CROWN CASTLE



CODE OF CONDUCT



CEO Message

At the top level, our values define what we expect of ourselves and one another. Living them means doing what is right, even when the right decision may not be the easiest or most obvious one. The "how" matters. Our reputation, our relationships, and our success depend on how we do business.

This Code digs in a bit deeper. It helps us recognize risks, ask the right questions, and make thoughtful decisions in accordance with our values. Each of us is responsible for understanding the Code, following the policies and laws that apply to our work, completing required training, and seeking guidance when something is unclear.

We also each have a responsibility to speak up. If you see conduct that may be inconsistent with our Code, our policies, or the law, raise the concern promptly. Asking a question or reporting a concern in good faith helps protect our teammates, our culture, and our company.

While all our values apply, **Character anchored by integrity** is the central theme to our Code of Conduct. As you read through the document, please think about how it applies to your role and keep it top of mind every day on our journey to best in class.

Thank you for your commitment to doing business the right way.

Chris Hillabrant

President and Chief Executive Officer



SECTION 1

OUR CODE AND RESPONSIBILITIES

> CORE Four Values

> Using this Code of Conduct

> Our Responsibilities

> Speak Up

> No Retaliation

CORE Four Values

CHARACTER anchored by integrity
We approach every interaction and decision with integrity and honor, respecting others and upholding our commitment to safety.

ONE TEAM wins the day
Our business is a team sport – we win together and celebrate success.

RESULTS driven by accountability
We hold each other accountable, openly communicate, and tenaciously achieve results.

EXCELLENCE in operations
We target best-in-class operations, data-backed decisions, and continuous improvement.

CORE FOUR



Our CORE Four values are the foundation for how we work, make decisions, and treat one another. They remind us to act with integrity, take ownership, and stay focused on doing what is right for our customers, communities, stakeholders, and teammates. Living these values builds trust, supports our culture, and helps Crown Castle operate responsibly and ethically.

Using this Code of Conduct

Crown Castle strives to conduct its business with honesty and integrity. Our CORE Four value, **Character anchored by integrity,** reminds us that how we do our work matters just as much as what we accomplish. This Code of Conduct is designed to show what integrity looks like in action and is the foundation of the key ethical standards and legal and policy requirements we follow at Crown Castle. This Code of Conduct applies to all teammates, including directors and officers.

This Code cannot provide guidance on every situation that you may encounter. When the right answer is not clear, use this Code to choose the path that is legal, objective, and consistent with our values.

If you need more details about any Code topic, review the related policy or policies to determine whether you're doing things the right way. Remember, we follow all laws and regulations that apply to our work, even those not specifically mentioned in the Code.



Our Responsibilities

Everyone conducting business for Crown Castle must follow this Code of Conduct. This includes officers, directors, and employees (including interns), referred to as teammates in this Code of Conduct. Business partners working with us, including suppliers, vendors, contractors, and consultants, are required to comply with our Supplier Code of Conduct.

All teammates have a responsibility to:

> Uphold the Code, Crown Castle policies, and the law.

> Read, understand, and comply with this Code and the policies, laws, and regulations that apply to your job. Failing to read or attest to the Code does not mean that you are not responsible for adhering to the Code.

> Complete Code training on time and attest that you understand and commit to comply with the Code.

> Stop, think, and ask when you're faced with a difficult situation.

> Speak up when you see a possible violation of the Code, Crown Castle policies, or legal or regulatory requirements.

> Be truthful and cooperate fully in any internal or external investigation.

Q: I noticed something that might violate the Code, but I'm not sure I have all the details. Should I wait until I know more before saying something?

A: You do not need to investigate the issue yourself or have all the facts before raising a concern. If something seems inconsistent with the Code, company policy, or legal or regulatory requirements, speak up. Raising concerns early helps the company review and address issues appropriately.

People leaders have additional responsibilities to:

> Report any complaint or concern raised to them, or if they observe or become aware of any issues that need to be raised.

> Make teammates feel comfortable raising a concern. Remember, it can be difficult to raise concerns about a colleague or manager.

> Reinforce that Crown Castle prohibits retaliation for raising good-faith concerns.

Q: I overheard comments in a team meeting that may have been inappropriate, but no one complained. Do I need to do anything?

A: Yes. People leaders are expected to act when they observe or become aware of conduct that may violate the Code, company policy, or the law. You should not wait for someone to complain. Raise the concern promptly through the appropriate channel so it can be reviewed and addressed.

Speak Up

Your voice matters. Speaking up about workplace concerns helps us build an ethical and compliant company and is part of our culture.

If you are unsure if something might violate this Code, a company policy, or the law, say something. You don't have to have all the details or be certain something is wrong to raise a concern.

