

## 2021 GRI CONTENT INDEX

Global Reporting Initiative (GRI): An international independent standards organization that helps businesses, governments and other organizations understand and communicate their impacts on issues such as climate change, human rights and corruption.

**STATEMENT OF USE:** Crown Castle has reported the information cited in this GRI content index for the period January 1, 2021, to December 31, 2021, with reference to the revised [Universal GRI Standards](#).

**GRI 1 USED:** GRI 1: Foundation 2021

GRI 2: General Disclosures 2021

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-1 Organizational details</b>	Crown Castle International Corp. is a publicly held corporation that operates as a real estate investment trust (REIT) for U.S. federal income tax purposes. Our headquarters are located at 8020 Katy Freeway in Houston, Texas. We operate in the United States.	<a href="#">2021 Form 10-K</a> , Item 1 Business (p. 4) and Item 2 Properties (p. 25)
<b>2-2 Entities included in the organization's sustainability reporting</b>	Our sustainability and financial reporting is done on a consolidated basis.	<a href="#">2021 Form 10-K</a> , Exhibit 21 Schedule of significant subsidiaries (p. 97)
<b>2-3 Reporting period, frequency and contact point</b>	The reporting period for our sustainability and financial reporting is January 1 through December 31.  We publish our ESG Report annually. The publication date of our ESG Report is July 18, 2022. Questions about our sustainability reporting can be directed to <a href="mailto:ESG@crowncastle.com">ESG@crowncastle.com</a> .	<a href="#">Investors</a>  <a href="#">ESG Resources</a>
<b>2-4 Restatements of information</b>	There were no restatements of information with respect to the reporting period covered in this GRI Content Index.	
<b>2-5 External assurance</b>	We obtain external limited assurance with respect to the sustainability targets included within our credit facility.	<a href="#">Form 8-K</a>

## GRI 2: General Disclosures 2021, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-6 Activities, value chain and other business relationships</b>	<p>We are classified as Lessors of Other Real Estate Property [NAICS code 531190]. We own, operate and lease shared communications infrastructure that is geographically dispersed throughout the U.S., including (1) more than 40,000 towers and (2) more than 80,000 route miles of fiber. Approximately 56% and 71% of our towers are located in the 50 and 100 largest U.S. basic trading areas (BTAs), respectively.</p> <p>Our core business is providing access, including space or capacity, to our shared communications infrastructure via long-term contracts. As an ancillary business, we also offer certain services primarily relating to our Towers segment, predominately consisting of (1) site development services and (2) installation services. Our Towers customers are primarily comprised of large wireless carriers that operate national networks, such as T-Mobile, AT&amp;T and Verizon Wireless, which collectively accounted for approximately three-fourths of our 2021 consolidated site rental revenues. Our Fiber customers generally consist of large wireless carriers and organizations with high-bandwidth and multi-location demands, such as enterprise, government, education, healthcare, wholesale, financial, legal, media and entertainment, content distribution, and energy and utilities customers.</p>	<a href="#">2021 Form 10-K</a> , Item 1 Business (p. 4)
<b>2-7 Employees</b>	Refer to our Workforce Demographics table for a breakdown of our permanent employees by gender, ethnicity and job category.	<a href="#">Workforce Demographics</a>
<b>2-9 Governance structure and composition</b>	<p>Crown Castle is governed by a board of directors. The board of directors has four standing committees: Audit Committee; Compensation Committee; Nominating, Environmental, Social and Governance (NESG) Committee; and Strategy Committee. Following the Annual Meeting of Stockholders held on May 19, 2022:</p> <ul style="list-style-type: none"> <li>› Crown Castle's board consists of one executive member, Jay Brown, our President and Chief Executive Officer (CEO). The remaining nine board members are nonexecutive members.</li> <li>› 80% of our board is independent.</li> <li>› The average tenure of the directors on our board is 7.9 years.</li> <li>› None of the members of our board sits on more than two additional public company boards.</li> <li>› 30% of our board is female and 70% is male.</li> <li>› 40% of our board is racially/ethnically diverse.</li> <li>› Refer to our Board Matrix for information regarding the experiences and skills of our board.</li> </ul>	<a href="#">2022 Proxy Statement</a> , Snapshot of Director Nominees (p. 2) and Board Matrix (p. 33)

