



2019

CORPORATE  
SUSTAINABILITY  
REPORT



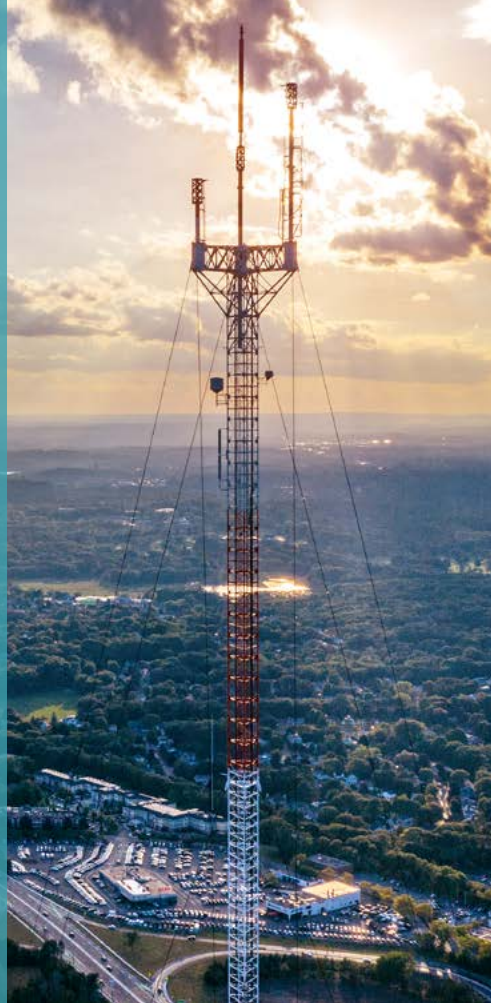
**AMERICAN TOWER®**  
CORPORATION

As a global company expanding access to wireless communications, American Tower is dedicated to generating long-term value for our stockholders and embraces our responsibility to deliver value to our tenants, invest in our employees, interact fairly with our suppliers and support our surrounding communities.



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# Letter From Our President and CEO



As American Tower continues to execute on our *Stand and Deliver* strategy, corporate sustainability remains a critical component of our operating philosophy, mission and commitment to all of our stakeholders.

The cornerstones of *Stand and Deliver*—driving efficiency throughout the industry, growing our assets and capabilities, innovating for a mobile future and leading wireless connectivity around the globe—continue to guide us as we seek to connect the world through our critical communications infrastructure.

As you will see in our third sustainability report, as part of this mission, we are proactively investing in practices and technologies to enhance the environmental sustainability of our global organization and helping our tenants to do so as well along the way.



**Thomas A. Bartlett**  
President and  
Chief Executive Officer

Our teams seek to reduce the environmental footprint of modern wireless networks, as well as engage in philanthropic, volunteer and disaster-relief activities. All the while, we dedicate ourselves to acting with the highest ethical standards.

- American Tower has invested more than \$100 million in green energy solutions, such as advanced batteries, solar installations and other innovative technologies, primarily in India and our African markets. Across these markets, we have reduced our diesel fuel consumption used to power our tenants' equipment by more than two million liters per month, the equivalent of removing 13,000 cars<sup>1</sup> from the road or preserving 24,000 acres of forest<sup>2</sup> each year.
- Our Digital Village initiative to offer broadband access to underserved populations has expanded to three continents, delivering a host of e-learning and skills-development benefits. In this report, you will read how lives have been positively impacted, such as Mavis Aghedo and David Obot in Nigeria, who were able to leverage the capabilities of the local Digital Village to secure a scholarship and employment, respectively.

Initiatives like these, and the others described in this report, exemplify how we embrace our responsibility to deliver sustained value to our people, tenants, suppliers, stockholders and surrounding communities.

Furthermore, diversity and inclusion continue to remain a top priority at American Tower. A critical factor in our success is ensuring respect, inclusion and diversity remain at the core of our business culture, which infuses fresh ideas into the business and helps us remain connected to our tenants in a dynamic global market. We strive to be an inclusive community that accepts and celebrates the wonderfully diverse backgrounds of our people. In an effort to support economic, educational and social equality, the American Tower Foundation made a sizeable donation to the National Association for the Advancement of Colored People and launched a new employee matching gift campaign for racial justice.

1. EPA  
2. Urban Forestry Network

> \$100M  
invested in green  
energy solutions

> 2M  
fewer liters of diesel  
fuel used per month



# Stand & Deliver

BUSINESS STRATEGY



Industry Leadership



Innovation



Efficiency

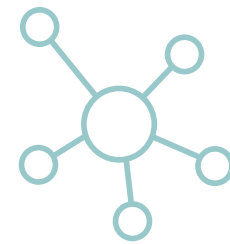


Strategic Positioning

Our unwavering commitment to corporate responsibility is even more essential today, as American Tower joins the global community in responding to the ongoing impacts of the COVID-19 pandemic. At a time when we are physically distant from each other, I am proud of the role our Company plays in supporting the mobile networks that help keep us connected around the globe. Our infrastructure makes remote work possible and expands access to vitally important information, particularly in emerging markets where fixed-line infrastructure and access is minimal. Our ongoing investments, innovative approach and commitment to partnerships mean that we are positioned to help deliver the critical connectivity needed for the increasing demand for mobile services the pandemic has created. Through our American Tower Foundation and regional philanthropic programs, we have also made grants to organizations focused on supporting COVID-19 response aid efforts and assisting communities in need during the pandemic, and have committed more than \$3 million to support global relief efforts.

In this time of extraordinary challenges, we are poised to play a critical role in the digital future. We are committed to building connections responsibly, promoting diversity and inclusion in our everyday actions and driving efficiencies throughout the industry, while providing value to our stakeholders in a sustainable way.

**Thomas A. Bartlett**  
President and Chief Executive Officer



**At a time when we are physically distant from each other, I am proud of the role our Company plays in supporting the mobile networks that keep us connected around the globe.**



# Executive Summary

We believe that integrating corporate responsibility into the key tenets underlying our operations enhances our business performance and augments the positive contributions our wireless infrastructure has on our vision of making wireless communication possible everywhere. Therefore, our Board of Directors and executive leadership team are proactive, inclusive and committed to further advancing corporate responsibility throughout our business.

The 2019 Corporate Sustainability Report offers a comprehensive view of our overall corporate responsibility program, anchored by five core pillars: ethics, people, environment, philanthropy and performance. Building on thoughtful risk and opportunity analyses, we take a fact-based approach to create effective, impactful programs. We constantly strive to expand on the success of the past, while leading the industry forward.

**Our Board of Directors and executive leadership team are proactive, inclusive and committed to further advancing corporate responsibility throughout our business.**

## Ethics

The American Tower commitment to ethical operations is codified in our [Code of Ethics and Business Conduct Policy](#) (Code of Conduct) and embraced at every level of the Company. Company leadership is united in delivering on our mission and vision with integrity and accountability across the value chain. This culture of ethics is reinforced by employee training and engagement. **We are proud that our most recent biennial survey showed 93% of American Tower employees believe the Company shows a commitment to ethical business decisions and conduct.**

## People

Nearly 5,500 American Tower employees around the globe are our partners in success; their dedication, innovative thinking and community engagement embody our *Stand and Deliver* mission. It is our responsibility to help them succeed. We do so through programs that incorporate and respond to employee feedback, foster professional growth, provide competitive pay and benefits and recognize success. **As a result, 91% of our employees are proud to work for American Tower.**

### Diversity and Inclusion

Our philosophy of inclusion, as reflected in our [Diversity Statement](#), guides us in how we interact with each other, how we hire and manage our people and how we serve our tenants. Our differences enable us to have greater depth, wider capabilities and broader perspectives in pursuing our goals. We **ARE** stronger together as a team and together as a Company. From recruitment and retention to ongoing training and development to community activities, we foster an inclusive and equitable environment. **As a result, in 2019, American Tower was named to Forbes' list of America's Best Employers for Diversity.**

### Safety

Our steadfast commitment to safety starts with comprehensive policies and training and continues with ongoing oversight, incident reporting and proactive remediation of any issues that may arise. While American Tower outsources a portion of our tower technician crews, we provided more than 40,000 safety-specific training hours in 2019 to our employees and contractors, and American Tower conducted more than 500 safety standard audits of the third-party vendors providing tower-specific support services. **As a result, our reportable injury rate (incidents per 100 full-time equivalent employees) was 0.04, significantly below the industry average.**

See the American Tower [Code of Ethics and Business Conduct Policy](#) (Code of Conduct) at [www.americantower.com/ethics](http://www.americantower.com/ethics)  
See the American Tower [Diversity Statement](#) at [www.americantower.com/inclusion](http://www.americantower.com/inclusion)

# 93%

of American Tower employees believe the Company shows a commitment to ethical business decisions and conduct

# 91%

of our employees are proud to work for American Tower

American Tower was named to Forbes' list of

## America's Best Employers for Diversity

# 0.04

is our reportable injury rate, which is significantly below the industry average

## Environment

### Energy

American Tower has committed to clear quantitative goals for reducing Scope 1 fossil fuel emissions needed to meet the requirements of our tenants, **investing over \$100 million in energy-efficient technologies at the site level** (e.g., transitioning to new lithium-ion batteries [LIBs] and LED lighting) and site-based green energy solutions (e.g., solar photovoltaic power generation). In 2019, the Company's estimated emissions, calculated according to the Greenhouse Gas Protocol, decreased by three percent.

### Land Stewardship

We manage our business with a full life-cycle perspective and prioritize the protection of the natural environment. In every phase of our work—planning, constructing, operating and decommissioning sites—our teams consider and address multiple environmental factors. For example, American Tower has a number of programs in place that protect native animal species surrounding our sites and proactively plant new trees. **In fact, our 2019 tree planting initiatives will remove an estimated 200,000 metric tons of carbon dioxide from the air over the next 40 years.<sup>1</sup>**

## Philanthropy

Our philanthropy programs focus on three main areas: empowerment and education through technology, disaster relief and community-based philanthropy. Through a multifaceted approach, which includes workplace giving, volunteer days, regional philanthropic programs and financial contributions through the American Tower Foundation, we use our resources to improve the communities where we operate. **In 2019, American Tower disbursed nearly \$3.5 million across the globe.** In 2020, we have supported several COVID-19 response initiatives, and have committed more than \$3 million to support relief efforts globally.

## Performance

Guided by our *Stand and Deliver* strategic plan, American Tower continued to exceed our financial performance goals. **In 2019, we generated solid growth in property revenue, Adjusted EBITDA<sup>2</sup> and Consolidated AFFO<sup>3</sup> while at the same time adding almost 14,000 communications sites to our global portfolio.** Led by our Chief Technology Officer, we have invested more than \$1.2 billion to date in innovation projects, as we seek to build on our long track record of growth and attractive total stockholder returns.

1. Source: CO<sub>2</sub> Meter  
2. Earnings before interest, taxes, depreciation, amortization and accretion  
3. Adjusted funds from operations

# \$100M+

invested in energy-efficient technologies

# ~200K

metric tons of carbon dioxide estimated to be removed from the air over the next 40 years as a result of our 2019 tree planting initiatives

# ~\$3.5M

disbursed across the globe in 2019

# ~14,000

communications sites added to our global portfolio

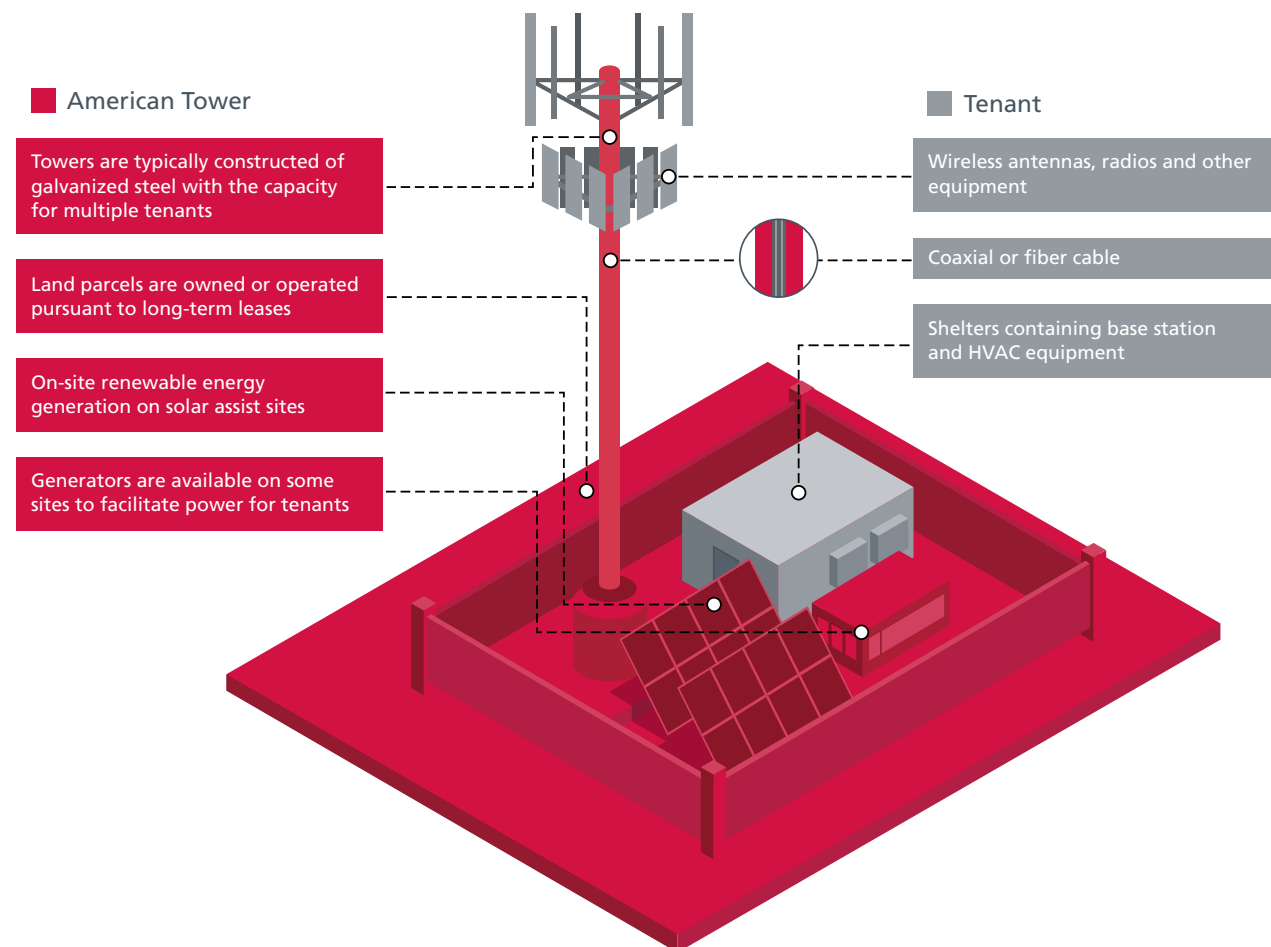
## The American Tower Story

Established in 1995, we are one of the largest global real estate investment trusts and a leading owner, operator and developer of multitenant communications real estate.

Our global portfolio consists of approximately 180,000 communications sites, including wireless and broadcast towers, in-building systems, outdoor distributed antenna systems and other right-of-way solutions. 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.

The American Tower infrastructure-sharing model allows a diverse array of tenants—wireless service providers, radio and television broadcast companies, wireless data providers, government agencies, municipalities and companies from various other industries—to operate more efficiently and sustainably. Our nearly 5,500 employees across 19 countries as of December 31, 2019, along with thousands of contractors and service providers, are committed to working productively with our tenants to achieve their goals.

Our towers support the installation of telecommunications equipment from multiple tenants. Located on owned or leased land parcels, the towers are owned or held under long-term leases, along with select other equipment at the tower site, such as generators and other energy solutions in some regions. 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.



~23M  
Americans in rural  
areas lack access to  
broadband internet

## Connecting the Unconnected

An estimated 23 million Americans in rural areas lack access to broadband internet, which limits vital opportunities in areas such as education, health, communication and finance. In 2019, American Tower established a partnership with a Fortune 100 company to bring connectivity to three million people in underserved, rural communities across the U.S. by 2022. Organizations like ours support wireless technologies to bring affordable broadband access to rural communities globally. For example, we are also contributing to bring connectivity to rural areas in Colombia, a country where almost 40% of the population still lacks reliable internet access.

Every day, billions of people communicate with others and connect to the internet through equipment hosted on American Tower communications sites. Wireless connectivity, today more than ever, is supporting people in working remotely, maintaining relationships with family and friends and consuming entertainment, as we all work through the challenges of the ongoing pandemic.

This critical moment for wireless communications tools and internet technology also points to a deep need: nearly four billion people globally do not have reliable access to these services. The inequity that results touches every aspect of life: health, economic opportunity and interpersonal relationships. It is clear to us that as an independent owner, operator and developer of wireless and broadcast communications real estate and enabler of connectivity, we have a tremendous opportunity to help bridge this gap. While our business model is straightforward—we provide the infrastructure our tenants use to connect their customers—the heart of our business supports transformational opportunities for people, communities and nations. We are working with our industry colleagues and policymakers in support of connecting the unconnected.

In 2019, American Tower built on our existing commitment to sustainability with advanced environmental initiatives, philanthropic giving and engagement and innovations across our business, all with an eye toward maximizing opportunity and managing risk. Our work is driven by both our *Stand and Deliver* strategic plan and feedback from our stakeholders. From our top leadership to our local team members, the American Tower community is focused on further enhancing our position as a responsible corporate citizen. We are pleased to share with you the progress we are making in sustainably providing communications services around the globe.



In operating our business ethically and with integrity, we can sustainably and equitably enhance connectivity around the world, while driving toward many of the United Nation's Sustainable Development Goals (SDGs). Expanding access to high-speed broadband can achieve positive progress as it relates to education, economic growth, infrastructure and equality, helping to transform lives.

# CORPORATE RESPONSIBILITY AT AMERICAN TOWER

American Tower's  
*Stand and Deliver*  
Strategy

Lead  
wireless connectivity around the globe.

Innovate  
for a mobile future.

Drive  
efficiency throughout the industry.

Grow  
our assets and capabilities to meet customer needs.

## Corporate Governance and Risk Management

Through strong corporate governance practices, an engaged and forward-looking Board and an accountable leadership team, American Tower consistently delivers on our goal of creating long-term benefits for our stakeholders. Our executive team is responsible for leading our global operations through the *Stand and Deliver* strategy, with a firm commitment to doing business ethically and with integrity. Our Board of Directors oversees this strategy and is focused on upholding the highest standards of corporate governance. Our directors bring a wealth of leadership experience, diverse viewpoints, knowledge and skills that benefit our Company and stakeholders. We are proud to be recognized once again by the Boston Club's annual survey, the 2019 Census of Women Directors and Executive Officers of Massachusetts Public Companies, as a leader in our commitment to gender diversity on the Board, which includes diverse leadership in the Committee and Board chair positions.

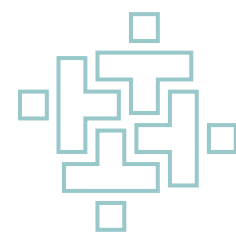
The Board's leadership is focused on ensuring sound management, fostering innovation and advancing the continued development of the people who make American Tower so effective. Environmental, social and governance issues remain a core priority for the Board and are directly tied to the success American Tower has enjoyed to date in sustainable value creation. Our Nominating and Corporate Governance Committee is responsible for overseeing the sustainability reporting function and general governance matters, and receives regular reports from our Corporate Sustainability Officer. In 2019, key activities for this Committee included reviewing this sustainability report, Board refreshment and the onboarding of a new director, lobbying disclosure and oversight, and a survey of corporate governance trends and best practices.

In addition to overseeing overall strategy, another key focus area for our Board is risk management. Our Board spends time with the executive team evaluating the Company's ability to identify, measure and manage risks and opportunities. This ongoing dialogue is essential to determining and shaping the direction and business priorities of the Company. In addition to quarterly reviews of the strategic, operational and emerging risks in each of our markets, and an annual enterprise risk assessment, in 2019 we conducted a comprehensive climate-related risks and opportunities assessment and a governance risk assessment. Collectively, these assessments support the Board in ensuring that policies and procedures are in line with the Company's risk appetite.



