AMERICAN TOWER®
CORPORATION

CORPORATE
SUSTAINABILITY
REPORT

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2018

American Tower connects people around the world with efficient, pro-environmental shared digital infrastructure. We strive to operate this business ethically and in a way that cares for our people and communities.

Chairman's Letter

Technology, communications, entertainment and data applications are rapidly evolving worldwide, and our mission at American Tower is to provide the critical infrastructure necessary to support this evolution. As a company positioned at the intersection of real estate and digital technology, we have a unique opportunity to drive innovation while investing in regions of the world that will significantly benefit from expanded access to mobile broadband. This exciting and dynamic combination positions us to bring about positive change on a global scale and meaningfully contribute to the sustainable development of digital connectivity worldwide.

With this opportunity comes great responsibility to all of our stakeholders, including employees, shareholders, tenants and the communities where we operate. We make every effort to conduct ourselves according to the highest ethical standards and to constantly improve the environmental sustainability of our operations. Here in our second corporate sustainability report, we seek to provide clear assessments of our business' impacts on the world and to set goals against which we will measure our future progress.

To further these goals, we have implemented a program to proactively invest in practices and technologies to enhance sustainability throughout our global organization. This includes utilizing renewable energy sources to power tenant equipment and deploying advanced battery technologies to reduce the amount of fossil fuels used in energy production. Through these actions, we are committed to

delivering more reliable service to our tenants and to the communities where our infrastructure is located in an efficient, ecologically focused manner.

We are also dedicated to operating as a responsible and ethical corporate citizen in ways that extend beyond our core business. Our teams are engaged in philanthropic and volunteer activities in all regions where we operate. We invest in programs such as our Digital Villages initiative, which brings digital connectivity and educational resources to underserved communities. Our employees volunteer for nonprofit organizations, and we donate funds to worthy efforts that are seeking to improve people's lives.

Corporate responsibility at American Tower begins at the top of our organization, but it extends through all levels of our company. By having an engaged, well-trained team, we are confident that we are living up to our core values.

Thank you for joining us on this journey.

Sincerely,

James D. Taiclet

James D. Taiclet
Chairman of the Board, President and Chief Executive Officer

Here in our second corporate sustainability report, we seek to provide clear assessments of our business' impacts on the world and to set goals against which we will measure our future progress.

Sustainability in a Connected World

nearly

4

BILLION

people still lack access to reliable communication and internet technology

The world is growing increasingly connected, both physically and virtually. However, according to the United Nations, nearly 4 billion people still lack access to reliable communication and internet technology. As a leading developer of multitenant communications sites and enabler of connectivity, we are helping to bridge this gap while advancing global efforts to implement and achieve the United Nation's Sustainable Development Goals (SDGs). Through our shared infrastructure and focus on doing business ethically and with integrity, we connect people, devices and networks. Fundamentally, the principles of sustainability are at the core of our business model and value-creation process.

Our communications infrastructure facilitates expanded access to high-speed broadband, which is a key contributor to economic growth in today's digital world. High-speed broadband helps to reduce poverty by allowing individuals to leverage the internet to gain access to gainful job opportunities as well as a diverse set of educational and capacity building tools. In addition, internet connectivity helps achieve gender equality by enabling more women and girls to access quality education and work, as well as promoting social and economic inclusion.

Our infrastructure sharing model allows our tenants to reduce their operating expenses while simultaneously increasing the efficiency of today's wireless networks and reducing the footprint of tower sites in the surrounding communities. Beyond the ongoing benefits of our sharing model, we continue to evaluate and deploy renewable energy solutions and other efficiency measures to reduce reliance on traditional fuel sources throughout our organization. In recent years, for example, we installed advanced batteries at select sites with the goal of reducing generator diesel consumption.

The American Tower Story

Founded in 1995, we are one of the largest publicly listed global real estate investment trusts (REIT) and a leading owner, operator and developer of multitenant communications real estate. Our tenants include wireless service providers, radio and television broadcast companies, wireless data providers, government agencies, municipalities, and companies from various other industries. In addition to towers, we own and operate distributed antenna system (DAS) networks, which provide seamless coverage solutions for certain in-building and outdoor wireless environments. We also manage rooftop and tower sites for property owners and lease other telecommunications infrastructure, fiber and property interests to communications service providers and third-party tower operators.

Our global portfolio consists of over 170,000 communications sites, including more than 40,000 communications sites in the United States and approximately 130,000 communications sites internationally. As of December 31, 2018, we directly employed over 5,000 people on a full-time basis in 17 countries across five continents and worked with thousands more through our network of contractors and service providers.
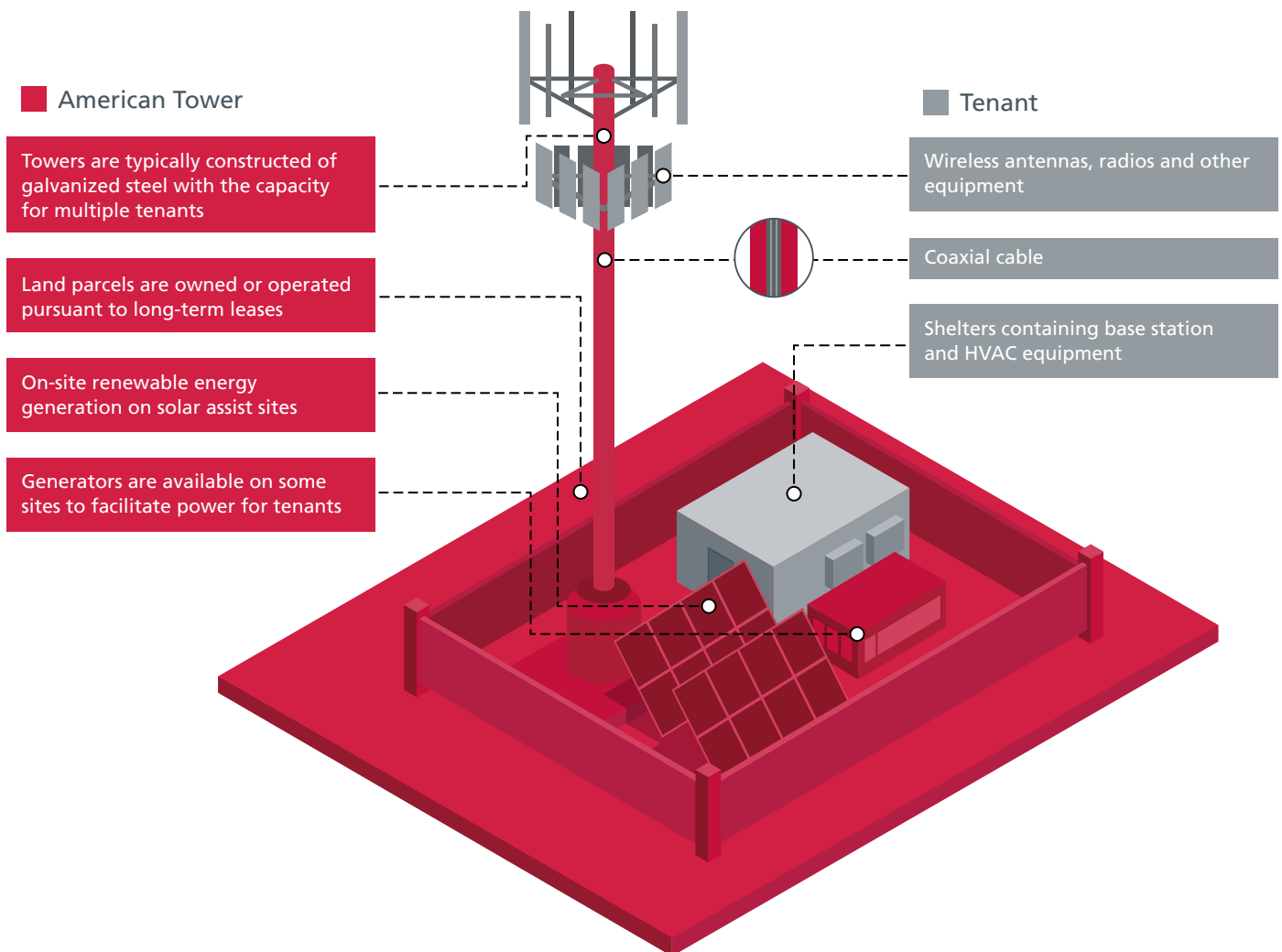
OUR GLOBAL PORTFOLIO

over

170
THOUSAND
communications sites

more than

40
THOUSAND
communications sites in the United States

approximately

130
THOUSAND
communications sites internationally

Our infrastructure sharing model allows our tenants to reduce their operating expenses while simultaneously increasing the efficiency of today's wireless networks.

Towers are vertical structures typically designed to support the installation of telecommunications equipment from multiple tenants. The towers themselves, which are located on owned or leased land parcels, are owned or held under long-term leases, along with select other equipment at the tower site, such as generators in some regions. Meanwhile, tenants typically own and operate their own signal transmission equipment and associated hardware, including antenna arrays, coaxial cables, base stations and equipment shelters, among others. Below is an illustrative example of the components of a typical tower site.

American Tower

Towers are typically constructed of galvanized steel with the capacity for multiple tenants

Land parcels are owned or operated pursuant to long-term leases

On-site renewable energy generation on solar assist sites

Generators are available on some sites to facilitate power for tenants

Tenant

Wireless antennas, radios and other equipment

Coaxial cable

Shelters containing base station and HVAC equipment

In 2018, we continued to enhance our risk management and mitigation strategies as part of our environmental initiatives, philanthropic activities and innovation program, among other pursuits. We seek to engage and consult our stakeholders to ensure we remain a responsible corporate citizen and are excited to share how we will continue providing telecommunications capabilities around the globe in a sustainable way.
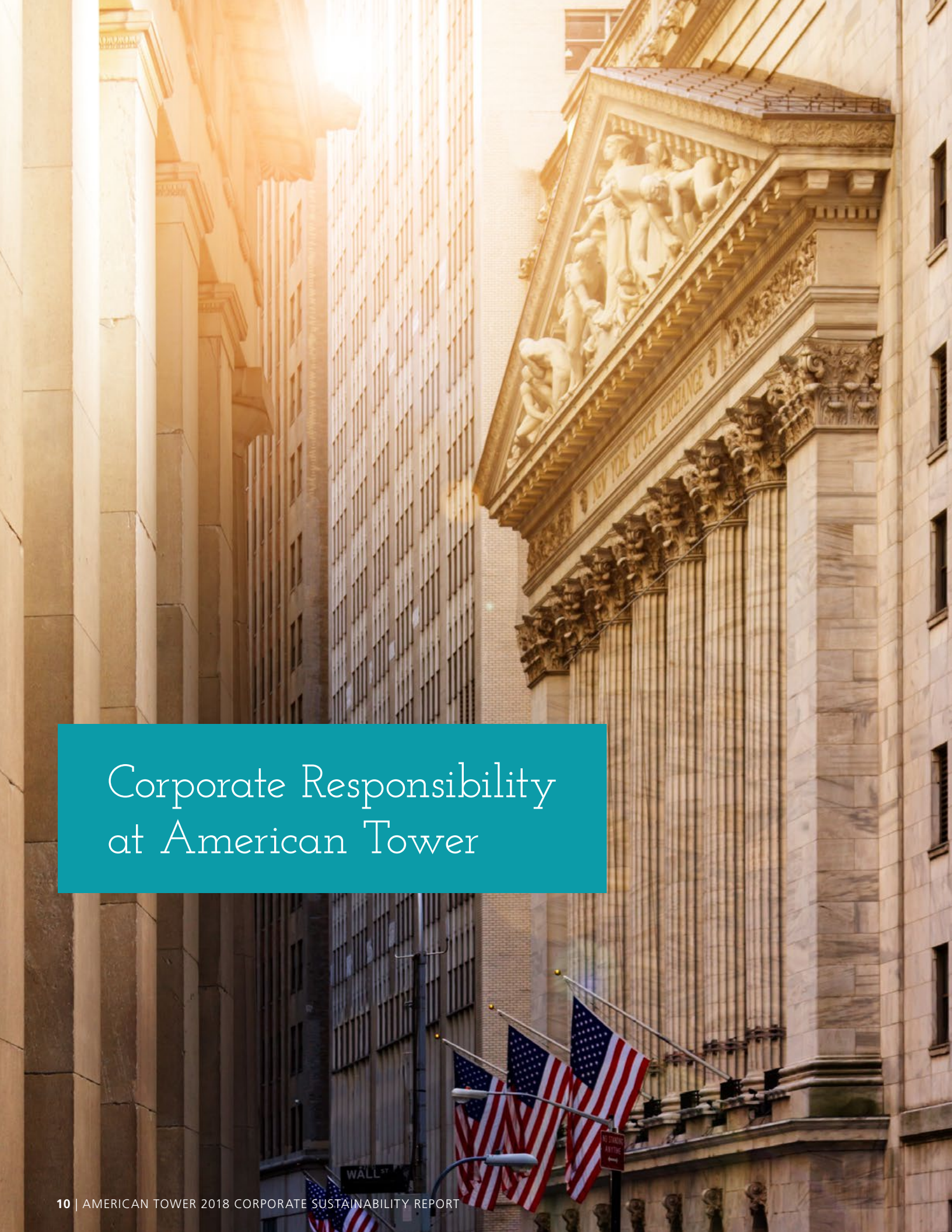
Corporate Responsibility
at American Tower

Our corporate responsibility program is built upon five core pillars: ethics, people, environment, philanthropy and performance. Putting corporate responsibility at the core of how we strive to operate has a positive impact on our business performance. We believe that encouraging innovation and thought leadership, as well as seeking to meet high environmental, social and governance standards and practices positively impacts our bottom line and also the communities in which we operate. Our unwavering commitment to corporate responsibility plays a critical role in our overall strategy.