If you have a question about the Code or if you are concerned about a potential violation, you have a number of options:





Talk to any people leader



Contact Human Resources at employeerelations@crowncastle.com



Contact any VP-Legal or the General Counsel



Use the Ethics AlertLine

at 866-480-6138 or https://crowncastle.alertline.com.

Crown Castle's Ethics AlertLine ("AlertLine") is managed by Navex Global, an independent firm that specializes in managing integrity, ethics, and conduct issues. Navex Global hosts the AlertLine website and AlertLine toll-free number. AlertLine works with Internal Audit, Business Support, and the Legal Department to address matters raised by alerts left on the AlertLine. Communications to the AlertLine can be submitted anonymously.

No matter how you choose to report, Crown Castle is committed to reviewing all reported concerns, conducting fair and thorough investigations, and taking appropriate remedial action.

No Retaliation

It takes courage to speak up when something is not right. Crown Castle prohibits retaliation, and we want you to feel confident speaking up.

Crown Castle will not tolerate retaliation for raising a question or concern in good faith, whether to Crown Castle or any governmental authority, or for participating in or cooperating with an investigation or legal proceeding.

Retaliation can take many forms, including:

> Demotion, suspension, or termination from employment

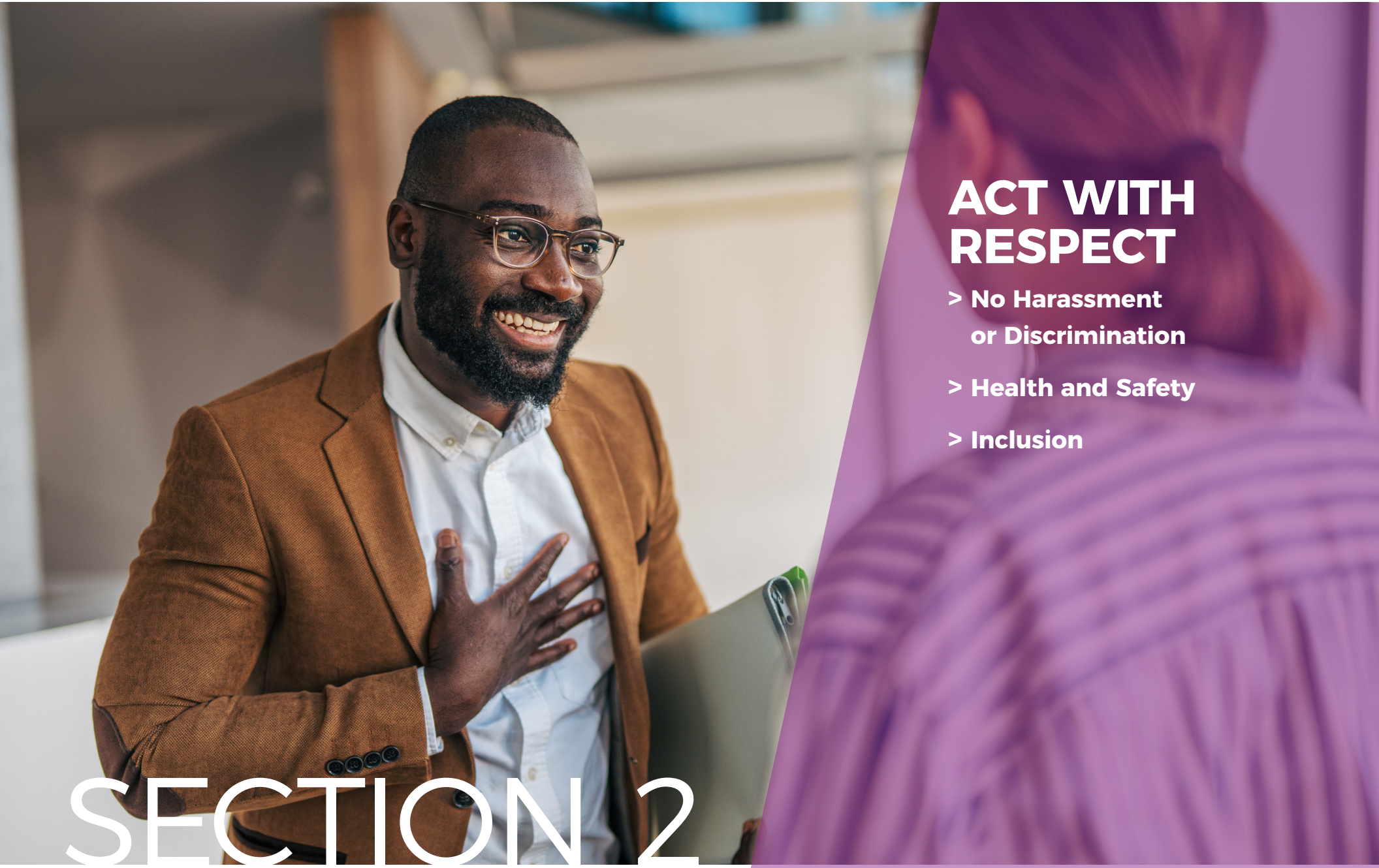
> Reduction in salary, compensation, benefits, or status

