



# Human Rights Statement

## Introduction

SBA Communications Corporation (“SBA”) is committed to respecting and protecting human rights. We conduct business in accordance with the highest ethical and legal standards in the markets in which we operate and promote socially responsible practices in our workforce and supply chain. Our human rights statement sets the standards by which we expect our global officers, directors, employees, vendors and other stakeholders to abide by.

Our commitment to human rights is reflected in two of the core pillars of our Sustainability Strategy – Social Responsibility and Governance, respectively. We demonstrate our commitment to human rights through our global policies, sustainable leadership principles, governance and ethical business practices.

This Human Rights Statement is informed by the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multi-National Enterprises.

## Diversity and Inclusion

SBA is dedicated to being an equal opportunity employer. We are committed to recruiting, promoting and evaluating our team members’ performance based on merit and without regards to gender, race, ethnicity, minority group, nationality, origin, age, disability, veteran and service member status, LGBTQI+, religious belief, relationship status, or other self-identifications.

We believe that a collaborative, innovative, diverse, and inclusive workplace enables us to fulfill our mission and drive long-term value. As such, we are committed to providing a work environment that is free from discrimination, victimization, sexual harassment and vilification in order to promote a positive, safe and inclusive work environment. We maintain a zero-tolerance policy regarding all forms of harassment.

## Health and Safety

Providing a safe and healthy work environment for the protection of our team members is paramount to SBA. We believe that injuries and accidents can be prevented, and the responsibility of safety is shared throughout our organization.

SBA maintains a safe and healthy work environment by implementing a comprehensive occupational health and safety policy and a systematic approach to incident reporting, investigation, inspections and corrective actions, in compliance with all applicable health and safety laws and regulations.

We maintain a broad safety, injury and illness prevention program, with training sessions held annually. Through training, each team member is empowered with the responsibility for their personal health and safety and the health and safety of their fellow team members and contractors.

## Fair Labor Practices

We believe that providing a fair remuneration policy that is inclusive of overtime pay and comprehensive benefits is critical to the continued success of our business. We ensure that our wages are in accordance with federal and state minimum wage laws and take pride in the comprehensive and competitive remuneration offered to our team members. We adhere to regulatory requirements for maximum working hours and minimum living wages.



## *Freedom of Association*

SBA abides by all applicable laws governing the rights of employees to join or participate in collective bargaining, trade or labor unions.

## **Forced Labor, Human Trafficking, and Slavery**

SBA places high importance on preventing forced labor, human trafficking, and slavery, including modern slavery. We are strictly against the trafficking of persons, slavery and forced labor.

## **Child Labor**

SBA ensures compliance with all minimum age laws and regulations, including with respect to minimum age for all work, including hazardous work. SBA adheres to the ILO Convention 138 on Minimum Age Convention to ensure the safety and fundamental rights of children. SBA prohibits child labor, trafficking or exploitation of children.

## **Monitoring and Compliance**

SBA remains committed to monitoring, reporting and mitigating human rights violations across our business operations.

This Human Rights Statement serves to communicate our human rights principles and ethical business practices with our team members, customers, suppliers and other stakeholders.

We expect our team members to conduct themselves with the highest degree of honesty, integrity and ethics and within the confines of the law when acting on behalf of SBA. Our team members participate in regular compliance and business ethics training to ensure that our policies and procedures are adhered to. Team members who violate this Statement are subject to disciplinary action up to and including termination of employment or removal from the Board.

In the event that we become aware of human rights violations within our supply chain, we will take the appropriate action, which may include contract termination.

## *Grievance Mechanism*

In the event that a team member or business associate knows of a violation or suspected violation of this Human Rights Statement they are both encouraged and required to promptly report the situation to SBA. Anonymous reports of known or suspected violations relating to this Human Rights 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 Statement.