Board Oversight and Governance

We are committed to strong corporate governance practices that we believe will ensure American Tower is managed for the long-term benefit of our shareholders and our other stakeholders. As part of this commitment, the Board and its three standing committees—Audit, Compensation, and Nominating and Corporate Governance—meet throughout the year and engage with management to ensure that the Board is informed of our critical activities, operating plans and strategic initiatives. We believe it is imperative for the Board to play a lead role in encouraging sustainable value creation by overseeing the company's leadership team, engaging in constructive dialogue about business strategy and potential risks,

We believe it is imperative for the Board to play a lead role in encouraging sustainable value creation by overseeing the company's leadership team, engaging in constructive dialogue about business strategy and potential risks, ensuring the development of its people, and requiring commitment to sound ethics, governance, and social and environmental responsibility.

BOARD OF DIRECTORS

AUDIT

COMPENSATION

NOMINATING & CORPORATE GOVERNANCE
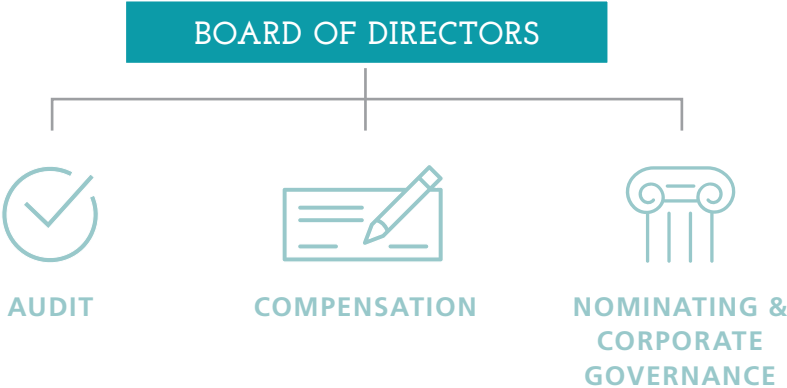
Our most recent proxy statement can be viewed at **americantower.com/ proxystatements**.

ensuring the development of its people, and overseeing a commitment to sound ethics, governance, and social and environmental responsibility.

The Board considers the company's risk management framework when overseeing its strategy and risk profile and verifies that strategic plans are commensurate with the company's ability to identify, measure and manage risk appropriately. In addition, the Board helps guide the alignment of business decisions with the company's overall strategic direction. Environmental, social and governance issues are among the many topics that our Board manages as part of this process, and our Nominating and Corporate Governance Committee oversees the sustainability reporting function and general corporate governance matters. For more information on our Board structure, governance, and our risk management and approach, please see our most recent proxy statement at: americantower.com/proxystatements.

Stakeholder Engagement

We believe that active stakeholder engagement is a critical component in driving sustainability and we place significant importance on understanding and considering the needs and interests of our tenants, shareholders, regulators, the communities where our real estate is located, employees and other stakeholders.

102-40/102-42/102-43

In 2018, we continued our practice of engaging directly with shareholders to understand their perspectives on corporate governance, executive compensation, sustainability and other matters. We presented at financial and industry conferences, met with financial analysts and investment firms and held in-person meetings with shareholders. Through these discussions, we have received valuable feedback over the years, which, among other things, impacted our compensation design to incorporate more performance-based metrics and corporate governance practices such as proxy access and enhanced disclosure relating to our Board self-evaluation and recruitment processes. In addition to our outreach efforts, shareholders are able to provide feedback through communications with our Investor Relations group, the Chair of our Nominating and Corporate Governance Committee, or at our annual shareholder meeting.

Developing lasting relationships with our tenants is critical to our success and ability to achieve our vision. We do this by understanding their needs and exceeding their expectations. To understand our tenants' needs, we conduct periodic customer satisfaction surveys in all markets in addition to the other formal and informal day-to-day feedback mechanisms we have. The surveys are tailored to address individual market factors, but typically include questions on our customer service, ease of doing business, portfolio of sites, network uptime and responsiveness. The results of these surveys are used to develop team performance goals to drive improvements in the overall customer experience. For example, based on feedback received, our U.S. Tower division enhanced the online customer portal to improve the customer experience, increasing the overall satisfaction with customer service to nearly 80% in 2018.

Additionally, as described in greater detail in the "People" section that follows, we regularly engage with our employees to ensure a strong and united corporate culture through companywide surveys, Town Hall meetings with executives, employee hotlines and annual performance review and career development processes.

Finally, American Tower ensures the interests of its stakeholders are appropriately represented through leadership roles in industry groups, thoughtful participation in global organizations and representation before governments that are considering regulation or legislation that may impact our business. For example, in the U.S., American Tower is a leading participant in the Wireless Industry Association (WIA)

STAKEHOLDER ENGAGEMENT

We engage with stakeholders in a variety of ways. For instance, we interact with property owners, local governments and community representatives through public notices and community meetings. Through these discussions, we provide a forum for interested parties to understand, evaluate and comment on our impacts in their communities.

PARTICIPATION IN INDUSTRY GROUPS

Americas Society / Council of the Americas

Business Council for International Understanding

CTIA

National Association of Real Estate Investment Trusts

U.S.-Africa Business Center

U.S.-India CEO Forum

Wireless Infrastructure Association

World Economic Forum

and CTIA, where our Executive Vice President and President of our U.S. Tower division previously served as Chairman of the WIA Board and currently serves as a member of the CTIA Board. We are also members of the National Association of Real Estate Investment Trusts (Nareit), where our Chairman and CEO serves on the Executive Board. On a global basis, American Tower is a board member of the Business Council for International Understanding and the U.S.-Africa Business Center and participates in the World Economic Forum and Americas Society / Council of the Americas to support sustainable development initiatives. In addition, our Chairman and CEO was selected by the U.S. Department of Commerce to co-chair the U.S.-India CEO Forum. Finally, to help further our strategic vision to lead wireless connectivity around the globe, our Board recruitment efforts and skill set qualifications include experience in working with business and policy thought leaders.

These engagement efforts help us identify and focus on the topics most material to the company and our many stakeholders.

Defining Material Topics

To identify the sustainability issues most material for our company and stakeholders, we conducted a materiality assessment in 2017 as part of our inaugural report. This assessment began with a comprehensive list of potentially relevant topics informed by the Global Reporting Initiative (GRI) Standards, the ISO 26000 Guidance on Social Responsibility, the EU Directive on Non-Financial Reporting, the Task Force on Climate-related Financial Disclosures, the Sustainability Accounting Standards Board (SASB), corporate responsibility reports of other similar companies and topics known or assumed to be relevant to sustainability.

Following the GRI Standards, each of the topics was assessed as to its potential to:

• present a significant risk or opportunity for American Tower;

• impact our ability to create long-term value for our stakeholders; and

• impact those stakeholders' interests.

We then surveyed internal stakeholders, including our senior leadership team, performed benchmark analyses of other companies and explored the interests of external stakeholders. The resulting final list of topics determined to be material to American Tower is shown in the table below.

MATERIAL TOPICS

ETHICS	PEOPLE	ENVIRONMENT	PHILANTHROPY	PERFORMANCE
Client Satisfaction and Brand Image	Diversity, Equal Opportunity and Non-discrimination*	Energy and Emissions*	Corporate Presence in Communities*	Financial Performance*
Regulatory Compliance*	Training and Education*	Land Use Management		Innovation
Anti-corruption*	Occupational Health and Safety*	Biodiversity*		
Public Policy* and Thought Leadership				

* Topic included in the GRI Standards framework.

Ethics and Reputation

"Consistently meeting the highest ethical standards throughout our organization requires the active participation and commitment of all employees, starting with me and my team, and extending throughout every office and every department in our global organization."

–James D. Taiclet, Chairman of the Board, President and Chief Executive Officer

At American Tower, our leadership team is committed to doing business the right way in order to manage risk, both legal and reputational, and ensure that we are viewed as a partner of choice for our tenants and the communities where we operate. Our commitment to operating in an ethical manner is visible throughout our day-to-day work and is clearly manifested in our training regimen and communications from our senior leadership.

As a result of our performance in a variety of areas, including ethics and compliance, American Tower is included, for the 13th straight year, in the FTSE4Good Index, which recognizes companies demonstrating best-in-class management of environmental, social and governance risks.

Onboarding and Ongoing Reinforcement

We take seriously our obligation to ensure that all employees understand and internalize the company's emphasis on ethics and doing business the right way. All new employees are introduced to our *Code of Ethics and Business Conduct Policy* (Code of Conduct), which forms the basis of our ethics program by outlining procedural and behavioral guidelines that apply to all Board members, employees and business partners.

New employees also participate in the classroom course *Excellence Through Ethics.* This global program focuses on the key elements of ethical business culture and is led by senior leaders at American Tower. The program is conducted through both lectures and case study discussions, and employees are informed of the various mechanisms for reporting ethical violations and concerns. Employees are encouraged to "raise their hand" by reaching out to our Ethics Committee, local human resources department, management, local legal department, or by using a third-party administered confidential hotline.

Another critical aspect of the onboarding process is the requirement for new employees to complete market-specific compliance training courses on a range of topics, including: the Foreign Corrupt Practices Act (FCPA), the Code of Conduct, anti-harassment, confidentiality, insider trading and cybersecurity awareness. Courses are offered in Spanish, Portuguese and French, in addition to English.

In addition to our robust onboarding process, all employees are required to annually certify that they understand and agree to abide by the standards outlined in our FCPA and ethics policies, as well as other key company policies. These policies are reviewed annually by our legal and human resources teams and updated as needed. As an example, prior to the 2018 annual certification process, the *U.S. Anti-Harassment Policy* was updated to encompass and emphasize bullying as a prohibited behavior in order to ensure our workplace is respectful, professional and free of harassment. Our annual certification process is monitored to ensure 100% compliance across the company.

OTHER RECOGNITION

Forbes

American Tower was named to the **Forbes list of America's Best Mid-Size Employers** and **Growth Champions** in 2018.

EY

EY named Mr. Taiclet as its **2018 Entrepreneur of the Year in the New England region for Real Estate and Investing** and its **2018 National Entrepreneur of the Year for Real Estate, Hospitality and Construction**.

Harvard Business Review

The Harvard Business Review recognized Mr. Taiclet as one of the **100-Best Performing CEOs in the World** in 2018.

We maintain a zero tolerance policy for bribery and corruption.

We believe that our program of onboarding and continuous training, coupled with our ongoing communication and reporting avenues, provides our employees with the best tools to conduct business the right way.

Holding Ourselves Accountable

We track all reported instances of misconduct and manage the resolution of such occurrences on an individual basis. In 2018, we received 50 inquires or reports related to the Code of Conduct, which included inquiries and reports made by reaching out to our Ethics Committee, local human resources and legal departments, management, or by using our third-party administered confidential hotline. Issues that are reported are screened, managed and resolved on a case-by-case basis. All lines of business certify any known issues of potential fraud or other Code of Conduct violations to our Chief Executive Officer and Chief Financial Officer each quarter prior to the filing of a periodic report with the Securities and Exchange Commission (SEC). The company also maintains a Disclosure Committee, composed of senior leaders from each region, to review all periodic filings made with the SEC. In connection with these reviews, the Disclosure Committee serves as a forum to inquire as to whether anyone is aware of fraud or other Code of Conduct violations.

We take seriously and regularly assess the effectiveness of the avenues available to employees for reporting to ensure the lines of communication we have put in place are providing the flow of information the company needs to address any issues that arise. Through these various measures, we maintain a zero tolerance policy for bribery and corruption.

Supplier Guidelines

Our requirements for ethical business behavior extend to our suppliers and other business partners. Regional teams employ market-specific processes and policies for communicating our ethical standards to vendors, including FCPA training and certification in our higher-risk markets. Our legal teams also review all tenants, suppliers and service providers to ensure that no Office of Foreign Assets Control (OFAC), Bureau of Industry and Standards (BIS) or other sanctions are applicable to such parties.

FCPA TRAINING AT AMERICAN TOWER

Our FCPA training program is an integral component of our ethics program and consists of four parts that inform employees of U.S. and local laws, provide case studies and offer additional resources. Non-U.S. employees complete the *FCPA I Awareness* online course in their first 45 days at American Tower to gain a basic understanding of the law and the employee's respective responsibilities to adhere to it. Employees within each market outside the U.S. then attend the *FCPA II* course, led by the local legal team, to reinforce key points from the online course and expand on market-specific information. For the third training, *FCPA III*, employees attend a session led by the company's General Counsel, the Chief Human Resources Officer and outside counsel to further discuss key points from the previous courses and relevant scenarios that employees may encounter. The final course, *FCPA IV*, consists of challenging case studies and more in-depth scenario planning and is led by the company's General Counsel, the Chief Human Resources Officer and outside counsel.

People

over

5,000

full-time employees
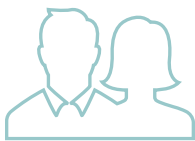
5 continents

17 countries

We employ over 5,000 diverse full-time employees across five continents and 17 countries. Through our Core Principles, our employees support our *Stand & Deliver* mission of leading wireless connectivity around the globe, innovating for a mobile future, driving efficiency throughout the industry and growing our assets and capabilities to meet the needs of our tenants.

The integration of these principles into our daily work begins with our senior leaders. They lead by example and are responsible for setting the tone for how we want our business units and employees to carry themselves, day in and day out. It is our responsibility to provide the structure and framework for our employees to succeed in their work. We use a robust system of feedback to regularly assess where we can improve our management, coupled with a strong portfolio of programs to further develop our teams' capabilities and enhance our diversity in order to operate more effectively and better serve our tenants.