> Threats or deliberately hostile behavior

Anyone who retaliates against another person for engaging in these protected activities will be subject to disciplinary action, up to and including termination.

Learn More: If you have questions about speaking up to raise concerns or Crown Castle's prohibition on retaliation, review our Reporting & Anti-Retaliation Policy, or speak with your people leader.





SECTION 2

ACT WITH RESPECT

> No Harassment or Discrimination

> Health and Safety

> Inclusion

No Harassment or Discrimination

At Crown Castle, respect, integrity, accountability, and teamwork shape how we work. We are committed to providing a workplace where everyone is treated with dignity and has the opportunity to succeed. We do not tolerate discrimination or harassment based on any characteristic protected by law and make employment decisions based on merit, qualifications, and performance.

Living our CORE Four values means treating one another fairly, speaking up when concerns arise, and creating an environment where every teammate is respected, included, and empowered to do their best work.



How we prevent harassment and discrimination

- Make all employment-related decisions, including hiring, promotions, compensation, and discipline, without regard to a person's status or other protected characteristic under applicable law.
- Treat fellow teammates with dignity and respect.
- Remain committed to providing reasonable accommodations to qualified teammates.
- Promptly report any harassment, discrimination, retaliation, or any behavior inconsistent with this Code.
- Review and understand our Anti-Harassment policies, our Anti-Retaliation and Reporting Policy, and our EEO Policy.
- Complete assigned trainings regarding anti-harassment.

Learn More: If you have questions about harassment or discrimination, speak with your people leader and review our EEO and Anti-Harassment policies and Reporting & Anti-Retaliation Policy.

Health and Safety

Safety is fundamental to how we work. We believe every teammate has the right to feel safe at work, and we do not compromise when it comes to safety.

Each of us is responsible for helping create a healthy, safe, and hazard-free workplace, and every teammate is expected to follow applicable safety requirements, procedures, and guidelines. Our workplace includes all office locations and other places where teammates work, such as tower sites. Teammates are encouraged to speak up and identify potential hazards to keep themselves and others safe.

How we help keep our workplace safe and secure

> Follow safety rules, procedures, and training requirements.

> Use required safety equipment and protective gear when performing our work.

> Report unsafe conditions, incidents, injuries, near misses, and safety concerns promptly.

> Stop work and seek guidance when conditions appear unsafe or create unacceptable risk.

> Comply with the Weapons Policy and raise concerns promptly if you have reason to believe someone may have a weapon at the workplace.

> Look out for one another and maintain a culture where safety concerns can be raised openly and responsibly.

> Ensure that all required health and safety training is completed.

Q: I noticed a hazard or experienced a near miss, but no one was injured. Do I still need to report it?

A: Yes. Report unsafe conditions, incidents, injuries, illnesses, and near misses promptly, even when no injury or property damage occurred. Reporting helps Crown Castle identify risks, investigate causes, and take steps to prevent a more serious incident. Good-faith safety reports are protected from retaliation.

Learn More: If you have questions about health and safety, speak with your people leader and visit the Safety Connect Page. In addition, you can review the Health and Safety Policy, the Pocket Safety Guide, the Contractor Safety Handbook, the Fleet Policy, the Weapons Policy, and the Incident Response Policy.

Inclusion

We believe our differences make us stronger. At Crown Castle, we are committed to fostering an inclusive workplace where teammates feel respected, valued, and able to contribute their best work. Inclusion is not just about who is on our team. It is about how we work together every day. We seek to understand different perspectives, encourage open dialogue, and create an environment where everyone feels comfortable sharing ideas, asking questions, and contributing to our success. An inclusive workplace helps us innovate, adapt, and better serve our customers and communities.





SECTION 3

MAKE OBJECTIVE AND ETHICAL DECISIONS

> Conflict of Interest

> Selecting Suppliers and Vendors

> Fair Dealing

> Anti-Corruption

Conflicts of Interest

We act in Crown Castle's best interests and make business decisions based on what is right for the company, not what benefits us personally. Conflicts of interest can arise when personal relationships, outside activities, financial interests, or other personal considerations interfere, or appear to interfere, with our responsibilities at work. We avoid actual, potential, and perceived conflicts of interest, disclose concerns promptly, and seek guidance whenever a situation could affect our objectivity, judgment, or commitment to Crown Castle.

