

## Introduction

This Conflict of Interest and Disclosure Policy states the principles and expectations regarding each Crown Castle employee's duty and obligation to avoid situations that create, or appear to create, conflicts of interest. We use [Convercent](#), a governance tool, to support this Policy and to assist employees in identifying, avoiding, and/or resolving situations where their activities create an actual, apparent, or potential conflict with the interests of the Company. For purposes of this Policy, "employee" refers to officers of Crown Castle, members of the Crown Castle Inc. Board of Directors, and all other employees, including interns, of Crown Castle.

Business decisions must be made in the best interest of the Company and never for personal benefit or gain. Crown Castle employees must avoid any actual or perceived conflicts of interest and not permit outside interests to interfere with their professional duties. Crown Castle prohibits all employees from using their position with Crown Castle or Crown Castle's relationship with its customers, vendors, competitors or suppliers for private gain or to obtain benefits for themselves, for someone with whom they are in a personal relationship, or for a Family Member<sup>1</sup>. Employees should not try to achieve indirectly, through agents or other intermediaries, that which is prohibited directly.

All employees should comply with the spirit and letter of this Policy. Failure to read this Policy, or any amendment or revision of this Policy, does not exempt employees from their responsibility to comply with this Policy or applicable laws and regulations. Employees who violate the law, regulations, or this Policy are subject to disciplinary action, up to and including termination.

## Conflict of Interest

For purposes of this Policy, a Conflict of Interest occurs when an employee's outside interests interfere with Crown Castle's interests or the employee's work-related duties ("Conflict of Interest"). In some cases, a Conflict of Interest may arise due to an employee's personal relationships, including a Family Member's activities or job.

An employee's outside interests can be their own or a Family Member's personal interests or activities or financial interests. Financial interests are a monetary interest in a competitor, vendor, customer, or partner of Crown Castle, which includes owning stock, bonds, or having other investments in these entities<sup>2</sup>. Such outside interests may interfere, or appear to interfere, with the employee's ability to make objective business decisions in the best interest of Crown Castle. A Conflict of Interest can exist merely by the facts of a personal

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<sup>1</sup> For purposes of this Policy, "Family Member" means a spouse or domestic partner, child, son-in-law, daughter-in-law, step-child, parent, step-parent, parent-in-law, grandparent, grandchild, sibling, brother-in-law, sister-in-law, step-sibling (including adoptive relationships), of an employee or any person (other than a tenant or employee) sharing the same household of such employee.

<sup>2</sup> Ownership or investment in publicly traded securities of a competitor, vendor, customer, or partner of Crown Castle is permitted if such ownership or investment is an insignificant percentage of that entity's publicly traded securities.

relationship, activities, or obligations that appear inconsistent with the responsibilities and obligations owed by an employee of Crown Castle.

## Examples

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

- Holding a position or interest, directly or indirectly, with any supplier, customer, or competitor of Crown Castle (except for an investment in publicly traded securities as described below).
- Accepting gifts or favors of more than nominal value from an actual or prospective customer or supplier of Crown Castle or any governmental official or employee (except as otherwise permitted in this Policy).
- Disclosing or using confidential information gained by reason of employment or other business relationship with Crown Castle for profit or advantage for the employee or anyone else.
- Competing with Crown Castle in the acquisition or disposition of rights or property.
- Engaging in outside activities, including outside employment<sup>3</sup>, that detracts from or interferes with the full and timely performance of the employee's job duties for Crown Castle, including outside activities that (1) interfere with an employee's work schedule; (2) require the use of Crown Castle tools, materials, or equipment; or (3) directly or indirectly compete with the business or interests of Crown Castle, regardless of when the work is performed.
- Engaging in a romantic relationship or relatives employed at Crown Castle in violation of the [Relatives and Relationships Policy](#).