Climate-related  
risks and  
opportunities  
assessment

**Goal:** To consider policy, regulatory, reputational and physical risks that could impact the business, as well as opportunities for efficiency (transportation, recycling, production and distribution, building operations and water usage) and alternative energy.



Governance risk  
assessment

**Goal:** To assess the exposure to material board-level and operational governance risk areas, such as board and committee composition and independence, executive compensation, fiduciary duties, political contributions and whistleblower protection.



## Stakeholder Engagement

American Tower is keenly focused on understanding our stakeholders' priorities and building enduring relationships as part of our strategy to drive sustainability. As a global company expanding access to wireless communications, American Tower embraces our responsibility to deliver value to our tenants, invest in our employees, interact fairly with our suppliers, support our surrounding communities and generate long-term value for our stockholders. Our recent commitment to the Business Roundtable's Statement on the Purpose of a Corporation reflects this view.

The critical connectivity American Tower helps deliver is essential to enabling societies to advance and meet the needs of all stakeholders. As our partners and ambassadors, American Tower employees offer invaluable perspective on our work. Companywide surveys, Town Hall meetings with executives, employee hotlines, talent management reviews and career-development processes are among our many efforts to ensure a strong and united Company culture through direct engagement with our team members. The People section in this report offers additional information in this area and on our engagement and inclusion efforts.

Exceeding tenant expectations, understanding their evolving needs and building lasting relationships is fundamental to our being able to fulfill our vision of making wireless communication possible *everywhere*. Regionally tailored customer satisfaction surveys and the collection of informal day-to-day feedback allow us to evaluate the quality of our customer service, portfolio of sites and network uptime and responsiveness. Survey results drive team performance goals and customer experience improvements. For example, in the U.S., an enhanced online customer portal was launched to deliver additional self-serve capabilities and the website was updated with a dedicated customer support section, simplified navigation and more robust content for more audiences. The international websites are being similarly updated to further support the unique needs of their customers.



**Our vision is to  
make wireless  
communication  
possible *everywhere*.**

We cannot deliver on our commitments to our tenants without strong relationships across our supply chain and with the thousands of landlords who own land under our sites. For this reason, we invest in the platforms and interfaces to make the landlord experience as seamless as possible. An example of this can be seen in Brazil, where we revamped our property management interface using a data-driven platform called PROMPT, which consolidates payments, accounts, sites, cases and calls into a single program, enabling more timely and efficient data analysis.

More broadly, we participate in a wide array of financial and industry conferences. We meet regularly with financial analysts, investment firms and stockholders to discuss best practices and seek to refine Company compensation and governance policies. In 2019, stockholder outreach topics included performance; succession planning and board refreshment; diversity and inclusion; environmental, social and governance matters; executive compensation; and political contributions disclosure. Senior management regularly updates the Board on the items discussed and feedback received during these stockholder outreach discussions. In addition to our outreach efforts, we encourage stockholder feedback through communications with our Investor Relations group, the Chair of our Nominating and Corporate Governance Committee and at our annual stockholder meeting.

## Thought Leadership

In a globally connected world, wireless connectivity is at the heart of individual, business and community needs, and it will play an even more critical role in the future. As such, our business and the broader industry is of interest to policymakers, business leaders and civic institutions. We ensure the interests of our stakeholders are appropriately represented through serving on the boards of our principal industry groups, including the Wireless Infrastructure Association, CTIA, the National Association of Real Estate Investment Trusts, the Business Council on International Understanding, the European Wireless Infrastructure Association, the U.S.-Africa Business Council, the U.S.-India Business Council and the U.S.-India Strategic Partnership Forum. We also engage in thoughtful participation in groups such as the Business Roundtable, World Economic Forum and GSMA. We advise governments more directly through serving as the co-chair of the U.S.-India CEO Forum, participating on the President's Advisory Council on Doing Business in Africa and engaging with the United Nation's International Telecommunication Union. Finally, we work with organizations, such as the 5G Automotive Association and CBRS Alliance, and policymakers to inform policy decisions around innovation. Overall, the Company plays an active role in more than 20 influential business, telecommunications and environmental trade groups across the globe.

## Memberships & Appointments

5G Automotive Association

Business Council on  
International Understanding

Business Roundtable

CBRS Alliance

CTIA

European Wireless  
Infrastructure Association

GSMA

International Telecommunication  
Union

National Association of Real Estate  
Investment Trusts

President's Advisory Council on  
Doing Business in Africa

U.S.-Africa Business Council

U.S.-India Business Council

U.S.-India CEO Forum

U.S.-India Strategic  
Partnership Forum

World Economic Forum

Wireless Infrastructure Association



Our memberships position us for long-term success, as we gain insight into core issues for the industry, the opportunity to share expertise and the ability to build consensus among organizations with similar interests and advocate in favor of those interests. We try to inform policy decision makers on policy questions they face that impact the reliability and resiliency of our mobile infrastructure today and innovation in the future. The oversight of our participation is monitored by an internal, global public affairs committee that conducts an annual cost benefit analysis of all memberships, and ultimately our Board of Directors, which receives governmental affairs briefings, including information on changes to the regulatory and socioeconomic landscape.

Additionally, we build and maintain relationships with government leaders as part of our long-term efforts to educate policymakers on issues related to regulations and legislation that may impact our business and our tenants. In 2019, we grew our public affairs teams across the globe and opened an office in Washington, D.C. where we work with our trade associations, members of Congress, federal policymakers, embassies and other key industry stakeholders to ensure all have the information they need to make informed decisions.

Our [Code of Conduct](#) prohibits the use of corporate funds or assets to participate in any political campaign, election or referendum. In addition, our Code of Conduct prohibits any employee or Director from directing or requiring any other employee or Director to contribute to any political party, cause, organization or candidate. Further, as a matter of policy, we do not have, nor do we believe it is necessary to establish, a Political Action Committee. American Tower does not join industry groups and trade associations to advance political purposes, and our memberships do not represent our agreement with all positions or views of such organizations. In addition, industry groups and trade associations operate independently from us, and we do not individually direct how dues are utilized.



**Corporate Responsibility  
at American Tower**

## #BetterFuture

American Tower is proud to have recently signed GSMA's Digital Declaration, which is a set of aspirational principles to guide activity in the digital age.

**82 CEOs**  
of leading global companies  
have signed the Digital Declaration  
to date.

**The oversight of our participation in industry groups and trade associations is monitored by an internal, global public affairs committee, and ultimately our Board of Directors.**

**Corporate Responsibility  
at American Tower**



## LatAm Customer ImpACT

The primary goal of Customer ImpACT was to overcome geographical boundaries by unifying team members in the region around a single important purpose to connect with our tenants.

As part of an effort to become an even more innovative, agile partner to our tenants, the Latin America team at American Tower launched Customer ImpACT. The primary goal of this initiative was to overcome geographical boundaries by unifying team members in the region around a single important purpose to connect with our tenants. From a business perspective, Customer ImpACT aligns with our *Stand and Deliver* strategic plan and Core Principle of "understanding our customers' needs and satisfying them," which considers all aspects of Company operations as it relates to the customer experience.

Customer ImpACT focused on two key areas: team (recruiting, skills assessments and training) and customer service (assessing customer perceptions and needs, tracking customer engagements and managing service requests). Through team programs, trainings and new tools, the Latin American markets created a sustained focus on improving the quality of their customer interactions.

The results were clear. Surveys of client leadership teams showed improvement (from 2018 to 2019) in the perception of our ability to understand client business needs and identify innovative opportunities to support their businesses and an expected increase in total business with American Tower over the next three years.

## Cybersecurity and Information Technology

Properly addressing the cybersecurity threats that are a real part of today's global business environment, maintaining adequate safeguards to minimize the chance of a successful attack and developing thorough response procedures are top priorities for the Company. Our Board, through the Audit Committee, has committed to ensuring the Company maintains a strong cybersecurity strategy to protect our tenants, business and assets. The Board, with support from third-party consultants as needed, regularly evaluates our cybersecurity program, which includes a comprehensive incident response plan that considers all levels of cybersecurity needs. In 2019, there were no material breaches that warranted Board attention.

American Tower has built a strong team of technology professionals, led by our Chief Information Security Officer with oversight from the Board, who have the capacity to assess areas of potential risk, report on emerging threats, manage cybersecurity issues and respond immediately to suspected loss of information or unauthorized access to information.

Every employee globally undergoes mandatory cybersecurity training three times each year to learn how to maintain data privacy, and detect and report malware, ransomware and other malicious software or related attempts to compromise the Company's information technology systems. Senior personnel or those with access to sensitive information receive more advanced training. Companywide, over 17,000 training classes were completed in the past year, with 100% compliance among employees with access to sensitive information. This work is ongoing, with both training and technology continually updated to make certain the Company's most sensitive information and assets are secure.

Our commitment to strong cybersecurity planning and practices is tied to the overall approach to best practices embraced by the American Tower Global Information Technology team, which maintains ISO (International Organization for Standardization) 9001



certification for its Quality Management System (QMS). The QMS program was implemented with the goal of ensuring continuous improvement around governance, risk mitigation, internal customer feedback and satisfaction and more informed decision-making. By achieving ISO certification, the team proved it has met or exceeded globally recognized quality standards. To further enhance our cybersecurity platform, our innovation product team is currently seeking an ISO 27001 certification for its Information Security Management System (ISMS) and aligning its information security program to the U.S. government's National Institute of Standards and Technology 800-171 standard. The goal of this program is to enhance the ISMS to increase the confidentiality, integrity and availability of the products we offer.

## Corporate Responsibility at American Tower

### Cyber Threat Response Plan

Our cybersecurity response plan addresses the major phases of incident response, including:

- Preparation
- Detection and Analysis
- Containment and Investigation
- Notification
- Eradication and Recovery
- Post-Incident Analysis



17K+ training classes were completed in the past year, with

100% compliance among employees with access to sensitive information.

## Defining Material Topics

A comprehensive assessment of sustainability issues most material for our Company and stakeholders was conducted in 2017. Building on several leading sources of guidance and standards, and 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 continually monitor and assess underlying standards for relevance to the Company and our stakeholders. For example, in 2019, we reviewed our activities in light of the SDGs, as noted throughout this report. The resulting final list of topics determined to be material to American Tower is shown in the column to the right.

## Corporate Responsibility at American Tower

### Material Topics

Ethics 

Client Satisfaction and Brand Image

Regulatory Compliance\*

Anti-corruption\*

Public Policy\* and Thought Leadership

People 

Diversity, Equal Opportunity and Non-discrimination\*

Training and Education\*

Occupational Health and Safety\*

Environment 

Energy and Emissions\*

Land Use Management

Biodiversity\*

Philanthropy 

Corporate Presence in Communities\*

Performance 

Financial Performance\*

Innovation

\*Topic included in the GRI Standards framework.

The American Tower leadership team is committed to being a partner of choice for our tenants, suppliers, joint ventures and the communities where we operate.

To do so, we have established that ethical, high-quality operations are a top priority for American Tower, and we support that commitment with a strong training program and ongoing communications. Our focus on doing business the right way also ensures that we can manage legal and reputational risk.

## Recognition

- Forbes' America's Best Midsize Employers list for the second consecutive year in 2019
- Forbes' America's Best Employers for Diversity 2019 list
- S&P 500 ESG Index

American Tower is honored that our sound performance across multiple areas of operations, including diversity and inclusion, has earned us a place on Forbes' America's Best Midsize Employers list for the second consecutive year in 2019. In addition, we have been recognized in Forbes' America's Best Employers for Diversity 2019 list and the S&P 500 ESG Index.



A common thread throughout our business strategy and global operations is our commitment to operating in an ethical, transparent manner in all our day-to-day activities, communications, employee training programs and reporting. In our 2019 employee survey, 93% of the participants noted that American Tower shows a commitment to ethical business decisions and conduct.



**"Our values, culture and commitment to ethical operations are embraced at every level of the Company, and we are united in our focus on doing our jobs the right way, with the highest levels of integrity."**

– Edmund DiSanto, Executive Vice President, Chief Administrative Officer, General Counsel and Secretary

# ETHICS

## Educating and Engaging Employees

At American Tower, maintaining the right tone at the top is the bedrock of our ethics and compliance program. Our senior leaders consistently communicate these values to our employees, helping to reinforce our strong culture of ethics and integrity. In fact, 92% of employees surveyed during our biennial employee survey believe that the American Tower executive leadership team is committed to ethical business practices and conduct. This dedication to ethics and doing business the right way depends overwhelmingly on the daily conduct and decisions of our employees, which is why we invest so substantially, both in time and resources, in training and creating an ethical Company culture.

92%

of employees surveyed during our biennial employee survey believe that the American Tower executive leadership team is committed to ethical business practices and conduct.

The first step is educating new employees on our [Code of Conduct](#), which helps to ensure our employees internalize the Company's emphasis on ethics. Excellence Through Ethics, a global program led by senior leaders at American Tower, continues the training. This interactive program is conducted through both lectures and case study

discussions and encourages employees to "raise their hands" by reaching out to our Ethics Committee, local human resources department, management, local legal department or by using a third-party-administered confidential hotline to report ethical concerns or violations. Clearly understanding that the Code of Conduct applies from top to bottom—from Board members and senior leaders to employees and business partners—reinforces the importance of this topic in day-to-day operations.

Training for all employees consists of market-specific compliance courses on a range of topics, including: the Foreign Corrupt Practices Act (FCPA), our Code of Conduct and anti-harassment, confidentiality and insider trading policies. These policies are reviewed annually by our legal and human resources teams and updated as needed. All employees and Directors are required to certify annually that they understand and agree to abide by the standards outlined in these key Company policies. In addition, the Company launches certain policy refresher training courses throughout the year, which are mandatory for our employees to complete.

Training for all employees consists of market-specific compliance courses on a range of topics, including: the Foreign Corrupt Practices Act, our Code of Conduct and anti-harassment, confidentiality and insider trading policies.



We maintain a **ZERO-TOLERANCE** policy for bribery and corruption.



## Accountability and Tracking

We track all reported instances of misconduct and manage the resolution of issues on a case-by-case basis. In 2019, across nearly 5,500 employees, thousands of vendors, tenants and partners around the world, we received 133 inquiries or reports related to the [Code of Conduct](#). These inquiries and reports were made through the many available channels that we offer, including by reaching out to our Ethics Committee, local human resources and legal departments, management or by using our third-party-administered confidential hotline. All reported issues were addressed, evaluated and remediated as necessary or appropriate. The Board, through its Audit Committee, received summaries of all substantive matters addressed, and our independent auditors were apprised as to all matters that would have a potential impact on our financials or their ability to sign off on our reported results.

We maintain a zero-tolerance policy for bribery and corruption. All lines of business report 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's Disclosure Committee, composed of senior leaders from each region, reviews all SEC filings and reports any known allegations of fraud or other Code of Conduct violations. Additionally, our Office of Risk Management conducts an annual fraud risk assessment, the findings of which are subsequently reported to our Audit Committee.

We regularly reassess the effectiveness of all the avenues available to employees for reporting any issues of ethics and reputation that may arise.

133

inquiries or reports related to the Code of Conduct were received in 2019 across nearly 5,500 employees and thousands of vendors, tenants and partners around the world.



## Supplier Guidelines

American Tower holds our vendors, suppliers and other business partners to the same high standards of ethical conduct as Company staff. We require full compliance with the Company [Code of Conduct](#), including educating and training appropriate staff to ensure they understand and follow these principles. The majority of our suppliers are outside contractors who support construction and maintenance activities at our sites; these and other vendors are carefully vetted by regional teams and then are overseen by dedicated quality assurance supervisors, who are committed to ensuring our contractors adhere to relevant policies and standards. These same teams employ market-specific processes and policies to communicate our ethical and business standards to vendors and secure their compliance. We also mandate certification in FCPA compliance among higher-risk vendors in all of our international markets, complemented with vendor training where deemed appropriate. Our legal teams rigorously and continually review lists of all tenants, suppliers and service providers to ensure they are not under sanctions imposed by the Office of Foreign Assets Control (OFAC), Bureau of Industry and Standards (BIS) or other relevant authorities.

We have worked to add appropriate, country-specific measures in our contracts and other regional policies to ensure suppliers are meeting and exceeding our Company's expectations for conduct. For example, the vendor code of conduct established in India considers local labor laws. Similarly, American Tower contracts across the globe integrate local compliance with ethics, environmental protection, labor and human rights standards and the specific principles of our Code of Conduct. Those suppliers that do not meet our expectations for conduct, or are not in full compliance with our Code of Conduct, are subsequently terminated.

In the area of diversity, our Diversity Commitment in the U.S. encourages our contractors to achieve at least 20% spending on goods and services with businesses owned by women, minorities, veterans, including service-disabled veterans, and other certified diverse subcontractors, and to report on their progress meeting this goal each quarter.



American Tower contracts across the globe integrate local compliance with ethics, environmental protection, labor and human rights standards and the specific principles of the American Tower Code of Conduct.



5  
continents

19  
countries

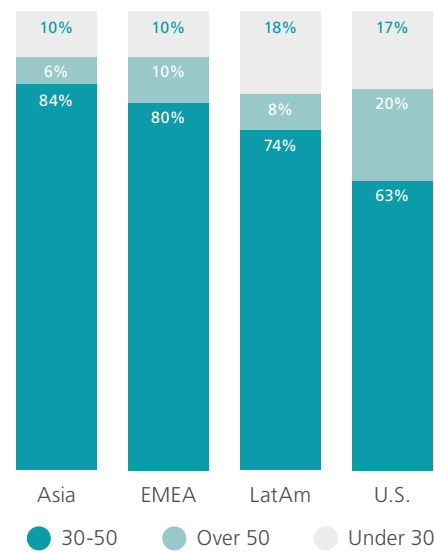
5,500  
employees

At American Tower, our employees are our partners in achieving success. Driven by a shared passion to innovate for a mobile future and committed to our mission of advancing global wireless connectivity, almost 5,500 full-time American Tower employees work tirelessly to bring our *Stand and Deliver* mission to life. With 89% of American Tower employees proud of our efforts around social responsibility, it is clear that they believe their work is meaningful to the larger community. The diverse perspective of colleagues across five continents influences every aspect of our operations, enhancing our role as an industry leader and ensuring that we constantly evolve to meet the needs of our tenants. Our senior leaders nurture this commitment, creating opportunities for team building, innovation, professional growth and community engagement. This management approach maximizes the talents of our team, allowing us to operate effectively, serve our tenants at the highest level and lead the industry in planning for the future.

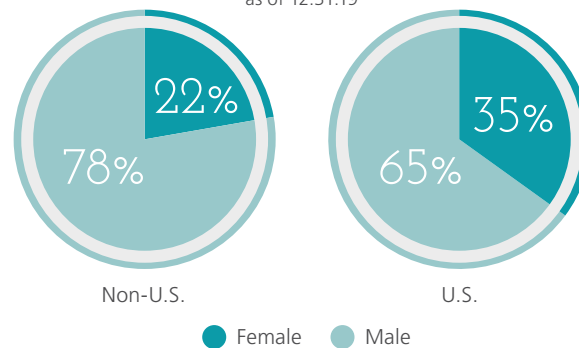
We also recognize the responsibility American Tower has to offer our employees opportunities for professional growth, fair compensation and an equitable and respectful environment.



Employee Age Distribution  
as of 12.31.19



Employee Gender  
as of 12.31.19



97%

of our employees understand and believe in the values of the Company

83%

intend to remain at the Company for the foreseeable future (an increase of 16% over the 2017 survey)

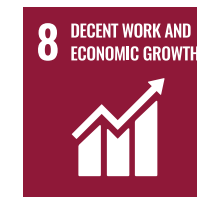
87%

think positively about employee engagement at American Tower (an increase of 8% over the 2017 survey)

90%

believe that internal teams work well together and employees share experiences and knowledge with each other

## Listening to Our Employees



The first step in honoring the pledge to our employees is listening to them and understanding their needs. We engage our employees through *Submit a Question to Our CEO* communications, Town Hall meetings, team meetings and biennial Companywide surveys to better understand their perspectives on key issues related to working at American Tower. Survey responses also show that our sustained focus on building a culture on the foundation of strong values, ethical business practices and outstanding leadership has paid off. Of the almost 91% of employees who responded to our 2019 biennial employee survey, 92% are proud to work for our Company.