## GRI 2: General Disclosures 2021, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-10 Nomination and selection of the highest governance body</b>	<p>The NESG Committee has the authority to recommend nominees for election as directors to the board. Subject to specified procedural requirements, stockholders may also make director nominations.</p> <p>In considering candidates for the board, the NESG Committee considers the entirety of each candidate's credentials and currently does not maintain any specific minimum qualifications that must be met by a director nominee.</p> <p>The NESG Committee generally considers, among other factors, whether prospective nominees are able to read and understand basic financial statements, have relevant business experience, have industry or other specialized expertise, and have high moral character. In addition, the NESG Committee considers issues of diversity, including with respect to experience, expertise, viewpoints, skills, race, ethnicity and gender, in connection with the director selection process.</p>	<p><a href="#">2022 Proxy Statement</a>, Nominating, Environmental, Social and Governance Committee (p. 38) and Stockholder Nominations and Proposals for 2023 Annual Meeting (p. 69)</p> <p><a href="#">Crown Castle Corporate Governance Guidelines</a></p>
<b>2-11 Chair of the highest governance body</b>	Our independent board chair is P. Robert Bartolo, a nonexecutive director.	<a href="#">Corporate Governance</a>
<b>2-12 Role of the highest governance body in overseeing the management of impacts</b>	The responsibilities of our NESG Committee include assisting the board in overseeing ESG matters. Members of our Executive Management Team (EMT) and Investor Relations team keep our board apprised of ESG developments and Crown Castle's ESG priorities, goals and initiatives. Together, our board and EMT define our strategic approach to overseeing and managing actual and potential impacts of material ESG risks and opportunities for Crown Castle.	<a href="#">Corporate Governance</a>
<b>2-13 Delegation of responsibility for managing impacts</b>	<p>Our EMT, which reports on sustainability matters to the board, leads the management and execution of our sustainability priorities within the company. Our Chief Financial Officer (CFO) monitors and is responsible for financial matters, and social topics are overseen by the Executive Vice President (EVP) &amp; General Counsel and the EVP of Business Support. The EVP &amp; General Counsel also oversees environmental matters. These officers are appointed by the board and report to the Chief Executive Officer (CEO) and the board. Other senior-level officers within Crown Castle are also charged with managing specific sustainability matters.</p> <p>Quarterly, a memo is prepared by management to update the board on sustainability matters. The board and EMT discuss sustainability matters at the regularly scheduled board and board committee meetings.</p>	<a href="#">2022 Proxy Statement</a> , Risk Oversight (p. 34)
<b>2-15 Conflicts of interest</b>	<p>We have various processes for identifying and avoiding actual and potential conflicts of interest, including related person transactions. Our Business Practices &amp; Ethics Policy ("Ethics Policy") provides that each employee is expected to avoid engaging in business or conduct, or entering into agreements or arrangements, that would give rise to actual, potential or apparent conflicts of interest. The Ethics Policy also provides procedures for reporting any actual or potential conflicts of interest.</p> <p>Under our Related Party Transactions Policy, each executive officer, director or director nominee is expected to notify the General Counsel or Corporate Secretary prior to entry into a related person transaction. If a related person transaction is identified, such transaction is brought to the attention of the NESG Committee for its approval, ratification or disapproval in consideration of all of the material facts and circumstances that it deems appropriate.</p>	<p><a href="#">2022 Proxy Statement</a>, Certain Relationships and Related Transactions (p. 41)</p> <p><a href="#">Proper Business Practices and Ethics Policy</a> (pp. 3-5)</p>

## GRI 2: General Disclosures 2021, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-16 Communication of critical concerns</b>	<p>Our Vice President—Audit and Security reports to the Audit Committee and provides periodic updates (generally quarterly) to the Audit Committee with respect to the Internal Audit department's activities, including with respect to risk management matters and the audit agenda.</p> <p>In addition, at least annually, the board, through its committees, and management engage in an interactive review and evaluation of the key risks that are essential and mission critical to our business and operations. The board exercises these responsibilities periodically as part of its meetings and through its committees, each of which examines various components of risk in connection with its responsibilities.</p>	<a href="#">2022 Proxy Statement</a> , Risk Oversight (p. 34)
<b>2-17 Collective knowledge of the highest governance body</b>	Internal and external experts present to the board quarterly on relevant topics. Our Corporate Governance Guidelines provide, in part, that Crown Castle encourages its directors to engage in continuing education activities that will expand and enhance the directors' knowledge of issues and matters regarding corporate governance, director roles and responsibilities, and other matters relating to the carrying out of director duties, and Crown Castle will reimburse a director for reasonable expenses incurred related thereto.	
<b>2-18 Evaluation of the performance of the highest governance body</b>	The NESG Committee leads the board in its annual review of the performance of the board and its committees.	<a href="#">NESG Committee Charter</a>
<b>2-19 Remuneration policies</b>	Details regarding board and executive compensation are included in our Proxy Statement. To align the interests of our executives with those of our stockholders, the focus of our executive compensation program is on incentive compensation that emphasizes "pay-for-performance," rewarding our executives for performance against pre-established financial goals and total stockholder return.	<a href="#">2022 Proxy Statement</a> , Board Compensation (p. 39) and Executive Compensation (p. 45)
<b>2-20 Process to determine remuneration</b>	<p>The board maintains a compensation arrangement for its non-employee directors, subject to the NESG Committee's periodic review. As part of this process, the NESG Committee reviews a competitive market analysis prepared by an external compensation consultant, currently Meridian Compensation Partners. The Compensation Committee is primarily responsible for evaluating and determining the compensation levels of our executive officers. It also obtains input from the external compensation consultant. Refer to our proxy statement for additional details regarding board and executive compensation.</p> <p>Our stockholders have historically approved our say-on-pay proposal at a high rate, with approximately 97% of votes cast in favor of the 2021 compensation of our named executive officers.</p>	
<b>2-21 Annual total compensation ratio</b>	For 2021, our CEO's annual total compensation compared to the median employee annual total compensation (CEO pay ratio) was 113:1. This represents a decrease from our 2020 CEO Pay Ratio, which was 129:1. Refer to the CEO Pay Ratio section of our proxy statement for more details, including contextual information necessary to understand the data and how the data was compiled.	<a href="#">2022 Proxy Statement</a> , CEO Pay Ratio (p. 71)

