



Vendor Code of Conduct

Introduction

At SBA Communications Corporation ("SBA"), sustainability is integral to how we do business. We remain focused on driving long-term shareholder value through good corporate citizenship and encourage all of our vendors to join us in working towards a more sustainable and connected future.

Our Vendor Code of Conduct articulates the ethically sound business practices by which we expect our vendors, suppliers and other third parties to conduct business. SBA expects all of our vendors to abide by our standards regarding human rights, fair labor practices, diversity and inclusion, health and safety, business ethics, confidentiality and data protection, and environmental management and compliance. We also expect all of our vendors to conduct business in accordance with the highest ethical and legal standards, promote socially responsible practices and diversity, and mitigate the environmental impact and carbon footprint of their operations.

This Vendor Code of Conduct 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.

This Vendor Code of Conduct should be read in conjunction with our Code of Conduct, Equal Employment Opportunity Policy, Human Rights Statement, International Anti-Corruption Policy and Privacy Policy, and any existing contracts or agreements that a vendor may have with SBA. Vendors must comply with all applicable laws, regulations and standards in the countries in which they operate. Vendors must ensure that adequate management systems and controls are in place to ensure compliance with this Vendor Code of Conduct. It is the responsibility of our vendors to ensure that their employees, sub-contractors or suppliers are informed and uphold the requirements of this Vendor Code of Conduct.

If a vendor is found to be in violation of any policy set forth in this Vendor Code of Conduct, SBA may review our relationship with the respective vendor. Upon review, SBA may take corrective action, including, but not limited to termination of any and all contracts, agreements or relationships.

Diversity and Inclusion

SBA is dedicated to promoting diversity, equity and inclusion in our workforce. Our vendors should be familiar with and understand our Equal Employment Opportunity Policy and promote similar practices within their own organizations. Vendors should adopt a zero-tolerance policy for harassment and discrimination on the basis of gender, race, ethnicity, minority group, nationality, origin, age disability, veteran and service member, LGBTQI+, other self-identifications or any other protected status in accordance with the requirements of federal, state and local laws and regulations.

Health and Safety

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. Our vendors should take adequate measures to document injury, accident and fatality rates and to adopt policies and safeguards to mitigate such occurrences. We expect our vendors to be compliant with all applicable health and safety laws and regulations. In addition, our vendors should require all partners, subcontractors or other businesses or persons with which our vendors may engage to comply with all related laws and regulations.



Fair Labor Practices

Our vendors should pay fair wages for labor and should comply with all applicable wage and compensation laws. If there are other legally mandated benefits outside of wage and compensation, our vendors should also comply with those regulations. Our vendors should also adhere to regulatory requirements for maximum working hours and minimum living wages.

Freedom of Association

Our vendors should abide by all applicable laws governing the rights of employees to join or participate in collective bargaining, trade or labor unions.

Human Rights

Forced Labor, Human Trafficking, and Slavery

SBA is strictly against the trafficking of persons, slavery and forced labor and expect our vendors to uphold the same ethical principles. Our vendors should not conduct business operations with any partners, subcontractors or other businesses or persons who engage in, or are suspected of engaging in, any forms of human trafficking, slavery, or forced labor.

Child Labor

Our vendors should comply with all minimum age laws and regulations, including with respect to minimum age for 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 and require our vendors to abide by these standards.

Ethical Business Practices

Anti-Bribery and Anti-Corruption

Our vendors should be familiar with and understand the requirements and prohibitions of all applicable U.S. and non-U.S. anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. Our vendors should not directly or indirectly give, offer to give, promise to give, or authorize bribes or any other form of improper or illegal payment to induce the recipient, including government officials and their families, to take or refrain from taking any action that would bestow a commercial benefit or advantage, or to receive anything of value in return.

Money Laundering

Our vendors should take reasonable measures to prevent money-laundering.

Sanctions

Our vendors should comply with all applicable political and economic sanctions by countries against states or organizations. Vendors should not engage in any transactions with individuals against whom, or entities or jurisdictions against which the U.S. government has imposed sanctions.

Fair Competition and Anti-Trust

Our vendors should comply with all national and international competition laws. Our vendors should operate



with ethical business practices that are consistent with the promotion of fair competition by not participating in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

Insider Trading

Our vendors, their employees and sub-contractors should not trade in our or another company's securities while in possession of material non-public information. Material non-public information is information not available to the investing public that a reasonable investor would consider important in making a decision to trade such securities.

Conflicts of Interest

SBA recognizes that our vendors may take part in legitimate financial, business and other activities outside of the relationship we have with them. However, our vendors should avoid business, financial, or other direct or indirect interest, relationships or activities which would (i) be or have the appearance of being unlawful, hostile or adverse with SBA, (ii) result or have the appearance of resulting in a conflict with the interests of SBA or (iii) divide or have the appearance of dividing his or her loyalty to SBA. Moreover, vendors should not take personal advantage of opportunities that they become aware of through their relationship with SBA.

Confidentiality and Data Protection

Confidential Information

Our vendors must not disclose confidential information to anyone outside of their organization, nor to anyone within their organization, who does not have a business reason to know such information.

Intellectual Property Rights

Our vendors must aim to protect all SBA intellectual property. Our vendors may not use SBA intellectual property or information for personal gain.

Data Privacy Laws

Our vendors should comply with all applicable privacy and data protection laws and maintain protections for personal information.

Data Breach

If our vendors are victims of a data breach that could potentially result in the destruction, loss, alteration, accessibility, or disclosure of confidential information or personal information, they must notify SBA immediately upon reasonable suspicion of such breach.

Records Retention

Our vendors should create and maintain complete and accurate records. Vendors must retain and delete records in accordance with applicable law.



Environmental Management and Compliance

Environmental Laws and Permits

SBA is committed to long-term, environmentally responsible operations. We consider environmental protection, conservation and other impacts during our site selection, development and operations. 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.

Responsible Resource Usage – Minimization of Waste, Energy and Water

SBA recognizes the importance of minimizing our environmental impact of our extended value chain. We expect our vendors to have programs and processes in place to manage, mitigate and reduce their fuel and electricity consumption, which are key drivers of greenhouse gas emissions. Vendors are also expected to adopt environmentally responsible business practices for water conservation, hazardous waste and recycling.

Monitoring and Compliance

Beyond our operations, SBA views the sustainability of our vendors as an integral aspect of our overall strategy and business success. We evaluate our vendors on various criteria, including social and environmental factors, and ask that all vendors adhere to our ethical standards and business practices. Our engagement with our vendors helps us determine the environmental impact of our extended supply chain and improve our responsible procurement practices.

SBA utilizes a third-party firm to review qualifications of our vendors and sub-contractors in the areas of insurance, sustainability, environmental, diversity and safety compliance. Vendors who fail to meet these standards and business practices are actively monitored, and our engagement with vendors may be put under review, suspended or terminated until standards or business practices are met. Our Quality and Safety team regularly conducts field inspections of our suppliers to verify our subcontractors' compliance and credentials. As part of our supplier engagement program, SBA remains committed to guiding our vendors on ways to improve social and environmental performance and compliance.

Grievance Mechanism

Complaints and concerns on matters relating to this Vendor Code of Conduct may be submitted anonymously to SBA's General Counsel by email to vendors@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 Vendor Code of Conduct.