How we avoid conflicts of interest

> Put Crown Castle's interests ahead of personal gain.

> Avoid situations where personal relationships, outside activities, or financial interests could influence business decisions.

> Confirm that any family or romantic relationships comply with Crown Castle policy.

> Do not accept or give gifts, favors, or other benefits that could influence, or appear to influence, business decisions.

> Avoid outside employment or activities that interfere with your job duties or compete with Crown Castle's business interests.

> Disclose actual, potential, or perceived conflicts of interest promptly through the appropriate reporting and disclosure process.

Q: A vendor I work with offered me tickets to a sporting event as a thank-you for our business. Can I accept them?

A: Before accepting, consider whether the gift could influence—or appear to influence—your business judgment. Gifts, entertainment, or favors from vendors or business partners may create a conflict of interest, especially if they are valuable, frequent, or connected to a pending business decision. If you are unsure, disclose the offer and ask for guidance.

Learn More: If you have questions about conflicts of interest, speak with your people leader and visit the Compliance Hub. You can also review the Conflict of Interest Policy, the Relatives and Relationships Policy, and the Related Party Transactions Policy.

Selecting Suppliers and Vendors

We choose suppliers and vendors who share our commitment to integrity, ethical conduct, human rights, safety, and compliance. We expect those who provide products, services, or labor resources to Crown Castle to comply with applicable laws, follow ethical business practices, and meet the standards set forth in our Supplier Code of Conduct. By working with responsible business partners, we help promote human dignity, protect people, manage risk, and strengthen the integrity of our supply chain and business relationships.

How we choose ethical vendors and suppliers

- Expect suppliers to comply with applicable laws, regulations, contractual obligations, and Crown Castle's standards.
- Select business partners that meet or exceed the expectations established in Crown Castle's Supplier Code of Conduct.
- Seek suppliers that promote human dignity, equality, and fair treatment of workers.
- Expect suppliers to maintain safe workplaces and follow appropriate health and safety standards.
- Follow competitive bidding requirements and procurement processes whenever they apply.
- Protect confidential supplier information and do not share pricing, proposals, technical information, commercial terms, or other sensitive supplier information with competing suppliers or other unauthorized parties.
- Monitor supplier compliance with applicable standards and recognize that Crown Castle may assess whether suppliers are meeting the requirements of the Supplier Code of Conduct.

Q: A supplier has a close personal relationship with a Crown Castle teammate involved in the selection process. Is that a concern?

A: It may create an actual, potential, or perceived conflict of interest. The relationship should be disclosed promptly, and the teammate should not participate in the selection decision unless the situation has been reviewed and appropriate safeguards have been established.

Learn More: If you have questions regarding vendor and supplier selection, speak with your people leader and review the Human Rights Policy, the Procurement Policy, and the Environmental Policy.

Fair Dealing

We compete honestly and fairly. We treat customers, suppliers, vendors, contractors, competitors, and other business partners with integrity and respect, and we conduct our business in accordance with applicable laws and regulations. We believe fair competition benefits our customers, our business, and the markets in which we operate. Every teammate is expected to deal fairly with others, support ethical business practices, and help maintain a level playing field for those who do business with Crown Castle.



How we compete fairly

> Provide suppliers, vendors, and other qualified parties with fair opportunities to compete for Crown Castle's business.

> Conduct all interactions with third parties in accordance with company policies and applicable laws and regulations.

> Make business decisions based on objective business considerations, not favoritism or improper influence.

> Follow competitive bidding requirements and procurement processes whenever they apply.

> Never participate in price-fixing, bid-rigging, market allocation, or other anti-competitive practices.

> Do not discuss pricing, costs, customers, territories, or other competitively sensitive information with competitors when doing so could violate competition laws.

> Ensure arrangements with third parties are properly documented and accurately reflect the goods or services being provided.

Q: During a competitive bid, may I tell one supplier the amount of another supplier's proposal so the first supplier can offer a better price?

A: No. Supplier bids, pricing, proposals, technical information, and commercial terms must be kept confidential and must not be shared with competing suppliers. Follow the applicable competitive bidding process and provide bidders with a fair opportunity to compete based on the established requirements and evaluation criteria.

Learn More: If you have questions about how we compete fairly, speak with your people leader and review the Antitrust & Competition Policy and the Procurement Policy.

