

# Environmental and Biodiversity Statement

## Introduction

SBA is helping to meet today's challenge of building sustainable telecommunication networks. We build and operate shared infrastructure for telecommunication networks in developed and emerging markets, enabling increased access to digital technologies with a minimal environmental footprint. Our company's sustainability efforts focus on the issues most material to our financial performance, operational risk and stakeholder priorities. Environmental management and biodiversity are important issues for our industry and stakeholders.

We are committed to mitigating the environmental footprint of our operations and promoting sustainable land management and biodiversity practices. We recognize our role in contributing to the United Nation's Sustainable Development Goals (UN SDGs), including SDG #15, Life on Land. We aim to disclose our nature-related impacts through recognized frameworks such as the Taskforce on Nature-related Financial Disclosures (TNFD). Our commitments to environmental management and biodiversity are reflected in our Sustainability Report and this Environmental and Biodiversity Statement.

## Environmental Policy

Our Environmental Policy aims to reinforce our commitment to environmentally responsible business practices in all markets in which we operate. The Policy provides essential guidance for our employees, contractors and vendors to comply with our environmental practices and objectives.

Our Environmental Policy statement is as follows:

- Promoting responsible business practices and sustainable resource use to lessen our environmental impact and pollution, fulfill compliance obligations and deliver stakeholder value, while maintaining and continually improving the effectiveness of our environmental management system.

We are committed to long-term, environmentally responsible operations. Our commitments include, among others:

- Using natural resources (energy and water) more efficiently
- Reducing emissions and landfill waste
- Measuring and monitoring our environmental performance
- Reporting regularly on environmental issues
- Promoting environmental protection
- Complying with environmental regulations
- Creating environmental awareness
- Consulting with stakeholders on environmental issues
- Continuously improving our environmental management system

## Biodiversity Commitments

### *Nature-Related Impacts*

Our neutral host infrastructure assets have a relatively small geographic footprint. In rural areas, support for our towers, equipment shelters, and related equipment requires a tract of land that is typically up to 10,000 square feet. Less than 2,500 square feet is required for a monopole or self-supporting tower typically used in metropolitan areas for wireless communications towers. To support sustainable land management practices, we review site acquisition and construction plans where appropriate to minimize deforestation and our impact on surrounding vegetation. The ground beneath our tower sites is often permeable, allowing surface water to be absorbed through the ground rather than contributing to surface water runoff and soil erosion.

### *Environmental Compliance*

We ensure continuous compliance with conservation, permitting and land management regulations. We take the steps necessary to comply with environmental regulations in the markets in which we operate, ensuring the environmental impact of our portfolio is minimized.

### *Environmental Risk Assessment*

We consider environmental protection, conservation and other impacts during our site selection, development and operation. Where possible, we seek to avoid selecting sites for development in legally protected areas or areas of high biodiversity value. We conduct a Phase I Environmental Site Assessment and environmental screening for substantially all tower sites that SBA builds or acquires in the U.S. The Phase I analysis determines if the site is likely to be free from environmental contamination or if it requires additional screening in a Phase II Environmental Site Assessment Report.

Our screening for environmental impacts, including dependency- and impact-related biodiversity risks, includes evaluation of tower site locations:

- That might be located in a wilderness area or a wildlife preserve
- That might affect threatened and endangered species or their habitat (Endangered Species Act - ESA)
- That might be located in a floodplain and where facility equipment will not be placed at least one foot above the base flood elevation of the floodplain
- That might affect UNESCO World Heritage areas and IUCN Category I-IV protected areas
- Whose construction will involve significant changes in surface features (e.g., in wetlands, water diversions, considerable ground disturbance, deforestation)
- That might affect migratory birds if the towers are over a certain height
- That would involve similar considerations under the laws or best practices of our international markets

## *Mitigation Hierarchy*

We use a mitigation hierarchy approach to determine how to best avoid, minimize or restore areas impacted by our operations if they are found to be near critical wildlife or habitats.