## GRI 2: General Disclosures 2021, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-22 Statement on sustainable development strategy</b>	“Our strategy is to provide profitable solutions to connect communities and people, and our carbon neutral goal furthers our commitment to deploy our strategy sustainably. Our business model is inherently sustainable, as shared infrastructure solutions limit the proliferation of infrastructure and minimize the use of natural resources. We are taking action to improve on our strong foundation, including proactive work to reduce our energy consumption and source renewable energy.” – Jay Brown, Chief Executive Officer	<a href="#">Leadership Letter</a>
<b>2-23 Policy commitments</b>	<p>We maintain policies and guidelines that set expectations, provide guidance and reinforce our ethical standards through periodic training opportunities across all levels of our company. Our Ethics Policy applies to all of our directors, officers and employees and addresses our ethics and compliance policies on various matters. Our Supplier Code of Conduct outlines ethics and compliance expectations for our suppliers, including issues related to conflicts of interest, competition and fair dealing. Our Human Rights Policy reflects our commitment to promoting human rights, dignity and equality with all stakeholders. Refer to the included policy links for additional details.</p> <p>We have developed our Human Rights Policy with guidance from the principles of the United Nations (UN) Universal Declaration of Human Rights. Within our policy, we strictly prohibit and do not tolerate discrimination against or harassment of teammates, applicants and covered persons because of race (including traits historically associated with race, such as hair texture and protective hairstyles), color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy or pregnancy-related conditions), gender (including gender identity and expression as well as status as a transgender individual), sexual orientation, age, physical or mental disability, citizenship, genetic information, marital status, past, current or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state or local law.</p> <p>Depending on the policy, each one is approved by the board of directors, our EVP &amp; General Counsel and/or certain members of our EMT.</p> <p>We expect our employees and the suppliers who represent us to comply with applicable laws and regulations and to demonstrate their commitment to maintaining high ethical standards throughout their work for and with our company. We provide our employees with training to enhance their understanding of responsible behavior and our strict ethical standards.</p>	<a href="#">Policies</a>
<b>2-24 Embedding policy commitments</b>	All employees are responsible for reading, understanding and complying with our policies and exercising good judgment. We require annual training and an acknowledgment by our employees for several of our key policies. Our B3 values—Be Real, Be Accountable, and Be an Owner—are fundamental to how we work and connect with one another and our customers and make decisions that drive our business.	<a href="#">Policies</a>

## GRI 2: General Disclosures 2021, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>2-26 Mechanisms for seeking advice and raising concerns</b>	Any concerns or suspected violations of the Ethics Policy and Financial Code of Ethics can be reported anonymously and confidentially to our Ethics Alert System. This anonymous reporting service is managed by a third-party provider and is available at all times.	
<b>2-28 Membership associations</b>	Our industry association memberships include: National Association of Real Estate Investment Trusts (Nareit) Wireless Infrastructure Association (WIA) Competitive Carriers Association (CCA) Telecommunications Industry Association (TIA) National Association of Tower Erectors (NATE) National Wireless Safety Alliance (NWSA) Telecommunications Industry Registered Apprenticeship Program (TIRAP) Environmental, Health & Safety Communications Panel (EHSCP) INCOMPAS Common Ground Alliance (CGA) Advanced Television Systems Committee (ATSC) National Association of Telecommunication Directors (NASTD) National Association of State Chief Information Officers (NASCIO) 5G Americas Small Cell Forum (SCF) OnGo Alliance	
<b>2-29 Approach to stakeholder engagement</b>	We assess the sustainability perspectives of our key internal and external stakeholders, including customers, investors, employees and sustainability rating agencies, using interviews, surveys and desktop analysis to identify and prioritize sustainability issues with potential impact on our business and stakeholders.	<a href="#">ESG Materiality Assessment</a>
<b>2-30 Collective bargaining agreements</b>	Crown Castle is not party to any collective bargaining agreements. Crown Castle's Human Rights Policy states that we respect the rights of our teammates to associate freely, bargain collectively and form, join or not join labor unions.	<a href="#">2021 Form 10-K</a> , Human Capital (p. 10)