Anti-Corruption

We conduct business with honesty, integrity, and transparency, and we do not tolerate bribery, corruption, or improper payments. We comply with the U.S. Foreign Corrupt Practices Act (FCPA), anti-bribery laws, election laws, and other applicable anti-corruption requirements wherever we do business. We maintain ethical relationships with government agencies, officials, customers, suppliers, and business partners, and we do not offer, authorize, or provide anything of value to improperly influence an official business decision or obtain an unfair advantage.

How we uphold our anti-corruption commitment

- Conduct business in accordance with high ethical standards and all applicable anti-corruption laws.
- Never directly or through a third party authorize, offer, make, request, or accept bribes, kickbacks, or other improper payments.
- Do not give anything of value, directly or indirectly, to government officials, political candidates, or other parties to influence any decision made in their official capacity or to obtain or retain business or gain an improper advantage.
- Avoid making illegal payments to government officials in any country.
- Maintain relationships with governmental agencies and officials in a manner that reflects integrity, complies with legal requirements, and protects Crown Castle's reputation.

Learn More: If you have questions about our anti-corruption commitment, review the Foreign Corrupt Practices Act Policy.



PROTECT COMPANY RESOURCES

> Company Assets and Resources

> Confidentiality

> Proper Computer Use

> Data Protection

> Records Preservation

> Artificial Intelligence

> Insider Trading

> Accurate Books and Records

SECTION 4

Company Assets and Resources

We all share responsibility for protecting Crown Castle's assets and using them wisely. These assets include funds, company property, equipment, vehicles, technology, information, facilities, and other business resources entrusted to us. We use these assets for legitimate business purposes. We also protect them from loss, theft, waste, damage, and misuse. By protecting Crown Castle's resources, we help preserve the value, integrity, and reputation of our company.



How we use company resources and assets the right way

- Use company assets and resources for legitimate business purposes.
- Help prevent theft, loss, carelessness, waste, damage, and misuse of company property.
- Follow Crown Castle policies and guidelines governing the use of company equipment, systems, vehicles, funds, and other resources.
- Use Crown Castle funds responsibly and only for authorized business activities.
- Never approve or make payments with the understanding that any portion will be used for an unlawful purpose.
- Exercise good stewardship of company resources by avoiding unnecessary costs and waste.
- Report suspected theft, fraud, waste, misuse, damage, or loss of company property.

Learn More: If you have questions about proper use of company resources and assets, speak with your people leader. Many of our policies address the proper use of company resources, and you are encouraged to review the Commitment Authority Policy, the Expense Reimbursement Policy, the Acceptable Use Policy, and the Fleet Policy for common questions.

Confidentiality

We protect Crown Castle's confidential information because it reflects our business plans, operations, and competitive position. Confidential information includes all non-public information that you learned in the course of your work for Crown Castle and belongs to or relates to the business of Crown Castle. Such information may be stored in written, printed, graphic, or electronic format. In some circumstances, you may have access to or obtain confidential information from Crown Castle's customers, suppliers, vendors, or other business partners, and should also maintain the confidentiality of that information.

We each play a role in preserving Crown Castle's confidential information, trade secrets, and proprietary assets, and we only disclose it when authorized or legally required. Our responsibility to protect confidential information does not end when employment ends.

How we safeguard Crown Castle information

> Protect information belonging to Crown Castle, our customers, suppliers, vendors, and other business partners.

> Use confidential information only for authorized business purposes and never for personal gain.

> Do not disclose, publish, share, or make confidential information available to others unless authorized to do so.

> Limit access to trade secrets, proprietary information, and other sensitive data to people who are authorized and have a legitimate business reason to know such information.

> Recognize that information provided by or about companies doing business with Crown Castle may also be confidential, even if it does not belong to Crown Castle.

> Return all documents, records, devices, and other materials containing confidential information when your employment or business relationship ends.

> Continue to protect confidential information even after leaving Crown Castle.

Q: A teammate from another department asked me to send them a report that includes customer and project information. They work at Crown Castle, so can I share it?

A: Not automatically. Confidential information should only be shared with teammates who are authorized to receive it and have a legitimate business need to know. Before sharing, confirm that the teammate needs the information for their work and that sharing it is permitted under company policy.

Proper Computer Use

We use Crown Castle's technology, systems, networks, and data responsibly because they are important business resources that help us serve our customers and protect our company. Crown Castle IT Resources are provided for business purposes and must be used in a secure, ethical, lawful, and responsible manner. Each of us is responsible for protecting company systems, data, devices, and accounts, and for helping maintain a secure technology environment wherever we work.

How we keep Crown Castle IT Resources and systems secure

> Use Crown Castle IT Resources in a responsible, secure, ethical, and lawful manner.

