Our Corporate Responsibility Framework

American Tower’s four pillars of corporate responsibility are rooted in our core values.

At American Tower, corporate responsibility is a key part of our strategy. We take great pride in the initiatives our global teams embark on every day as part of our commitment to responsible corporate citizenship. We do this through four strategic pillars.

- **ethics**: Dedication to ethical business practices
- **environment**: Preservation of our environment
- **people**: Development of our diverse global teams
- **philanthropy**: Focus on giving back to our communities
A commitment to ethical business practices extends throughout our organization—from the responsible corporate citizenship of our board members, to continuous improvement of our corporate governance practices, to the comprehensive training that every employee receives.

In all of our interactions with customers, vendors, suppliers and the communities where we do business, we ensure that our employees maintain the highest level of integrity, guided by our Code of Ethics and Business Conduct Policy.

**Our Independent Board of Directors**

**Providing the vision for our strategic direction**

**Our Focus.** As our Company expands, we are committed to continuing our support of diversity, starting with the members of our board. Our Corporate Governance Guidelines have led to the selection of directors that reflect a wide array of skills, professional and personal backgrounds and experience:

- Women and ethnic minorities: 50% (women: 30%; ethnic minorities: 20%)
- Current and former CEOs: 60%
- International experience: 80%
- Wireless and/or REIT industry experience: 70%

Our Nominating and Corporate Governance Committee regularly reviews the board’s composition to assess existing skill sets against the needs identified to benefit our Company and our shareholders. Our board, together with the Committee, believes that board refreshment is necessary to optimize the board’s effectiveness. As we expand our operations throughout the world, the Committee strives to create a board with the knowledge, experiences and capability to effectively oversee a global company.

**Recognition**

The National Association of Corporate Directors, New England Chapter, recently named our Board as the “2016 Public Company Board of the Year.”
Corporate Governance Policy Updates

Ensuring our corporate governance policies are best in class

Our Focus. We are committed to good corporate governance practices and ensuring that the Company is managed for the long-term benefit of our shareholders. For instance, after engaging in meaningful discussions with our shareholders and reviewing current market practices and trends, we:

- Revised our Corporate Governance Guidelines to increase the stock ownership requirements for our Chief Executive Officer and to include a holding requirement for executives until the ownership guidelines are met.
- Redesigned our executive compensation package to reinforce our pay for performance philosophy, including greater weighting toward performance, having two well-balanced metrics aimed at sustainable value creation in our long-term incentive program and key annual financial performance metrics in our short-term incentive program.
- Amended our By-Laws to facilitate proxy access and provide our shareholders a more meaningful voice in director elections.
- Added two new highly qualified, experienced and capable directors in the last 18 months following a review of board skills and tenure.
Training Our Employees to Achieve Excellence through Ethics

Ensuring business ethics and integrity are the cornerstones of our Company culture across the globe

Our Focus. A key component of achieving excellence through ethics is our comprehensive ethics and compliance training. In 2015, our employees completed over 7,000 total hours of ethics and compliance training. This year, we introduced a new course on American Tower’s Code of Ethics and Business Conduct to U.S. employees, and the course will be rolled out globally in 2016. In addition, all new employees attend a custom-designed program entitled *Excellence through Ethics*, which includes case-based business ethical situations discussed in live classroom sessions. International employees also receive comprehensive training on the Foreign Corrupt Practices Act.

Beyond the online and classroom training courses, every year, each employee must affirm that they have read, understand and agree to comply with core Company policies, including our Code of Ethics and Business Conduct Policy. Our employees are encouraged to “raise their hand” if something doesn’t seem right, and they are provided with a range of reporting options, from emailing the Ethics Committee, to contacting Human Resources or their managers, to submitting a confidential report through a third-party hotline.

In our 2015 Employee Survey, 98% of respondents said they understand and believe in our Company values.