## GRI 3: Material Topics 2021

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE
<b>3-1 Process to determine material topics</b>	To identify material topics for the voluntary purposes of this GRI framework, we leveraged the results of our Materiality Assessment and met with cross-functional leaders to consider Crown Castle's activities, business relationships, stakeholders and the sustainability context of our operations. Crown Castle has voluntarily reported within this GRI Content Index topics that we believe will be most relevant to the users of our sustainability reporting, and inclusion herein does not suggest financial materiality. The terms "material" and "materiality" as used in the context of this report, including the indices, and in our materiality assessment are different from such terms as used in the context of filings with the SEC; issues deemed material for purposes of this report may not be considered material for SEC reporting purposes. We are committed to increased transparency and continued progress in our ESG reporting, and we will continue to refine our disclosure processes in future years.
<b>3-2 List of material topics</b>	See below for disclosures on the topics that we believe are most relevant for the users of our sustainability reporting.
<b>3-3 Management of material topics</b>	We assess the sustainability perspectives of our key internal and external stakeholders, including customers, investors, employees and sustainability rating agencies, using interviews, surveys and desktop analysis to identify and prioritize sustainability issues with potential impact on our business and stakeholders.
<b>2-30 Collective bargaining agreements</b>	Refer to our <a href="#">ESG Website</a> and our <a href="#">ESG Materiality Assessment</a> for information regarding our management of material topics.

## GRI 201: Economic Performance 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>201-1 Direct economic value generated and distributed</b>	Refer to our consolidated financial statements for details regarding our financial results and dividends.	<a href="#">2021 Form 10-K</a> , Item 8 Financial Statements and Supplementary Data (p. 48)
<b>201-2 Financial implications and other risks and opportunities due to climate change</b>	Our board, including through its committees, oversees climate-related risks as part of its broader annual enterprise risk assessment. Refer to our TCFD Index for information about our climate-related risks and opportunities.	<a href="#">2021 Form 10-K</a> , Item 1A. Risk Factors (p. 13)  <a href="#">TCFD Disclosure</a>
<b>201-3 Defined benefit plan obligations and other retirement plans</b>	Crown Castle offers a defined contribution plan to employees, specifically a 401(k) plan for U.S.-based employees and an 1165(e) plan for Puerto Rico-based employees.  We offer our employees an automatic 3% base match of their contribution to a 401(k) account and have historically also made an additional annual 3% discretionary match. Through our discretionary "B3 Stock Award," we also make an equity contribution to each employee's 401(k) account, which has historically represented 4% of the employee's year-end base salary.	<a href="#">Benefits</a>

## GRI 203: Indirect Economic Impacts 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>203-1 Infrastructure investments and services supported</b>	<p>We have been in the business of building and operating shared communications infrastructure for more than 25 years. Every day, our work naturally intersects with societal challenges like maintaining public safety and bridging the digital divide. To date, we have invested approximately \$10B in communications infrastructure in low-income areas. This calculation is based on capital invested in Crown Castle assets that are located within, or provide service coverage (entirely or partially) to, U.S. Census blocks with 2021 median household income at or below \$50,000, which is the threshold to qualify for federal student aid.</p> <p>Our investments are generally commercial in nature. We work closely with community members, government officials and our customers to design and build solutions that meet their unique connectivity needs—from wireless coverage to smart city solutions to custom fiber-optic networks.</p>	
<b>203-2 Significant indirect economic impacts</b>	<p>Our infrastructure enables a variety of direct and indirect economic benefits for the communities and stakeholders we serve. One example is the increased public safety enabled by our infrastructure, including phone calls to 911 or roadside assistance, a secure, dedicated wireless broadband network for emergency personnel, and increased access to data for first responders.</p> <p>Another example is the reliable connections supported by both our tower infrastructure and the more targeted, fiber-connected small cells that minimize dead zones and create enough capacity to handle today's increased data usage. Additionally, our infrastructure enables the build-out of 5G, which is ushering in many new developments across industries including healthcare, education, manufacturing, technology, and more. 5G also enables smart devices and wearables, self-driving cars to make roads safer and cities less congested, and smart city technologies to bring new efficiencies and innovations to communities around the country.</p>	

## GRI 205: Anti-corruption 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>205-1 Operations assessed for risks related to corruption</b>	Crown Castle's board, including through its committees, oversees corruption-related risks as part of its broader annual enterprise risk assessment. The risk assessment process takes place throughout the year at regularly scheduled meetings of the board and its committees. There were no significant risks related to corruption identified through the risk assessment.	
<b>205-2 Communication and training about anti-corruption policies and procedures</b>	Our policies, including those with respect to anti-corruption, are made available to our employees. Annually, our employees are required to complete training with respect to certain of our policies, including policies dealing with anti-corruption. Additionally, we encourage our employees to ask questions and report ethical concerns or suspected violations to their manager or manager's supervisor, the business support department, or the legal department. They can also report anonymously to our Ethics AlertLine System, which is managed by a third-party provider (Navex) and is available around the clock. We maintain a strict non-retaliation policy for concerns raised in good faith.	