> Protect company devices, systems, accounts, and other IT Resources entrusted to you.

> Do not allow others to use your assigned devices, accounts, or IT Resources.

> Use strong PINs, passcodes, passwords, and available security features, and configure devices to lock automatically whenever they are unattended.

> Access Crown Castle systems only from approved and compliant devices.

> Use company technology primarily to conduct Crown Castle business and in accordance with company policies.

> Be alert for phishing and other suspicious communications.

> Before traveling internationally, request remote access if you have a business need to access Crown Castle information.

> Avoid unlawful, inappropriate, harassing, or offensive use of Crown Castle IT Resources.

> Return company-provided devices, accounts, and IT Resources when employment or access ends.

Q: A teammate needs temporary access to a system. Can I let them use my account or share my password?

A: No. Never share passwords, passcodes, accounts, or assigned devices, even with another teammate. The teammate should request access through the appropriate process. Store passwords only in the approved password management tool.

Learn More: If you have questions about using company IT Resources, speak with your people leader and review the Acceptable Use Policy, the Mobile and Personal Electronic Device Policy, and the Information Security Policy.

Data Protection

Data is a critical Crown Castle asset that supports our operations, decisions, customer relationships, and business growth. We protect data throughout its lifecycle—from creation and use through retention and secure disposal—by identifying its sensitivity, limiting access, and applying appropriate safeguards. Each of us is responsible for handling Crown Castle data carefully, preserving its confidentiality, integrity, and availability, and complying with applicable privacy, security, contractual, and records-management requirements.

How we protect Crown Castle data

- Understand the sensitivity and classification of the data you create, access, use, store, print, or share.
- Only use approved Crown Castle systems, applications, storage locations, and secure methods to store or transmit data.
- Collect, use, and retain only the data needed for a legitimate business purpose, and dispose of it securely when it is no longer required, subject to retention requirements and legal holds.
- Protect personal information, customer and contract data, operational information, financial information, and other sensitive or regulated data from unauthorized use, access, disclosure, alteration, loss, or destruction.

Learn More: If you have questions about protecting or handling Crown Castle data, speak with your people leader and visit the Data Risk Management page on CONNECT. You can also review the Privacy Notice, Information Security Policy and Document Retention and Destruction Policy.

Records Preservation

Teammates should follow all procedures implemented by Crown Castle or required by law for the maintenance, preservation, and destruction of business documents and non-essential information.

Teammates should also comply with all evidence preservation requirements related to legal matters, including legal hold letters. Teammates are prohibited from knowingly altering, destroying, concealing, or falsifying 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 government agency.

Learn More: If you have any questions about document retention or destruction, speak with your people leader and review the Document Retention and Destruction Policy. If you have any questions about a legal hold letter, you should contact the legal counsel identified in the letter.

Artificial Intelligence

We embrace artificial intelligence (AI) as a tool that can increase productivity, support innovation, and help us work more effectively. We use AI in a safe, ethical, secure, and lawful manner, while recognizing and managing the risks that AI can present. Each of us is responsible for using AI responsibly, protecting Crown Castle information, and helping prevent misuse, bias, inaccuracies, unethical outcomes, and information security breaches.

How we use AI responsibly

> Use AI tools in a safe, ethical, secure, productive, and lawful manner.

> Use AI to support business objectives while exercising human judgment and accountability.

> Use only approved AI tools or AI tools that have been reviewed and authorized through Crown Castle's governance processes.

> Do not enter proprietary, confidential, restricted, secret, or other protected information into unauthorized AI tools.

> Consider the potential risks of AI-generated content, including inaccuracies and unintended outcomes, before relying on or sharing it.

Q: An AI tool created a polished summary that appears accurate. Can I send it without reviewing it?

A: No. AI-generated content may be incomplete, inaccurate, biased, or based on unreliable information. Review the output carefully, verify important facts using trusted sources, confirm that it does not disclose protected information, and make any necessary corrections before using or sharing it. If the information cannot be verified, do not use it.

Learn More: If you have a question about using artificial intelligence, speak with your people leader and review the Artificial Intelligence Usage Policy.

Insider Trading

We are committed to maintaining the trust of our investors and the integrity of the financial markets. We do not buy, sell, or otherwise trade, directly or indirectly, Crown Castle securities while aware of material non-public information, and we do not share that information with others who might trade on it. Using confidential information or other material non-public information for personal gain or providing it to others is both unethical and illegal.

How we avoid trading on inside information

> Do not buy, sell, or otherwise trade Crown Castle securities while aware of material non-public information.

> Do not use confidential information to obtain a personal financial benefit.