Listening is only one part of the equation. We also act on the feedback received. Based on prior-year feedback, for example, ATC Mexico conducted comprehensive communication, team building and networking events built around the Company Core Principles to strengthen understanding of Company values, goals and major initiatives. ATC Colombia responded to employees' desire for deeper collaborations within and across departments with an innovative new flexible-workspace program that promotes wider interaction and cooperation.

## Employee Benefits

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 U.S., the benefits we offer include but are not limited to:

- Medical / dental / vision
- Retirement savings / 401K
- Stock purchase plan
- Life / disability insurance
- Wellness programs
- Parental leave
- Adoption assistance
- Education assistance

## Core Principles

- Understand our customers' needs and satisfy them
- Hire good people and empower them
- Focus on solutions, not problems
- Do what we say we're going to do
- Have fun
- Play to win

## Employee Training and Development

Our most important asset at American Tower is our people. Employee feedback indicates that engagement, understanding of the Company's Core Principles and interest in remaining at American Tower are all enhanced by strong professional programs. Comprehensive, creative and flexible programs for training and professional development are also a critical investment in our capacity to provide tenants with outstanding support and customer service. Beyond sustaining the achievement of our strategic goals, these programs demonstrate to our teams that we want them to understand all their skills and competencies, know their career aspirations, foster their professional talents and create opportunities for them to grow in their career.

Beginning with an in-depth and well-supported onboarding program (familiarizing employees with everything from our corporate values and [Code of Conduct](#) to cybersecurity and information privacy policies), followed by self-assessment and performance management programs, we encourage all employees to set strong goals for themselves and their teams.

With more than 1,000 distinct courses offered globally, American Tower also considers local needs: Courses are offered in multiple languages, tailored to regional goals and updated regularly to address changing marketplace dynamics and employee interests. In 2019, employees participated in approximately 71,500 hours of internal training across all markets, an increase of 20% from 2018. This translates into an average of 14 hours of classroom or online training per employee. In addition to our own professional development programs, American Tower supports its employees in pursuing further education, with around \$250,000 invested in tuition reimbursement in 2019.

Our Company offers all employees a variety of development programs that address business needs and align with strategic initiatives, training our staff in:

- Compliance and foundational skills
- Job-specific matters
- Professional development and interpersonal skills
- Leadership development and management



## Professional Development at American Tower

8

TowerStar Award winners

346

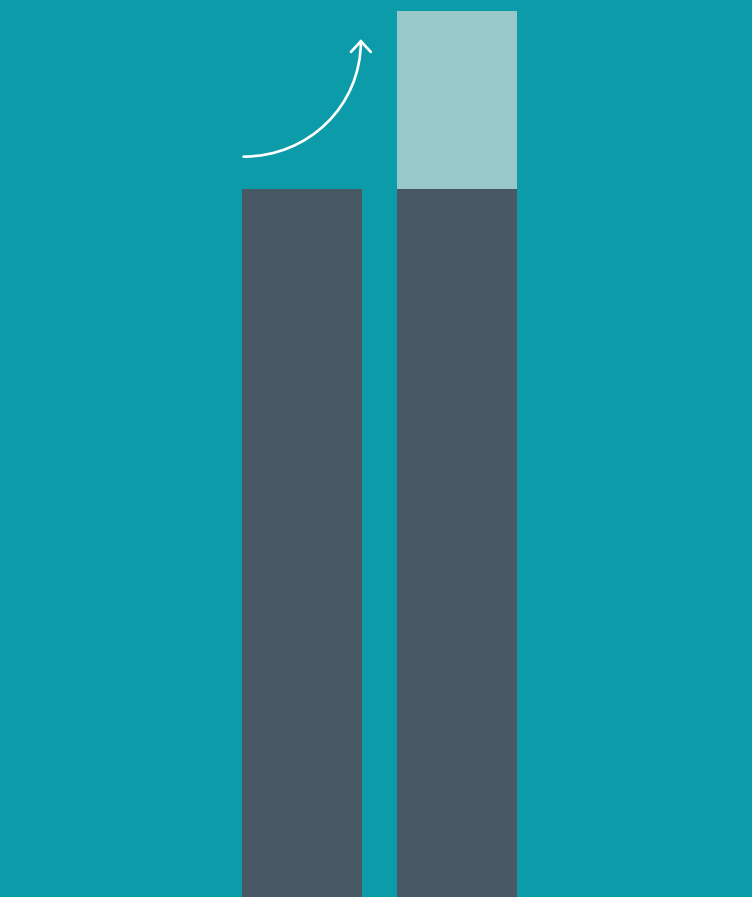
MDAT participants

44

LEAP participants

71,500

hours of training and development



20%

increase in training and development hours over 2018

## TowerStar Award Program

Our TowerStar Award program, encouraging employees across our markets to nominate individuals and teams they believe deserve recognition for excellence by senior leadership and the Board of Directors, recently celebrated its 18th anniversary. To date, more than 146 American Tower employees and 24 teams have been celebrated as TowerStar Award honorees.

- **Josefina Hernandez**, the Director of Legal and Public Affairs in Buenos Aires, Argentina, recognizes the important role strong partnerships—with clients, municipalities and utility companies—play in our success. In a short period of time, she expanded and deepened relationships across these key groups, both positioning the Company as an industry leader and supporting her colleagues in exceeding their regional business goals.
- As Vice President for Technology, Projects and Innovation in Gurgaon, India, **Bijender Yadav** takes a proactive approach to identifying new products, innovative solutions and streamlined models of service delivery. As a result, his team has successfully launched new projects—including an in-building solution for the Mumbai International Airport—that highlight our effectiveness at meeting complex client needs.
- The **ATC India Kerala Circle Team** (led by **Ramachandran Balan**, Circle Head – Tamil Nadu) helped their region maintain service during the devastating monsoon rains of August 2018. The team immediately established an emergency operations center to ensure networks remained operational, allowing first responders and others to communicate critical information to impacted parties. As a result of their tireless efforts, all sites were back on air within six days, the best recovery time of any tower company in the area.



Josefina Hernandez

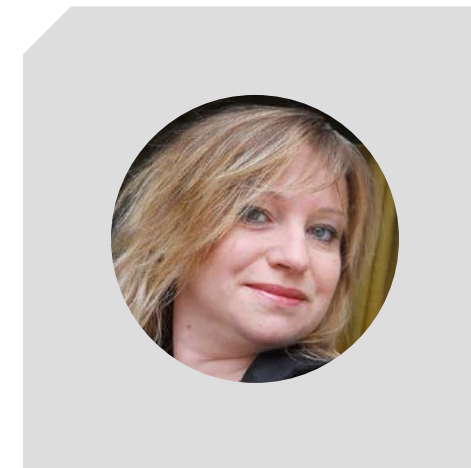


Bijender Yadav



The ATC India Kerala Circle Team led by Ramachandran Balan

146 employees and 24 teams have been celebrated as TowerStar Award honorees



“I found the MDAT training to be very well structured. The learning stages are clear and are greatly enriched by expert testimonies from senior leaders talking about the paths they took, their mistakes and their successes.”

– Anne LeCadre, Rooftop Leasing Manager, ATC France

We also have a comprehensive talent-management review process to develop future leaders and ensure effective succession planning at the Company. The Management Development at American Tower (MDAT) program has been designed to provide continuous development opportunities for managers and directors, help identify tools and resources that enable both management and team success, and build and strengthen the competencies of people managers to help them respond to the needs of a growing and increasingly complex organization. It offers a blended classroom and online curriculum, developing skills such as managing teams, delegating and delivering essential feedback.



Senior leaders attending LEAP in September 2019

For a second year, the Company offered a four-day American Tower global senior leadership program, Leadership Excellence at American Tower Program (LEAP), designed in partnership with and held at the Massachusetts Institute of Technology (MIT) in Cambridge, Massachusetts. LEAP covers global strategy, innovation and design thinking, organizational leadership and change and digital ecosystems. Led by MIT Sloan professors and the American Tower leadership team, more than 40 senior leaders from across the globe collaborated and completed learning modules that helped them grow in understanding what is required to be an effective leader and what that leader can do to influence others, negotiate change and drive both strategy and organizational transformation unique to each region.

Our regions and individual markets build on Companywide development with locally tailored programs. For example, in Africa, we launched the SHINE program, which directly aligns with the region’s strategic expansion goals, with 10 interactive, employee-focused sessions tied to key SHINE elements, followed by training sessions focusing on change readiness and change management in 2019, with customer and commercial excellence being planned as part of the next phase. The program has focused on developing employees at all levels, fostering a customer-focused approach and emphasizing the importance of teamwork and collaboration, setting the stage for both personal development and successful execution of the Company’s strategic plan in Africa.

## SHINE

- Strategic customer and stakeholder positioning for growth
- High-performance culture
- Innovation / proactive positioning for densification
- New market entry (low cost, low risk)
- Existing market scale



“American Tower will always be an inclusive community that accepts and celebrates the wonderfully diverse backgrounds of our people. We will always respect, support and treat each other as equals. Racism will never be tolerated at our Company, period.”

– Thomas A. Bartlett, President and Chief Executive Officer

## Promoting Diversity and Inclusion



As a global company, American Tower relies on a diverse, multicultural workforce with a wealth of varied experiences and backgrounds. Accordingly, everyone at American Tower, regardless of position, is accountable for fostering an inclusive and equitable environment. With nearly half of the American Tower Board either

female or part of a minority group, we see every day how diversity provides a competitive advantage. Consistent with our commitment to the CEO Action for Diversity and Inclusion pledge as discussed in more detail below, our Board is fully engaged at a strategic level in our efforts to enhance diversity, bringing their own extensive experiences to the table.

The range of perspectives throughout our Company infuses fresh ideas into our business and helps us remain connected to our tenants in a dynamic global market. Further, it enables us to understand and better serve the communities where we do business. In 2019, in recognition of the diversity initiatives we have put into place, American Tower was named to Forbes’ list of America’s Best Employers for Diversity. This annual list is based on employee feedback and recognizes U.S. companies across all industries for their inclusive workplace practices.

Every employee starting a career at American Tower is aware from the outset that diversity for us is a differentiator, and we are proud of our [Diversity Statement](#). In addition, our recruiting efforts consistently include strategies to build diverse candidate pipelines and create an environment that maintains a diverse team of global employees. Many of the events and charitable activities American Tower supports in the workplace and community setting communicate our commitment to diversity and enhance our recruiting efforts (see sidebar on page 33). Our sponsorship of outside organizations, such as the Girls in Tech Forum and Hope For The Warriors, as well as our hiring of several people with intellectual and developmental disabilities from Best Buddies in many of our LatAm markets, also support this goal.



## American Tower Diversity Statement

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



ATC South Africa celebrates Nelson Mandela International Day

We also know that the competition for diverse talent can be fierce. To ensure we are well-positioned to attract the best candidates, the team considers strategies that encourage individuals to choose to work for and remain with American Tower. This includes proactively pursuing pay equality (and employing an ongoing process to identify any unnoticed discrepancies), as well as regularly reviewing and enhancing our benefits programs to ensure they best meet the diverse needs of our employees and their families.

Once at American Tower, all new employees must complete the Diversity at American Tower online training, as part of a comprehensive onboarding process. The course content is customized for each regional market, and almost 100% of employees complete this training within 30 days of their hiring. This initial training is supplemented with implicit bias education and other market-specific training around diversity.

As part of our efforts to help diverse employees both succeed in their roles and have access to advancement opportunities, we create a variety of development opportunities unique to each market. For example, we have a number of programs designed to enhance 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 Wireless Infrastructure Association. As a result, we are in a stronger position to promote women to management level: as of the end of 2019, 29% of female employees held a management level or above position in the U.S. and 16% held such positions internationally.

American Tower has fully embraced the ethos behind the CEO Action for Diversity and Inclusion pledge, which recognizes that addressing persistent inequities and expanding diversity in the workplace require ongoing commitment and self-reflection. We continue to explore formal and informal programs that allow us to foster ongoing dialogue around complex issues and address challenges and learn from both what we do well and programs that do not meet our expectations. While we are proud of both the spirit behind our commitments and how we follow through on them, we continue to evolve and invest in this area as an ongoing corporate priority.



## Commemorative Month Recognition

American Tower is proud to support our global workforce with diverse celebrations. During cultural recognition months, American Tower communicates with employees to highlight our philanthropic involvement in different civic and outreach efforts that honor the spirit of the month.

### February: Black History Month

The National Society of Black Engineers and The Thurgood Marshall College Fund

### March: Women’s History Month

The Anita Borg Institute and The Mona Foundation

### June: LGBTQ Pride Month

The Trevor Project and The Human Rights Campaign

### September & October: National Hispanic Heritage Month

The Hispanic Scholarship Fund

### November: Veterans Day

Hope For The Warriors

## Veterans and American Tower

American Tower takes a number of steps to recruit military veteran candidates to the Company, including its sponsorship of Warriors4Wireless, a nonprofit charity that seeks out veterans for positions in the wireless industry. One such employee is Rick Tufts, a 24-year U.S. Army and Operation Iraqi Freedom combat veteran who is now an Operations Site Lead.

At American Tower, Tufts focuses on safety, security, maintenance and upkeep of our towers across Maine and Northern New Hampshire. Tufts' supervisor, Territory Manager Matt Beaupre, notes the experience veterans have working with complex technology in field locations translates particularly well to the responsibilities associated with keeping the Company's more than 40,000 communications sites in the U.S. safely and reliably operating around the clock and all year long.

Tufts credits part of his success to the mentoring and support he has received from Beaupre, saying: "He understands the challenges that come with being a military family. That has fostered our relationship and open communication."



**"If I were talking to veterans or people transitioning on from the military, I would say: Look to American Tower. The management understands the needs of veterans and the unique abilities that veterans possess to bring to other organizations."**

**– Rick Tufts, Operations Site Lead, U.S. Tower**

## People



U.S. Tower staff celebrating Halloween 2019

## Have Fun!

At American Tower, we work hard to deliver on our commitments to our team, customers and community. By taking a step back, recognizing shared successes and celebrating milestone moments, we create a positive working environment that reflects one of our Core Principles: "Have Fun."

This principle is alive in big and small ways in each of our offices across the globe. For example, one popular team-building tradition is the annual Halloween party at our U.S. Tower headquarters in Massachusetts. Friendly competition among employee teams transforms the office into creative sets—ranging from Snow White and the Seven Dwarfs to Star Wars. Even the most senior team members get in on the fun. Pictured above is Steven Vondran, Executive Vice President and President, U.S. Tower Division, dressed as a ghost.

## People



## Encouraging ICT and STEM in Ghana

We were honored to host 60 selected girls and their teachers, from the Western Region of Ghana, for a week-long Girls in Information and Communications Technology (ICT) training program in August 2019 in Accra, Ghana. Girls in ICT is part of an initiative backed by International Telecommunications Union Member States and sponsored by ATC Ghana in partnership with Ghana's Ministry of Communications to empower and encourage girls to pursue ICT, as well as Science, Technology, Engineering and Math (STEM) careers. As part of a program organized by female American Tower team members, the participants spent two days at our Accra headquarters in operations, sales, business process management and human resources and learned about the Company's business operations and the many practical applications of ICT education and training in the job market, as well as the growing importance of artificial intelligence at American Tower and in the industry as a whole.

Our Company was especially honored to welcome to the event Ghana's Minister of Communications, Hon. Ursula Owusu-Ekuful (MP), who recognized American Tower in her annual address to Parliament:

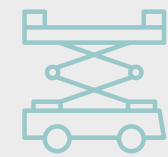


**"We are optimistic that this initiative and the partnership with ATC Ghana will enable the girls to gain a practical appreciation of ICT and the many opportunities that it provides."**

**– Hon. Ursula Owusu-Ekuful (MP), Ghana's Minister of Communications**



## AMERICAN TOWER Safety-Related Training\*



12,500  
work at  
height hours



6,200  
defensive  
driving hours



19,900  
office and  
management hours



3,800  
general health  
and safety hours

\*In some cases, hours include training of our vendors and contractors.

## Health and Safety Management

Safety is a priority at American Tower. We conduct risk assessments, invest resources in making certain everyone working on an American Tower property (regardless of their affiliation with the Company) can do so safely and ensure continued vigilance on all aspects of compliance. American Tower has extensive operational manuals with details on tower and site safety protocols, a strong commitment to incident reporting and corrective actions and a comprehensive program for ensuring vendor compliance with safety standards and certifications.

As an industry leader, we help to set the standards for training and certification in the wireless industry. Members of our management team hold leadership roles in organizations such as the Telecommunications Infrastructure Registered Apprenticeship Program and Telecommunications Industry Association (TIA) in the U.S., where they are strong advocates for workplace safety best practices. In addition, we are members of the National Association of Tower Erectors, a leader in safety standards for the tower erection, service and maintenance industry.

Critical to ensuring our towers are structurally safe for field personnel, vendors, tenants and communities is our strict adherence to the rigorous standards set forth by the relevant authorities, such as the TIA. Our engineering teams around the world are responsible for this compliance and ensuring the proper design, modification and maintenance of our tower portfolios. In 2019, our industry-leading teams of experts provided fast, reliable and up-to-date engineering services for over 53,000 structural analyses across all of our markets.



All American Tower employees conducting work on towers undergo training on topics ranging from working at heights to relevant rescue techniques. Other topics we cover through trainings and manuals, complying with all applicable policies and local regulations, include the use of personal protective equipment, electrical safety, hazardous waste handling, motor vehicle safety and issues regarding work around electromagnetic fields. Safety training constitutes a major percentage of our overall training hours: Work at height (12,500 hours), defensive driving (6,200 hours), office and management (19,900 hours) and general health and safety (3,800 hours).

A significant portion of tower-related work on our properties is performed by third-party vendors. American Tower requires these vendors to hold appropriate certifications in tower safety, climbing/rigging expertise and electrical safety protocols. Vendors must also undergo locally required audit or verification processes regarding their qualifications and training, and our Company performed more than 500 of these audits during 2019.

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 important aspect of our health and safety management processes is the control of access to our sites. Every site has security measures, ranging from fencing and locks to alarm systems monitored 24/7 via a centralized operations center and site-specific guards.

### Safety certifications

American Tower set the goal of earning ISO 45001:2018 certification for all markets (as of December 31, 2018) that have determined certification attainable by 2023. As of the end of 2019, four markets have earned certification for



their health and safety management systems according to the Occupational Health and Safety Assessment Series 18001 and ISO 45001 frameworks, with three more markets pursuing such certification in 2020.

Earning certification for these standards demonstrates a firm organizational commitment to effective health and safety management, including strong documentation, training and continuous improvement processes.

“It was a true team effort to achieve ISO certification in the South African market; the team already had the commitment to high safety standards and best practices and believed that this work would support further leadership in this area. As a result, the entire team is well-aligned on our standards.”

– Karien Lubbe,  
Occupational Health, Safety and  
Environment Compliance Officer,  
ATC South Africa

People

## Safety Data

While we outsource a portion of our tower technician crews, in 2019, our reportable injury rate (incidents per 100 full-time equivalent employees) was 0.04, comparing favorably to the 2018 rate of 0.24 and significantly below the industry average of 2.5.<sup>1</sup>

**We attribute our low rate of injury to a comprehensive focus on safety training, protocols and oversight.**

American Tower continuously monitors safety data and works closely with our country teams to identify opportunities to improve training and safety systems, in order to achieve our goal of zero reportable injuries.