## GRI 206: Anticompetitive Behavior 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>206-1 Legal actions for anticompetitive behavior, anti-trust, and monopoly practices</b>	We have not been identified as a participant in legal actions pending or completed during 2021 regarding anticompetitive behavior or violations of anti-trust and monopoly legislation.	<a href="#">2021 Form 10-K</a> , Item 3 Legal Proceedings (p. 25)

## GRI 302: Energy 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>302-1 Energy consumption within the organization</b>	<p>Total fuel consumption within the organization from nonrenewable sources was 145,215 gigajoules. This includes diesel, gasoline and propane.</p> <p>Our electricity consumption was 631,429 gigajoules and our natural gas consumption was 41,690 gigajoules.</p> <p>Our total energy consumption was 818,334 gigajoules. Our fuel and energy consumption calculations were based on an operational control approach, as defined by the WRI GHG Protocol and scope guidance. Boundaries include all material operating locations. Where actual consumption data was not available, we used a sampling approach or public information, such as equipment fuel efficiency and power ratings, to estimate fuel and energy consumption.</p> <p>The 2021 methodology for capturing emissions associated with HVAC systems at our tower sites leveraged a unit-type approach for each HVAC unit category (e.g., central air, window unit) to precisely reflect the differing energy consumption levels of each type and the resulting emissions. Energy consumption for our offices and warehouses is based on actual consumption data for offices, owned and leased square footage, and estimates derived from nationwide energy-intensity statistics from the Energy Information Administration's (EIA's) Commercial Building Energy Consumption (CBEC) Survey for the remainder of the offices. Fuel consumption by our fleet vehicles was based on estimated allocation between diesel and gasoline vehicles. Conversion factors were obtained from EPA AP-42: Compilation of Air Emissions Factors, Appendix A.</p>	<a href="#">Consumption and emission tables</a>
<b>302-2 Energy consumption outside of the organization</b>	We do not currently track energy consumption outside of the organization.	
<b>302-3 Energy intensity</b>	<p>Our energy intensity ratio is 0.000129 gigajoules / net revenue.</p> <p>We included the consumption of natural gas, electricity, diesel, gasoline and propane within the organization to calculate our energy intensity and used our annual net revenue as the denominator.</p>	

## GRI 302: Energy 2016, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>302-4 Reduction of energy consumption</b>	Approximately 40% of Crown Castle's total electricity consumption comes from our Towers portfolio, and tower lighting is one of the two major sources of this utilization. Approximately 12,000 of our 40,000 towers are mandated by law to have lighting beacons that operate 24/7. As of December 31, 2021, we have converted the lighting on 57% of those towers to efficient LED lighting from traditional lighting (including incandescent and xenon systems). We estimate that LED is approximately 90% more efficient than traditional lighting, and that LED lighting has a life expectancy approximately five times longer than traditional lighting, resulting in fewer truck rolls for replacement. We are also exploring additional initiatives to reduce the emissions related to our office buildings and our fleet vehicles.	<a href="#">Carbon Neutrality</a>

## GRI 304: Biodiversity 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</b>	<p>Prior to performing construction activities at our sites, we undertake a rigorous screening process. The assessment includes identifying and analyzing potential operational impacts on endangered wildlife, wilderness areas, historic preservation areas, and fragile ecosystems, such as wetland habitats. From the outset, we review publicly available sources, including websites hosted by federal, state or local governmental agencies and local conservation groups, to identify possible threatened or endangered species and critical habitats in the vicinity of the proposed site. Based on this information, we use internal and external sources to determine whether any species or critical habitats are present at the proposed site. If endangered wildlife or a critical habitat is detected, we engage third-party analysts to assess the impact of our deployment activities and operations and develop modifications to reduce the impact.</p> <p>We maintain our environmental policies and procedures in an effort to comply with applicable laws and regulations and observe industry standards. Our environmental management system, based on ISO 14001, provides us with a mechanism to help us understand our environmental footprint and manage our legal and regulatory compliance obligations.</p>	