> Do not trade securities of another public company while aware of material non-public information gained through your role at Crown Castle that could impact the price of those securities.

> Never share material non-public information with family members, friends, business associates, or anyone else who could trade on that information.

> Remember that insider trading restrictions apply not only to you, but also to members of your household, family members, and entities you control.

> Wait until material information has been publicly released and absorbed by the market before trading, meaning a full trading day has passed between the time the material information is released and the time trading occurs.

Q: I learned confidential information about a new customer contract during a meeting at work. How do I know if the information is "material non-public information"?

A: In simple terms, material non-public information is any type of information, whether positive or negative, that has not been publicly disclosed and could reasonably be expected to affect the market price of our securities. Examples may include significant financial results, major transactions, important business developments, or significant leadership changes. If you are unsure, do not trade and seek guidance.

Learn More: If you have any questions about insider trading, review the Insider Trading Policy. Depending on your role, you may be subject to heightened requirements, which are outlined in the Insider Trading Policy.

Accurate 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.

How we maintain accurate books and records

> Do not make (or cause the making of) false, misleading or deliberately inaccurate books, records, accounts, or entries.

> All payments should be made with the intention or understanding that all or any part of it is to be used for the purpose 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 any other governmental or regulatory authority.

> Provide full, fair, accurate, timely and understandable disclosures in reports and documents that Crown Castle files with, or submits to, the SEC and in other public communications that the Company makes.

> No action to fraudulently influence, coerce, manipulate, or mislead Crown Castle's internal or independent auditors should be made or taken.

> Ensure that all information you report or file, including timecards, expense reports, government or public disclosures, and regulatory reporting, is accurate and complete.

Q: I worked extra hours last week but forgot to record them. Since it was only a small amount of time, can I just leave my timecard as-is?

A: No. Timecards and other work records must accurately reflect the work performed. If you notice an error or omission, correct it promptly through the appropriate process. Accurate records help Crown Castle comply with legal, accounting, and reporting requirements.

OPERATE RESPONSIBLY

- > Earning Customer Trust
- > Meeting Our Regulatory Responsibilities
- > External Communications
- > Social Media
- > Political Contributions
- > Lobbying



SECTION 5



Earning Customer Trust

Our customers depend on us to be a reliable, accountable, and transparent partner. We earn their trust by understanding their needs, communicating openly, setting clear expectations, and following through on our commitments. When challenges arise, we take ownership, keep customers informed, and work with urgency to resolve concerns. Every interaction is an opportunity to strengthen our customer relationships and demonstrate the integrity, responsiveness, and operational excellence at the heart of our CORE Four values.

Meeting our Regulatory Responsibilities

We operate responsibly and comply with the laws, regulations, permits, approvals, and other requirements that apply to our communications infrastructure. This includes requirements administered by the Federal Communications Commission (FCC), Federal Aviation Administration (FAA), environmental and wildlife agencies, and state and local authorities. Compliance helps protect aviation and public safety, the environment, protected species, and the communities we serve. We identify applicable requirements early, obtain required approvals before work begins, follow the conditions attached to those approvals, and maintain accurate records throughout the life of our assets.

How we meet our regulatory obligations

- Obtain required zoning approvals, building and environmental permits, licenses, and other governmental authorizations before beginning work, and comply with all conditions, deadlines, inspections, and closeout requirements.
- Follow FCC requirements, including applicable antenna structure registration, environmental review, historic-preservation review, radio-frequency exposure, AM detuning, and other communications-related requirements.
- Follow FAA requirements for airspace review and the marking, lighting, monitoring, and reporting of structures that may affect aviation safety.
- Protect migratory birds, eagles, and other protected wildlife species. Removal of nests on our infrastructure requires Crown Castle approval and may require state and/or federal permits/authorizations.
- Consider the potential effects of our operations on people and communities, consistent with our commitment to human dignity, equality, health, safety, and access to water.
- Work with internal partners and relevant agencies to promptly escalate missed deadlines, potential violations, or changes that may require additional review or approval.

Q: I arrive at a site and observe a bird nest or signs of bird activity near the planned work area. What should I do?

A: Stop work and contact Crown Castle's Network Operations Center. Do not disturb the birds, eggs, or nest. The Migratory Bird team will assess the situation and provide next steps. Work may resume only after required permits or authorizations have been obtained and Crown Castle provides approval or conditions to proceed.

Learn More: If you have questions about regulatory compliance, contact the appropriate Regulatory, Permitting, or Legal team. You can also review the Environmental Sustainability Policy, the Human Rights Policy, and the Crown Castle Protected Bird Guidance.