1. As of the preparation of this report, 2019 data had not been released; 2018 industry data used.

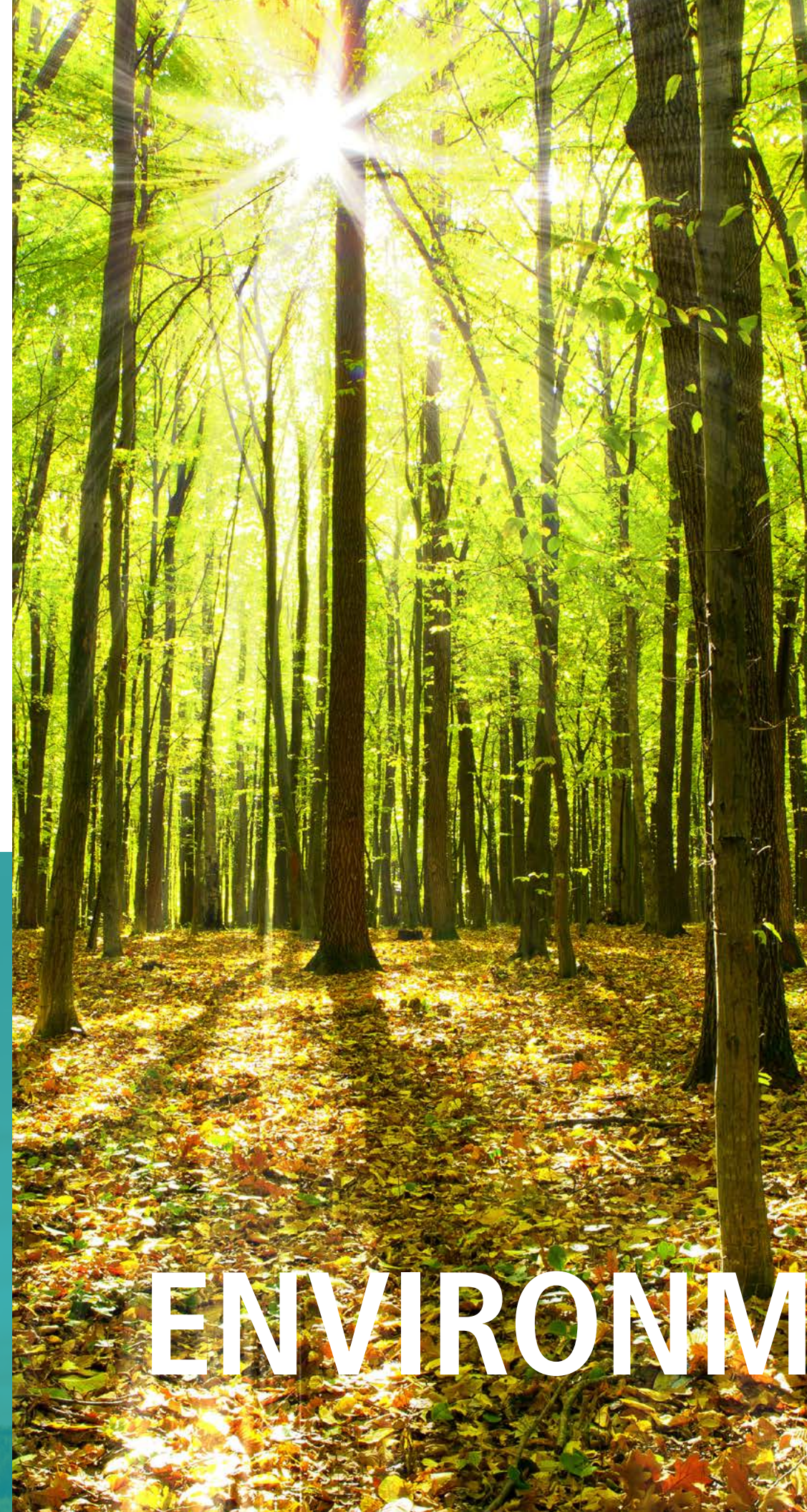
	2018	2019
Total employees	5,026	5,454
Total number of reportable injuries to employees	12	2
Reportable injury rate (employees) <sup>2</sup>	0.24	0.04*
Total number of lost time injuries	10	2
Lost time injury rate (employees) <sup>2</sup>	0.20	0.04

\*Compared to industry average of 2.5

2. Rates calculated as incidents per 200,000 working hours or 100 FTE.

## Using Drones to Enhance Employee Safety

In 2019, after thorough training and testing through our innovation platform, we received pre-approval from the Federal Aviation Administration to fly drones at approximately 8,000 towers across the U.S. The drone program leverages automation technology to digitize our assets and automate information collection across our portfolio. The advancement allows us to achieve greater accuracy in tower data, with the end results to improve safety, increase operational efficiency and, ultimately, enhance the customer experience. The successful launch of the program also opens opportunities to develop additional innovative solutions for the business and has reinforced the value of the program as we explore expanding it internationally.



The American Tower strategy for fulfilling our environmental and energy responsibilities has three pillars:



Reducing consumption of fossil fuels and other resources



Accelerating the deployment of clean and renewable energy



Using land responsibly and mitigating our impact on land and wildlife

# ENVIRONMENT



American Tower is committed to operating as sustainably as possible and with the least possible environmental impact.

Our overall business model of developing and leasing neutral infrastructure to multiple communications providers, as an alternative to each company building its own, fundamentally reduces consumption of energy, materials and resources.

We have undergone a comprehensive assessment of the risks and opportunities relative to climate using the TCFD guidance as our model. Our analysis considered a variety of factors, including compliance with evolving policy mandates, acute and chronic physical risks, as well as opportunities for resource efficiency, resilience and energy source. Based on the resilience and sustainability of the American Tower operating model, the financial impacts of these risks to our business are low, but the exercise reinforced the benefits of our ongoing strategy in this area.

Through our Green @ American Tower initiative and other programs, we continually assess our operations and protocols to ensure we are not just doing our part on addressing climate change, but leading our industry in exemplifying best practices for energy use and environmental stewardship.



## Overview of Energy Usage

As a provider of real estate to the information and communications technology sector, American Tower is committed to helping our energy-intensive tenants better implement sustainable energy practices. In many of our markets, including in the U.S., Europe and Latin America, the electricity usage of our tenants' equipment is separately metered, and their energy consumption is unknown to us. This is different in much of Africa and India, where we are responsible for sourcing and delivering the energy that keeps our tenants' connectivity equipment up and running. Energy consumed by our tenants' cellular equipment accounts for more than 99% of our reportable carbon footprint, as the recurring emissions directly related to the operation of our administrative offices and to the manufacturing of the steel that comprises our towers is minimal. Nevertheless, we have been and remain committed to helping encourage the tenants we support to operate as sustainably as possible and back that encouragement with energy conservation and capital investment.

We sell primary power as a service to tenants in parts of Africa and India with nonexistent or unreliable electric grids and have found this initiative to be a marketplace differentiator that drives our overall customer satisfaction. These markets also represent nearly all of our 2019 carbon emissions and, as such, represent the largest source of emissions the Company can substantially impact and directly reduce. Accordingly, American Tower made a commitment in 2017 to reduce this Scope 1 fossil fuel consumption and diesel-related Greenhouse Gas (GHG) emissions in Africa and India by more than 60% by 2027, or 140 million liters of diesel annually. Several programs are now underway to achieve this goal. During 2019, we cut the overall amount of diesel purchased for site generators by over 21 million liters, or nine percent. To create leadership-level accountability for fulfilling this commitment, the Compensation Committee included a targeted reduction in

diesel-driven generators in emerging markets in our CEO's short-term incentive compensation plan for 2019.

**The 65 million liter reduction is the equivalent of taking more than 35,000 cars off the road for a year or preserving more than 65,000 acres of forest.**

As a result of the significant efforts detailed in this report, the Company reduced actual annual diesel consumption by approximately 34 million liters from our 2017 baseline and by approximately 65 million liters after normalizing 2019 consumption for site acquisitions and new builds in 2018 and 2019.<sup>1</sup> This normalized reduction represents the

equivalent of 163,000 avoided metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) and moves us 46% of the way to fulfilling our 10-year goal. The 65 million liter reduction is the equivalent of taking more than 35,000 cars off the road for a year or helping to preserve more than 65,000 acres of forest. Recognizing the significant positive environmental impact, American Tower will build on this early success and continue our methodical approach to decreasing fossil fuel consumption in all areas.

1. Normalization calculations make certain assumptions and estimates for newly acquired or built sites based on applying the average 2017 diesel usage per site.



Our diesel fuel reduction efforts since 2017:

Over 21 million liters cut for site generators

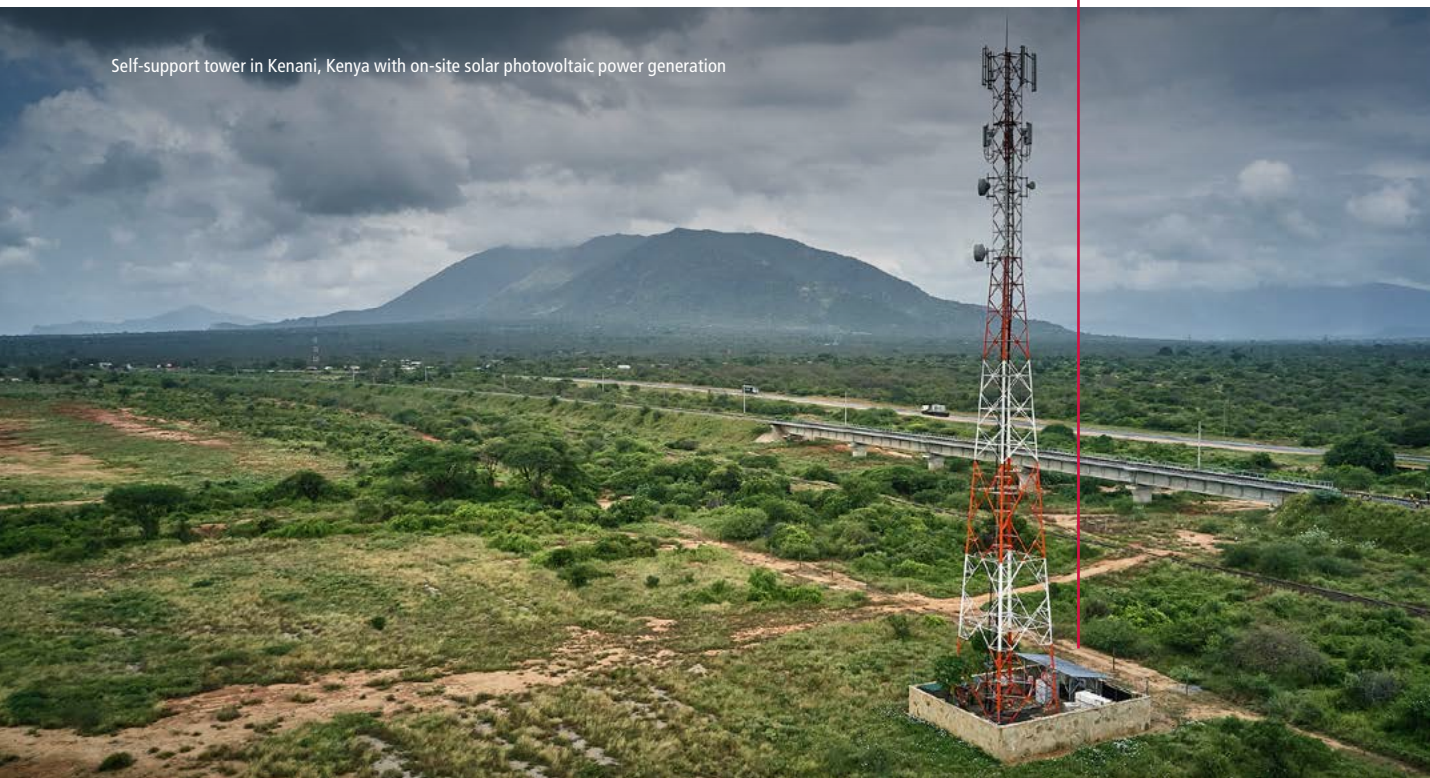
65 million liter per year reduction Companywide

## Accelerating Our Deployment of Clean Energy Solutions

Achieving our 2027 emissions reduction goal involves deploying a broad mix of solutions, tailored to close analysis of individual sites' energy usage patterns. American Tower continues to explore options to reduce energy usage at the site level, expand use of clean energy and implement office-based and other strategies when opportunities to improve operations exist.

### Reducing energy usage at the site level

Careful analysis of site-based energy patterns has allowed us to replace equipment and update technologies in ways that also achieve energy reduction goals. For example, we have installed intelligent automatic voltage regulators at certain sites to ensure they can continue to use grid power during periods of fluctuating voltage. Additionally, we have replaced traditional lead-acid batteries with superior performing LIBs for on-site energy storage. Further, our site optimization program for HVAC configurations lowers cooling demand, which in turn reduces generator run hours and demand on the grid. Our site optimization program in India has been particularly successful, completing close to 1,000 site conversions in 2019. By transitioning from indoor to outdoor cabinets and converting sites to free, natural and transmission cooling unit technologies, we reduced diesel usage required by our tenants by an estimated 420,000 liters and related electricity consumption by 6,000 megawatt-hours (MWh) annually.



Self-support tower in Kenani, Kenya with on-site solar photovoltaic power generation

Around the world, we have also now invested more than \$10 million to transition tower lighting to LED technology, increasing the number of LED-lit sites from 16,000 to 21,000 during 2019. Deploying LED technology cuts lighting-related energy consumption and costs at these sites by up to 85%. It also delivers many operational and safety benefits due to the longer lifespan of LED lights and reduced need to deploy technicians to climb towers to replace them.



We also understand that because our tenants are the end-users of the energy at our sites, our ultimate energy reduction success depends on working together with them to solve the challenges the world is facing. While still at the early stages of partnering to reduce our sites' energy consumption, we have achieved strong, early success in India, where we have collaborated with our tenants to eliminate diesel usage at 4,200 sites, reducing the recurring diesel usage by 2.4 million liters annually. We continue to explore similar options across our portfolio.

### Implementing site-based green energy solutions

As of the end of 2019, we had invested more than \$100 million in green energy solutions, such as on-site solar photovoltaic power generation, LIBs and other optimization initiatives, primarily in our African and Indian markets. During 2019, we more than doubled our solar portfolio in Africa, implementing solar technology at over 500 sites to bring our total to 940 sites with 3.7 megawatts (MW) of installed solar generation capacity. Coupled with our already strong solar footprint in India, this brings our solar portfolio to approximately 2,995 sites globally, totaling 12.3 MW of installed solar generation capacity. These solar sites produced 14,065 MWh of clean, on-site energy in 2019.

In conjunction with the investments in solar, we now have 4,538 sites using LIBs, up from 1,800 in 2018. American Tower and our tenants are benefiting from their superior performance compared to cyclic lead-acid batteries, as well as the improved efficiency due to their reduced charging times. LIBs are less sensitive to higher temperatures, which reduces cooling thresholds and further reduces energy consumption. LIBs also support and enhance our solar photovoltaics deployments, as they can operate efficiently under a partial state of charge, while solar panels either cover electric load from tower equipment or recharge the LIBs.

Since ramping up our African investments in solar and LIBs in 2018, we estimate that our expenditures in clean energy solutions have resulted in more than \$18 million of fuel savings and have avoided more than 60,000 MTCO<sub>2e</sub> of emissions by eliminating the need for approximately 24 million liters of diesel annually, all the while increasing the reliability and resilience of our infrastructure.

\$10M+

invested to transition tower lighting to LED technology

12.3MW

installed solar generation capacity across a solar portfolio of approximately 2,995 sites globally

4,538

sites are now using lithium-ion batteries, up from 1,800 sites in 2018



Our lithium-ion batteries in action



**Other efforts**

American Tower is pursuing many other efforts to reduce energy consumption around the world. While implementing strategies to reduce energy usage and making capital investments to create on-site renewable generation are the focus, where these options are not financially or logistically optimal, we seek other ways to reduce our impact and carbon footprint. For example, our U.S. Tower operations achieved carbon-neutral status in 2019 through a combination of 92,145 MTCO<sub>2</sub>e of purchased renewable energy certificates and carbon offsets. These market-based instruments offset all of our U.S. operations electricity consumption across the country, effectively ensuring we paid for the generation of renewable energy equivalent to what we took from the conventional grid, as well as carbon credits to cancel out the impact of diesel and gasoline usage, and our Scope 3 air-travel and hotel-stay emissions.

Our U.S. Tower operations achieved carbon-neutral status in 2019 through a combination of

**92,145 MTCO<sub>2</sub>e**  
in renewable energy certificates and carbon offsets.

**The Green @ American Tower Initiative**

This program focuses on minimizing the environmental impact of the materials used in our daily operations by reducing, reusing and recycling. This includes everything from solar panels on our U.S. operations headquarters to electric vehicle charging stations in our office parking lots.



“Through a focused team effort, we designed and installed solar photovoltaic power systems at over 200 off-grid sites in Uganda, with 160 more installations planned for 2020. Our optimal location at the equator means that we have many days of sunshine throughout the year and, therefore, high solar energy potential. By using deep-cycle LIBs at our solar sites, we have ample and efficient storage of all solar energy generated, providing clean energy to our tenants, even throughout the night. Our work in Uganda has created a template for off-grid solar specifications for our other markets throughout Africa.”

– Nelson Tashobya, Senior Manager Technical Support, ATC Uganda

**2019 Energy Consumption**

For our 2019 assessment of energy usage and GHG emissions, we leveraged the improved data collection protocols implemented in 2018 to build out increasingly detailed consumption and cost data from each of the 17 countries in which we were operating as of the end of 2019 (now up to 19 countries as a result of end-of-year acquisitions<sup>1</sup>). Even as we continued to grow our portfolio of towers, overall energy usage decreased in 2019 from 4.9 million MWh to 4.8 million MWh, a two percent reduction. Tower-related energy accounted for approximately 99% of the Company’s total energy usage: 57% via grid-supplied electricity and 42% via diesel-driven generators.

**Energy**

Performance Indicator	Unit	2019	2018	% Change	
Tower/Rooftop/DAS operations electricity	MWh	2,737,317	2,624,344	4%	
Fiber operations electricity	MWh	6,184	5,907	5%	
Building electricity	MWh	10,407	11,681	-11%	
Building heating	Natural gas, heating oil	MWh	176	41	329%
Building district heating	District energy	MWh	0	30	-100%
Tower generators <sup>2</sup>	Diesel, gasoline, and propane	MWh	2,029,051	2,240,723	-9%
Vehicles	Diesel and gasoline	MWh	15,259	14,589	5%
<b>Total Energy Usage<sup>3,4,5</sup></b>	<b>MWh</b>	<b>4,798,394</b>	<b>4,897,315</b>	<b>-2%</b>	

In 2019, the Company’s estimated emissions, calculated according to the Greenhouse Gas Protocol, decreased three percent to 2.3 million MTCO<sub>2</sub>e, of which 0.6 million metric tons were direct Scope 1 emissions from the combustion of fuels used by heating systems, generators and vehicles and 1.8 million metric tons were indirect Scope 2 emissions from the generation of electricity.