AGE DISTRIBUTION OF EMPLOYEES

ASIA
- 11%
- 6%
- 84%

EMEA
- 10%
- 10%
- 80%

LATIN AMERICA
- 19%
- 9%
- 72%

U.S.
- 19%
- 20%
- 61%

○ under 30 years old   ● 30–50 years old   ● over 50 years old
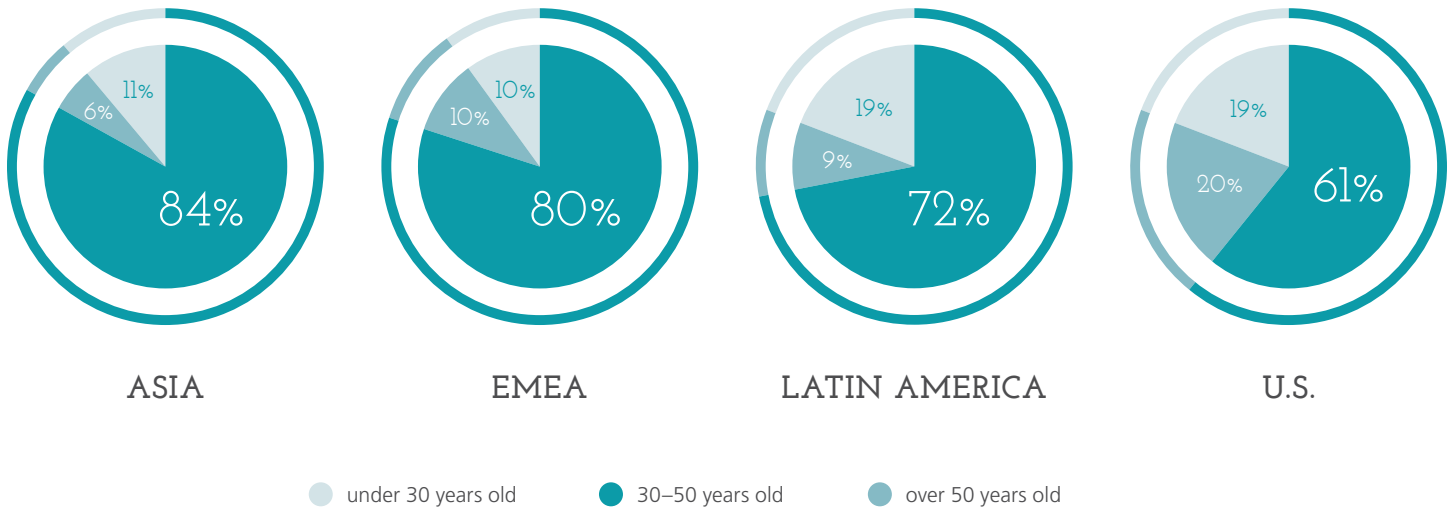
At American Tower, we value the dedication and contributions of our people and make every effort to invest in top-tier benefits that meet their needs both at work and at home. While benefits vary by market, we offer a competitive benefits package to all full and part-time employees around the world. For example, in the United States, the benefits we offer include but are not limited to:

Medical, Dental and Vision Coverage

Retirement Savings Plan: 401(k)

Stock Purchase Plans

Life/Disability Insurance

Wellness Programs

Parental Leave

Adoption Assistance

Educational Assistance

OUR CORE PRINCIPLES

Hire good people and empower them.

Focus on solutions, not problems.

Do what we say we're going to do.

Understand our customers' needs and satisfy them.

Have fun.

Play to win.

Listening to Our Employees

We regularly engage our employees through "Ask the Chairman" communications, Town Hall meetings, team meetings and biennial companywide surveys to better understand their perspectives on key issues related to working at American Tower. In our last companywide survey, almost 4,000 employees participated, reflecting a 92% response rate. Globally, our strongest performance was found in the culture and leadership categories, with more than 95% of our employees affirming that they understand and believe in the values of the company. It was also broadly agreed that the executive leadership team is committed to ethical business practices and conduct, with over 90% of employees responding favorably. Nearly 90% of participating employees said they are proud to work for American Tower and are proud of our efforts around social responsibility.

However, there are always opportunities for improvement. For example, based on a careful review of both the quantitative results and qualitative feedback related to our Corporate department, we identified three areas where we can drive improvement: communication, collaboration and career development. We have since implemented focused efforts to improve in these areas, including, events to support relationship building and collaboration opportunities and enhanced communications skills trainings.

Employee Training and Development

Our people are the most valuable asset in which we invest. Our investments in training and professional development are essential components of our approach to people management. By offering our employees opportunities to further develop their skills and capabilities, we can continue to provide our tenants with state-of-the-art, high-quality services and outstanding customer service, and we can be best positioned to achieve our strategic goals.

In addition, the company offers all global employees a variety of development programs and opportunities that address business needs and align with business strategy, including:

- foundational and compliance training;

- management/leadership development training;

- soft skills/professional development training; and

- job-specific training.

In several markets, managers with direct reports are invited to participate in the Management Development at American Tower program, a curriculum of online and classroom modules that focus on skills, such as managing teams, delegation and feedback essentials. Following best practices of learning organizations, each market utilizes leaders in the organization to facilitate discussions on these same topics.

In 2018, over 40 senior leaders participated in the American Tower global senior leadership program, LEAP. The four-day program was designed and delivered in 2018 in partnership with MIT and covered global strategy, innovation and design thinking, organizational leadership and change, and digital ecosystems.

This past year, as a result of continued emphasis and priority on our employee development programs and goals, we increased companywide training and development hours to more than 60,000 from 50,000 hours the year before.

In addition to our companywide development programs, our individual markets also provide their own programs to build upon these offerings. For example, in 2018, the first class of students graduated from ATC Brazil's "university."

~**90%**
of employees are proud to work for American Tower and of our efforts around social responsibility
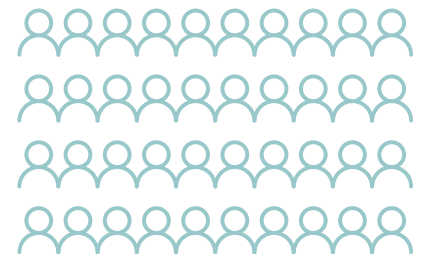
In 2018, more than

40
SENIOR LEADERS
participated in the American Tower global senior leadership program, LEAP, in partnership with MIT.

2017   2018

We increased companywide training and development hours to more than **60,000 from 50,000 hours** the year before.

40% delivered online

60% classroom training
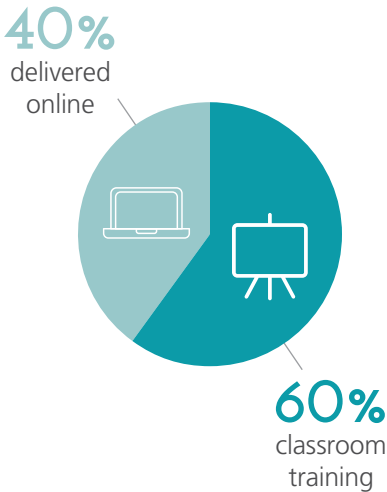
employees averaged

~12

HOURS

of training

Started in 2017, the idea for this program initially stemmed from a meeting in which the ATC Brazil human resources team learned that several team members had professional teaching experience at major universities in the country. While ATC Brazil already boasted robust development opportunities for more seasoned employees, the team recognized an opportunity to leverage this teaching expertise to develop a curriculum for classroom training that would help newer employees gain an understanding of all aspects of our business.

Promoting Diversity and Inclusion

A major component of our diversity program is ensuring that mutual respect, inclusion and collaboration remain at the forefront of our culture. Workforce diversity gives American Tower a strategic advantage, as it brings fresh ideas into the business and helps us stay better connected to our tenants and communities. Our employees across the globe bring unique perspectives and come to us with different backgrounds, cultures and experiences. We know that these differences help drive innovation and long-term success.

All new employees must complete the *Diversity at American Tower* online training course. The course content is customized for each regional market and almost 100% of employees complete this training within 30 days of their hiring.

We have also taken other steps to promote a culture of diversity and inclusion:

- Broadening our recruiting strategies to build diverse candidate pipelines and retain a diverse team of global employees;

- Providing development opportunities for our female leaders, such as Strategies for Success, the Simmons Women's Leadership Conference, and the Women's Wireless Leadership Forum of the WIA;

- Promoting women to management level so that as of the end of 2018, 31% of female employees held a management level or above position in the U.S., and 17% held such positions internationally;

- Sponsoring a number of organizations and groups, including the Girls in Tech Forum, Best Buddies and U.S. Veterans;

We are proud to have a Board of Directors that is highly diverse with respect to gender, ethnicity, experience and independence.
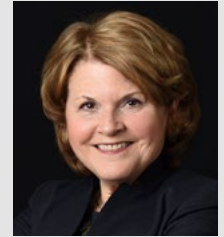
50%

of our board is composed of women or ethnic minorities

- Establishing a global charitable foundation focused on better access to education and technology for those most in need, as discussed within the Philanthropy section of this document;

- Proactively driving pay equality and employing a process to identify discrepancies; and

- Regularly reviewing and enhancing our benefits programs to ensure they best meet the diverse needs of our employees and their families.

While we are proud of our progress so far, we know there is still work to do and are committed to making further advances in these areas. Initiatives may vary by market or region depending upon need, but numerous programs are underway, including unconscious bias training, further expanding our channels to recruit diverse applicants, and signing the CEO Action for Diversity & Inclusion pledge.

We also recently launched a manager training program in the U.S., *Creating the Right Environment*, which focuses on managerial legal responsibilities needed to create a respectful and inclusive work environment for employees. The participants are presented with various scenarios that they respond to with proposed solutions.

QUALITY ASSURANCE

Around the globe, our engineering teams are responsible for ensuring the proper design, modification and maintenance of our tower portfolios. In 2018, our industry-leading U.S. Tower team of experts provided fast, reliable and up-to-date engineering services for over 30,000 structural analyses, while adhering strictly to the standards set forth in ANSI TIA-222. Statistically driven quality assurance procedures are applied to improve internal processes, enhance interdepartmental information flow and ensure that the highest degree of long-term, safe solutions are implemented.

Health and Safety Management

Safety comes first and is of critical importance to the company. Our approach is based on risk assessments, a strong commitment to compliance and doing what is right for our employees, tenants, business partners, vendors, contractors and the communities where we operate.

The specific approach taken by each market regarding health and safety practices depends upon whether higher-risk activities, such as tower construction and climbing, are performed by American Tower employees or third-party contractors. Regardless of who is performing the work, however, the company has invested considerable resources to ensure that everyone who works on American Tower properties remains safe. Additionally, we participate in the standard-setting process around training and certification for the wireless industry with members of our management holding leadership roles in organizations such as the Telecommunications Infrastructure Registered Apprenticeship Program and Telecommunications Industry Association (TIA) in the U.S.

In all countries where American Tower employees engage in work on towers, they are required to undergo training specifically focused on working at heights and, in some cases, relevant rescue techniques. Other topics that are part of our approach to employee safety include the use of personal protective equipment, electrical safety, hazardous waste handling, motor vehicle safety and issues regarding electro-magnetic fields. Where employees are exposed to these risks, safety training and manuals are provided according to all applicable policies and local regulations. In addition, many of our markets have implemented balanced scorecards to facilitate performance monitoring.

Because most market operations outsource tower-related work to third-party vendors, there are typically requirements for these service providers to possess certifications related to the type of work they are contracted to perform. These include tower safety, climbing/rigging expertise, various insurance coverage and electrical safety protocols. In most countries, vendors must undergo an audit or verification process regarding their qualifications and training processes.

Several markets require first aid training for employees, as well as fire safety training. In addition to training protocols, most American Tower country-level business units have formalized incident management procedures to enhance communication, coordination and decision-making at all levels when health and safety-related incidents occur.

Another strong year in worldwide health and safety training with:

more than

1,000
HOURS
of height and climbing safety training

more than

13,000
HOURS
of defensive driving and accident prevention training

Another important aspect of our health and safety management processes is the control of access to our sites. Most of our sites are secured with fencing and locks, and many are equipped with alarm systems that are monitored 24/7 by a centralized network operations center for the local market. In some limited instances, we employ guards to ensure that only those authorized to do so can gain access to the sites.

Safety Certifications

Several of our operations have earned certification for their health and safety management systems according to the OHSAS 18001 and ISO 45001 frameworks, with more markets pursuing these certifications in 2019. Given the importance that American Tower places on the health and safety of both our employees and those we partner with, we have set a five-year aspirational goal to achieve ISO 45001 certification for those existing markets (as of 12/31/18) that have determined certification attainable given various market-specific factors.

Receiving certification for these standards demonstrates that an organization is committed to effective health and safety management and has implemented the necessary documentation, training and continuous improvement processes.

We are committed to full compliance with all local regulations around the disposal of hazardous wastes used within our business. When possible, these wastes are recycled to minimize our overall environmental footprint.

In 2018, we recycled

44,000+
LITERS
of oil in Ghana

~28,000
BLOCKS
of lead acid batteries in Nigeria.

Our employees participated in the National Safety Council of India's annual safety week. Health and safety teams engaged over 3,200 people for training and awareness on a variety of safety topics, including working at heights, driving, and electrical and fire safety.

Specific messaging emphasized the role individuals and managers play in maintaining a secure work environment. Training was also held in offices and included screenings of videos and employee talks that emphasized the importance of everyday safety precautions, even outside the office, such as wearing reflective gear and helmets while biking. Families also became engaged through an organized contest, where children of ATC India employees created posters with themes related to tower site safety and protocol.

Safety Data

Our health and safety performance data is shown below. In 2017, our reportable injury rate (incidents per 100 full-time equivalent employees) was 0.17 and in 2018, the rate was 0.24. Given our commitment to safety training and protocols, our injury rates remain quite low, with the small increase in 2018 being largely the function of a very small sample size of recordable injuries. We are committed to monitoring these results on an ongoing basis and working with our country teams to identify opportunities to improve training and safety systems in order to achieve our goal of zero reportable injuries.

We are committed to improving training and safety systems to achieve zero reportable injuries.

	2017	2018
Total employees	4,752	5,026
Total number of reportable injuries to employees	8	12
Reportable injury rate – employees[1]	0.17	0.24
Total number of lost time injuries	4	10
Lost time injury rate – employees[1]	0.08	0.20
Total number of reported injuries to contractors/tenants	13	15

[1]Rates calculated as incidents per 200,000 working hours or 100 FTE.