Recognition

In 2015, American Tower once again received FTSE4Good recognition, a designation for companies that demonstrate strong environmental, social and governance practices.
Reducing our impact on the environment and promoting sustainable practices in our operations

American Tower’s business model is fundamentally green. Providing shared infrastructure solutions to our customers reduces the impact that communications sites place on our land and natural resources. Furthermore, our culture of integrity and our strong compliance programs aim to ensure that all of our tower sites conform to all applicable land use and environmental impact regulations. We also understand that we have a responsibility to employ sustainable business practices and protect the environment both now and in the future, beyond what is mandated.

Green at American Tower

Almost everything used in our day-to-day operations, from generators in the field to paper products in our offices, can have an impact on the environment.

Our Focus. In each of our markets, teams of employees identify and work on ways to reduce our environmental impact. Some examples include eliminating paper-based products by using reusable water bottles and coffee mugs in the office, while also recycling certain materials from our offices and tower sites, such as paper, electronics, waste oil and batteries. In addition, over the past two years, we have partnered with an e-Stewards Certified Recycler to responsibly dispose of e-waste items that cannot be reused, repurposed or donated, including computers, printers, monitors and a number of others. In the U.S., we recycled 14,094 pounds of this e-waste in 2015. Meanwhile in South Africa, we reduced electricity use in our office by 18% by encouraging an energy-saving culture and promoting simple energy-saving practices. In addition, our team in Uganda established programs to recycle generator batteries and return used oil and filters to lubricant suppliers for recycling.
Sustainability and Compliance

At American Tower, consistent with our vision of environmental responsibility and our culture of compliance, we treat our environmental compliance process as a key element of responsible tower siting.

Our Focus. In the U.S., prior to constructing or augmenting tower sites, we consider possible environmental effects pursuant to the National Environmental Policy Act (NEPA). The NEPA process involves consultation with various federal and state agencies overseeing protection of environmental, historical and cultural resources to ensure we minimize our environmental impact when building new tower facilities. This includes careful attention to tower footprint reduction and environmental preservation, such as the installation of bird diverters on towers near migratory flyways, implementing seasonal tree clearing during construction in protected bat habitats and using soil and erosion controls during construction when near wetlands or waterways. Once a tower facility has been constructed, we continue to monitor environmental sensitivities through our daily operations.

Nearly 2,200 protected bird sites
Further, our Bird Watch Program has a well-established method for identifying and tracking bird nest sites and ensuring appropriate protection of endangered species nesting on our towers. At over 2,000 nest sites, American Tower and our customers are able to get work done without causing harm to nesting migratory birds.

- Nearly 2,200 protected bird sites
- 150 wildlife biologist visits to nest sites in the past year, for the purpose of verifying species and nest activity status
- 3,845 bird site work advisories issued in the past year

**Impact in Energy Management**

In a number of our markets, grid power is either unavailable or of poor quality. To provide our customers with optimal network uptime, we have historically relied on diesel generators.

**Our Focus.** Our Power Solutions teams across the globe are committed to improving processes and systems in order to make our energy use more efficient and reduce our dependence on diesel fuel. We have taken a comprehensive approach to energy management throughout our footprint, as detailed below.

**INDIA**

**Renewable Energy.** Solar power sites represent an important component of ATC India’s renewable energy initiatives. Solar photovoltaic panels generate clean energy, replacing or reducing reliance on diesel generators.

- 850 solar installations
- Total installed capacity: 2.8 Mw
- 13,000 metric tons of CO₂ eliminated annually
In December 2015, India’s Minister of State for Finance presented ATC India with an award for “Excellence in Sustainable Business Practice,” attributed to our commitment to timely services, responsiveness to customer needs and adherence to environmentally friendly practices.

**Demand Optimization.** Free Cooling Units (FCUs) maintain a cooler ambient temperature within telecom equipment rooms, reducing the need for air conditioning. This reduces the site energy requirement to optimum levels and leads to decreased overall power consumption.

