castle files with the SEC.

Compliance with Equal Employment Opportunity and Anti-Harassment Policies

Crown Castle is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. In addition, Crown Castle strives to create a work environment free of unlawful discrimination or harassment. All teammates are expected to comply with Crown Castle's Anti-Harassment and Equal Employment Opportunity policies.

Cooperation with Preservation of Evidence and Records Retention Requirements

Teammates should follow all procedures implemented by Crown Castle (including pursuant to any record management program implemented by Crown Castle) or required by law for the maintenance, preservation, and destruction of business documents and non-essential information to ensure companywide retention and defensible disposal of eligible documents. Teammates may not exercise discretion when implementing procedures, nor is the indefinite retention of documents permitted, except where specifically stated. For more information regarding Crown Castle's Records Management Program, please contact a member of the Legal & Tax Ops team, currently Lindsey Spagnolo.

In addition, Crown Castle seeks to comply with all evidence preservation requirements as relates to any legal matters. All teammates should comply with all litigation hold letters issued to individual teammates and not delete any record, document or tangible object of Crown Castle that is the subject of any investigation or litigation. Teammates may not knowingly alter, destroy, conceal, or falsify any record, document, or tangible object with the intent to impede or obstruct litigation, an investigation, or proper administration of any matter within the jurisdiction of any court or federal, state, or local department or agency.

Reporting Violations or Concerns

Crown Castle proactively promotes ethical behavior. Teammates should report integrity or ethical concerns, including violations or potential violations of this Policy. Teammates may report concerns through any of the following:

- A manager or supervisor
- Business Support – Employee Relations at employeerelations@crowncastle.com
- Any VP – Legal or the General Counsel
- Crown Castle's Ethics Alert Line

Proper Business Practices and Ethics Policy

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Crown Castle's Ethics Alert Line ("Alert Line") is managed by Navex Global, an independent firm that specializes in managing integrity, ethics, and conduct issues. Navex Global hosts the Alert Line website and Alert Line toll-free number. Alert Line works with Internal Audit, Business Support, and the Legal Department to address matters raised by alerts left on the Alert Line. The U.S. toll-free number is 866-480-6138 and is available 24 hours a day, 7 days a week. Issues can also be submitted through the Alert Line website <https://crowncastle.alertline.com>. Communications to the Alert Line can be submitted anonymously.

A person making a good faith report of a concern under this Policy, or any other Crown Castle Policy, will not face any form of discipline, reprisal, intimidation or retaliation for making that report. Likewise, a person will not be retaliated against in any way for cooperating in an investigation related to a report of concerns. Any teammate who retaliates against anyone who reports a concern or is involved in an investigation will be subjected to disciplinary action. For more information regarding reporting and Crown Castle's prohibition of retaliation, see Crown Castle's Reporting and Anti-Retaliation Policy.

Waivers of this Policy

Any waiver of this Policy for executive officers or directors may be made only by the Board or a committee of the Board and will be promptly disclosed as may be required by applicable laws and regulations.

Amendment

Any amendment to this Policy shall be made only by the Board, or the appropriate committee thereof. If an amendment to this Policy is made, disclosure will be made as may be required by applicable laws and regulations.