External Communications

We communicate with external audiences thoughtfully, accurately, and through the appropriate channels. External statements can affect Crown Castle's reputation, business opportunities, and financial results, so we take care to ensure communications are accurate, authorized, and consistent with company policies. When communicating with customers, vendors, investors, the media, government agencies, or the public, we protect non-public information and follow established approval and communication processes.

Q: I have been invited to speak on an industry conference panel about Crown Castle's business. Do I need approval before accepting?

A: Yes, if the engagement concerns Crown Castle, the industry, or company information and is outside your ordinary job duties. Obtain written approval through the Speaker Approval process before accepting. For an approved engagement, a people leader at the director level or above must approve the presentation content before it is shared.

Learn More: If you have questions about communicating externally, speak with your people leader and review the External Communications Policy.



Social Media

We encourage teammates to participate responsibly in social media and other online conversations. Social media can help us share ideas and connect with others, but it also requires sound judgment, professionalism, and respect. We are each personally responsible for what we post online and should use social media in a way that protects Crown Castle's people, reputation, confidential information, and legitimate business interests.

How we use social media the right way

> Use the same good judgment, professionalism, and common sense online that you would use at work. Remember that you are personally responsible for the content you post, share, or comment on.

> Protect Crown Castle's confidential, proprietary, and non-public information at all times.

> If discussing work-related matters in a personal capacity, make clear that your views are your own and do not necessarily reflect the views of Crown Castle.

> Do not post content that is maliciously false, threatening, intimidating, harassing, bullying, or discriminatory.

> Respect copyrights, trademarks, privacy rights, and other third-party rights when sharing content online.

> Use social media and company technology appropriately during working time and in accordance with Crown Castle policies.

Q: If I post or comment on my personal social media account on my own time, does the Code of Conduct apply?

A: Yes, this Code of Conduct may apply to your personal social media use. For example, if you post discriminatory comments, such behavior may constitute a violation of this Code or the Social Media Policy.

Learn More: If you have questions about using social media, speak with your people leader and review the Social Media Policy.

Political Contributions

We respect every teammate's right to participate in the political process and support candidates or issues of their choosing. At the same time, Crown Castle generally does not make political contributions or independent political expenditures unless specifically authorized by Crown Castle's CEO or any Executive Vice President and permitted by law. When participating in political activities, teammates should make clear that their views and actions are their own and not those of Crown Castle. If Crown Castle makes a political contribution, it does so to support Crown Castle's public policy objectives and promote its interests, without regard for the private political preferences of its executives and board of directors. When required by applicable laws and regulations, Crown Castle has an obligation to publicly report its political contributions to the U.S. Congress and state and local regulatory bodies. We are committed to complying with all applicable laws, regulations, and reporting requirements related to political activities and contributions.

Lobbying

We engage in lobbying activities responsibly, transparently, and in compliance with the law. When conducted appropriately, lobbying can help educate policymakers and government decision makers about Crown Castle's legitimate business interests and the issues that affect our industry. Because lobbying laws are complex and vary by jurisdiction, all lobbying activities must be properly coordinated, supervised, and reported and must comply with both applicable laws and Crown Castle policies.

How we follow the rules on lobbying

- Recognize that lobbying includes communicating with or attempting to persuade lawmakers, public officials, and government employees regarding laws, regulations, policies, procurement, or any other government actions that may affect Crown Castle.
- Ensure lobbying activities are appropriately coordinated, supervised, and reported.
- Follow Crown Castle's approval, reporting, and oversight requirements before engaging in lobbying activities on behalf of the company.
- Coordinate the engagement of external lobbyists through the appropriate Crown Castle processes and oversight functions and ensure that any external lobbyists or third parties working on Crown Castle's behalf comply with applicable lobbying laws and company requirements.
- Do not offer, provide, or authorize anything of value in violation of anti-corruption laws or the Foreign Corrupt Practices Act when interacting with government officials.
- Maintain accurate reporting and compliance documentation when lobbying activities trigger legal disclosure or registration requirements.

Learn More: If you have questions about lobbying, speak with your people leader and review the Lobbying Policy and the Foreign Corrupt Practices Act Policy.

Waiver

It is the responsibility of all Crown Castle teammates to understand and comply with our Code of Conduct. Subject to applicable law, if you violate the policies and procedures in our Code, you may be subject to disciplinary action, up to and including termination of employment. Only the Crown Castle Inc. Board of Directors ("Board") or a committee of the Board may provide a waiver of a provision of this Code for directors or executive officers. Individuals seeking a waiver must explain why the waiver is necessary, appropriate, or in the best interest of the company. Any such waiver will be disclosed promptly in accordance with legal requirements and stock exchange regulations.

Effective Date: November 9, 2026