## GRI 304: Biodiversity 2016, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>304-2 Significant impacts of activities, products and services on biodiversity</b>	<p>One example is our Seasonal Bird Program. From time to time, protected birds select our infrastructure, particularly our towers, for nesting activities. We maintain a dedicated team of environmental specialists and a robust program to spot, track and document nest sites and protected bird activity. We limit access to our sites with nests containing eggs or flightless young birds. Removal of inactive nests is subject to stringent internal protocols. To promote compliance with all applicable laws and regulations and our internal policies, we provide training materials to all workers on our sites. We also communicate with our customers, suppliers who service our towers, and other stakeholders to promote compliance with our protected bird policy. Where appropriate, we coordinate with third-party experts and regulatory authorities, such as the U.S. Department of Agriculture, to relocate birds using noninvasive, low-disturbance methods.</p> <p>Another example is our Wildfire Risk Mitigation Program, which is designed to provide additional risk management procedures for “hot work,” including cutting, welding and grinding, in areas prone to wildfires. Conducting hot work at sites in areas vulnerable to wildfires requires additional precautions and safety measures to avoid potentially sparking a fire, especially during high-risk seasons. Since we established this program, we have enhanced approval procedures for third-party projects to ensure appropriate oversight of all maintenance work that poses a wildfire risk. We have also conducted mandatory trainings to educate our construction, implementation and modification project managers about wildfires.</p>	

## GRI 305: Emissions 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>305-1 Direct (Scope 1) GHG emissions</b>	<p>Our Scope 1 emissions were 13,052 MTCO<sub>2</sub>e. Gases included in the calculation are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O).</p> <p>We used emission factors from 40 CFR Part 98 Tables C-1 and C-2 and EPA eGRID factors. Global Warming Potential documented in the Intergovernmental Panel on Climate Change AR5 report was used to calculate CO<sub>2</sub>e for methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). We use an operational control consolidation approach, as defined by WRI GHG Protocol and scope guidance. Boundaries include all material operating locations. Emissions calculated using WRI GHG Protocol's location-based method.</p>	<a href="#">Consumption and emissions tables</a>
<b>305-2 Energy indirect (Scope 2) GHG emissions</b>	<p>Our Scope 2 emissions were 57,787 MTCO<sub>2</sub>e. Gases included in the calculation are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O).</p> <p>We used emission factors from 40 CFR Part 98 Tables C-1 and C-2 and EPA eGRID factors. Global Warming Potential documented in the Intergovernmental Panel on Climate Change AR5 report was used to calculate CO<sub>2</sub>e for methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). We use an operational control consolidation approach, as defined by the WRI GHG Protocol and scope guidance. Boundaries include all material operating locations. Emissions are calculated using the WRI GHG Protocol's location-based method.</p>	<a href="#">Consumption and emissions tables</a>

## GRI 305: Emissions 2016, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>305-3 Other indirect (Scope 3) GHG emissions</b>	We do not currently track Scope 3 emissions.	
<b>305-4 GHG emissions intensity</b>	Our GHG emissions intensity ratio is 0.0000112 MTCO <sub>2</sub> e / net revenue.  Scope 1 and Scope 2 GHG emissions were included in our emissions intensity ratio. Gases included in the calculation are carbon dioxide (CO <sub>2</sub> ), methane (CH <sub>4</sub> ) and nitrous oxide (N <sub>2</sub> O). We chose to calculate our GHG emissions intensity ratio using our annual net revenue as the denominator.	

## GRI 401: Employment 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees</b>	<p>Crown Castle has a robust, market-leading benefits package that ranks second among Willis Towers Watson's high-tech BenVal survey. Because we recognize the importance of holistic well-being, we provide quality healthcare, financial planning, time off and education benefits.</p> <p>For physical health, we offer comprehensive medical, dental and vision plans—plus on-site gyms and telehealth. We partner with a leading healthcare navigation company, Included Health, which is committed to raising the standard of healthcare. This benefit program connects our teammates and families to top providers, expert opinions, treatment decision support and more—at no cost to them. For mental health, we offer each teammate and their family members up to 16 sessions of therapy or mental health coaching through Lyra Health annually, also at no cost.</p> <p>For financial security, we have a competitive 401(k) plan—ranking first in Willis Towers Watson's high-tech BenVal survey. We also have tuition reimbursement and funded healthcare savings accounts. We provide flexible paid time off for vacations, holidays and personal reasons. We offer parental leave, adoption benefits and more. Also, we match charitable contributions and encourage our employees to help communities by volunteering through our Connected by Good program.</p>	<a href="#">Benefits</a>
<b>401-3 Parental leave</b>	Crown Castle's New Child Leave Policy provides mothers and fathers up to eight weeks of 100% paid leave upon birth or legal adoption of a new child. Additionally, birth mothers are eligible to receive up to eight weeks of 100% paid medical leave under the short-term disability policy, for a total of 16 weeks.	