- **Avoid:** We are committed to avoiding negative impacts on threatened and protected species. SBA operates with the highest commitment to environmental stewardship by maintaining reliable and efficient service on our towers while protecting avian wildlife by limiting or restricting access to sites with nests containing eggs or flightless young, providing shelter for birds to nest undisturbed. Our Avian Protection Program (APP) guides the enhancement of our biodiversity and conservation efforts in the U.S. We are committed to spotting, identifying, tracking and protecting migratory birds, including threatened or endangered species, on our towers. SBA follows the guidance of the Migratory Bird Treaty Act, which covers over eight hundred migratory bird species, the Bald and Golden Eagle Protection Act and the Endangered Species Act, as well as tribal, state and municipal avian guidelines. We complete migratory bird evaluations and consult with third-party avian biologists, state agencies and U.S Fish and Wildlife agencies to determine bird species, stage of nesting cycle, and nest history data at our sites. We proactively partner, engage and consult with the community and conservation agencies, such as the National Audubon Society, to document bird activity.
- **Minimize:** We proactively implement programs to minimize our impact on wildlife and the environment. When any of the listed categories above impact a tower site, we promptly complete an environmental assessment and, if needed, obtain approval from the appropriate regulatory agency, which may include steps to mitigate the impact of construction or operation of the site. We have installed Federal Aviation Administration (FAA) recommended tower flashing red lighting systems in the U.S. to minimize potential bird collisions with our tower structures. According to the FCC, modified red lighting systems can reduce potential bird collisions by as much as 70%, particularly for migratory birds. SBA recognizes the importance of managing and minimizing our water consumption. The World Resources Institute's Water Stress by Country indicates that less than 1% of our global water consumption in 2022 was withdrawn in regions with High or Extremely High Baseline Water Stress. We have identified water conservation as a priority in emerging markets such as South Africa and Chile.
- **Restore:** We promote sustainable land management and biodiversity practices. When decommissioning a tower site, we restore the ground to its natural state, including by filling prior holes with fresh dirt. We fund reforestation and afforestation initiatives as ways to contribute to regeneration and positive natural capital. We strive to maintain the landscaping surrounding our corporate office with greywater drawn from nearby stormwater retention ponds.

## Oversight

Our Board is actively involved in the oversight and management of risks that could affect SBA, including nature-related risks and opportunities. This oversight and management is conducted primarily through its Committees, although the Board retains responsibility for general oversight of risks. Our Nominating and Corporate Governance Committee regularly monitors our sustainability initiatives, including nature-related issues, opportunities and goals, and receives reports from management on our sustainability program, performance and initiatives at every regularly scheduled meeting of the Committee.

Management proactively assesses, manages and integrates nature-related dependencies, impacts, risks and opportunities into business processes and procedures, including the Environmental and Biodiversity Statement. A rigorous governance framework ensures the integration of our sustainability strategy across our business and value chain. Our sustainability strategy and programs are governed by the Executive Sustainability Committee, comprised of our President and Chief Executive Officer and members of the Executive Leadership Team, and the Sustainability Steering Group, comprised of senior leaders across our business units.

## Monitoring & Compliance

SBA recognizes the importance of managing, measuring and reducing the environmental impact of our extended value chain. We engage with and assess our suppliers on various sustainability topics. We ask that our suppliers adhere to our ethical standards and business practices outlined in our Environmental and Biodiversity Statement. Our vendors should take necessary steps to ensure they are compliant with applicable environmental laws and regulations, as well as conservation, permitting and land management regulations. We utilize a third-party firm to review the qualifications of suppliers and subcontractors in the areas of insurance, safety, compliance and sustainability. The engagement process benefits our company and our suppliers, as it ensures the adoption and adherence to responsible, ethical and sustainable business practices across our supply chain.

## *Grievance Mechanism*

Complaints and concerns on matters relating to this Environmental and Biodiversity Statement may be submitted anonymously to SBA's General Counsel by email to [notify@confidentialreporting.net](mailto:notify@confidentialreporting.net).

SBA will not undertake any efforts to determine the identity of individuals making anonymous submissions. Anonymous submissions should contain as much detailed information as possible regarding the complaint or concern to permit the matter to be properly investigated.

SBA will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any director, officer or employee in the terms and conditions of service or employment based upon any lawful actions of such director, officer or employee with respect to good faith reporting of violations of this Environmental and Biodiversity Statement.