Environment

Managing our environmental impact is an essential element of our value proposition to our tenants and our commitment to sustainability. By deploying the latest renewable energy technologies, advanced battery storage systems and reducing energy usage as much as practicable, we can offer our tenants a more stable, resilient and efficient platform for their equipment's power requirements. In addition, with over 170,000 sites worldwide, we are committed to expanding connectivity in a sustainable manner by working with our local communities to ensure protection of our surrounding land and ecosystems.

Overview of Energy Usage

Energy usage in the information and communications technology (ICT) sector continues to grow, and as the backbone of today's modern wireless networks, we are dedicated to doing our part to help our tenants become more sustainable from an energy use perspective. As a passive real estate provider, our direct carbon footprint is very low, with almost 100% of our company's energy usage attributable to energy-intensive connectivity equipment owned by our tenants. In many of our markets, such as the U.S. and Latin American region, our tenants' equipment is typically separately metered, resulting in low to zero visibility into their operations and usage. However, in some parts of our EMEA and Asia markets where the electric grid is unreliable, we often deliver primary power to our tenants pursuant to our contractual obligations, typically through diesel-powered generators. This power-as-a-service and ability to provide superior uptime to our tenants in these regions is a differentiator for us in the marketplace and a driver of our overall customer satisfaction results. However, it is also responsible for nearly 95% of the total carbon footprint attributable to our business. Therefore, in 2017, as part of our ongoing process of assessing risks and opportunities related to all aspects of our business, including those related to energy and climate change, we established a goal of reducing our Scope 1 fossil fuel consumption and diesel-related greenhouse gas (GHG) emissions in Africa and India by more than 60%, or 140 million liters of diesel annually, by 2027. In addition, one of our Chief Executive Officer's short-term incentive compensation goals includes the targeted reduction in diesel usage by generators in the company's emerging markets.

Diesel Reduction

Progress made to date toward our long-term energy reduction goal has been the result of focused and strategic efforts in our international markets. Each of our sites is evaluated on an independent basis to determine the best applicable solution to drive down diesel usage. Historically, the focus has been on more traditional solutions, such as investing in additional grid connections, installing intelligent automatic voltage regulators, installing cyclic lead-acid batteries and optimizing site HVAC configurations to effectively reduce generator run hours. More recently, due to advances in battery and renewable technology, as well as the accompanying

In 2017, we established a goal of reducing our Scope 1 fossil fuel consumption and greenhouse gas emissions in Africa and India by more than

60%
OR
140
MILLION
liters of diesel annually
by 2027.

While these initiatives require significant upfront investment, they generate substantial cost savings by extending the lives of our generators and reducing site fuel consumption.

decrease in costs associated with these technologies, we have, among other things, been able to achieve significantly greater efficiencies through the mass replacement of lead-acid batteries with lithium-ion batteries and broader utilization of solar power sources.

Lithium-ion batteries offer superior performance in energy density, life cycle economics and cyclic properties to their lead-acid counterparts. This technology has further enabled the introduction of solar photovoltaic solutions to our assets, since the systems can be operated under a partial state of charge without any long-term performance degradation. This lithium-ion battery technology also uses our existing generators more effectively, as the batteries can be charged at much faster rates than lead-acid batteries, which reduces generator run time, and the batteries do not require an absorption charge.

In 2018, we invested over $30 million in energy solutions through our capital expenditure program. While these initiatives require significant upfront investment, they generate substantial cost savings by extending the lives of our generators and reducing site fuel consumption—sometimes up to 76% in the case of our lithium and solar hybrid sites. As of the end of the year, we had increased the number of lithium-ion battery sites to over 1,800 worldwide, primarily in EMEA and Asia, with the remainder in our LatAm region, generating cost savings of over $10 million USD annually. In conjunction with the investments in batteries, we have also grown our number of solar assist sites to approximately 3,000 globally, with 13 megawatts (MW) of installed solar generation capacity, including a total of approximately 10 MW of solar across 2,300 locations in India. The deployments in India and Africa have an annual energy production of 13,400 megawatt hours (MWh) and 2,300 MWh, respectively. Solar energy generation also enables American Tower to increase the reliability and resilience of our infrastructure, reduce energy costs by approximately $5 million USD annually, and avoid over 12,000 metric tons CO_2e of GHG emissions each year.

These efforts and investments help move American Tower operations away from fossil fuel dependence in certain areas and integrate renewable technologies into the solutions we offer our tenants. In 2018, after normalizing for new builds and acquisitions, we were able to reduce our diesel usage in Africa and India by almost 42 million liters, achieving 30% of our 10-year aspirational goal.

TOTAL DIESEL GHG INTENSITY*
Metric Tons of Carbon Dioxide Equivalent (MTCO$_2$e) per tower

15%
AVERAGE DECREASE

INDIA
21%
DECREASE

6.0 — 2017
4.8 — 2018

NIGERIA
14%
DECREASE

51.2 — 2017
43.8 — 2018

GHANA
15%
DECREASE

9.3 — 2017
7.9 — 2018
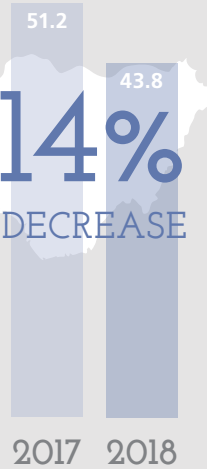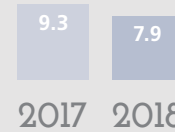
UGANDA
12%
DECREASE

19.8 — 2017
17.5 — 2018

*To account for new tower builds and acquisitions during the year, intensity calculations performed using a weighted average of quarter-end tower counts.

This power-as-a-service and ability to provide superior uptime to our tenants in our EMEA and Asia markets is a differentiator for us in the marketplace and a driver of our overall customer satisfaction results.

U.S. Tower division headquarters in Woburn, Massachusetts
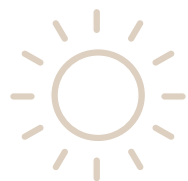
over

1,700
SOLAR PANELS

installed on the roof
of our Woburn, MA
headquarters

Green Initiatives

While our targeted diesel reduction program is our most impactful use of resources and efforts in sustainable operations, we also sponsor other programs that are focused on reducing, reusing and recycling under our companywide Green @ American Tower initiative.

We believe that weaving sustainability into our culture is essential to our success and this starts where employees work every day. We do this by investing in renewables and other energy efficiencies in our offices around the world. For example, in the U.S., we installed over 1,700 solar panels on the roof of our U.S. Tower division headquarters in Woburn, Massachusetts, offsetting approximately 16% of the building's usage annually. In this same location, we also spent approximately $350,000 USD to replace around 2,000 ceiling lights to reduce our energy consumption going forward.

Outside of the office, we continued to make significant strides in improving the overall efficiency of our operations, including tower lighting. To date, we have converted over 16,000 communications sites worldwide to LED systems. In addition to reducing our lighting energy usage by up to 85% at these sites, we also realized other operational and safety benefits due to the longer lifespan of LED lights.

In India, we sought to reduce the energy required to cool the equipment on or around our towers. To do this, we redesigned our cooling systems in a manner similar to free and natural cooling units. This helped reduce water leakage into shelters, while making our cooling systems more efficient and more scalable for the future. High-load sites also began using direct current (DC) fans with dedicated solar panels for cooling on hot days. In Mexico, we are piloting systems with scalable lithium-ion battery banks. These systems could provide cooling that maximizes the life cycle of batteries, while providing a modular and scalable solution that accommodates tenant growth. These efforts will prove beneficial for both American Tower and our tenants, resulting in more efficient systems and significant reductions in cost and energy usage.

Using purchased renewably generated electricity is another way we reduce environmental impacts and GHG emissions. For example, our operations in Brazil have worked with grid partners to source 254 MWh of renewably generated electricity. In other countries in which we operate, such as Paraguay and Costa Rica, the national electricity grids supply electricity generated almost completely by renewable sources. In 2018, approximately 495,000 MWh, or 19%, of our purchased electricity was renewably generated. By continuing to improve our percentage of connected sites, we will be better positioned to take advantage of the ever-increasing percentage of grid-based renewable energy. In all our markets, we continuously evaluate market conditions and the availability of renewably generated electricity and will consider the purchase of this energy when it meets our pricing and reliability requirements.

> We believe that weaving sustainability into our culture is essential to our success and this starts where employees work every day.

Paraguay

Costa Rica

In Paraguay and Costa Rica, the national electricity grids supply electricity generated almost completely by renewable sources.

2018 Energy Data

For our 2018 assessment of energy usage and GHG emissions, we collected consumption and cost data from each of the 17 countries where we operate. This approach reflects greater actual data compared to the prior year, for which we estimated energy usage based on the profiles of typical towers in respective regions where data was lacking. We expect further improvements over time.

In 2018, American Tower utilized approximately 5.1 million MWh of energy. Tower-related energy accounted for approximately 99% of the company's total energy usage (51% via electricity and 48% via diesel-driven generators). While usage increased overall due to the growth of our business, the per tower energy intensity decreased across our portfolio.

GHG emissions were calculated according to the Greenhouse Gas Protocol. In 2018, the company's estimated emissions totaled 2.4 million metric tons of CO_2 equivalents, of which 0.6 million metric tons was direct Scope 1 emissions from the combustion of fuels used by heating systems, generators and vehicles, and 1.8 million metric tons was indirect Scope 2 emissions from the generation of electricity.

We collected data from each of the

17

COUNTRIES

where we operate

ENERGY

Performance Indicator		Unit	2018	2017	% Change
Tower/rooftop/DAS operations electricity[1]		MWh	2,592,125	2,320,658	12%
Fiber operations electricity[2]		MWh	2,412	-	-
Building electricity		MWh	11,657	10,138	15%
Building heating[3]	Natural gas	MWh	41	215	-81%
Building district heating	District energy	MWh	30	26	15%
Tower generators[4]	Diesel, gasoline and propane	MWh	2,430,356	2,555,658	-5%
Vehicles[5]	Diesel and gasoline	MWh	24,739	23,856	4%
Total Energy Usage[6]		**MWh**	**5,061,360**	**4,910,551**	**3%**

GHG

Performance Indicator	Unit	2018	2017	% Change
Tower/rooftop/DAS operations electricity[1]	$MTCO_2e$	1,771,302	1,611,175	10%
Fiber operations electricity[2]	$MTCO_2e$	1,091	-	-
Building electricity	$MTCO_2e$	6,276	6,214	1%
Building heating[3]	$MTCO_2e$	7	39	-82%
Building district heating	$MTCO_2e$	7	6	17%
Tower generators[4]	$MTCO_2e$	613,268	644,951	-5%
Vehicles[5]	$MTCO_2e$	5,981	5,765	4%
Total GHG Emissions[6,7]	**$MTCO_2e$**	**2,397,932**	**2,268,150**	**6%**

GHG

Performance Indicator	Unit	2018	2017	% Change
Direct (Scope 1)	$MTCO_2e$	619,256	650,755	-5%
Indirect (Scope 2)	$MTCO_2e$	1,778,676	1,617,395	10%

WATER

Performance Indicator	Unit	2018	2017	% Change
Water consumption[8]	Cubic Meters	43,419	-	-

[1]Reflects amended 2017 data in Paraguay, as it was determined there was no electricity consumption associated with tower/rooftop/DAS operations.

[2]Fiber operations electricity was a new performance indicator collected in 2018.

[3]Fluctuation in natural gas figures was attributable to the closure of and relocation from offices with natural gas accounts in U.S.

[4]Includes building generators, which make up less than 1% of this balance.

[5]Reflects amended 2017 data in U.S., where propane had been incorrectly reported under vehicles, instead of backup generators.

[6]Energy and GHG are collected and compiled according to the principle of operational control.

[7]Electricity emission factors updated to IEA Emission Factors 2018 Edition.

[8]Water consumption was a new performance indicator collected in 2018. Total volumes reflect actual consumption in the U.S., India, South Africa, Uganda, Brazil, Chile, Costa Rica, Paraguay and Peru. Estimations were prepared for countries with no data available.