- 2,400+ FCU installations

**Storage Solutions.** Deep discharge and quick recharge batteries are in use at more than 400 sites. These batteries are charged using available grid power at a faster rate than conventional storage batteries, while providing longer backup duration during grid failures.

- 400+ energy-efficient battery installations

Combined, these initiatives in India have helped us eliminate consumption of more than 7 million liters of diesel and 19,000 metric tons of CO₂.
Nigeria

Solar Installation Refurbishment. A number of solar powered sites within our recently acquired Nigerian portfolio had constantly running diesel generators. The team began refurbishing these sites in July 2015, correcting operational issues with the solar power systems and backup battery functionality.

- 15 sites repaired in 2015
- Reduction in generator run hours: 10 hours per day per site, or 42%
- Over 8,000 liters in monthly fuel savings
- An additional 100 sites are scheduled to be repaired in 2016

Grid Connectivity. Various infrastructure issues at 233 sites were rectified so that the power systems could be reconnected to the grid to reduce diesel generator operating times, which in turn translated to fuel savings at all these sites.

- 233 sites repaired in 2015
- Reduction in generator run hours: 274 hours per site per month, or over 37%
- Over 190,000 liters in monthly fuel savings

Hybrid Reactivation. At sites with hybrid power installations (use of deep cycle batteries to reduce diesel generator operation), repairs, including software upgrades and replacements of damaged fans, cables and rectifiers were made to reactivate the systems or make them more efficient.

- 238 sites repaired in 2015
- Reduction in generator run hours: 7.7 hours per site per day, or 32%
- Nearly 150,000 liters in monthly fuel savings
GHANA

DC Power Solution Implementation. In 2015, ATC Ghana began offering customers an efficient DC backup power solution.

- 400 DC power installations

Shelter Temperature Optimization. At sites using the DC Power Solution, batteries and telecom equipment are kept in separate enclosures. The temperature of the telecom equipment shelters can then be raised 5 degrees, reducing the energy needed to cool these enclosures.

- 6 sites completed in 2015
- Average savings per site per day: 5.2 kWh, or 33%

Energy Efficient DC Air Conditioners. Furthermore, the Ghana team has begun installing energy efficient air conditioners that reduce cooling power consumption up to 50%.

- 210 sites completed in 2015
- Average savings per site per day: 0.8 kW

Running DC Sites in Hybrid Mode. Backup batteries were installed to reduce generator run times, resulting in savings on maintenance, fuel and carbon emissions.

- 92 sites completed in 2015
- Reduction in generator run hours: 160 hours per site per month, or 37%

Installation of Intelligent Automatic Voltage Regulators (iAVRs). At sites with poor grid power, iAVRs allow for maximum utilization of grid power by regulating low- or high-voltage phases and selecting optimal voltage phases.

- 151 sites completed in 2015
- Reduction in generator run hours: over 96 hours per site per month, or 43%
One of our Core Principles is to hire good people and empower them, and over the course of 2015, our global headcount grew to 3,300+ employees. As our Company continues to grow, our employees remain American Tower’s most important asset. Our top priorities include fostering a culture of respect and inclusion amongst our workforce, investing in the continuous development of their talents and skills and, above all, encouraging a culture of safety as a responsibility shared by all team members.

**Diversity and Inclusion**

We are committed to promoting respect and inclusion in our offices and in the field.

**Our Focus.** At American Tower, we celebrate the diverse experiences, skills and perspectives of our team members, provide equal access to growth and advancement and treat each other with respect. All new employees complete a Company-specific diversity course, customized for their market, within their first 90 days. We also employ diversity initiatives in our hiring practices. In the U.S., for example, we have formed a unique partnership with Warriors4Wireless (W4W) to support military veterans transitioning into the civilian workforce. We collaborated on the design and implementation of the W4W tower training and certification program that offers hands-on instruction in wireless technology basics to help veterans develop the skills necessary for civilian jobs in the industry.