## GRI 403: Occupational Health and Safety 2018

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>403-1 Occupational health and safety management system</b>	<p>Industry best practices lay the groundwork for our safety programs, which are reinforced through our extensive training courses. We harness our collective field experience to improve safety standards throughout the entire telecommunications industry.</p> <p>We encourage our suppliers to share our safety philosophy and contractually require them to follow certain safety rules and standards. We periodically audit supplier work at various stages of a project and suspend suppliers when a major safety incident occurs or a safety violation is observed. Before we consider reinstatement, the supplier must provide us with a corrective action plan detailing its proposed corrective measures for addressing the incident or our safety concerns. By incentivizing our suppliers to adopt appropriate safety standards, we promote improvement in the workplace conditions of others in our sector.</p>	<a href="#">Safety</a>
<b>403-2 Hazard identification, risk assessment, and incident investigation</b>	<p>Safety practices are tailored to conform to or exceed industry standards. We assign safety training based on potential exposure to hazards associated with an individual's job, including the required use of personal protective equipment (PPE) to mitigate hazards that may be encountered on the job.</p> <p>Employees have a number of methods available to them to report concerns of any nature, including reporting to their supervisor, to their supervisor's manager, directly to the Legal or Internal Audit Departments, or utilizing our anonymous, third-party administered Ethics AlertLine, which is available 24/7/365.</p> <p>As part of our incident management program, we investigate safety incidents involving avoided incidents, injuries or property damage. Our safety team records statements from both the involved employees and their supervisors for inclusion in the incident report. Incident data collected during the investigation is tracked and analyzed to identify root causes and contributing factors and to formulate short-term and long-term solutions.</p>	<a href="#">Safety</a>
<b>403-4 Worker participation, consultation, and communication on occupational health and safety</b>	<p>A safety committee, comprising cross-functional leaders at the company, oversees and provides additional guidance and support to our safety and risk management teams. They provide an extra level of accountability to better manage risk across the organization. The board and EMT receive periodic updates regarding safety risks, trends and developments pertinent to our business.</p>	<a href="#">Safety</a>
<b>403-5 Worker training on occupational health and safety</b>	<p>The success of our safety program hinges on our workers being properly trained to recognize and manage the everyday hazards of their jobs. We devote considerable resources to educating our workforce on safety practices and procedures. We require our field workers to complete annual safety training on a variety of topics, including hazardous material handling, radiofrequency training, lockout-tagout, aerial lift operation, battery safety, first aid and CPR. Supplemental training is available on a monthly basis through online courses offered on our internal website. We also require our workers who operate a company vehicle to complete courses on topics ranging from defensive driving to speed management. During 2021, our workforce completed over 26,000 safety training modules.</p>	<a href="#">Safety</a>

## GRI 403: Occupational Health and Safety 2018, cont'd

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>403-6 Promotion of worker health</b>	<p>We recognize that well-being, whether physical, emotional or financial, drives employee engagement, satisfaction and productivity. As such, we provide our employees with the resources to allow them to take care of themselves and their covered family members. We also provide paid time off and other leave-related benefits to allow our employees to care for others when needed.</p> <p>Some of the health and wellness benefits we offer include:</p> <ul style="list-style-type: none"> <li>› Medical, dental and vision plans</li> <li>› Up to 16 sessions of mental health coaching or therapy at no cost for each employee and their family members</li> <li>› Healthcare navigation resources for expert medical opinions, decision support for conditions and treatments, concierge provider referrals, and more</li> <li>› Health savings account contributions</li> <li>› Disability coverage</li> <li>› Life insurance</li> <li>› Free flu shots</li> <li>› On-site gym at select locations</li> <li>› Gym membership reimbursement</li> <li>› Employee assistance program</li> <li>› Personal time off</li> <li>› Parental leave</li> <li>› Subsidized milk shipping service for traveling nursing moms</li> <li>› Adoption expense reimbursement</li> </ul>	<a href="#">Benefits</a>
<b>403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</b>	<p>We contribute to safety dialogues held by the numerous industry groups with which we are associated. Recognizing the tremendous value of our engineering and field experience, the information derived from research initiatives and our incident management program, we actively participate in defining industry safety standards. Through our involvement with industry associations, such as the National Wireless Safety Alliance and the Telecommunications Industry Registered Apprenticeship Program, we play an integral role in enhancing certification standards and expanding the scope and availability of training.</p> <p>Crown Castle employees routinely participate on panels and task forces charged with addressing existing and emerging safety issues and corresponding solutions. Further, our engagement with regulators positions us to advocate for improved safety standards. We are proud of these efforts and are committed to continuing to leverage our expertise and resources to promote a culture of safety within our company and the entire industry.</p>	<a href="#">Safety</a>
<b>403-9 Work-related injuries</b>	<p>Our 2021 Total Recordable Incident Rate (TRIR) was 0.31.</p> <p>TRIR was calculated as the number of U.S. OSHA-recordable incidents per 200,000 hours / total hours worked.</p>	<a href="#">Safety</a>
<b>403-10 Work-related ill health</b>	See above disclosure for our TRIR, which includes both injuries and illnesses.	<a href="#">Safety</a>