Energy and GHG Emissions Snapshot

2018 TOTAL ENERGY USAGE

51%   48%
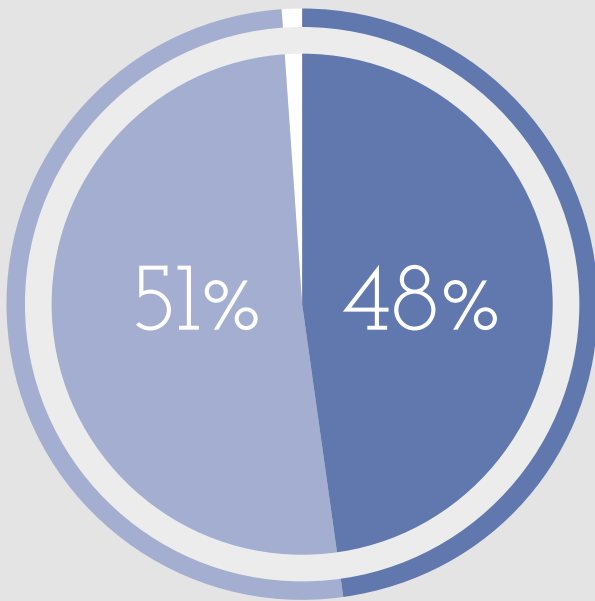
- Tower/rooftop/DAS operations electricity
- Tower generators' diesel/gasoline/propane
- Other[1]

2018 ENERGY SOURCES

48%   52%
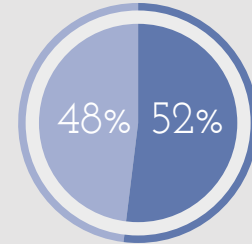
- Direct (Scope 1)
- Indirect (Scope 2)

2018 GHG EMISSIONS

26%   74%
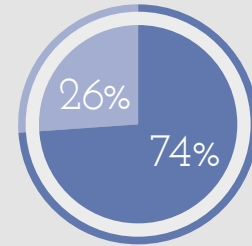
- Direct (Scope 1)
- Indirect (Scope 2)

TOWER GHG EMISSIONS INTENSITY BY REGION[2]
(MTCO$_2$E/# Tower)

ASIA
25.1
29.4

EMEA
24.4
26.4

U.S.
3.0
3.0

LATIN AMERICA
0.4
0.4
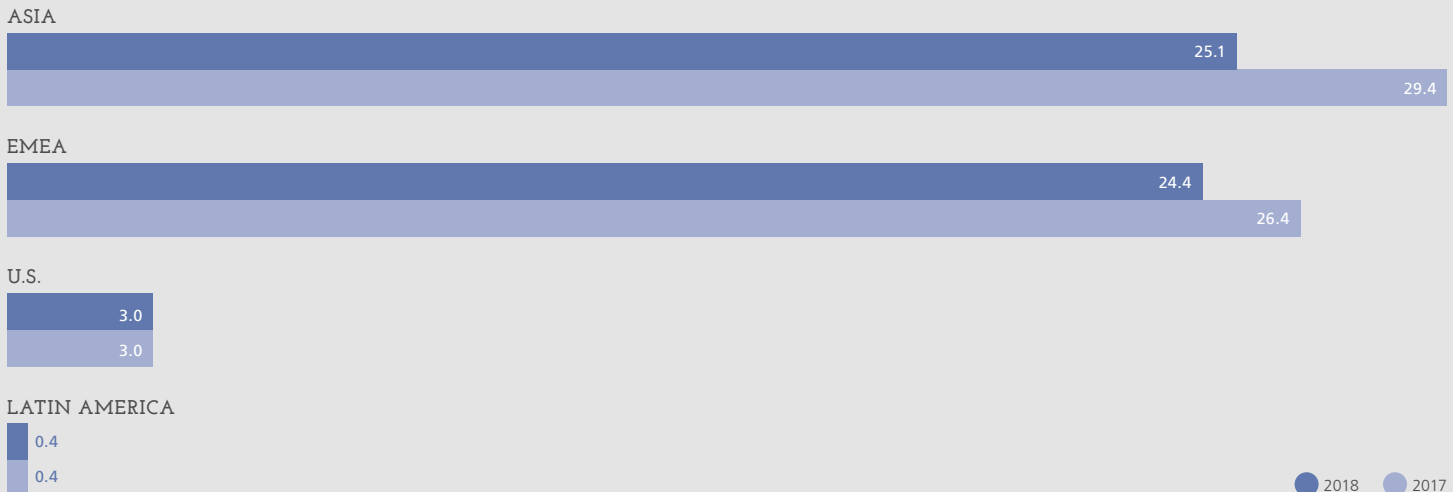
- 2018
- 2017

[1]Other comprises Fiber Operations Electricity, Building Electricity, Building Heating, Building District Heating and Vehicles.

[2]To account for new tower builds and acquisitions during the year, intensity calculations performed using a weighted average of quarter-end tower counts.

2018 GHG EMISSIONS BY COUNTRY

GERMANY
118

FRANCE
82

UNITED STATES
126,738

MEXICO
6284

COSTA RICA
93

COLOMBIA
548

PERU
948

BRAZIL
7,338

PARAGUAY
11

CHILE
126

ARGENTINA
293

GHANA
79,990

NIGERIA
212,809

KENYA
9,473

UGANDA
36,279

SOUTH AFRICA
54,073

INDIA
1,862,728

8.9%
Nigeria

5.3%
United States

3.3%
Ghana

2.3%
South Africa

1.5%
Uganda

1.1%
Argentina
Brazil
Chile
Colombia
Costa Rica
France
Germany
Kenya
Mexico
Paraguay
Peru

78%
India

PERCENTAGE OF
TOTAL GHG EMISSIONS

2018 MWH BY COUNTRY

Country	Value
INDIA	3,463,597
NIGERIA	861,981
UNITED STATES	227,530
GHANA	153,995
UGANDA	138,503
SOUTH AFRICA	106,399
COLOMBIA	44,855
KENYA	30,126
BRAZIL	15,908
MEXICO	15,316
PERU	1,400
GERMANY	528
COSTA RICA	403
ARGENTINA	385
CHILE	218
FRANCE	188
PARAGUAY	29

Looking Forward to a Cleaner Future

For 2019, many of our markets have planned initiatives to expand our usage of renewable energy. For solar energy, nine of our markets have plans to or are already pursuing additional solar energy generation projects. We have set a global goal of increasing the number of solar assist sites to 5,000, representing 20 MW of installed capacity by the end of 2022. In addition, we are partnering with research universities in the U.S. to develop commercial renewable energy solutions to be applied to our tower sites.

Our African operations also have plans to continue to deploy hybrid generation systems in 2019 to reduce generator-run hours on diesel systems and reach our 10-year diesel reduction goal. In Costa Rica, we have begun analyzing a "solar as a service" model, which would provide 800 KWh of renewably generated electricity per site to around 100 sites. In certain Latin American countries, teams have begun analyzing the applicability of autonomous LED solar lighting systems for towers. We expect to spend meaningful capital to further these program initiatives in 2019 and beyond. These efforts and ambitious goals bring us closer to reducing our carbon footprint and continue to propel American Tower's operations toward more sustainable stewardship of our assets.

Our African operations have plans to continue to deploy hybrid generation systems in 2019 to reduce generator-run hours on diesel systems.

Land Stewardship

Preserving the environment around our sites and viewing our business with a life-cycle perspective is an important part of our commitment to responsible and environmentally conscious operations. Whether we are planning, constructing, operating or decommissioning a site, compliance with all applicable environmental rules and regulations is not negotiable. These efforts are guided by local site development and land management teams.

Before any site construction happens, we take the time to assess the local ecosystems to determine what is appropriate for the site and to develop any necessary impact mitigation plans. While regulations and standards for these studies vary across the world, American Tower is committed to compliance with all jurisdictional laws and requirements, with dedicated teams in place to deliver that commitment. For example, in the U.S., we have personnel dedicated to identifying existing or potential sites that have significant ecological value, and as of the end of 2018, 370 sites were deemed wetlands and 184 sites were tracked for species sensitivity. In 2018, we performed prefeasibility and environmental impact studies on almost 900 new communications sites worldwide. These studies consider a range of issues, including the site's effects on the surrounding wildlife and sensitive ecosystems, such as wetlands.

We also take responsibility and initiative to proactively engage with the communities where we operate and in 2018, conducted almost 700 community forums globally. With respect to tower sites to be located on natural landscapes, the concern can be the aesthetic impact, which we are often able to address through camouflage tower designs.

Our shared infrastructure business model allows us to minimize our impact on the environment as fewer communications sites need to be built. We further seek to minimize our impact on local ecosystems wherever possible. To protect wildlife on land we endeavor to operate a comprehensive program to ensure the protection of migratory birds, including threatened or endangered species that are nesting on our towers. Over the last year, we have increased the number of protected bird sites in the U.S. from 2,900 in 2017 to over 3,100 in 2018. We also reviewed work proposals and provided guidance regarding wildlife protection for over 4,000 projects in 2018. These sites provide accommodations so native birds can nest undisturbed. New towers are also located to minimize impact on the birds' migratory routes.

almost

700

COMMUNITY
FORUMS

conducted globally
in 2018

We recognize the strain global bee populations are facing and have implemented a bee protection program to relocate beehives on towers or install new hives altogether.

2,900
PROTECTED BIRD SITES
in 2017

TO

over
3,100
PROTECTED BIRD SITES
in 2018

We recognize the strain global bee populations are facing and have implemented a bee protection program to relocate beehives on towers or install new hives altogether. This program recognizes that while bees are an essential part of our ecosystem, they can also pose a danger to workers at our communications sites. In 2018, ATC Ghana began providing safety gear and training and certifying local beekeepers to help manage bee infestations at its communications sites. Twenty people from three local communities have been certified thus far. When an infestation is now reported on one of our sites, these beekeepers safely transport the bees to protected hives. They are also able to harvest honey from the hives and distribute it in their communities. To date, the team in Ghana has relocated eight hives and installed five new hives.

This innovative, long-term solution keeps communications sites safe, conserves bee populations and provides an additional source of income for local communities. After the initial success, ATC Ghana is exploring a partnership to extend beekeeping training to additional communities.

We are proud of our holistic approach to land stewardship to date, and we continue to strive to set goals locally. For example, in Paraguay, the market has set the ambitious goal of zero tree-removal for site development. In the U.S., we have "The Million Trees Initiative," where over the next decade, operations in the U.S. will plant one million trees. Other markets are currently investigating initiatives that will enhance our land stewardship performance.

Water Usage Reduction

Due to the nature of our business, water usage is not a material part of our operations. Globally, our water usage is primarily used for sanitation and drinking and totaled approximately 43,000 cubic meters in 2018, withdrawn from municipal water utilities. Despite this low water consumption, we are still proactively looking for ways to incrementally conserve. To engage employees in these efforts, we created an internal campaign to educate and increase awareness about water conservation.

THE MILLION TREES INITIATIVE

In 2018, American Tower and American Forests launched a multiyear partnership to plant one million trees over the next ten years in critical ecosystems across the United States.

As of the end of 2018, American Tower has planted 100,000 jack pine trees in northern Michigan. These trees support the endangered Kirtland's warbler—a bird that almost went extinct just 20 years ago but has rebounded after extensive restoration efforts.

In addition to the impact we will make on large landscapes, American Tower is also committed to giving back to our communities. Recently, a team of employees joined American Forests, Speak for the Trees Boston and the Food Forest Coalition to plant fruit and nut trees at Mass Audubon's Boston Nature Center. These trees will provide a multitude of benefits for the neighborhood, including cleaner air, reduced threat of flooding and economic benefits—potentially lowering energy bills from reduced temperatures in hot summer months and free food for community members. Plans are underway for the next steps this impactful partnership will make, including tree planting efforts in Cary, North Carolina and wildfire restoration in California.

Philanthropy

At American Tower, leading our industry as part of our *Stand & Deliver* strategy means being good corporate citizens. Philanthropy and community outreach help sustain and improve the communities that our business impacts. Philanthropy at American Tower consists of companywide initiatives that unite our global operations, including the American Tower Foundation (the Foundation), regional philanthropic initiatives that work to directly address targeted issues and employee-driven initiatives that enable our employees to pursue their passions through volunteering and employee-based giving.

Companywide Efforts

One way we demonstrate our commitment to communities is through the Foundation. Launched in 2017, the Foundation's mission is to focus on education and technology use to empower students, teachers and communities in need worldwide. Through grants, the Foundation facilitates partnerships with charitable organizations such as school districts and youth development agencies, that support hands-on, technology-based learning, increased student participation in robotics, and STEM programs that offer access to higher education to underrepresented, high-potential students.

Providing Disaster Relief

During natural disasters, American Tower infrastructure is critical in supporting public safety and relief efforts. During and immediately after such an event, our first priority is ensuring that all our employees are safe. Next, our network operations center focuses on securing our assets, including making sure generators are fueled and fully functional, coordinating with our customers and placing inspectors on standby. After the storm has passed, all damage and issues identified are assessed and addressed based on criticality, with safety, service and access issues prioritized first. Beyond our towers being critical to disaster recovery efforts, American Tower also provides financial support to populations impacted by natural disasters. In 2017 and 2018, the Foundation contributed almost $500,000 in support to disaster relief operations around the world. Some of these crisis relief efforts include:

California Wildfires Aid: In response to the wildfires in California, the Foundation donated to the American Red Cross to support relief efforts and offered to match all U.S. employee donations (up to $5,000 per employee) for an organization that helped deal with the aftermath of the fires.

SUSTAINABLE DEVELOPMENT GOALS

ADVANCING UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

Reducing poverty, gender inequality and environmental degradation are all ways our business and philanthropic activities advance the SDGs. For example, building infrastructure for high-speed broadband not only spurs economic growth, but it enables individuals to leverage educational and employment opportunities they otherwise could not have reached.

SUPPORTING HURRICANE RELIEF EFFORTS

In **Mexico Beach, Florida,** the area hardest hit by **Hurricane Michael**, our tower remained intact. Because most of the surrounding area was without power or cell coverage, government agencies created a "tent city" next to our tower, so they would be able to effectively communicate. **This site was deemed so vital to relief efforts that the U.S. National Guard established a checkpoint at the entrance to the access road.**

Hurricane Aid: After Hurricanes Florence and Michael hit the U.S., the Foundation made contributions to the American Red Cross and again offered to match any donation up to $5,000 toward an organization that helped deal with the hurricane recovery.

Floods in India: After severe flooding in Kerala, a state in southern India, American Tower's India team helped create and sustain communications channels, achieving almost 100% overall uptime for these vulnerable tower sites, while also distributing supplies to local communities. As the flood waters began to recede, employees partnered with local government authorities to provide fuel and cooktop stoves for approximately 800 local families left without power. Overall, American Tower's quick responses helped preserve crucial communication abilities, support relief efforts and provide aid to local community members.

Supporting Organizations With Targeted Initiatives

In addition to our companywide efforts, our regions, often with the support of the Foundation, have their own philanthropic budgets that they use to support education and technology-related causes and other projects. Our regions are dedicated to supporting organizations that work hard to make a change in the communities near them. Below are some of the organizations we supported in 2018:

Kids Club Kampala works with vulnerable communities in and around Kampala, Uganda. To date, the organization has helped nearly 3,000 children and their families. Services they provide include access to education, child safety measures and basic needs. American Tower helps promote the organization's "Encouraging Education" program, which focuses on providing out-of-school children living in Kampala with a safe environment, and access to education and the opportunity to learn.