**GHG**

Performance Indicator	Unit	2019	2018	% Change
Tower/rooftop/DAS operations electricity	MTCO <sub>2</sub> e	1,775,664	1,789,778	-1%
Fiber operations electricity	MTCO <sub>2</sub> e	1,547	1,294	20%
Building electricity	MTCO <sub>2</sub> e	3,410	5,888	-42%
Building heating	MTCO <sub>2</sub> e	32	7	357%
Building district heating	MTCO <sub>2</sub> e	0	7	-100%
Tower generators <sup>2</sup>	MTCO <sub>2</sub> e	553,104	611,717	-10%
Vehicles	MTCO <sub>2</sub> e	3,145	3,616	-13%
<b>Total GHG Emissions<sup>3,4,5,6</sup></b>	<b>MTCO<sub>2</sub>e</b>	<b>2,336,902</b>	<b>2,412,307</b>	<b>-3%</b>
Direct (Scope 1)	MTCO <sub>2</sub> e	556,281	615,347	-10%
Indirect (Scope 2)	MTCO <sub>2</sub> e	1,780,621	1,796,960	-1%

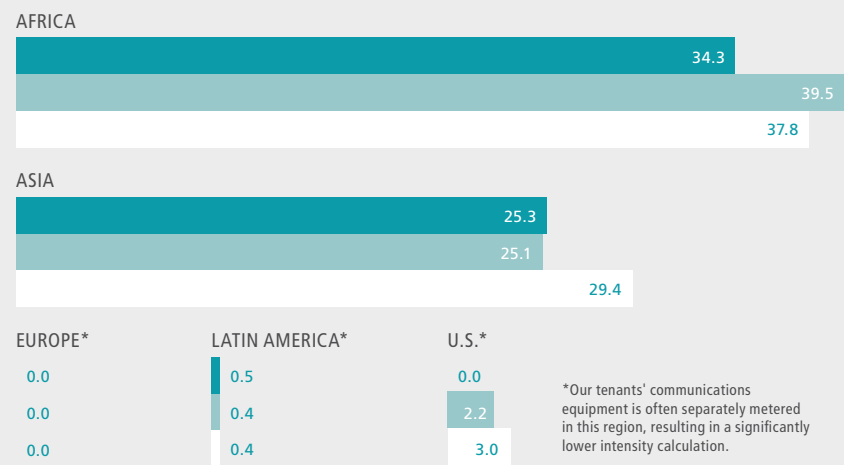
**Water**

Performance Indicator	Unit	2019	2018	% Change
Water Consumption <sup>7</sup>	m <sup>3</sup>	50,166	43,419	16%

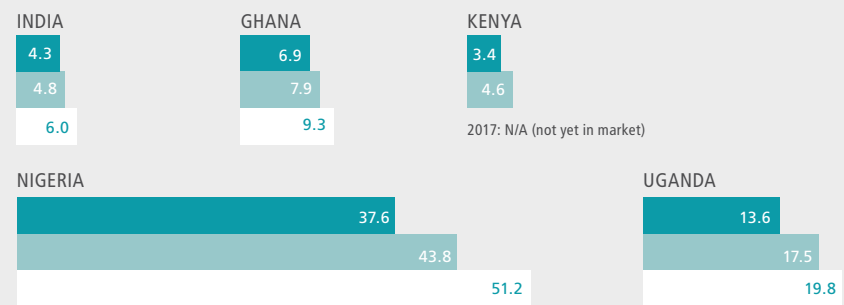
1. The Company launched operations in Burkina Faso and Niger through the Eaton Towers acquisition, which closed on December 31, 2019. The GHG impact was determined to be immaterial to this report, and therefore, these two markets were excluded from our 2019 data collection process.  
 2. Includes building generators, which make up less than 1% of this balance.  
 3. Energy and GHG are collected and compiled according to the principle of operational control.  
 4. Upon reviewing our energy inventorying procedure, we found an error of ~3.26% in total energy consumption for 2018, resulting in underreporting of MTCO<sub>2</sub>e of ~1%.  
 5. While an MTCO<sub>2</sub>e measurement approach that conforms with the Greenhouse Gas Protocol relies on energy consumption data, the Company currently relies primarily on energy cost data in some markets as the calculation input for energy consumption that is then used to calculate the related MTCO<sub>2</sub>e footprint. The Company has determined this approach to be appropriate to achieve a materially accurate emissions calculation and presentation, considering the complexity of the business and existing management systems.  
 6. Electricity emission factors updated to IEA Emission Factors 2019 Edition.  
 7. Water consumption volume reflects actual consumption where available and relies on estimations where the data is unavailable.

# Energy and GHG Emissions Snapshot

## Tower GHG Emissions Intensity by Region<sup>1</sup> MTCO<sub>2</sub>e per Tower



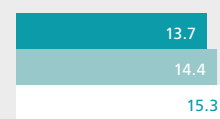
## Total Diesel GHG Intensity MTCO<sub>2</sub>e



## Energy Intensity per Tower MTCO<sub>2</sub>e



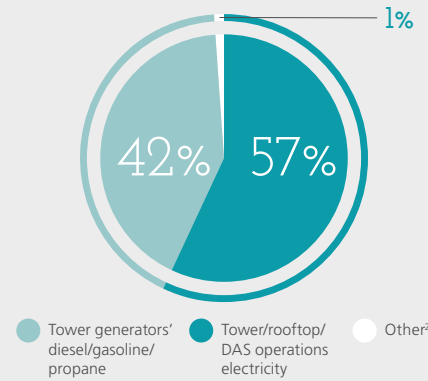
## GHG Emissions per Tower MTCO<sub>2</sub>e



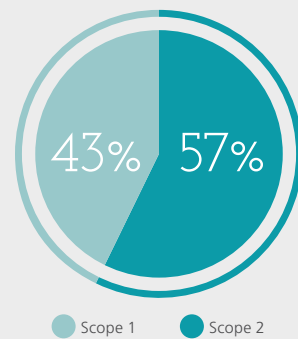
● 2019 ● 2018 ● 2017

1. To account for new tower builds and acquisitions during the year, intensity calculations were performed using a weighted average of quarter-end tower counts.  
2. "Other" comprises Fiber Operations Electricity, Building Electricity, Building Heating, Building District Heating and Vehicles.

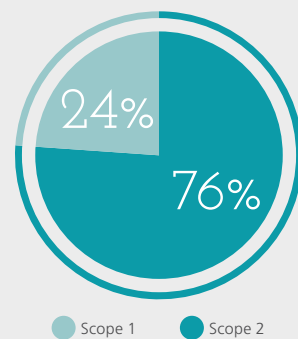
## 2019 Total Energy Usage



## 2019 Energy Sources

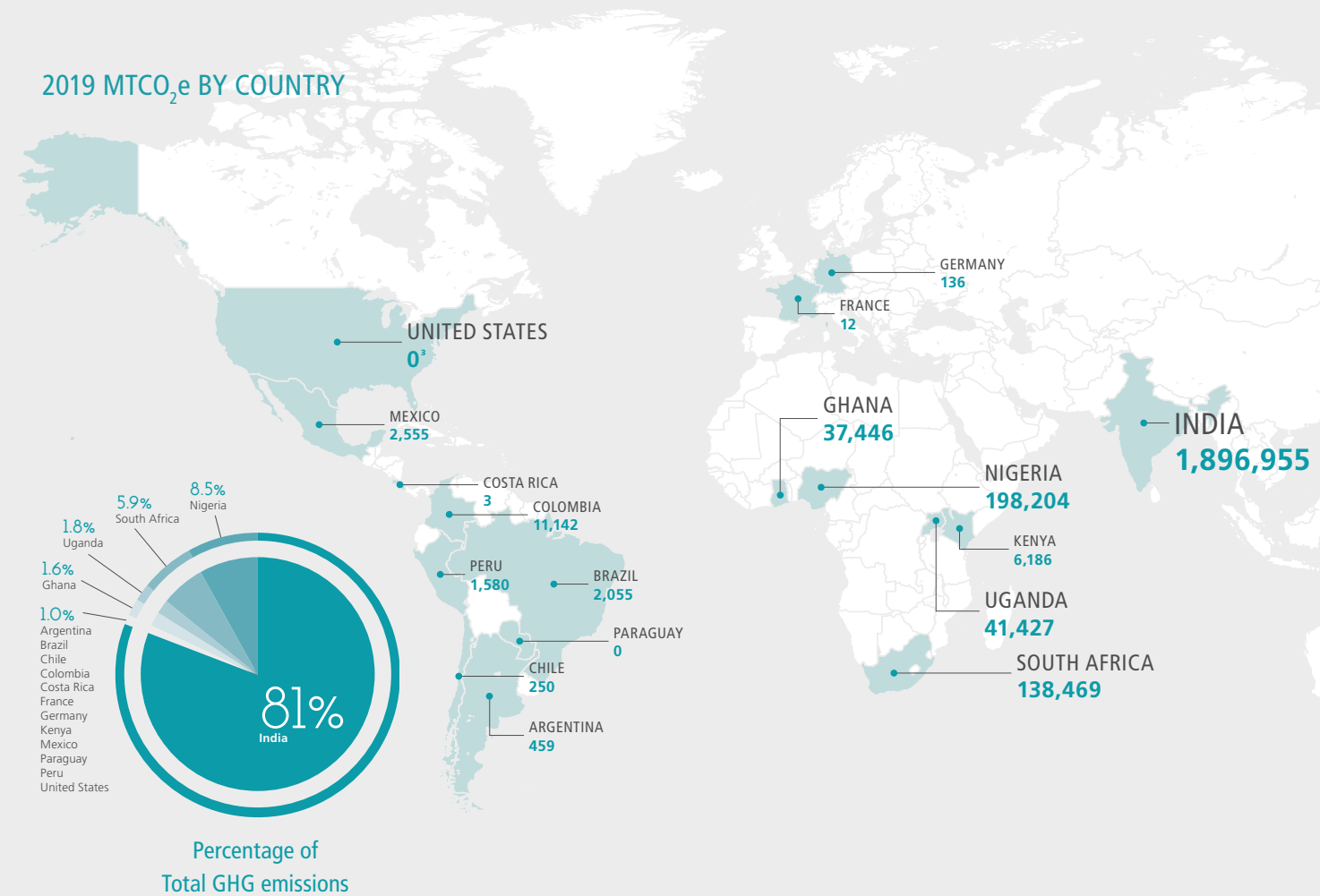


## 2019 GHG Emissions



● Scope 1 ● Scope 2

## 2019 MTCO<sub>2</sub>e BY COUNTRY



## 2019 MWh by Country

INDIA	3,338,964
NIGERIA	713,314
UNITED STATES	208,002
GHANA	163,263
SOUTH AFRICA	149,599
UGANDA	113,345
COLOMBIA	49,518
KENYA	28,382
BRAZIL	16,890
MEXICO	6,506
PERU	5,922
ARGENTINA	1,275
CHILE	623
GERMANY	426
COSTA RICA	289
FRANCE	217
PARAGUAY	29

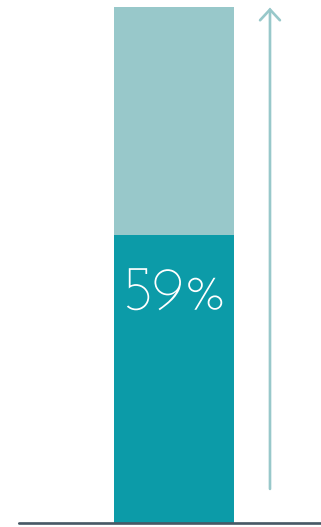
3. U.S. operations achieved carbon-neutral status in 2019 through a combination of 92,145 MTCO<sub>2</sub>e of purchased renewable energy certificates and carbon offsets.



## Investing in a Sustainable Energy Future

We are exploring the development of science-based emissions targets consistent with the Paris Agreement goals. By dedicating specific resources to this initiative, American Tower will be positioned to maximize our existing programs, adopt additional best practices and continue our industry leadership.

In 2020, many of our markets will expand renewable energy initiatives. Seven of our markets will pursue additional on-site solar generation projects, and others will continue to look for opportunities to advance our solar program. In Brazil, we finalized a solar power purchase agreement that is expected to launch in 2020; over the next decade, it is expected to provide 34,000 MWh of clean, renewable electricity and cover more than 100% of our current and projected future fiber energy needs. We are now 59% of the way toward fulfilling our global goal of 20 MW of installed renewable capacity through 5,000 solar-assist sites by the end of 2022. In addition, we continue to partner with leading research universities in the U.S. to develop commercial-scale renewable energy solutions to be deployed at our tower sites.



We are now 59% of the way toward fulfilling our global goal of 5,000 solar-assist sites with 20 MW of installed capacity by the end of 2022.

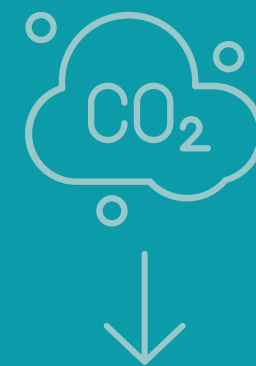


of our electricity purchases came from renewable sources in 2019.

Over the longer term, American Tower believes the most effective way for us to increase our use of renewable energy and decrease diesel consumption by us and our tenants is to support efforts by countries where we operate to build cleaner and more sustainable national energy grids, so we may connect our towers to those grids. Already, for example, Costa Rica and Paraguay run their power grids on nearly 100% renewable energy. In South Africa, we are moving to harness wind power from the Eastern Cape in 2020. In 2019, we estimate that approximately 23%, or 620,000 MWh, of our electricity purchases came from renewable sources. American Tower supports efforts globally to expand renewable energy at grid scale and continue to move toward 100% renewable energy.

Costa Rica and Paraguay run their power grids on nearly

100%  
renewable energy.



In 2020 and beyond, American Tower will continue to make significant capital investments in reducing our carbon footprint and moving toward more environmentally sustainable operations and stewardship of our assets.

## Land Stewardship



Collocation of multiple tenants on a shared communications infrastructure is fundamentally an environmentally sustainable business model that maximizes efficient use of land, water, energy and other resources. We manage our business with a full life-cycle perspective and prioritize the protection of the natural environment. In every phase of our work—planning, constructing, operating and decommissioning sites—our local site development and land management teams are committed to complying fully with the letter and spirit of all applicable environmental laws and regulations.

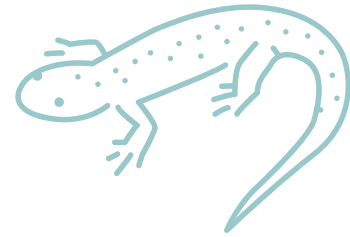
### Site planning and construction

Before locating a new site, American Tower considers multiple environmental factors. Our site acquisition and project teams undergo training to ensure they have the skills needed to identify and consider a range of potential environmental impacts. For example, ATC India team members underwent more than 5,000 hours of environmental training to guide their work. In 2019, across the Company, we completed more than 2,400 prefeasibility and environmental impact assessments related to construction and other projects and held more than 2,500 community forums to engage proactively with residents of the markets in which we operate.

To more than offset the impact of removing trees for tower construction or safety maintenance, in 2018 we committed to our Million Trees Initiative, in partnership with American Forests. By the end of 2019, we had planted more than 200,000 of the one million trees promised—more than 50 new trees for every one that had to be removed.



## Environment



Our environmental compliance teams consider strategies and projects to prevent or minimize habitat disturbance, including:

- **Modifying construction plans to protect sensitive habitats or species,**
- **avoiding construction during sensitive times of year (migratory, nesting or breeding times) and**
- **educating construction workers about impacted species and deploying biologists on-site to monitor construction.**

By following these principles, our U.S. operations were able to protect more than 20 different species in 2019, ranging from salamanders and frogs to piping plovers and northern long-eared bats.

Among countless other positive impacts, our tree planting initiatives have supported saving the Kirtland's Warbler bird species from extinction in Michigan and replenished trees devastated by wildfires in areas such as the Eldorado and Sierra National Forests in California.



## Environment



200K+

new trees planted in the U.S. pursuant to our Million Trees Initiative

350+

trees planted in Mexico to reforest 50 acres of national park burned by wildfires

500

fruit-bearing trees planted in Odisha, India to replace trees lost to Cyclone Fani

These efforts will remove an estimated 200,000 metric tons of carbon dioxide from the air over the next 40 years.

**Site operations**

Many of the strategies considered during site planning and construction influence site operations as well, with teams monitoring for wildlife impact after construction is complete, planting trees, ensuring appropriate treatment of any hazardous materials and evaluating operations for unintended consequences for wildlife.

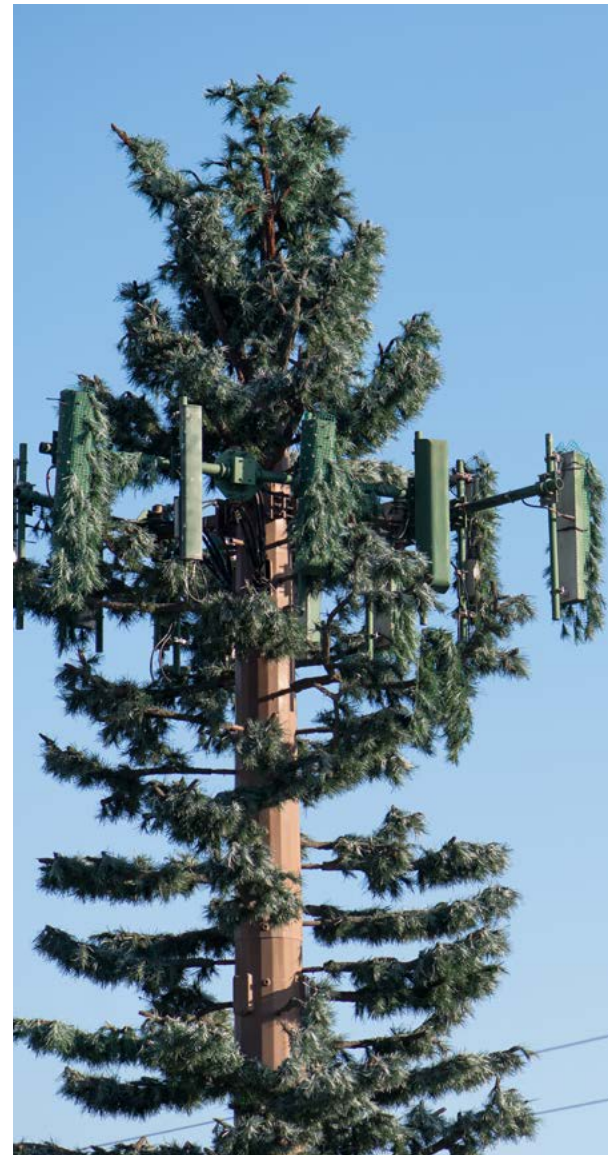
A key focus is our comprehensive and growing program to ensure the protection of migratory birds, including threatened or endangered species that nest on our U.S. towers, such as osprey, bald and golden eagles, red-tailed hawks, great horned owls, barn owls, herons and killdeer. As of the end of 2019, we counted 2,864 protected nest sites in the U.S. These sites provide accommodations so native birds can nest undisturbed. New towers are also located to minimize the impact on the birds' migratory routes.

We are also protecting bees. In 2019, we expanded Ghana's successful bee protection program to include South Africa, where our teams are deploying purpose-built "bee relocation boxes" baited with pheromones to attract them. Once the bees are in the boxes, we relocate them to bee farms where they can multiply and pollinate crops.



Integral to protecting the surrounding wildlife and ecosystems is making certain that any hazardous materials used in our operations are properly handled and disposed of at the end of their useful lives. While our business has an inherently low footprint in this area in most of our markets, for sites dependent on diesel

generators as a primary energy source, we have strict programs in place to ensure safe management of diesel delivery, as well as oil and battery disposal. During 2019, an estimated 42,000 blocks of lead-acid batteries and 509,000 liters of oil were recycled by our trained employees or diligent vendors across our global operations.



4,100+ camouflage-design towers around the globe mitigate the aesthetic impact of new towers on natural landscapes

**Recycling**

9,000 tons: That's the total volume of steel, cables, antennas and shelters removed and recycled so far from U.S. tower sites, at which our site development real estate solutions team created a new program in 2019 to recycle materials from decommissioned sites.

Partnering with certified vendors, we removed and recycled 1,579 pieces of abandoned coaxial and other cables, antennas and steel from 96 of our sites—that's 175,245 pounds (79,489 kg) of recycled material. In addition, the team has sold 600 abandoned shelters to a firm that will remove, refurbish and repurpose them, eliminating 9,000 tons (8,146 metric tons) of material from going into landfills.

How big an impact is this on the environment? According to the American Iron and Steel Institute, for every 2,000 pounds of steel recycled, we eliminate the consumption of:

2,500LBS  
ore

120LBS  
limestone

1,400LBS  
coal

Recycling abandoned material found at our sites, like steel and cables that contain copper, has tremendous value for energy and natural resource conservation.