## GRI 404: Training and Education 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>404-1 Average hours of training per year per employee</b>	We invest in our employees by providing resources that support their professional growth and empower them to build new skills. Employees have access to a wide range of training tools—including our Learning Management System, LinkedIn Learning, Harvard ManageMentor and Harvard Spark. During 2021, there were 5,490 learners at Crown Castle that completed ~61,000 training hours, for an average of ~11 hours per learner. During the same time, there were more than 90,000 course completions and 1,000+ leaders that completed the "Leading at Crown Castle" development program.	<a href="#">Learning</a>
<b>404-2 Programs for upgrading employee skills and transition assistance programs</b>	The Crown Castle Extended Service Separation Program (ESSP) provides certain retirement-type benefits to employees following their voluntary departure, subject to satisfaction of certain age and service requirements. This program financially rewards employees who have contributed to our value creation and offers them greater flexibility to exit the workforce when they are ready.	

## GRI 405: Diversity and Equal Opportunity 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>405-1 Diversity of governance bodies and employees</b>	<p>Following our Annual Meeting of Stockholders held on May 19, 2022, our board of directors' diversity was:</p> <ul style="list-style-type: none"> <li>› Female: 30%, Male: 70%</li> <li>› Persons of color: 40%, White: 60%</li> </ul> <p>As of December 31, 2021, our employee diversity was:</p> <ul style="list-style-type: none"> <li>› Female: 32%, Male: 68%</li> <li>› Persons of color: 25%, White: 73%, Not Specified: 2%</li> </ul>	<p><a href="#">2022 Proxy Statement</a>, Snapshot of Director Nominees (p. 2)</p> <p><a href="#">Workforce Demographics</a></p>

## GRI 406: Non-discrimination 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>406-1 Incidents of discrimination and corrective actions taken</b>	Crown Castle is an equal opportunity employer and seeks to comply with applicable federal, state and local fair employment practices laws. We strictly prohibit and do not tolerate discrimination or harassment against teammates, applicants and covered persons because of race (including traits historically associated with race, such as hair texture and protective hairstyles), color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy or pregnancy-related conditions), gender (including gender identity and expression as well as status as a transgender individual), sexual orientation, age, physical or mental disability, citizenship, genetic information, marital status, past, current or prospective service in the uniformed service, or any other characteristic protected under applicable federal, state or local law.	<a href="#">Human Rights Policy</a>

## GRI 413: Local Communities 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>413-1 Operations with local community engagement, impact assessments, and development programs</b>	<p>Our nationwide portfolio of communications infrastructure connects cities and communities to essential data, technology and wireless service—bringing information, ideas and innovations to the people and businesses that need them. Our business is built around connecting people and communities. Every day, our work naturally intersects with societal challenges like maintaining public safety and bridging the digital divide.</p> <p>We aim to make sure communities have the right mix of towers, small cells and fiber to stay connected to what matters most. We involve municipalities in the process.</p> <p>At Crown Castle, we do more than just connect communities with our infrastructure; we connect with our communities. Our Connected by Good program is one way we give and volunteer in the communities where we live and work.</p>	<a href="#">Your Community</a> <a href="#">Connected by Good</a>

## GRI 414: Supplier Social Assessment 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>414-1 New suppliers that were screened using social criteria</b>	<p>Crown Castle is committed to conducting business with honesty and uncompromising integrity. This commitment applies with equal vigor to Crown Castle's supply chain. Our Supplier 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 the Supplier Code of Conduct and any agreements between Crown Castle and the respective supplier.</p> <p>In addition to our internal vetting process for suppliers, Crown Castle also works with third-party supplier qualification and compliance management firms to assist with initial screening and periodic reviews of suppliers that service our assets. This includes assisting in verifying that our suppliers are properly insured and meet or exceed safety performance metrics. This verification process is conducted through a comprehensive review of supplier questionnaire responses, public records, and supplier health and safety statistics benchmarked against industry standards.</p>	<a href="#">Suppliers</a> <a href="#">Supplier Code of Conduct</a>



## GRI 415: Public Policy 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>415-1 Political contributions</b>	While we regularly engage with policymakers, Crown Castle generally does not make political contributions and does not have a political action committee. Our Ethics Policy explicitly prohibits political contributions unless permitted by law and approved by our CEO or an executive vice president. During 2021, no such political contributions were approved in accordance with our policy.	<a href="#">Proper Business Practices and Ethics Policy</a>

## GRI 418: Customer Privacy 2016

DISCLOSURE	CROWN CASTLE METRIC OR QUALITATIVE DISCLOSURE	DISCLOSURE LOCATION
<b>418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data</b>	In 2021, we did not incur any material monetary losses as a result of legal proceedings associated with breaches of customer privacy.	<a href="#">2021 Form 10-K</a> , Item 3 Legal Proceedings (p. 25)