The Click Foundation deploys online English literacy programs in under-privileged primary schools across South Africa. The programs offer young students the opportunity to work at their own pace through fun and enjoyable activities, navigating their learning journey by means of technology. Our partnership with the Click Foundation began in 2015 when we introduced 77 students to the program. Five years later, we now have 18 schools in the program and are making a difference in the lives of approximately 12,500 students.

JA Worldwide is dedicated to inspiring and preparing young people to succeed in a global economy. By providing young people with the skills and tools for employment and entrepreneurship, JA Worldwide creates pathways for employability, job creation and financial success. American Tower support contributed to JA's Latin Code Week program to empower future generations with coding skills to become key participants in the workforce and contribute to the economic development of Latin America.

Posse Foundation is an educational organization dedicated to training and educating young leaders from diverse backgrounds. Posse offers programs that help scholars excel at school, win competitive internships and earn prestigious awards. American Tower chose to focus its support on the STEM Posse Program, a five-year comprehensive program that helps increase the numbers and improve the performance of underrepresented students majoring in STEM fields, while developing more welcoming campus communities for students from diverse backgrounds.

Kids in Tech Inc. works to excite, educate and empower children to acquire skills and confidence in technology through interactive after-school programs. Partnering with school districts and youth development agencies in Massachusetts, Kids in Tech provides hands-on, technology-based learning projects to children, with a goal of inspiring them to pursue other computer science activities.

Learn more about the organizations we supported:

kidsclubkampala.org

clickfoundation.co.za

jaworldwide.org

possefoundation.org

kidsintech.org

BUILDING DIGITAL VILLAGES IN INDIA

Through our Digital Villages program in India, broadband connectivity now reaches thousands of families where the sites are deployed. The NIIT Foundation, ATC India's partner in this endeavor, certified the curriculum that is intended to promote digital literacy in local communities.

Since the Digital Villages initiative launched with a focus on promoting India's National Digital Literacy Mission, more than 90 digital learning centers and Hole-in-the-Wall education kiosks have been established across the country, including in rural villages, resulting in the graduation of over 22,000 students.

Supporting a Connected World: Digital Villages

The reach of the internet in many developing countries remains limited due to cost, scalability, power outages and educational barriers. To help alleviate this problem, American Tower is using its communications infrastructure in an innovative way by building Digital Villages near tower sites to bring broadband connectivity to communities in remote and rural areas in India, Nigeria and Ghana.

Digital Villages are computer-equipped centers or kiosks that use the uninterrupted power supply and broadband link from our sites to provide local communities with free ICT education and training, increase computer literacy and help create digitally empowered societies. Digital Villages have also helped developing countries address some of their most pressing challenges, including reducing poverty and inequality, increasing quality education, achieving gender equality, and improving access to employment.

Digital Villages Highlights

AUDIO/VISUAL
32" TV for projections
Deskjet printer
Whiteboard and flipboard

HSE
First Aid box
Fire extinguisher
4 channels CCTV and 500GB HDD

POWER
24/7 power from BTW
Inverter and backup battery

INFO TECH
Wireless internet
Laser printer

TECH LAB
12 workstations
Airconditioned, insulated container
Well illuminated
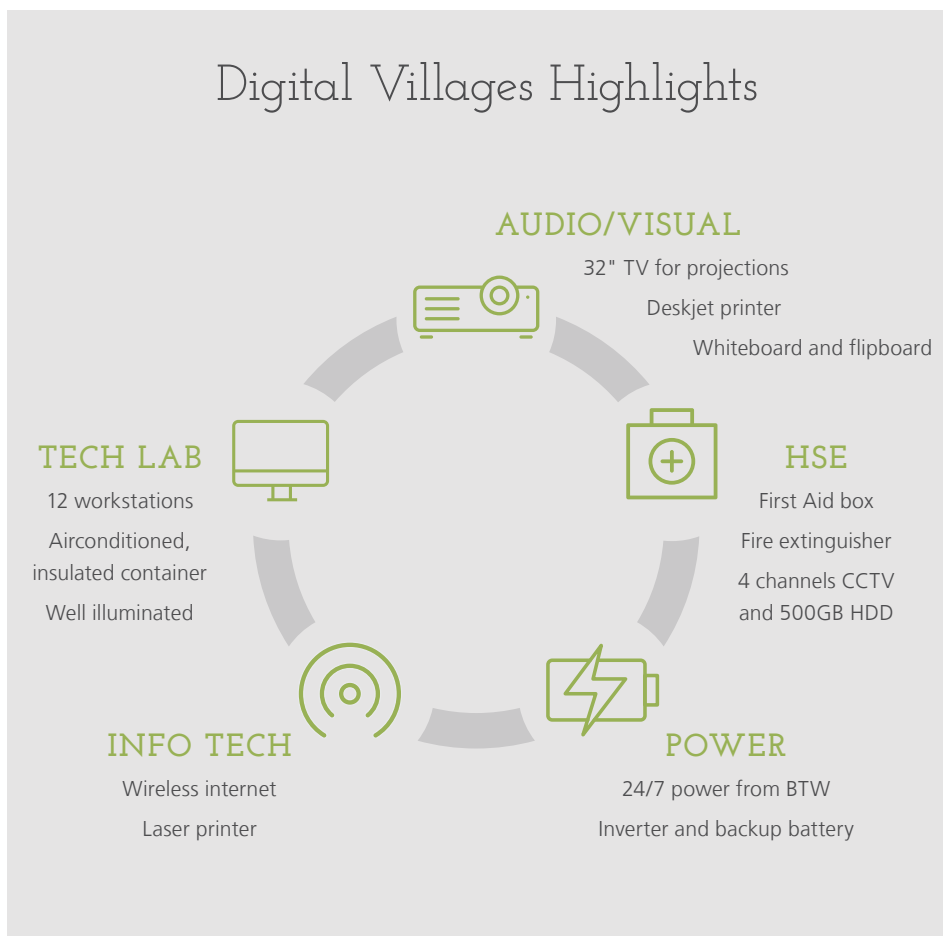
NIGERIA

21
digital villages

986
students enrolled

612
graduates

66
graduates in placement

GHANA*

1
digital villages

40
students enrolled

*Initiative launched at the end of 2018.

16
HOURS
allotted per employee
during company-
sponsored volunteer
days in 2019

Employee Volunteerism and Giving

Volunteering is a key part of our culture of giving, serving as a powerful tool for employee and community engagement. To promote volunteerism in 2018, employees in the U.S. were each allotted eight hours of volunteer time that they were free to use independently or during company-sponsored volunteer days. For 2019, we are excited to increase these allotted hours to 16 per employee. Below are just a few examples of our substantial global volunteer efforts:

Ending Hunger One Meal at a Time: In Boston, employees partnered with Rise Against Hunger, a nonprofit organization dedicated to ending hunger by providing food and life-changing aid to the world's most vulnerable populations. To further this powerful mission, American Tower employees spent a day packaging 19,000 meals for those in need.

Walking with a Cause: In France, employees participated in a 5-10 kilometer walk/run for Handicap International, a Nobel Peace Prize–winning French non-governmental organization (NGO) that supports victims of conflicts and natural disasters. Twenty American Tower employees, along with their friends and family, helped raise needed funds for the organization.

Building a Better Future: To improve the lives of pediatric cancer patients in Uganda, American Tower employees helped build a school shelter for Bless a Child Foundation, an NGO that provides care support services to children up to age 12 suffering from cancer and related infections. A group of employees also helped set up the classroom and spent time with the children.

Empowering Girls in Tech: In Ghana, American Tower employees participated in the Information, Communications and Technology (ICT) Ministry's "Girls-in-ICT" event. The initiative encourages member states to develop policies and enabling environments to promote the participation of girls and young women in ICT-related fields and to encourage these groups to consider pursuing careers in ICT. At American Tower, we hosted 62 girls in the office and organized activities throughout the day to engage them in ICT activities.

The Future of Philanthropy at American Tower

2018 was a positive year of corporate giving and employee involvement. Moving forward, we are excited to see how our efforts impact surrounding communities in the long term, while we look to adopt new projects and initiatives to advance our philanthropic impact. As the Foundation continues to grow, we anticipate an increase in grant giving to purpose-driven organizations. We hope to continue engaging both employees and surrounding communities in our commitment to responsible corporate citizenship.

Moving forward, we are excited to see how our efforts impact surrounding communities in the long term, while we look to adopt new projects and initiatives to advance our philanthropic impact.

American Tower employees packaged

19,000
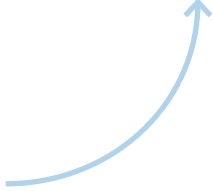MEALS
for those in need

Performance

Resilience and consistency have been the hallmarks of the fifth and final pillar of our corporate responsibility program: performance. The attractive returns that our stakeholders have come to rely on have been built upon our solid financial performance, and we are now looking to augment and enhance that performance through our innovation initiatives.

Financial Performance

Over the last 10 years, we have delivered consistent growth and believe that we are well positioned today to continue to drive compelling results. The four broad characteristics of our business that have enabled our financial performance and resiliency are:

1. Geographic, Tenant and Technological Diversification;

2. Lease Structure and Duration;

3. Strong Balance Sheet; and

4. Focused and Experienced Management.

Due to these attributes, we were able to grow our property revenues from $1.5 billion USD in 2008 to $7.3 billion USD at the end of 2018, achieving almost 17% compounded annual growth rate (CAGR), while maintaining strong margins and growing our adjusted funds from operations at a similar rate.

17%
COMPOUNDED ANNUAL PROPERTY REVENUE GROWTH
from 2008 to 2018

10-YEAR PERFORMANCE*

PROPERTY REVENUE	SITE COUNT	MARKET CAPITALIZATION	COMMON STOCK DIVIDEND PER SHARE**
'08: $1.5B → '18: $7.3B	'07: 22,807 → '18: 170,686	'07: $17.2B → '18: $69.7B	'12: $0.90 → '18: $3.15
~16.8% CAGR	~748% INCREASE	~405% INCREASE	~23.2% CAGR
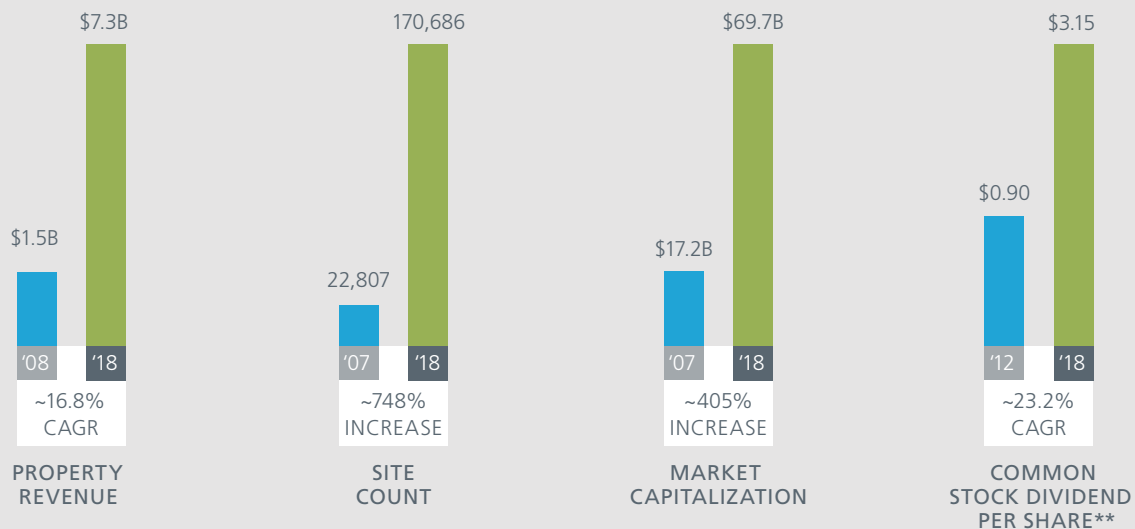
 *Balances reported as of fiscal year ends.

**Effective for the taxable year beginning January 1, 2012, we began operating as a REIT for federal income tax purposes.

COLLABORATION

Personnel from our India team visited ATC Mexico after the launch of their fiber business with the acquisition of redIT, one of the leading providers of fiber connectivity in Mexico. The teams exchanged best practices, held site visits and collaborated on opportunities beneficial to both markets.

INNOVATE18

In the fall of 2018, we brought together **70 innovation leaders from across** the company at our **inaugural Innovate18 conference**. Our people amplified what we've known for the last 10 years—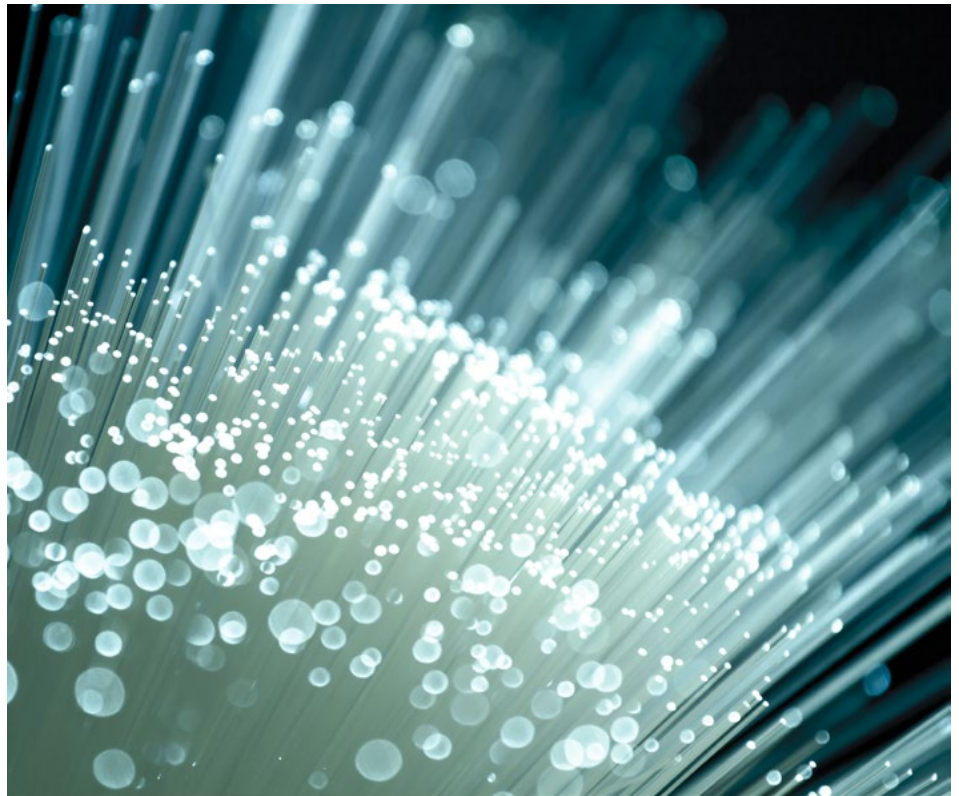that sharing experiences, exchanging best practices, and investing in innovation drive the innovation process and progress toward our milestones.