The following situations should not be considered conflicts of interest:

- Ownership of an insignificant percentage of the publicly traded securities of a supplier, vendor, customer, or competitor of Crown Castle.
- A transaction with one of Crown Castle's banks, which transaction is customary and conducted on standard commercially available terms, such as a home mortgage or bank loan.
- A transaction or relationship disclosed in accordance with this Policy or Crown Castle's [Related Party Transactions Policy](#) and determined by Crown Castle's General Counsel (or any internal or

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<sup>3</sup> In accordance with the District of Columbia's Ban on Non-Compete Agreements Amendment Act of 2022, Crown Castle may only restrict outside employment in limited circumstances in the District of Columbia. Crown Castle will enforce this Policy subject to and in accordance with applicable laws.

external legal counsel designated by the General Counsel) or the Board of Directors of Crown Castle Inc. (“Board”) (or a committee thereof) not to be a prohibited conflict of interest or transaction.

- A transaction involving a member of the Board deemed by the disinterested members of the Board (or a committee thereof) not to impact or impair such director’s independence.

## Gifts and Favors

Employees should make business decisions in the best interests of Crown Castle. Crown Castle prohibits employees from seeking or accepting any gifts, favors, entertainment, payment, cash, cash equivalents, or loans for themselves, a personal relationship, or Family Member, from any customer, vendor, supplier, contractor, or other party doing business with Crown Castle, except for gifts of nominal or modest value if (a) the gifts are consistent with the giver’s rules, (b) the acceptance of the gift is in compliance with this Policy, and (c) open disclosure of the gift would not embarrass or reflect poorly on Crown Castle, the giver, or the employee recipient. Cash gifts are especially problematic and generally should not be accepted.

Crown Castle also prohibits employees from giving any gifts or favors to any customer, vendor, supplier, contractor, government official, government employee or other party doing business with Crown Castle except for gifts of a nominal value without prior approval from their manager. Employees should be particularly mindful of government regulations regarding gifts.

Certain departments or business units may have more stringent restrictions for giving or accepting gifts based on the responsibilities of roles. Employees with questions regarding gifts and favors should discuss this Policy with their People Leader.

Crown Castle’s standard of business practices regarding gifts or favors, per this Policy, should be communicated to vendors, suppliers, contractors, and all parties doing business with Crown Castle.

## Disclosure Requirements

Crown Castle recognizes that avoiding a Conflict of Interest may not always be possible. Employees must disclose, for themselves or a Family Member, any activity or transaction that creates, or may appear to create, a Conflict of Interest, including: (1) any new, actual or potential Conflict of Interest; and (2) a change in status of an existing actual or potential Conflict of Interest. Additionally, all employees must disclose any gift or favor, beyond nominal or modest value, received from any customer, vendor, supplier, contractor, government official, government employee, or other party doing business with Crown Castle.

To facilitate disclosure, Crown Castle uses [Convercent](#). When a Conflict of Interest arises or is discovered, or when there is a change in status of an existing actual or potential Conflict of Interest, employees must complete the disclosure form on [Convercent](#). Additionally, Crown Castle may require all employees to complete the disclosure form on an annual basis.

Disclosing a potential or existing Conflict of Interest is a fundamental responsibility for every employee and is crucial for maintaining ethical conduct, protecting the Company's integrity, and fostering a culture of trust. Crown Castle will review the reported disclosure to determine, at its sole discretion, whether the reported disclosure is a prohibited Conflict of Interest or transaction. If the matter is deemed a Conflict of Interest that cannot be managed, the affected employee must withdraw from it. In the case of a potential Conflict of Interest arising from a Close Personal Relationship with another employee at Crown Castle, Crown Castle retains the right to take employment action as necessary to address any such conflict of interest.

Failure to disclose a known conflict of interest or to comply with the requirements of this Policy may result in disciplinary action, up to and including termination of employment or contract.

## Reporting Policy Violations or Concerns

Employees should report integrity or ethical concerns, including violations or potential violations of this Policy. Employees may report concerns through any of the following:

- A manager or supervisor
- Employee Relations at [employeerelations@crowncastle.com](mailto:employeerelations@crowncastle.com)
- Any VP – Legal or the General Counsel
- Crown Castle's Ethics Alert Line

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

## Anti-Retaliation

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

## Updating the Policy

The company will annually review this, Policy. Any updates to the Policy will be circulated to employees and posted on the Connect Policies and Guidelines page.

## Questions

Questions regarding this Policy should be directed to [compliance@crowncastle.com](mailto:compliance@crowncastle.com).