**Decommissioning**

Though it is rare, when sites go out of service, American Tower may be left with materials that can still be used in operations. The Company has always identified ways to repurpose any existing materials in a decommissioned site for other projects. However, when the cost and time for repurposing materials renders doing so ineffective, the team pursues strategies for recycling materials instead.



Markets that have achieved ISO 14001 environmental management certification

Ghana  
Kenya  
India



**Environment**



“Our skilled environmental compliance team reviews a wide range of federal, state and local regulatory considerations—from natural resource management to protected species and wetlands to the proper treatment of hazardous materials. By working in partnership with our teams on the ground, we can ensure American Tower is addressing these regulatory requirements in a comprehensive way. This integrated approach allows us to create thorough Company policies that advance broader environmental goals.”

— Megan Cook, Supervisor, Hazardous Material Compliance, U.S. Tower



Our Connecting to Communities program focuses on:



Empowerment and education through technology



Disaster relief and critical infrastructure support



Other philanthropic efforts and community engagement

**PHILANTHROPY**



Through our Connecting to Communities program, American Tower is an engaged corporate citizen wherever we operate. Our commitment to increasing connectivity covers both improving wireless communications in the communities and countries in which we operate and using philanthropy and outreach to build connections to learning and opportunity in those communities.



**Philanthropy**

We support these initiatives in many ways. Whether it is through our workplace giving and matching program, on-site philanthropic events, company-organized volunteer days, regional philanthropic programs or grant applications submitted by American Tower employees and funded by the American Tower Foundation, our people are connecting to communities and making a difference around the world. Through this multifaceted approach, as well as disaster relief funding and matching contributions to employee donations, American Tower has disbursed nearly \$3.5 million across the globe in 2019.

**\$3.5M**  
disbursed across the globe in 2019

ATC Uganda donated mattresses, dry foods and books to the Whisper Magical Children’s Hospital. They also donated similar items to the Hope for Katanga Kid’s Project, a nonprofit organization that offers children’s programs in music, dance, drama and sports.

**Philanthropy**



**Empowerment and Education Through Technology**

For all the ways the internet has transformed connections and opportunities across the world, even today internet access remains challenging in many developing countries because of cost, scalability, power outages and educational barriers.

At American Tower, we are working to close the digital gap by leveraging our global real estate portfolio of approximately 180,000 communications sites to help shape a more equitable and sustainable digital world.

Greater connectivity translates into multiple development benefits. Beyond bringing people closer, greater access to Information and Communication Technology (ICT) creates more opportunities that improve living conditions, especially for the poorest and most marginalized communities.

In 2019, we continued to make substantial progress in innovatively leveraging our communications infrastructure by building additional Digital Villages at or near tower sites to bring broadband connectivity and ICT literacy to the communities we serve. The American Tower Digital Villages are computer-equipped kiosks that use uninterrupted power supply and broadband connection from our nearby sites to provide communities with free education and training in ICT. As of the end of 2019, more than 64,000 individuals have completed training courses through the Digital Villages. Tailoring our efforts to local cultures and needs, we have deployed retrofitted shipping containers with workstations and computers in Africa and partnered with Hewlett Packard Enterprise to provide telehealth services in India.

**We are committed to adding more Digital Villages globally, with expanded services to help bridge the global digital divide.**

“As a corporate leader, American Tower is committed to acting sustainably and using our resources to improve the communities where we operate. Through our business focus on digital connectivity, we recognize that the digital divide can contribute to disparities in health, economic well-being and social connections. At American Tower, we seek to close that gap by expanding access and education through technology.”

– Olivier Puech, Executive Vice President and President, Latin America and EMEA



“The appreciation from the chief of the village and the community for having access and having a facility of this kind in their village reinforced the impact of this program.”

– Francois Van Zyl, Vice President, Regional Strategic Accounts, ATC Africa

In addition to more than doubling our number of Digital Villages in Nigeria, Uganda and India from 112 in 2018 to 232 in 2019, we also expanded the program into two new countries:

**Ghana**

Despite the availability of internet access in the country for years, many Ghanaians still have limited connectivity and ICT literacy due to lack of communications infrastructure, network coverage and capacity challenges, and the high cost of internet access. It is estimated that only 40% of the country’s population uses the internet. ATC Ghana’s first Digital Village in the Volta region provides the local community with internet access and ICT education and training to help individuals upskill and expand their employment prospects.

**Mexico**

Mexico became the newest market to host our Digital Villages with the opening of a Veracruz project in April 2019. In addition to ICT courses, the program at this Digital Village teaches reading and writing skills and offers summer courses. It is operated by Save the Children, a non-governmental organization (NGO) that has served as our longstanding partner in local community efforts.

We are committed to adding more Digital Villages globally, with expanded services to help bridge the global digital divide.



“Growing up, I wasn’t able to finish secondary school. It was through the internet I got here—the aid we’re given here—I was able to access the internet, search different schools, and I was so excited when it was announced that I had received a scholarship.”

– Mavis Aghedo, Digital Village Beneficiary



“We truly believe this program has the potential to transform the lives of villagers by providing them e-learning, e-health, e-governance and skill programs to improve employability. We are transforming the lives of rural people in 150 villages in a way that is envisioned in the Prime Minister’s Digital India program.”

– Amit Sharma, Executive Vice President and President, Asia



**Impact of Global Digital Villages**

238  
Digital Villages worldwide

41,374  
graduates in 2019

71,551  
students enrolled

64,163  
graduates since inception



“It’s quite expensive to learn [digital design] outside ... and here I get to learn it without paying money. I want to say a very big ‘thank you’ to American Tower for this opportunity.”

– David Obot, Digital Village Beneficiary



While our Digital Village program pairs access with education and is driven by American Tower, we also promote technology-driven education and empowerment by supporting existing community nonprofit organizations:

**Boston Health Care for the Homeless Program (BHCHP):** The American Tower Foundation partnered with BHCHP to provide, at no cost, high-performance Wi-Fi to a Waltham, Massachusetts hotel that offers temporary housing for families transitioning from homelessness. Wireless connectivity helps residents search for jobs, housing and benefits, complete schoolwork and job training and stay connected with loved ones.

**The Click Foundation:** The Click Foundation deploys online, self-paced English literacy programs in under-resourced primary schools across South Africa. Last year, through our support, 11,145 learners across 18 schools went through the program with 169,449 hours of literacy learning—a nearly 150-fold increase in program involvement since the relationship began in 2015.

**Junior Achievement Americas:** In Latin America, we extended our partnership with Junior Achievement Americas' Latin Code Week, a digital literacy initiative that provides training on coding tools, app development and business skills to young people. In addition to financial support, American Tower provided laptops, tablets, projectors and Microsoft Office licenses.

**Carolina for Kibera (CFK):** CFK's Best Schools Initiative seeks to establish practices that have the most influence on attendance and academic performance for students in the Kibera slum of Nairobi, Kenya. Our financial support advances both classroom-based initiatives and digital tools that monitor attendance, offer mobile learning platforms, track test scores and evaluate program effectiveness. Though still in its infancy, the program has successfully implemented eight best practices across 16 schools, with planned growth to 24 schools.



## Disaster Relief and Critical Infrastructure Support

While our philanthropy program is based on our Company connecting to our communities, we also ensure that those in our communities stay connected with one another. Whether it is enabling first responders during natural disasters, connecting loved ones in times of physical distancing or helping essential businesses conduct operations in a virtual environment, staying connected is now more important than ever.

In a variety of disaster scenarios—from extreme weather to global pandemics—the communications capabilities delivered by American Tower infrastructure are critical to public safety and relief efforts. Along with protecting the safety of our employees and the integrity of our equipment, American Tower makes it a top philanthropic priority to offer relief and hope to those impacted by catastrophic events, both through our Foundation and initiatives led by our teams around the world.

In addition to the critical role we play in directly supporting communication and relief efforts during and after natural disasters, the financial support given to humanitarian organizations is another way we help our communities in times of need. For example, in the spring of 2019, the Midwestern region of the United States experienced severe tornadoes and flooding while India was ravaged by Cyclone Fani. Then, in the summer of 2019, Dorian, a devastating hurricane, struck the Bahamas as well as coastal portions of the United States and Canada. The Foundation made monetary donations to the American Red Cross and Oxfam in support of these relief efforts. Since its launch in 2017, the Foundation has contributed approximately \$540,000 in support of relief operations around the world.



Finally, beyond our role as critical infrastructure and the monetary support we give, local teams have been quick to step up to support their communities during and after natural disasters. For example, in October 2019, Patna, the capital city of the Indian state of Bihar, faced unprecedented floods. With compassion and urgency, the ATC India Bihar Circle team leapt into action in collaboration with local NGOs and provided 550 families with essential supplies, like kitchen items, food, clothes and mosquito nets. ATC India helped ensure many children suffering from the floods' after-effects secured the emergency health care they needed.



## Other Philanthropic Efforts and Community Engagement

American Tower is committed to enabling meaningful change in the communities and countries in which we operate, both through our Foundation and through philanthropy budgets allocated to each local market. Local activities can range from expanded access to clean water; support for orphanages, senior centers and homeless shelters; hunger relief initiatives; and animal conservation efforts. Specific examples of other philanthropic efforts and community engagement the Company supported in 2019 include: an emergency housing construction program in Brazil, delivering two homes to families in need; outdoor trail maintenance and landscaping in greater Boston, Massachusetts, in support of nature programs for children from low-income communities; and full-team participation in a half-marathon in Kenya as part of a fundraiser to support wildlife conservation.



**Rise Against Hunger:** Continuing a partnership that began the previous year, in September 2019, 74 volunteers from our Boston and Marlborough, Massachusetts offices packaged more than 40,000 meals that went to families in need around the world. Our work was organized in partnership with Rise Against Hunger, an international relief organization distributing food and aid to some of the 820 million people globally who don't get sufficient nutrition, in support of the United Nations SDG of Zero Hunger by 2030. In total, our volunteers have provided nearly 80,000 meals since beginning our partnership with Rise Against Hunger.

## The Future of Philanthropy at American Tower

2019 was another positive year of Company giving, community engagement and employee involvement. Every aspect of our philanthropic work recognizes the importance of digital connectivity—for health, work and personal relationships. This topic has become even more relevant at a time when the world has come together to fight a global pandemic by limiting personal contact and turning to digital networks to meet many basic needs, as well as by standing together for racial justice and equality.

Moving forward, we will continue to operationalize our *Stand and Deliver* strategy—innovating and refining along the way to ensure our philanthropy continues to support the communities in which we operate and reflect the values of our business. American Tower understands the importance of philanthropy in addressing challenges and promoting opportunities across the globe and we anticipate an increase in grants to purpose-driven organizations in years to come. Through the Foundation and regional philanthropic initiatives, we have committed more than \$3 million in support of pandemic relief, and have also funded donations that are at the forefront of economic, educational and social equality for all in 2020. We will continue engaging and empowering both employees and communities in our commitment to responsible corporate citizenship.



ATC Kenya employees complete a half marathon to support the Lewa Wildlife Conservancy in June 2019



ATC Mexico employees volunteered to help reforest an area affected by wildfires near Mexico City in June 2019

## Employee Volunteerism and Giving

At every level of our Company, employees give back. We now offer all employees in the U.S. two days of paid volunteer time, up from one in 2018. Donations made to eligible organizations by U.S. employees can be matched by the Foundation up to \$5,000 annually and during specific campaigns, this \$5,000 limit is waived to promote additional giving and support.

Volunteerism and philanthropic giving at American Tower is as diverse as our global workforce.

- In South Africa, team members celebrated Nelson Mandela International Day 2019 by refurbishing the Ekukhanyisweni Primary School.
- Our Uganda team reconstructed two classrooms and a dormitory at the Comprehensive Senior Secondary School to improve the classroom and social experience for their students.
- In New York, our U.S. team members extended their support for the New York Hall of Science (NYSCI) and its initiatives to promote STEM learning in underserved communities.



We continue to meet our financial performance goals by:



Complementing organic growth with site acquisitions and new site construction



Researching, developing, and funding innovation



Achieving cost savings through operational efficiencies

# PERFORMANCE



Outstanding corporate responsibility requires consistent performance that is resilient in the face of challenges and global change. With a stable business model, ongoing and growing demand for wireless services and a strong balance sheet that allows American Tower to acquire attractive portfolios, we have achieved strong operational and financial results for over two decades. American Tower is unwavering in our mission to secure and optimally manage franchise real estate to facilitate wireless communications and deliver strong growth and returns in the process. At the same time, corporations like ours must constantly innovate to successfully improve the societies in which we operate and meet the needs of our diverse stakeholders.



## Financial Performance

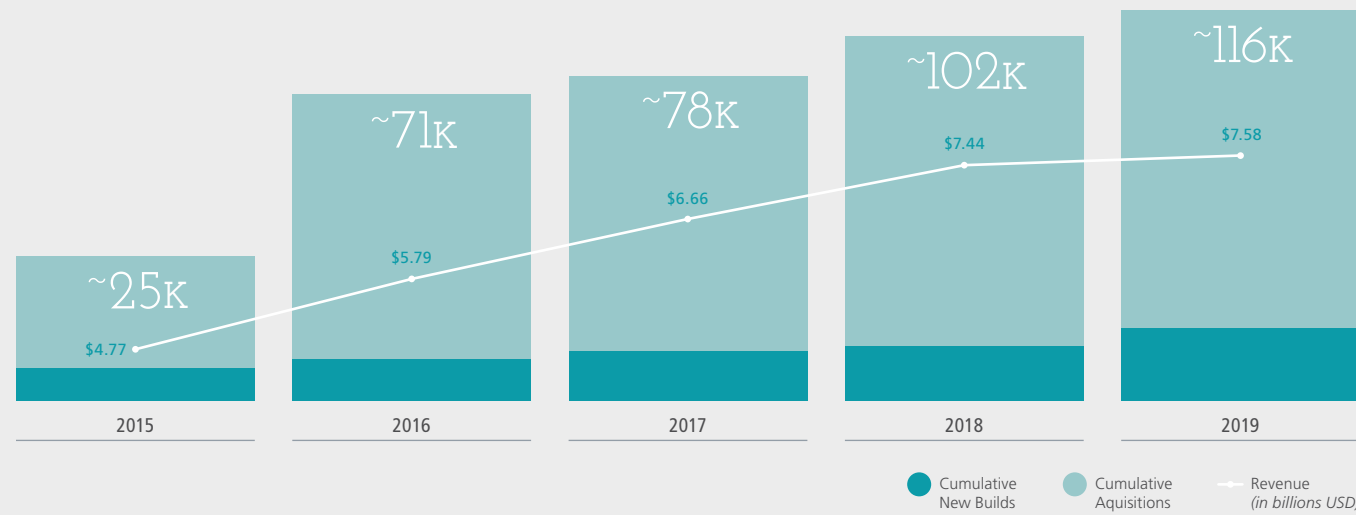
Guided by our 10-year *Stand and Deliver* strategic plan, American Tower continued to exceed our financial performance goals. In 2019, we generated solid growth in property revenue, Adjusted EBITDA and Consolidated AFFO while at the same time adding nearly 14,000 communications sites to our global portfolio. Further, we grew our dividend by 20%, reduced aggregate borrowing costs and extended the average tenor of our debt. As a result, stockholders saw total returns of more than 45%, as we executed on the Company's vision of making wireless communication possible everywhere.

Stockholders realized total returns of more than

45%



## COMMUNICATIONS SITE GROWTH



## Innovation

While innovation was formally adopted as a pillar to our *Stand and Deliver* strategy in 2018, our longstanding culture of innovation has always been integral to our success. Leadership in areas such as contract structure, international expansion strategy and a focus on more efficient and environmentally friendly energy solutions in emerging markets puts American Tower at the forefront of our industry. Looking ahead, we challenge ourselves to provide sustainable growth to our stockholders across our three distinct innovation workstreams: advanced tenant services, connectivity and energy and the environment.

In researching, developing and funding innovation, we follow a rigorously defined playbook, refined over years of market experience. As we work to build upon this progress, we are pursuing business models that either build on or complement our existing real estate business. We have invested more than \$1.2 billion to date and have an aspirational goal to generate \$1.7 billion in revenue through this innovation-driven platform by 2027. Innovation teams around the globe are continuously brainstorming, learning, experimenting, partnering and, ultimately, commercializing new opportunities. We consider all the needs and opportunities across our global footprint and apply local successes and innovations across our operations. As part of our *Stand and Deliver* strategy, our Innovation Council, led by our Chief Technology Officer, deepens our culture of innovation. Every employee of our Company is regularly encouraged to share their ideas via a dedicated internal account through which senior leaders identify promising concepts.

We have invested over

\$1.2B

to date and have an aspirational goal to generate

\$1.7B

in revenue through our innovation-driven platform.

## Innovation Project Evolution



Innovation in practice at American Tower is closely aligned with our customer service, environmental sustainability and strategic business goals. Below are some 2019 examples within our innovation platform in our advanced tenant services, connectivity and energy and the environment workstreams.



### Advanced tenant services

**Fiber Connectivity:** We made major strides in expanding our international fiber business, adding a sixth nation, Colombia, and bringing our global fiber-connectivity footprint to over 30,000 route kilometers, passing more than 700,000 homes. In Mexico, Argentina, India and

South Africa, we significantly expanded our fiber networks and the numbers of homes served. In Brazil, American Tower launched the country's first neutral, fiber-to-the-home network rollout.

**Edge Data Centers:** In the U.S. in 2019, we deployed edge data centers in Austin, Texas and Jacksonville, Florida, and plan to deploy four more locations in 2020. We also acquired and integrated Colo Atl, a premier regional data center with major carrier interconnections in Atlanta, Georgia. We hope to learn more about the edge ecosystem and key trends to enhance our relationships with potential customers through this acquisition.

**Internet of Things (IoT):** LoRa Brazil, a nationwide IoT network, grew to 1,300 installed gateways that cover areas home to 100 million people across 220 cities. In 2020, additional sites will be added to serve more cities, expanding the reach for water and gas utilities, enterprise users from all industries and IoT service to end-users via an expanding network of customer-facing distributors.



### Connectivity

**Urban Infrastructure:** In Paris, we are partnering with leading automotive companies and public entities on Paris2Connect, a smart city transportation infrastructure initiative. After proving out smart-intersection accessibility in Phase I, over the next couple of years, the collaboration intends to deploy smart poles, cameras, light detection and ranging, and vehicle connectivity, as well as test autonomous transit vehicles.

**Transformation of the Automotive Industry:** We are actively participating in the potential evolution of the automotive industry to Connected Autonomous Vehicles (CAVs). American Tower supports tenants who deploy ultra-fast, fully responsive 5G wireless networks to safely establish and expand CAV use, making our infrastructure as vital to CAV use as the streets upon which they drive.

### Energy and the environment

As described in significant detail in the Environment section of this report, American Tower has significantly invested in reducing the energy used to power our tenants' equipment at the site level and implementing site-based green energy solutions. In Africa and India, we have invested more than \$100 million to date in these efforts, which is helping us to achieve meaningful cost savings through operational efficiencies and reduce our diesel usage by tens of millions of liters annually, as well as thousands of avoided MTCO<sub>2</sub>e emissions.



Investments in reducing our energy usage at the site level and implementing site-based green energy solutions is helping us to achieve significant cost savings through operational efficiencies.

# PRINCIPLES OF REPORTING AND THE GRI CONTENT INDEX AND TCFD AND SASB INDICES

The Global Reporting Initiative (GRI), the Task Force on Climate-related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB) provide the world's most widely used frameworks for sustainability reporting. These 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. We also provide disclosures aligned with the TCFD in Appendix B and the SASB's guidance on the Real Estate and Technology and Communications sectors in Appendix C. The reporting principles for defining report content and quality have been applied throughout the information collection and report development process. The 2019 American Tower Corporate Sustainability Report covers the reporting period for fiscal year ended December 31, 2019. 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 Appendix A are based on 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.

Measurement of certain disclosures included in Appendices A, B and C (the "disclosures") of the 2019 American Tower Corporate Sustainability Report include estimates and assumptions that are subject to inherent measurement uncertainty resulting from precision of conversion and other factors. The selection by management of different but acceptable measurement methods, input data or assumptions may have resulted in materially different amounts or disclosures being reported.