Innovation

Our world is connected today in ways that were not possible just a few years ago, from smart cities that connect energy and data, to the Internet of Things (IoT), to other autonomous systems. To remain a company on the leading edge of making these connections, we must innovate. The above traits have driven our past performance and created our current resilient business model, but we must continue to challenge ourselves in order to provide future sustainable growth to our shareholders. It was for this reason that, in 2017, we launched our innovation program and established a 10-year aspirational goal of deriving 25% of our baseline 2017 revenues through innovation initiatives by 2027.

To achieve this goal, we are pursuing business models that are either based upon or complementary to our existing real estate business, investing more than $900 million USD in these projects to date. Innovation teams around the globe are consistently brainstorming, screening, experimenting and commercializing new opportunities. The benefit of regional innovation is each team can adapt to what they are experiencing locally, as each market has varying needs and opportunities. We enhance the process by enabling collaboration across regions. When a regional innovation team wants to scale a project, they meet with our Corporate Innovation Council, led by our Chief Technology Officer, to review and present ideas to senior leadership.

Our innovation initiatives are evaluated within the framework of our franchise real estate characteristics that made our existing operations so durable over the long-term: commercially shareable assets, long-term contracts and high operating leverage. This structure encourages innovation regionally, with the goal to quickly disseminate good ideas throughout the company.

Generally, most of our innovation initiatives are still in the early stages, but some projects, such as our fiber-related assets in both Latin America and South Africa, are already generating cash flow, driving collocation on our newly fiber-connected towers there and helping position us to benefit from small-cell driven densification in urban areas, like São Paulo and Mexico City. Below are select examples of our growing program:

Fiber Expansion: We have deployed fiber in select international markets where we believe returns are attractive and there are opportunities for synergies with our existing footprint. Our 2017 acquisition of redIT in Mexico added almost 5,000 kilometers of fiber, while our fiber network in Argentina reached 2,836 route kilometers as of the end of 2018. In South Africa, we have partnered with Frogfoot to traverse 30,000 households with fiber and are continuing to expand that presence.

Mobile Edge Computing: As the demand for mobile data and new applications grows rapidly, particularly in a 5G world, we expect to see significantly denser networks supported by the evolution of data processing to the edge of those networks over time. We anticipate that many of the new use cases that come to market will require not only enhanced network speeds and capacity but also extremely low latency. As a result, our U.S. Tower division is exploring the development of distributed storage and compute solutions at our tower sites, given our belief that many of the key prerequisites for edge computing are present at these locations. By evaluating the interdependencies of wireless connectivity and integrated edge computing, the company aims to be well positioned to support future network innovation in an ever more interconnected world.

Next Generation Connectivity: We are working to implement Fiber-to-the-Tower (FTTT) in select hyper-dense urban markets, like Mexico City, Buenos Aires, Delhi and Johannesburg, leveraging some of the fiber assets mentioned above. We expect that this access will help tenants deploy broadband services,

In 2017, we launched our innovation program and established a 10-year aspirational goal of having

over

1.6

BILLION USD

(25% of our 2017 baseline revenue)

revenue generated from innovation-related projects

by 2027.

> To remain a company on the leading edge of building these connections, we must innovate.

including 5G, more rapidly. We expect to continue developing these and other new architectures for smart city solutions, and for evolving requirements from tenants, such as in-building solutions and small cells.

IoT Open Labs: In order to support and accelerate the development of the IoT applications, in Brazil we launched the country's first IoT experience center: IoT Open Labs. This is a key part of our initiative to promote our neutral and shared IoT LoRa (long-range) network, in partnership with Everynet, which is now in 90 cities in Brazil. The lab is a place for business partners, customers, tenants, developers and students to use our IoT LoRa network to experiment and test their applications.

While our innovation program is largely focused on pursuing tower-like returns through new revenue opportunities, we also constantly evaluate aspects of our existing operations for innovative cost-savings opportunities, with two highlighted below:

Drone-Based Maintenance: One of the most exciting new developments in modern technology is Unmanned Aerial Systems (UAS), or drones. Our U.S. Tower division's operations have been researching and testing drone use to improve climber safety, increase operational efficiency and digitize our assets. These efforts will dramatically increase the accuracy of our data, which will drive efficiencies and open new, innovative ways to use UAS and automation. The technology has also been tested with flights in African markets.

Cleaner Energy: As discussed in greater detail in our Environment section above, we continue to find innovative clean energy solutions around the world that also drive market leadership and cost efficiencies. From our investments in lithium-ion batteries and solar assist sites to collaboration with leading academic institutions on new renewable technologies, innovation is critical to our success in reducing our GHG footprint.

Principles of Reporting and GRI Content Index

The Global Reporting Initiative (GRI) provides the world's most widely used framework for sustainability reporting. The GRI Standards offer a structured format to coherently and comprehensively share information about material issues, performance metrics and the management of sustainability-related issues within the organization. This report has been prepared in accordance with the GRI Standards: Core option. The reporting principles for defining report content and quality have been applied throughout the information collection and report development process. American Tower's 2018 corporate sustainability report covers the reporting period for fiscal year ended December 31, 2018. Data presented in the report represents all wholly owned American Tower operations, including directly and indirectly owned subsidiaries and joint ventures, unless explicitly noted otherwise. All disclosures in this report are based on the 2016 version of the GRI Standards. For the Materiality Disclosures Service, GRI Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report.

GRI 101: FOUNDATION 2016

GRI 102: GENERAL DISCLOSURES 2016

Organizational Profile		
102-1	Name of the organization	American Tower Corporation
102-2	Activities, brands, products and services	Our primary business is the leasing of space on communications sites to wireless service providers, radio and television broadcast companies, wireless data providers, government agencies and municipalities and tenants in a number of other industries. See Sustainability in a Connected World (starting on page 6) for additional information.
102-3	Location of the headquarters	American Tower Corporation 116 Huntington Ave, 11th floor Boston, MA 02116
102-4	Location of operations	Headquartered in Boston, Massachusetts, American Tower has offices across the United States and in Argentina, Brazil, Chile, Colombia, Costa Rica, France, Germany, Ghana, Kenya, India, Mexico, Netherlands, Nigeria, Paraguay, Peru, Singapore, South Africa and Uganda.
102-5	Ownership and legal form	American Tower Corporation is a holding company, a global real estate investment trust, and we conduct our operations through our directly and indirectly owned subsidiaries and joint ventures. Our principal domestic operating subsidiaries are American Towers LLC and SpectraSite Communications, LLC. We conduct our international operations primarily through our subsidiary, American Tower International, Inc., which in turn conducts operations through its various international holding and operating subsidiaries and joint ventures.
102-6	Markets served	We offer a variety of wireless infrastructure solutions around the world, including towers, Distributed Antenna System (DAS) networks, fiber, backup power systems, project management and site development services.
102-7	Scale of the organization	See Annual Report on Form 10-K for the year ended December 31, 2018 (Form 10-K) concerning American Tower's key financials and further information concerning assets, debt and shareholders' equity, and People (starting on page 20) concerning staff numbers. **www.americantower.com/investor-relations/ annual-reports-and-proxy-statements**

102-8	Information on employees and other workers	American Tower employed over 5,000 people on a full-time basis globally as of December 31, 2018. See People (starting on page 20) for additional information.
102-9	Supply chain	American Tower's supply chain consists primarily of contractors who provide tower construction and maintenance services, fuel service providers and vendors who provide support to our office operations.
102-10	Significant changes to the organization and its supply chain	There were no significant changes regarding the organization's size, structure, ownership or its supply chain.
102-11	Precautionary Principle approach	The precautionary principle does not explicitly guide decisions made by American Tower.
102-12	External initiatives	In 2018, American Tower participated in conferences, events and workshops through its association memberships.
102-13	Membership in Associations	The company ensures the interests of its stakeholders are appropriately represented through its membership in industry groups and certain trade associations, including but not limited to: • Americas Society / Council of the Americas • Business Council for International Understanding (BCIU) • Business Roundtable (BRT) • Competitive Carriers Association (CCA) • CTIA • GSMA • International Telecommunications Union (ITU) • National Association of Real Estate Investment Trusts (Nareit) • The New England Council • U.S. Chamber of Commerce • U.S.-Africa Business Center • U.S.-India CEO Forum • Wireless Industry Association (WIA)

Strategy

102-14	Statement from senior decision-maker	See Chairman's Letter, pages 4 and 5

Ethics and Integrity

102-16	Values, principles, standards and norms of behavior	See Ethics and Reputation, starting on page 16

Governance

102-18	Governance structure	See Corporate Responsibility at American Tower, pages 11 and 12

Stakeholder Engagement

102-40	List of stakeholder groups	Tenants, shareholders, regulators, the communities where American Tower's real estate is located, employees and business partners. See Stakeholder Engagement, pages 12 and 13, for more information.
102-41	Collective bargaining agreements	Less than 10% of our employees are represented by labor unions. Less than 10% of our employees have collective bargaining agreements.
102-42	Identifying and selecting stakeholders	See Corporate Responsibility at American Tower, pages 12 and 13
102-43	Approach to stakeholder engagement	See Corporate Responsibility at American Tower, pages 12 and 13
102-44	Key topics and concerns raised	See Corporate Responsibility at American Tower, pages 13

Reporting Practice

102-45	Entities included in the consolidated financial statements	All data presented in the report represents all American Tower operations, including directly and indirectly owned subsidiaries and joint ventures, unless explicitly noted otherwise. Also, see Form 10-K for the year ended December 31, 2018.
102-46	Defining report content and topic boundaries	See Corporate Responsibility at American Tower, pages 14 and 15
102-47	List of material topics	The GRI Aspects deemed material for this report are: • Economic Performance • Socioeconomic Compliance • Anti-Corruption • Public Policy • Diversity and Equal Opportunity • Non-discrimination • Training and Education • Occupational Health and Safety • Energy • Emissions • Biodiversity • Local Communities See Corporate Responsibility at American Tower, page 15
102-48	Restatements of information	No significant restatements
102-49	Changes in reporting	No changes
102-50	Reporting period	January 1 to December 31, 2018
102-51	Date of most recent report	August 2018
102-52	Reporting cycle	Annual Reporting

102-53	Contact point for questions regarding the report	Mneesha O. Nahata Vice President, Corporate Legal Finance and Risk Management
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option
102-55	GRI content index	See page 57
102-56	External assurance	At this time, American Tower has decided to not seek external assurance for the report.

TOPIC-SPECIFIC DISCLOSURES: INFORMATION

Material Topic: Economic Performance

The American Tower material topic "Financial Performance" corresponds to the GRI topic "201 Economic Performance."
See Performance starting on page 52.

GRI 103: Management Approach 2016		
103-1	**Explanation of the Material Topic and its Boundary** Financial performance directly drives shareholder return and creates long-term value for American Tower. These are issues relevant to a wide range of stakeholders, including employees, tenants, suppliers and shareholders.	
103-2	**The Management Approach and its Component** The members of American Tower's senior leadership team, who report to the Board, are the most senior policy makers in the organization, and they set the tone and business priorities for the company, including its financial goals and strategies.	
103-3	**Evaluation of the Management Approach** Financial goals are monitored on an ongoing basis by all levels of management in the organization through financial performance goals, quarterly targets and annual revenue and profitability goals. Financial results are released on a quarterly basis through earnings releases.	
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	See Form 10-K
GRI 203: Indirect Economic Impacts 2016		
203-2	Significant indirect economic impacts	See Sustainability in a Connected World, starting on page 6

Material Topic: Client Satisfaction and Brand Image

The American Tower material topic "Client Satisfaction and Brand Image" corresponds to the GRI Disclosures 102-43 and 102-44, page 60. Also see Stakeholder Engagement, starting on page 12.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Client satisfaction and brand image define American Tower's reputation and, ultimately, our success in the marketplace. These topics are primarily relevant to our company and our customers.
103-2	**The Management Approach and its Component** This topic is managed by our local sales and marketing teams, who rely upon the input and support of individuals and teams throughout our organization. Issues are managed and assessed from the top down, as one of our Core Principles is "to understand our customers' needs and satisfy them."
103-3	**Evaluation of the Management Approach** We work as a team to build lasting customer relationships by understanding customer requirements and exceeding expectations. This is accomplished through regular customer interactions, surveys and direct feedback from key stakeholders throughout the year. In addition, team performance goals are typically set based on survey results.