**Diversity Statement**

We believe that what makes us different also makes us stronger. Our philosophy of inclusion guides us in how we interact with each other, how we hire and manage our people and how we serve our customers. To ensure our workplace is free from discrimination and intolerance, we must leverage the diverse talent and skill of our team members, provide equal access to growth and advancement and treat each other with respect.
**Employee Development**

We are investing in our greatest asset.

**Our Focus.** Ongoing investments in career development throughout the organization are a priority. We offer a wide array of educational tools and resources, including instructor-led training courses and access to web-based training, anytime, anywhere, through our online Development Center. We believe providing every employee with development opportunities will position them well for professional success. In 2015, employees completed over 32,000 hours of training and development. All employees receive a formal performance review annually in addition to less formal feedback conversations throughout the year.

**Culture of Safety**

The health and safety of our employees and the communities where we operate is paramount, and we all share responsibility for keeping each other safe.

**Our Focus.** Safety is a priority that helps ensure the well-being of our employees and communities, the trust and satisfaction of our customers and the success of our work. Through comprehensive safety training, tools and programs, American Tower demonstrates a commitment that maintains one of the lowest rates of injuries and accidents in the industry. In the U.S., American Tower’s recordable injury/illness rate of 0.64 per 100 employees compares favorably with the most recent Bureau of Labor Statistics rates for all industries (3.4) and the telecommunications industry specifically (2.2). While American Tower’s low rate of recordable injuries reflects our commitment to safety, our comprehensive safety programs, including extensive training for employees, are focused on the people, not only on the numbers.
Connecting to our communities and supporting technology in education

philanthropy

American Tower continues to direct our philanthropy efforts toward two key programs:

- The Company’s signature philanthropic program, which focuses on sponsoring initiatives that improve education through technology.
- Matching gift and volunteer day programs under which employees in the U.S. can have their charitable donations matched by the Company. In addition, employees also have the opportunity to participate in Company-sponsored volunteer days.

Education Connection

For the past five years, local teams have supported educational initiatives helping teachers, students and communities in need by forming multiyear partnerships with charitable organizations across the globe.

Our Focus. Our global teams have embraced American Tower’s signature program. ATC Colombia, for example, has worked with Fundación Dividendo por Colombia on educational programs for a number of years. During one recent volunteer day organized with help from Fundación Dividendo, employees visited the Pantaleon School to help plant a garden and build a recycling station for the students as part of an effort to instill the importance of environmental responsibility. The garden is being tended by the students, and the recycling station helped them get started on a new recycling program.

In Uganda, employees helped students at a number of schools in 2015. Team members constructed new classroom blocks at several local schools and also provided a permanent kitchen for preparing healthy meals at Our Lady of Fatima Secondary School Nakulabye.
Given limited classrooms and large school populations, the new classroom blocks will relieve congestion and improve students’ classroom experience.

Meanwhile, the ATC India team is working to create “digital smart village squares.” We bring computers, Internet access and computer literacy programs to rural and underserved areas of India by leveraging the space, security, uninterrupted power supply and broadband link provided by our towers. The team is partnering with multiple organizations to provide digital and financial literacy programs, Wi-Fi services, telemedicine, microfinance, skill development centers and even ATMs. ATC India has taken an initial step toward this goal by installing self-learning kiosks at 32 locations across the country. These kiosks are focused on providing computer literacy to children and are either installed at tower sites or at schools. Our towers provide a wireless broadband link to the learning stations, with solar panels providing the necessary power. In addition, about 40 “digital literacy centers” are planned for our tower sites, which will extend the digital literacy programs to the entire community.
As we continue to grow, we are committed to ensuring corporate responsibility is a part of everything we do going forward

We are proud of our work thus far but know we can do more. In 2016 and beyond, we will further build upon the four pillars of corporate responsibility to help drive our strategy and grow our business. American Tower is committed to doing what is best for our employees, customers, shareholders and the communities in which we live and work. We will remain actively engaged in focusing on sustainable solutions that protect our environment, develop our diverse global teams, give back through philanthropic endeavors across all of our markets and build relationships of trust and integrity.