## American Tower Innovation in India

As part of our *Stand and Deliver* strategy and an example of the many initiatives to ensure innovation is woven throughout the fabric of the Company, ATC India held its first Innovation Challenge in 2019. Employees were asked to submit innovative ideas that had the potential for cost savings, improved efficiencies and customer satisfaction or to generate additional revenue. Individuals and teams submitted 160 ideas, which were evaluated by an internal panel of subject matter experts for impact, feasibility,

resources and customer satisfaction. The panel chose 30 ideas to be presented to them in person, from which four exciting ideas were selected for pilot implementation:

- Smart funnel fuel monitoring at high diesel consumption sites
- "Site down" alarm as theft precaution
- Fiber-reinforced plastic rooftop poles
- Use of Auto Fire Off fire extinguisher balls at sites

Appendix A: GRI Content Index

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 <a href="#">The American Tower Story</a> , starting on page 10 for additional information.
102-3	Location of the headquarters	American Tower Corporation 116 Huntington Avenue, 11th Floor Boston, MA 02116
102-4	Location of operations	Headquartered in Boston, Massachusetts, American Tower has offices or operations across the United States and in Argentina, Brazil, Burkina Faso, Chile, Colombia, Costa Rica, France, Germany, Ghana, Kenya, India, Mexico, Netherlands, Niger, 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 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, data centers, backup power systems, project management and site development services. See <a href="#">The American Tower Story</a> , starting on page 10 for additional information.
102-7	Scale of the organization	See Annual Report on Form 10-K for the year ended December 31, 2019 (Form 10-K) concerning American Tower key financials and further information on our assets, debt and shareholders' equity. See <a href="#">The American Tower Story</a> , starting on page 10 for additional information, and see <a href="#">People</a> , starting on page 25 concerning staff numbers. <a href="http://americantower.com/proxystatements">americantower.com/proxystatements</a>
102-8	Information on employees and other workers	American Tower employed 5,454 people on a full-time basis globally as of December 31, 2019. See <a href="#">People</a> , starting on page 25 for additional information.
102-9	Supply chain	The American Tower 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. Like all other risks, supplier-related risks are identified and assessed using our established enterprise risk management framework. We have identified no significant risk posed by our supply chain. See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13 for more information. Further, see <a href="#">Supplier Guidelines</a> , starting on page 24 for additional information.
102-10	Significant changes to the organization and its supply chain	Despite adding approximately 14,000 communication sites during 2019, there were no other significant changes regarding the organization's size, structure, ownership or its supply chain in 2019.

102-11	Precautionary Principle approach	The Precautionary Principle does not explicitly guide decisions made by American Tower, however, the potential risk and harm of all of our actions undertaken are considered and appropriate steps are taken to mitigate to reasonable levels, as necessary.
102-12	External initiatives	In 2019, American Tower participated in conferences, events, workshops and meetings with government and policymakers through its association memberships.
102-13	Membership in Associations	<p>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:</p> <ul style="list-style-type: none"> <li>• Americas Society / Council of the Americas</li> <li>• Business Council for International Understanding</li> <li>• Business Roundtable</li> <li>• CBRS Alliance</li> <li>• Competitive Carriers Association</li> <li>• CTIA</li> <li>• European Wireless Infrastructure Association</li> <li>• GSMA</li> <li>• International Telecommunication Union</li> <li>• National Association of Real Estate Investment Trusts</li> <li>• President's Advisory Council on Doing Business in Africa</li> <li>• The New England Council</li> <li>• U.S. Chamber of Commerce</li> <li>• U.S.-Africa Business Center</li> <li>• U.S.-India Business Council</li> <li>• U.S.-India CEO Forum</li> <li>• U.S.-India Strategic Partnership Forum</li> <li>• World Economic Forum</li> <li>• Wireless Industry Association</li> </ul> <p>The oversight of the Company's participation is monitored by an internal, global public affairs committee, that conducts an annual cost-benefits analysis of all memberships, and, ultimately, the Company's Board of Directors.</p>
Strategy		
102-14	Statement from senior decision-maker	See <a href="#">Letter From Our President and CEO</a> , starting on page 5.
Ethics and Integrity		
102-16	Values, principles, standards and norms of behavior	See <a href="#">Ethics</a> , starting on page 20 and our <a href="#">Code of Conduct</a> .
Governance		
102-18	Governance structure	See <a href="#">Corporate Responsibility at American Tower</a> , starting on page 12 and the <a href="#">TCFD Index</a> , starting on page 82, for the Board's oversight of climate-related risks and opportunities.
Stakeholder Engagement		
102-40	List of stakeholder groups	Tenants, stockholders, regulators, the communities where American Tower real estate is located, employees and business partners and suppliers. See <a href="#">Stakeholder Engagement</a> , starting on page 14 for more information.
102-41	Collective bargaining agreements	Eight percent of our employees are represented by labor unions and seven percent of our employees have collective bargaining agreements.
102-42	Identifying and selecting stakeholders	See <a href="#">Stakeholder Engagement</a> , starting on page 14 for more information.

102-43	Approach to stakeholder engagement	See <a href="#">Stakeholder Engagement</a> , starting on page 14.
102-44	Key topics and concerns raised	See <a href="#">Stakeholder Engagement</a> , starting on page 14.
<b>Reporting Practice</b>		
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, 2019.
102-46	Defining report content and topic boundaries	See <a href="#">Defining Material Topics</a> , starting on page 19.
102-47	List of material topics	The GRI topics deemed material for this report are: <ul style="list-style-type: none"> <li>• Economic Performance</li> <li>• Socioeconomic Compliance</li> <li>• Anti-corruption</li> <li>• Public Policy</li> <li>• Diversity and Equal Opportunity</li> <li>• Non-discrimination</li> <li>• Training and Education</li> <li>• Occupational Health and Safety</li> <li>• Energy</li> <li>• Emissions</li> <li>• Biodiversity</li> <li>• Local Communities</li> </ul> See <a href="#">Defining Material Topics</a> , starting on page 19.
102-48	Restatements of information	This report includes updated energy and greenhouse gas data for 2017 and 2018, reflecting corrections to previously reported data. The restatements are due to improved data quality and corrections to emission factors.
102-49	Changes in reporting	No
102-50	Reporting period	January 1 to December 31, 2019
102-51	Date of most recent report	August 2019
102-52	Reporting cycle	Annually
102-53	Contact point for questions regarding the report	Mneesha O. Nahata, Vice President, Legal & Corporate Sustainability Officer
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 <a href="#">page 69</a> .
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 64.

### GRI 103: Management Approach 2016

103-1	<b>Explanation of the Material Topic and its Boundary</b>	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 stockholders.
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103-2	<b>The Management Approach and its Component</b>	The members of the American Tower senior leadership team, who report to the Board, are the most senior policymakers in the organization, and they set the tone and business priorities for the Company, including its financial goals and strategies.
103-3	<b>Evaluation of the Management Approach</b>	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 Consolidated Statements of Operations on page F-6 of Form 10-K.
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### GRI 203: Indirect Economic Impacts 2016

203-2	Significant indirect economic impacts	See <a href="#">The American Tower Story</a> , starting on page 10.
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### Material Topic: Client Satisfaction and Brand Image

The American Tower material topic “Client Satisfaction and Brand Image” corresponds to the GRI [General Disclosures 102-43 and 102-44](#), see page 72. Also see [Stakeholder Engagement](#), starting on page 14.

### GRI 103: Management Approach 2016

103-3	<b>Explanation of the Material Topic and its Boundary</b>	Client satisfaction and brand image define our reputation and, ultimately, our success in the marketplace. These topics are primarily relevant to our Company and customers.
103-2	<b>The Management Approach and its Component</b>	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	<b>Evaluation of the Management Approach</b>	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](#), starting on page 20.

### GRI 103: Management Approach 2016

103-1	<b>Explanation of the Material Topic and its Boundary</b>	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 tenants, employees, regulators and stockholders.
103-2	<b>The Management Approach and its Component</b>	While these issues are the responsibility of all American Tower employees, and are covered under our <a href="#">Code of Conduct</a> , ultimate responsibility for this topic resides with the American Tower legal and human resources teams, either at the corporate or country level. Reports of potential or perceived noncompliance 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.

<b>103-3</b>	<b>Evaluation of the Management Approach</b>	
	We monitor all reports of potential noncompliance, ethics and other legal issues, escalate them to the Ethics Committee under the Board of Directors where appropriate and ensure they are appropriately resolved.	
<b>GRI 419: Socioeconomic Compliance 2016</b>		
<b>419-1</b>	Noncompliance with laws and regulations in the social and economic area	In 2019, there were no significant fines or nonmonetary sanctions for noncompliance with laws and/or regulations in the social and economic area.
<b>Material Topic: Anti-Corruption</b>		
The American Tower material topic "Anti-Corruption" corresponds to the GRI topic "205 Anti-corruption" and "206 Anti-competitive Behavior." See <a href="#">Ethics</a> , starting on page 20.		
<b>GRI 103: Management Approach 2016</b>		
<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b>	
	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 tenants, employees, regulators and stockholders. American Tower follows the provisions of the FCPA, which prohibit U.S. companies and their directors, officers, employees and agents from offering, paying, promising or authorizing the giving of anything of value (e.g., money or gifts) to a person who is an official of any government outside the United States, or to any other person, while knowing that the item of value will be offered or given, directly or indirectly, to such a foreign official for the purpose of (i) influencing any decision of the foreign official, (ii) inducing a decision to fail to perform his or her lawful duty or (iii) inducing the foreign official to use his or her influence to affect any decision so as to be able to obtain any improper advantage in order to assist the Company to obtain or retain business.	
<b>103-2</b>	<b>The Management Approach and its Component</b>	
	While these issues are the responsibility of all Company employees, and are covered under our <a href="#">Code of Conduct</a> , ultimate responsibility for this topic resides with the American Tower legal and human resources teams, either at the corporate or country level. Reports of potential or perceived noncompliance 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. Bribery and corruption risks are also identified and assessed using our established enterprise risk management framework. See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, for more information.	
<b>103-3</b>	<b>Evaluation of the Management Approach</b>	
	We monitor all reports of potential noncompliance, ethics and other legal issues, escalate them to the Ethics Committee under the Board of Directors where appropriate and ensure they are appropriately resolved.	
<b>GRI 205: Anti-corruption 2016</b>		
<b>205-1</b>	Operations assessed for risks related to corruption	All markets are assessed for risks related to corruption before entering 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.
<b>205-2</b>	Communication and training about anti-corruption policies and procedures	See <a href="#">Ethics</a> , starting on page 20.
<b>GRI 206: Anti-competitive Behavior 2016</b>		
<b>206-1</b>	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.

<b>Material Topic: Public Policy and Thought Leadership</b>		
The American Tower material topic "Public Policy and Thought Leadership" corresponds to the GRI topic "415 Public Policy." See <a href="#">Stakeholder Engagement</a> , starting on page 14.		
<b>GRI 103: Management Approach 2016</b>		
<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b>	
	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.	
<b>103-2</b>	<b>The Management Approach and its Component</b>	
	The American Tower public affairs teams are responsible for evaluating issues of relevance regarding public policy and engaging on public policy-related issues relevant to our business and 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.	
<b>103-3</b>	<b>Evaluation of the Management Approach</b>	
	We regularly assess implemented or potential regulations and determine where it would be prudent to engage with the relevant policymakers to protect our long-term strategy.	
<b>GRI 415: Public Policy 2016</b>		
<b>415-1</b>	Political contributions	Under our <a href="#">Code of Conduct</a> , 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. See <a href="#">Thought Leadership</a> , starting on page 15.
<b>Material Topic: Appropriate Incentives</b>		
The American Tower material topic "Appropriate Incentives" is discussed in <a href="#">Ethics</a> , starting on page 20. For more information, see Definitive Proxy Statement for the 2020 Annual Meeting of Stockholders, <a href="http://americantower.com/proxystatements">americantower.com/proxystatements</a> .		
<b>GRI 103: Management Approach 2016</b>		
<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b>	
	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 assets are located.	
<b>103-2</b>	<b>The Management Approach and its Component</b>	
	Our Chief Human Resources Officer and country-level human resources teams, with the support of American Tower 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.	
<b>103-3</b>	<b>Evaluation of the Management Approach</b>	
	The global human resources function, along with the country-level human resources teams, regularly assesses whether salaries and contract structures are appropriate for the location and job performed.	
<b>Material Topic: Diversity, Equal Opportunity, Non-discrimination</b>		
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 <a href="#">Promoting Diversity and Inclusion</a> , starting on page 32.		
<b>GRI 103: Management Approach 2016</b>		
<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b>	
	The Chief Human Resources Officer and the country-level heads of human resources are ultimately responsible for human resources management. They oversee employee training and development, compliance-related issues and diversity and inclusion, and they report to the Chief Administrative Officer and General Counsel of the Company.	

<b>103-2</b>	<b>The Management Approach and its Component</b> These issues are primarily managed at the country level, with consideration given to local customs, norms and regulations. Also, see our Equal Employment Opportunity Policy, Equal Employment Opportunity Policy Statement and Diversity Statement: <a href="http://www.american tower.com/inclusion">www.american tower.com/inclusion</a> .
<b>103-3</b>	<b>Evaluation of the Management Approach</b> 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**

<b>401-1</b>	New employee hires and employee turnover	<b>Age Demographics</b>				
		<b>Regions</b>	<b>Under 30 years old</b>	<b>30–50 years old</b>	<b>Over 50 years old</b>	
		<b>Asia</b>	Current employees	10%	84%	6%
			New hires	20% (53)	77% (201)	3% (8)
		<b>EMEA</b>	Current employees	10%	80%	10%
			New hires	21% (33)	75% (118)	4% (6)
		<b>LatAm</b>	Current employees	18%	74%	8%
			New hires	27% (71)	67% (177)	6% (16)
		<b>U.S.</b>	Current employees	17%	63%	20%
			New hires	38% (75)	54% (109)	8% (16)
<b>Gender Demographics</b>						
<b>Regions</b>	<b>Male new hires*</b>	<b>Female new hires*</b>	<b>Male current employees</b>	<b>Female current employees</b>		
<b>Asia</b>	82% (216)	18% (46)	93%	7%		
<b>EMEA</b>	68% (107)	32% (50)	70%	30%		
<b>LatAm</b>	68% (180)	32% (84)	66%	34%		
<b>U.S.</b>	58% (116)	42% (84)	65%	35%		

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

<b>401-2</b>	Benefits provided to full-time employees that are not provided to temporary or part-time employees	See <a href="#">People</a> , starting on page 25.
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**GRI 405: Diversity and Equal Opportunity 2016**

<b>405-1</b>	Diversity of governance bodies and employees	See <a href="#">People</a> , starting on page 25 and <a href="#">Promoting Diversity and Inclusion</a> , starting on page 32.
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**GRI 406: Non-discrimination 2016**

<b>406-1</b>	Incidents of discrimination and corrective actions taken	In 2019, there were no substantiated incidents related to discrimination that required the attention of senior management and/or the Board of Directors.
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**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 28.

**GRI 103: Management Approach 2016**

<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b> The Chief Human Resources Officer and the country-level heads of human resources are ultimately responsible for human resources management. They oversee employee training and development, compliance-related issues and diversity, and they report to the Chief Administrative Officer and General Counsel of the Company.
<b>103-2</b>	<b>The Management Approach and its Component</b> These issues are primarily managed at the country level, with consideration given to local customs, norms and regulations.
<b>103-3</b>	<b>Evaluation of the Management Approach</b> 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**

<b>404-1</b>	Average hours of training per year per employee	See <a href="#">Employee Training and Development</a> , starting on page 28.
<b>404-2</b>	Programs for upgrading employee skills and transition assistance programs	See <a href="#">Employee Training and Development</a> , starting on page 28.
<b>404-3</b>	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 2019.

**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 36.

**GRI 103: Management Approach 2016**

<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b> 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 and solidifies our reputation with tenants that their equipment will be installed on structurally compliant infrastructure and will not introduce any liabilities to their business as a result of their relationship with American Tower.
<b>103-2</b>	<b>The Management Approach and its Component</b> 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 division’s General Counsel. In the Africa, Asia, Europe 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 safety trainings.
<b>103-3</b>	<b>Evaluation of the Management Approach</b> 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**

<b>403-2</b>	Types of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities	There were no fatalities of American Tower employees in 2019, and the reportable and lost time injuries were as depicted in the chart below. There were, however, some incidents at American Tower sites among contractors and subcontractors 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 our operations are safe for our employees and those visiting our sites.																																							
<b>Additional Health and Safety Data</b>																																									
		<table border="1"> <thead> <tr> <th rowspan="2">Regions</th> <th colspan="2">Reportable injuries</th> <th colspan="2">Lost time injuries</th> </tr> <tr> <th>Male</th> <th>Female</th> <th>Male</th> <th>Female</th> </tr> </thead> <tbody> <tr> <td>Asia</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Africa</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Europe</td> <td>0</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>LatAm</td> <td>0</td> <td>1</td> <td>0</td> <td>1</td> </tr> <tr> <td>U.S.</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Totals</b></td> <td colspan="2"><b>2</b></td> <td colspan="2"><b>2</b></td> </tr> </tbody> </table>	Regions	Reportable injuries		Lost time injuries		Male	Female	Male	Female	Asia	0	0	0	0	Africa	0	0	0	0	Europe	0	1	0	1	LatAm	0	1	0	1	U.S.	0	0	0	0	<b>Totals</b>	<b>2</b>		<b>2</b>	
Regions	Reportable injuries			Lost time injuries																																					
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See <a href="#">Health and Safety Management</a> , starting on page 36.																																									

**Material Topic: Energy and Emissions**

The American Tower material topic "Energy and Emissions" corresponds to the GRI topics "302 Energy" and "305 Emissions." See [Environment](#), starting on page 39.

**GRI 103: Management Approach 2016**

<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b> 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.
<b>103-2</b>	<b>The Management Approach and its Component</b> 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 of our Scope 1 greenhouse gas (GHG) emissions from fossil fuel and generator-related diesel consumption in the Company's emerging markets.
<b>103-3</b>	<b>Evaluation of the Management Approach</b> 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**

<b>302-1</b>	Energy consumption within the organization	See <a href="#">Environment</a> , starting on page 39.
<b>302-3</b>	Energy intensity	The Company's per tower average energy intensity was 28.1 MWh per tower in 2019, down from 29.2 MWh per tower in 2018.

<b>302-4</b>	Reduction of energy consumption	See <a href="#">Environment</a> , starting on page 39.
<b>302-5</b>	Reductions in energy requirements of products and services	See <a href="#">Environment</a> , starting on page 39.

**GRI 305: Emissions 2016**

<b>305-1</b>	Direct GHG emissions (Scope 1)	See <a href="#">Environment</a> , starting on page 39.
<b>305-2</b>	Energy-based indirect GHG emissions (Scope 2)	See <a href="#">Environment</a> , starting on page 39.
<b>305-4</b>	GHG emissions intensity	The Company's per tower GHG intensity was 13.7 MTCO <sub>2</sub> e per tower in 2019, down from 14.4 MTCO <sub>2</sub> e per tower in 2018.
<b>305-5</b>	Reduction of GHG emissions	See <a href="#">Environment</a> , starting on page 39.