Material Topic: Regulatory Compliance

The American Tower material topic "Regulatory Compliance" corresponds to the GRI topic "419 Socioeconomic Compliance." See Ethics and Reputation starting on page 16.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** It is a foundational value for American Tower to operate in an ethical and legally compliant manner. Ethics- and compliance-related issues are important to American Tower's tenants, employees, regulators and shareholders.
103-2	**The Management Approach and its Component** While these issues are the responsibility of all American Tower employees, and are covered under our Code of Conduct, ultimate responsibility for this topic resides with the American Tower legal and human resources teams, either at the corporate level or the country level. Reports of potential or perceived non-compliance or misconduct can be made by reaching out to our Ethics Committee, local human resources department, management, local legal department or by using a third-party administered confidential hotline.
103-3	**Evaluation of the Management Approach** We monitor all reports of potential non-compliance, ethics and other legal issues, escalate them to the Ethics Committee under the Board of Directors where appropriate and ensure they are appropriately resolved.

GRI 419: Socioeconomic Compliance 2016		
419-1	Non-compliance with laws and regulations in the social and economic area	In 2018, there were no significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area.

Material Topic: Anti-Corruption

The American Tower material topic "Anti-Corruption" corresponds to the GRI topic "205 Anti-corruption" and "206 Anti-competitive Behavior." See Ethics and Reputation starting on page 16.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary**
	It is a foundational value for American Tower to operate in an ethical and legally compliant manner. Ethics- and compliance-related issues are important to American Tower's tenants, employees, regulators and shareholders.
103-2	**The Management Approach and its Component**
	While these issues are the responsibility of all American Tower employees, and are covered under our Code of Conduct, ultimate responsibility for this topic resides with the American Tower legal and human resources teams, either at the corporate level or the country level. Reports of potential or perceived non-compliance or misconduct can be made by reaching out to our Ethics Committee, local human resource department, management, local legal department or by using a third-party administered confidential hotline.
103-3	**Evaluation of the Management Approach**
	We monitor all reports of potential non-compliance, ethics and other legal issues, escalate them to the Ethics Committee under the Board of Directors where appropriate and ensure they are appropriately resolved.

GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	All markets are assessed for risks related to corruption before entering into the market and then on an ongoing basis as part of the company's annual fraud risk assessment process. The results and identified risks are presented to the Audit Committee, along with the planned internal audits that address those risks.
205-2	Communication and training about anti-corruption policies and procedures	See Ethics and Reputation, starting on page 16

GRI 206: Anti-competitive Behavior 2016		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	There were no legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant.

Material Topic: Public Policy and Thought Leadership

The American Tower material topic "Public Policy and Thought Leadership" corresponds to the GRI topic "415 Public Policy." See Stakeholder Engagement starting on page 12.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Public policy is relevant to American Tower because regulations can impact many aspects of our business, including real estate purchases and dispositions, taxation, health and safety regulations, and tower siting and construction.
103-2	**The Management Approach and its Component** American Tower's public affairs teams are responsible for evaluating issues of relevance regarding public policy and engagement on public policy–related issues that are relevant to our business and our stakeholders. The company engages with stakeholders on public policy–related issues and uses this engagement as an opportunity to demonstrate its thought leadership regarding relevant issues.
103-3	**Evaluation of the Management Approach** We regularly assess implemented or potential regulations and determine where it would be prudent to engage with the relevant policy makers in order to protect our long-term strategy.

GRI 415: Public Policy 2016		
415-1	Political contributions	Under our Code of Conduct, no one may direct or require any employee or director to contribute to any political party, cause, organization or candidate. In addition, American Tower does not have, nor does it plan to have, a Political Action Committee.

Material Topic: Appropriate Incentives

The American Tower material topic "Appropriate Incentives" is discussed Ethics and Reputation starting on page 16.

For more information, see Definitive Proxy Statement for the 2019 Annual Meeting of Stockholders,

americantower.com/proxystatements

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Ensuring our employees are appropriately incentivized for their work is important for American Tower to maintain its reputation with its tenants and the communities where our facilities are located.
103-2	**The Management Approach and its Component** Our Chief Human Resources Officer and country-level human resources team, with the support of American Tower's legal teams, monitor employee incentive programs, including performance bonuses, to ensure they are duly earned and appropriate. The Compensation Committee of the Board of Directors is responsible for overseeing executive officer compensation.
103-3	**Evaluation of the Management Approach** The global human resources function, along with the country-level human resources teams, regularly assess whether salaries and contract structures are appropriate for the location and the job performed.

Material Topic: Diversity, Equal Opportunity, Non-discrimination

The American Tower material topic "Diversity, Equal Opportunity, Non-discrimination" includes the GRI topics "401 Employment," "405 Diversity and Equal Opportunity" and "406 Non-discrimination." See Promoting Diversity and Inclusion starting on page 24.

GRI 103: Management Approach 2016

103-1	**Explanation of the Material Topic and its Boundary** The Chief Human Resources Officer and the country-level heads of human resources are ultimately responsible for human resource management. They oversee employee training and development, compliance-related issues and diversity, and report to the Chief Administrative Officer and General Counsel of the company.
103-2	**The Management Approach and its Component** These issues are primarily managed at the country level, with consideration given to local customs, norms and regulations.
103-3	**Evaluation of the Management Approach** Progress on these issues is monitored regularly through a variety of methods, including employment engagement surveys, benchmarking studies and participation in training and development programs.

GRI 401: Employment 2016

401-1	New employee hires and employee turnover

Age Demographics

		Under 30 years old	30–50 years old	Over 50 years old
Asia	Current employees	11%	84%	6%
	New hires	16%	83%	1%
EMEA	Current employees	10%	80%	10%
	New hires	16%	77%	7%
LatAm	Current employees	19%	72%	9%
	New hires	32%	64%	4%
U.S.	Current employees	19%	61%	20%
	New hires	41%	47%	11%

Gender Demographics

Regions	Male new hires*	Female new hires*	Male current employees	Female current employees
Asia	93%	7%	80%	20%
EMEA	69%	31%		
LatAm	61%	39%		
U.S.	60%	40%	66%	34%

Non-U.S. hires are 74% male and 26% female

401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	See People, page 21

GRI 405: Diversity and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	See People, page 21, and Promoting Diversity and Inclusion, starting on page 24

GRI 406: Non-discrimination 2016		
406-1	Incidents of discrimination and corrective actions taken	In 2018, there were no substantiated incidents related to discrimination that required the attention of senior management and/ or the Board of Directors.

Material Topic: Training and Education

The American Tower material topic "Training and Education" corresponds to the GRI topic "404 Training and Education."

See Employee Training and Development starting on page 23.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** The Chief Human Resources Officer and the country-level heads of human resources are ultimately responsible for human resource management. They oversee employee training and development, compliance-related issues and diversity, and report to the Chief Administrative Officer and General Counsel of the company.
103-2	**The Management Approach and its Component** These issues are primarily managed at the country level, with consideration given to local customs, norms and regulations.
103-3	**Evaluation of the Management Approach** Progress on these issues is monitored regularly through a variety of methods, including employment engagement surveys, benchmarking studies and participation in training and development programs.

GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	See Employee Training and Development, page 24
404-2	Programs for upgrading employee skills and transition assistance programs	See Employee Training and Development, starting on page 23
404-3	Percentage of employees receiving regular performance and career development reviews	Close to 100% of our employees across all employee categories and regions participated in the annual performance review process in 2018.

Material Topic: Occupational Health and Safety

The American Tower material topic "Occupational Health and Safety" corresponds to the GRI topic "403 Occupational Health and Safety." See Health and Safety Management starting on page 27.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Employee and contractor health and safety is of critical importance to American Tower. Effective management of the topic ensures we will be an employer of choice in the country and solidifies our reputation with our tenants that their equipment will be properly installed and will not introduce any liabilities to their relationship with American Tower.
103-2	**The Management Approach and its Component** Employee health and safety is managed at the market level and varies by market or region. In the U.S. Tower division, the Health and Safety teams report to the legal group and the region's General Counsel. In the EMEA, Asia and Latin America regions, health and safety roles are part of the operations teams. Employees who engage in work on towers are required to undergo specific trainings.
103-3	**Evaluation of the Management Approach** We regularly monitor safety reports from the countries and regions, identify any systemic issues requiring corrective actions, and implement new policies and procedures where necessary.

403: Occupational Health and Safety 2016		
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	While no American Tower employees have died in 2018 from work-related injuries, there were some incidents at American Tower sites among contractors and sub-contractors and/or individuals unrelated to the company who, in some cases, were on the site illegally. Thorough investigations of each of these incidents were conducted in compliance with internal procedures and applicable laws and regulations. We will continue our work to advance industry safety standards for employees and contractors, and will strive to make sure all of our operations are safe for our employees and those visiting our sites. **Additional Health and Safety Data:**

Regions	Reportable injuries		Lost time injuries	
	Male	**Female**	**Male**	**Female**
Asia	0	0	0	0
EMEA	0	1	0	1
LatAm	2	3	2	3
U.S.	6	0	4	0
Totals	**12**		**10**	

See Health and Safety Management, page 29

Material Topic: Energy and Emissions

The American Tower material topic "Energy and Emissions" corresponds to the GRI topics "302 Energy" and "305 Emissions." See Overview of Energy Usage starting on page 31.

GRI 103: Management Approach 2016		
103-1	**Explanation of the Material Topic and its Boundary** Efficiently managing energy usage and the associated emissions are good business practices for American Tower. The company can increase the resilience of the infrastructure it owns and reduce costs and impacts on the environment by adhering to an environmentally responsible operating model.	
103-2	**The Management Approach and its Component** Responsibility for energy usage sits with the country-level management teams, who are responsible for monitoring usage, the costs associated with energy purchases and the resilience of the local energy supply. One of our Chief Executive Officer's short-term incentive compensation goals includes the targeted reduction in diesel usage by generators in the company's emerging markets.	
103-3	**Evaluation of the Management Approach** Energy and emissions are managed regularly by monitoring consumption and costs (recurring and capital expenses) associated with providing energy to our tenants' equipment.	
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	See Environment, starting on page 30
302-3	Energy intensity	The company's per tower average energy intensity was 30.0 MWh per tower in 2018, down from 32.8 MWh per tower in 2017.
302-4	Reduction of energy consumption	See Environment, starting on page 30
302-5	Reductions in energy requirements of products and services	See Environment, starting on page 30
GRI 305: Emissions 2016		
305-1	Direct GHG emissions (Scope 1)	See Environment, starting on page 30
305-2	Energy-based indirect GHG emissions (Scope 2)	See Environment, starting on page 30
305-4	GHG emissions intensity	The company's per tower GHG intensity was 14.2 MTCO2e per tower in 2018, down from 15.2 MTCO2e per tower in 2017.
305-5	Reduction of GHG emissions	See Environment, starting on page 30

Material Topic: Land Use Management and Biodiversity

The American Tower material topic "Land Use Management and Biodiversity" corresponds to the GRI topics "303 Water," "304 Biodiversity," "306 Effluents and Waste" and "307 Environmental Compliance." See Land Stewardship, starting on page 41.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Being a good steward of the land under its control is important to American Tower, its employees, its customers and the communities where the company operates.
103-2	**The Management Approach and its Component** American Tower's policies for land use management and stewardship are overseen by the regional markets, which are responsible for maintaining an oversight of the property portfolio and interacting with the local communities where its properties are located.
103-3	**Evaluation of the Management Approach** We regularly monitor and track regulations pertaining to land management and permitting, as well as other specific metrics related to land conservation and protected species.

GRI 303: Water 2016		
303-1	Water withdrawal by source	See Environment, pages 37 and 42

GRI 304: Biodiversity 2016		
304-2	Significant impacts of activities, products, and services on biodiversity	Tower construction activities tend to have minimal impacts on habitat and biodiversity. Where they do, the impacts are small areas of land disturbance for the footings of towers and small areas of concrete pads for auxiliary support structures. Where bird and insect species are determined to be potentially impacted, the company has implemented various protection programs, including nest relocation and animal protection protocols. See Land Stewardship, starting on page 41

GRI 306: Effluents and Waste 2016		
306-2	Waste by type and disposal method	See Health and Safety Management, page 28

GRI 307: Environmental Compliance 2016		
307-1	Non-compliance with environmental laws and regulations	The company received no significant fines or non-monetary sanctions for non-compliance with environmental laws and/or regulations.

Material Topic: Corporate Presence in Communities

The American Tower material topic "Corporate Presence in Communities" corresponds to the GRI topic "413 Local Communities." See Philanthropy, starting on page 44.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Philanthropy at American Tower consists of companywide initiatives that unite our global operations, including the American Tower Foundation (the Foundation), regional philanthropic initiatives that work to directly address targeted issues, and employee-driven initiatives that enable our employees to pursue their passions through volunteering and employee-based giving.
103-2	**The Management Approach and its Component** Each region, including Corporate, has its own philanthropic budget outside of the Foundation and has the authority to use those funds to support education and technology related projects and other causes. Regional initiatives are centered in the markets where the company operates and in many markets, long-term partnerships have been established with local organizations.
103-3	**Evaluation of the Management Approach** Decisions regarding funding priorities and levels are made by local management teams.

GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	See Philanthropy, starting on page 44, and Land Stewardship, starting on page 41.

Material Topic: Innovation

The American Tower material topic "Innovation" refers to our efforts to innovate and find ways to streamline our business processes through digitalization. See Innovation, starting on page 54.

GRI 103: Management Approach 2016	
103-1	**Explanation of the Material Topic and its Boundary** Innovation and the development of new products, services and business models are central to American Tower's long-term success. The topic is most relevant to the company, its tenants and other members of its value chain.
103-2	**The Management Approach and its Component** Innovation is managed globally at the corporate level by the Chief Technology Officer, who chairs the company's Innovation Council. The Council discusses and presents innovation projects ongoing in the regions where American Tower operates. The regions organically pursue various innovation-related initiatives independently to address market-specific needs. The Innovation Council also serves to educate and inform the broader technical and business community within the company on various innovation projects. The regions have VP-level innovation leaders who manage, source funds for and execute projects regionally.

103-3	**Evaluation of the Management Approach**
	The senior management team is regularly briefed and a more formal presentation of initiatives and the innovation roadmap is given annually to the Board of Directors.

Topic-Specific Disclosures	
Non-GRI Topic	See Innovation, starting on page 54

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