**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 50.

**GRI 103: Management Approach 2016**

<b>103-1</b>	<b>Explanation of the Material Topic and its Boundary</b> Being a good steward of the land under its control is important to American Tower, its employees, its tenants and the communities where it operates.
<b>103-2</b>	<b>The Management Approach and its Component</b> The American Tower policies for land use management and stewardship are overseen by the regional markets, which are responsible for maintaining oversight of the property portfolio and interacting with the local communities where its properties are located. Further, Ghana, Kenya and India, representing approximately 45% of our global portfolio, have achieved ISO 14001 certification.
<b>103-3</b>	<b>Evaluation of the Management Approach</b> 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**

<b>303-1</b>	Water withdrawal by source	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 50,166 cubic meters in 2019, withdrawn from municipal water utilities. Despite this low water consumption, we still proactively look for ways to incrementally conserve. To engage employees in these efforts, we promote internal campaigns to educate and increase awareness about water conservation.
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**GRI 304: Biodiversity 2016**

<b>304-2</b>	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 <a href="#">Land Stewardship</a> , starting on page 50.
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GRI 306: Effluents and Waste 2016		
306-2	Waste by type and disposal method	See <a href="#">Land Stewardship</a> , starting on page 50.
GRI 307: Environmental Compliance 2016		
307-1	Noncompliance with environmental laws and regulations	The Company received no significant fines or nonmonetary sanctions for noncompliance 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 <a href="#">Philanthropy</a> , starting on page 55.		
GRI 103: Management Approach 2016		
103-1	<b>Explanation of the Material Topic and its Boundary</b> Philanthropy at American Tower is managed through our Connecting to Communities program. This program executes on our commitment to improving wireless communications in the communities and countries in which we operate and using philanthropy and outreach for building connections to learning and opportunity in those communities. Our Connecting to Communities program focuses on:	
	<ul style="list-style-type: none"> <li>• Educating and empowering through the use of technology</li> <li>• Providing disaster relief and critical infrastructure support</li> <li>• Supporting other philanthropic efforts and community engagement</li> </ul>	
	We support these initiatives in many ways. Whether it is through our workplace giving and matching program, on-site philanthropic events, company-organized volunteer days, regional philanthropic programs or grant applications submitted by American Tower employees and funded by the American Tower Foundation, our people are connecting to communities and making a difference around the world.	
103-2	<b>Explanation of the Material Topic and its Boundary</b> 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	<b>Evaluation of the Management Approach</b> 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 <a href="#">Philanthropy</a> , starting on page 55, and <a href="#">Land Stewardship</a> , starting on page 50.

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 <a href="#">Innovation</a> , starting on page 66.	
GRI 103: Management Approach 2016	
103-1	<b>Explanation of the Material Topic and its Boundary</b> Innovation and the development of new products, services and business models are central to our long-term success. The topic is most relevant to the Company, its tenants and other members of its value chain.
103-2	<b>The Management Approach and its Component</b> 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 updates on the status of our innovation platform in the regions where American Tower operates. The regions organically pursue innovation independently to address market-specific needs. The Innovation Council also serves to educate and inform the broader technical and business community within the Company, through workshops and discussions on the overall innovation platform. The regions have VP-level innovation leaders, who manage, source funds for and execute on our innovation platform regionally.
103-3	<b>Evaluation of the Management Approach</b> 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.

## Appendix B: Task Force on Climate-related Financial Disclosures (TCFD) Index

### Governance

Disclose the organization's governance around climate-related risks and opportunities.

Describe the Board's oversight of climate-related risks and opportunities.	Our Board evaluates the Company's ability to identify, measure and manage risks and opportunities with the executive team. This process is essential to shaping the strategy of the Company.  Through quarterly reviews of the strategic, regulatory, operational, financial and emerging risks in each of our markets and an annual enterprise risk assessment, the Board executes this risk oversight. Climate-related risks and opportunities are evaluated through this established overall enterprise risk framework.	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.
Describe management's role in assessing and managing climate-related risks and opportunities.	Quarterly regional risk updates are prepared by senior management and provided to the Board, which may include climate-related risks. Climate-related risks are also assessed by management across all functions during the Company's annual enterprise risk assessment process, the results of which are presented to the Board. In addition, in 2019, the Company conducted a Companywide climate-related risks and opportunities assessment (CR assessment) modeled after guidance provided by the TCFD. This assessment was distributed cross-functionally throughout the organization, in joint collaboration with the Company's corporate risk management and sustainability functions, as ultimately overseen by the Company's Corporate Sustainability Officer.	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.

### Strategy

Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy and financial planning where such information is material.

Describe the climate-related risks and opportunities the organization has identified over the short, medium and long term.	As part of our CR assessment, the following risks were assessed over a 20-year horizon: policy and legal transition, technological transition, reputation transition and acute and chronic physical. In addition, the following opportunities were assessed: resource efficiency, energy source, product and services and resilience.  As disclosed in the Risk Factors to our Annual Report on Form 10-K for the year ended December 31, 2019, our towers, fiber networks, data centers or computer systems may be affected by natural disasters and other unforeseen events, due to climate change. Climate change or efforts to regulate emissions may also have direct or indirect effects on our business by increasing the cost of emission compliance or the fuel we need to deliver primary power, typically through diesel-powered generators, to our tenants under our contractual obligations in emerging markets. Further, any damage or destruction to, or inability to access, our towers, fiber networks, data centers or computer systems may impact our ability to provide services to our tenants and lead to tenant loss, which could have a material adverse effect on our business, results of operations or financial condition.  Opportunities were assessed based on relevance to American Tower business and potential financial impact. The results affirmed many of our current initiatives, such as reducing our carbon emissions by making significant investments (over \$100 million) in energy reduction and clean energy projects, provide strong investment returns.	See <a href="#">Environment</a> , starting on page 39.
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Describe the impact of climate-related risks and opportunities on the organization's business, strategy and financial planning.	Our business is less susceptible to climate-related risks, given the geographic diversification of our communications sites portfolio and the locations upon which we own or operate our sites. As such, the impact on our business, strategy and financial planning is low. We have protections in place to lessen or largely mitigate both transition and physical risks related to climate change.  In terms of our climate-related opportunities, American Tower continues to invest in areas that align with our <i>Stand and Deliver</i> strategy. As part of this strategy, we aim to drive efficiency throughout the industry. Our investments in energy-reduction programs reduce costs and deliver efficiencies, whether by using more efficient lighting, generators or battery storage or having less diesel delivery trucks on the road. Our energy/power as a service initiative is one of the three main workstreams within our innovation program. Additionally, we have utilized and continue to explore renewable energy certificates in certain markets to reduce our footprint, as well as development of science-based targets.	See <a href="#">Environment</a> , starting on page 39.
Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Our current and long-term strategies, including our <i>Stand and Deliver</i> strategy, are largely resilient to climate-related risks, including 2°C or lower scenarios. Under various models and scenarios, the Company does not foresee a reasonable likelihood of reduced demand for mobile services and the related infrastructure in the near or long term.	See <a href="#">Environment</a> , starting on page 39.

### Risk Management

Disclose how the organization identifies, assesses, and manages climate-related risks.

Describe the organization's processes for identifying and assessing climate-related risks.	<p>Described in more detail in the preceding Governance and Strategy sections of this index, the Company identifies and assesses climate-related risks using our established enterprise risk management framework.</p>  <p>Like all other risks, climate-related risks are identified and assessed in the context of Company goals and objectives. Goals and objectives are established at the highest levels of the organization, with Board oversight, and then cascaded down through the organization. Through various mechanisms, ranging from functional risk workshops and targeted exercises to Companywide enterprise risk assessments, American Tower seeks to identify new or emerging risks to achieving our established goals and objectives via industry forums, independent websites, publications and consultants and our significant in-house experience and expertise. These new risks are then added to our existing risk profile and subjected to our rigorous risk management practices, including consistent ratings methodology and scales. As part of this process, the mitigations related to these risks are also assessed from an effectiveness perspective and when the risk lies outside our Company's risk tolerance, additional remediation steps are determined and taken. These risks and related actions are then monitored and periodically updated.</p>	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.
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Describe the organization's processes for managing climate-related risks.	As detailed above, the American Tower process for managing climate-related risks is no different than our process for managing any risk. Part of this process is identifying the potential risks to achieving established goals and objectives and reviewing mitigation activities. Effectively identifying and managing risks has been critical to our Company's success.	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	As noted above, identification, assessment and management of climate-related risks are fully integrated into the Company's established risk management practices and framework.	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.

**Metrics and Targets**

Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.

Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	American Tower performs detailed measurement and tracking of energy- and climate-related metrics, ranging from regional tower intensity measurements to global MWh and GHG totals. See <a href="#">Environment</a> , starting on page 39 for a complete inventory of disclosed metrics.	See <a href="#">Environment</a> , starting on page 39.
Disclose Scope 1, Scope 2, and if appropriate, Scope 3 Greenhouse Gas (GHG) emissions, and the related risks.	Scope 1 and Scope 2 GHG emissions are disclosed in the Environment section within this report. Discussion of climate-related risks are covered in more detail within the preceding three sections of this index.	See <a href="#">Corporate Governance and Risk Management</a> , starting on page 13, and <a href="#">Environment</a> , starting on page 39.
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	American Tower made a commitment in 2017 to reduce our Scope 1 GHG emissions from fossil fuel and diesel consumption in Africa and India by more than 60% by 2027, or 140 million liters of diesel annually. While this diesel fuel consumption goal is focused on the Africa and India regions, it is also considered a Companywide goal, as these markets cover approximately 100% of the Company's Scope 1 emissions. Also, in 2018, we set a global goal of 20 MW of installed renewable capacity through 5,000 solar-assist sites by the end of 2022 and are 59% of the way toward achieving this goal.	See <a href="#">Environment</a> , starting on page 39.

**Appendix C: Sustainability Accounting Standards Board (SASB) Index<sup>1</sup>**

Topic	Real Estate Accounting Metric	Category	Disclosure	Unit of Measure	Code
Energy Management	Energy consumption data coverage as a percentage of total floor area, by property subsector	Quantitative	Floor area is not relevant to our tower leasing model, but American Tower reports on 100% of its energy consumption data, including related to our leased towers, in accordance with the operational control standard.	Percentage (%) by floor area	IF-RE-130a.1
	(1) Total energy consumed by portfolio area with data coverage, (2) percentage grid electricity and (3) percentage renewable, by property subsector	Quantitative	See <a href="#">TC-TL-130a.1</a> , starting on page 89.	Gigajoules (GJ), Percentage (%)	IF-RE-130a.2
	Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property subsector	Quantitative	Like-for-like 2018 versus 2019 percentage change in energy consumption for 100% of asset portfolio is reported within <a href="#">Environment</a> , starting on page 39.	Percentage (%)	IF-RE-130a.3
	Percentage of eligible portfolio that (1) has an energy rating and (2) is certified to ENERGY STAR, by property subsector	Quantitative	Energy ratings and ENERGY STAR certification are not applicable to our communication sites.	Percentage (%) by floor area	IF-RE-130a.4
	Description of how building energy management considerations are integrated into property investment analysis and operational strategy	Discussion and Analysis	As detailed within <a href="#">Environment</a> , starting on page 39, energy management and reduction are significant considerations and large components of our operational strategy, where we have operational control of the site's energy. In 2017, we established a goal to reduce our Scope 1 fossil fuel consumption and diesel-related GHG emissions in Africa and India by more than 60% by 2027. As these markets represent more than 99% of our leased portfolio's 2019 Scope 1 GHG emissions, we view this as a Companywide goal applicable to our global Scope 1 footprint. Achievement of this goal is dependent on significant investment in the energy-reduction strategies outlined in this report.	n/a	IF-RE-130a.5

1. Management reviewed the SASB's industry standards and in the interest of full and transparent disclosure has opted to disclose performance data and management approaches under both the Real Estate Sustainability Accounting and the Telecommunication Services Standards. Neither standard is fully applicable to the Company, however, the Company has included all the full standards and for items that are not applicable, has explained why, and for overlapping or similar metrics, has cross-referenced to the other line item.

Topic	Real Estate Accounting Metric	Category	Disclosure	Unit of Measure	Code
Water Management	Water withdrawal data coverage as a percentage of (1) total floor area and (2) floor area in regions with High or Extremely High Baseline Water Stress, by property subsector	Quantitative	The Company does not measure in terms of floor area.  (1) Our estimated water usage data coverage is for 100% of our operations.  (2) Our estimated water usage data coverage is for 100% of our regions with High or Extremely High Baseline Water Stress.	Percentage (%) by floor area	IF-RE-140a.1
	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property subsector	Quantitative	(1) We withdrew an estimated 50,166 cubic meters of water in 2019.  (2) Using the World Resources Institute's Water Stress by Country, approximately 33% of this water use is in regions with High or Extremely High Baseline Water Stress.	Thousand cubic meters (m <sup>3</sup> ), Percentage (%)	IF-RE-140a.2
	Like-for-like percentage change in water withdrawn for portfolio area with data coverage, by property subsector	Quantitative	Water use increased by 0.4% from 2018 to 2019.	Percentage (%)	IF-RE-140a.3
	Description of water management risks and discussion of strategies and practices to mitigate those risks	Discussion and Analysis	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, withdrawn from municipal water utilities. Due to the low reliance on water for business operations, the Company does not view it as a high risk and therefore it has not developed strategies and practices to mitigate that business risk. However, American Tower does promote ways to incrementally conserve water in our offices. To engage employees in these efforts, we have internal campaigns to educate and increase awareness about water conservation.	n/a	IF-RE-140a.4

Topic	Real Estate Accounting Metric	Category	Disclosure	Unit of Measure	Code
Management of Tenant Sustainability Impacts	(1) Percentage of new leases that contain a cost recovery clause for resource efficiency-related capital improvements and (2) associated leased floor area, by property subsector	Quantitative	(1) Not applicable.  (2) Not applicable.	Percentage (%) by floor area, Square feet (ft <sup>2</sup> )	IF-RE-410a.1
	Percentage of tenants that are separately metered or sub-metered for (1) grid electricity consumption and (2) water withdrawals, by property subsector	Quantitative	(1) An estimated 39% of tenants are separately metered, and the majority of remaining sites are either sub-metered or the Company has mechanisms in place to pass through the tenants' energy usage per agreed upon contractual terms.  (2) Separately metered water withdrawals are not tracked, as our communications sites require minimal water usage and it is therefore not a material metric.	Percentage (%) by floor area	IF-RE-410a.2
	Discussion of approach to measuring, incentivizing and improving sustainability impacts of tenants	Discussion and Analysis	For communications sites where we have operational control of the energy and also the right to pass through the costs of the electricity and diesel related to our tenants' energy usage, we typically try to renegotiate the energy pass-through terms with our tenants to swap direct pass-through costs with fixed energy pricing, which enables us to make energy-efficiency capital investments at the site. See <a href="#">Environment</a> , starting on page 39, for additional information around these programs.	n/a	IF-RE-410a.3

Topic	Real Estate Accounting Metric	Category	Disclosure	Unit of Measure	Code
Climate Change Adaptation	Area of properties located in 100-year flood zones, by property subsector	Quantitative	Due to the need for communications sites to be located in areas of relatively higher elevation to facilitate radio wave propagation, it is estimated that only a small percentage of sites are located in 100-year flood zones. However, as this is not a material risk to the Company, this metric is not formally tracked. See <a href="#">Appendix B</a> for more information on climate-related risks.	Square feet (ft <sup>2</sup> )	IF-RE-450a.1
	Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks	Discussion and Analysis	See <a href="#">Appendix B</a> for detailed assessment of climate change risk exposure analysis, degree of systematic portfolio exposure and strategies for mitigating risks.	n/a	IF-RE-450a.2
Real Estate Activity Metric					
Real Estate Activity Metric	Category	Disclosure	Unit of Measure	Code	
Number of assets, by property subsector	Quantitative	As of December 31, 2019, we owned and operated a portfolio of 179,520 communications sites, including 1,774 DAS networks. In addition, we own property interests that we lease to communications service providers and third-party tower operators. See the table in Item 7 of our 2019 Annual Report on Form 10-K for the year ended December 31, 2019, under the caption "Management's Discussion and Results of Operations—Executive Overview" for more detailed information on the geographic locations of our communications sites.	Number	IF-RE-000.A	
	Quantitative	While relevant to many real estate companies, leasable floor area is not a metric that is relevant to American Tower. We lease space on our towers, often measured in terms of height (e.g., from 50' to 62') to tenants.	Square feet (ft <sup>2</sup> )	IF-RE-000.B	

Real Estate Activity Metric	Category	Disclosure	Unit of Measure	Code	
Percentage of indirectly managed assets, by property subsector	Quantitative	While our tenants have the authority to place and manage their equipment within the portion of the tower they are leasing, we do not have assets where a single tenant has the greatest authority to introduce and implement operating and environmental policies on the tower site as a whole.	Percentage (%) by floor area	IF-RE-000.C	
Average occupancy rate, by property subsector	Quantitative	The average number of physical tenants per tower on a global basis was approximately 1.6. This metric is tracked in absolute terms as opposed to percentage.	Percentage (%)	IF-RE-000.D	
Topic					
Topic	Telecommunication Services SASB Metric	Category	Disclosure	Unit of Measure	Code
Environmental Footprint of Operations	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	(1) 17,274,218 GJ	Gigajoules (GJ), Percentage (%)	TC-TL-130a.1
			(2) 57.5% grid electricity		
			(3) Of the 57.5% of our consumed grid electricity, an estimated 23% is renewably generated (estimate based upon IEA data of renewable energy generation in countries where the Company has operations)		
Data Privacy	Description of policies and practices relating to behavioral advertising and customer privacy	Discussion and Analysis	As a provider of wireless infrastructure, behavioral advertising and the related customer privacy is not applicable to our business.	n/a	TC-TL-220a.1
	Number of customers whose information is used for secondary purposes	Quantitative	We do not use customer information or data for secondary purposes.	Number	TC-TL-220a.2
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Quantitative	We incurred \$0 in monetary losses as a result of legal proceedings associated with customer privacy.	Reporting currency	TC-TL-220a.3
	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	Quantitative	(1) Zero (2) Zero (3) Not applicable	Number, Percentage (%)	TC-TL-220a.4

Topic	Telecommunication Services SASB Metric	Category	Disclosure	Unit of Measure	Code
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	Quantitative	(1) There were no material breaches that warranted Board attention. (2) See (1) above. (3) See (1) above.	Number, Percentage (%)	TC-TL-230a.1
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	See <a href="#">Cybersecurity and Information Technology</a> on page 18, for discussion and analysis of the Company's approach to identifying and addressing data security risks, including the use of third-party cybersecurity standards.	n/a	TC-TL-230a.2
Product End-of- life Management	(1) Materials recovered through takeback programs, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Quantitative	The Company does not sell products and therefore does not have a takeback program. However, the Company does have recycling programs in place to properly deal with batteries, oil, steel and other related materials at our communications sites, excluding communications equipment, which is handled directly by our tenants. See <a href="#">Environment</a> , starting on page 39, for additional information.	Metric tons (t), Percentage (%)	TC-TL-440a.1
Competitive Behavior & Open Internet	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Quantitative	None.	Reporting currency	TC-TL-520a.1
	Average actual sustained download speed of (1) owned and commercially associated content and (2) non-associated content	Quantitative	As primarily a provider of infrastructure that supports the equipment used in downloading data, this metric is largely not applicable.	Megabits per second (Mbps)	TC-TL-520a.2
	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	Discussion and Analysis	Not applicable	n/a	TC-TL-520a.3

Topic	Telecommunication Services SASB Metric	Category	Disclosure	Unit of Measure	Code
Managing Systemic Risks from Technology Disruptions	(1) System average interruption frequency and (2) customer average interruption duration	Quantitative	Not applicable. Portions of our business related to this question make up less than one percent of our revenue.	Disruptions per customer, Hours per customer	TC-TL-550a.1
Technology Disruptions	Discussion of systems to provide unimpeded service during service interruptions	Discussion and Analysis	Not applicable. Portions of our business related to this question make up less than one percent of our revenue.	n/a	TC-TL-550a.2
Activity Metric		Category	Disclosure	Unit of Measure	Code
Number of wireless subscribers		Quantitative	American Tower infrastructure supports mobile network operators, but the Company does not have any direct wireless subscribers.	Number	TC-TL-000.A
Number of wireline subscribers		Quantitative	American Tower infrastructure supports mobile network operators, but the Company does not have any direct wireline subscribers.	Number	TC-TL-000.B
Number of broadband subscribers		Quantitative	Metric is not material to American Tower revenue.	Number	TC-TL-000.C
Network traffic		Quantitative	Metric is not material to American Tower revenue.	Petabytes	TC-TL-000.D



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