

Form 5500 Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Annual Return/Report of Employee Benefit Plan This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code). ▶ Complete all entries in accordance with the instructions to the Form 5500.	OMB Nos. 1210-0110 1210-0089 2021 This Form is Open to Public Inspection
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Part I	Annual Report Identification Information
For calendar plan year 2021 or fiscal plan year beginning <u>01/01/2021</u> and ending <u>12/31/2021</u>	
A This return/report is for:	☐ a multiemployer plan ☐ a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.) ☒ a single-employer plan ☐ a DFE (specify) _____
B This return/report is:	☐ the first return/report ☐ the final return/report ☐ an amended return/report ☐ a short plan year return/report (less than 12 months)
C If the plan is a collectively-bargained plan, check here.	☐
D Check box if filing under:	☒ Form 5558 ☐ automatic extension ☐ the DFVC program ☐ special extension (enter description)
E If this is a retroactively adopted plan permitted by SECURE Act section 201, check here.	☐

Part II	Basic Plan Information—enter all requested information										
1a Name of plan <u>AMERICAN TOWER RETIREMENT SAVINGS PLAN</u> 2a Plan sponsor's name (employer, if for a single-employer plan) Mailing address (include room, apt., suite no. and street, or P.O. Box) City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions) <u>AMERICAN TOWER CORPORATION</u> <u>116 HUNTINGTON AVENUE, 11TH FLOOR</u> <u>BOSTON, MA 02116</u>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">1b Three-digit plan number (PN) ▶</td> <td style="width: 20%; text-align: center;"><u>001</u></td> </tr> <tr> <td colspan="2">1c Effective date of plan <u>07/01/1998</u></td> </tr> <tr> <td colspan="2">2b Employer Identification Number (EIN) <u>65-0723837</u></td> </tr> <tr> <td colspan="2">2c Plan Sponsor's telephone number <u>617-375-7500</u></td> </tr> <tr> <td colspan="2">2d Business code (see instructions) <u>531190</u></td> </tr> </table>	1b Three-digit plan number (PN) ▶	<u>001</u>	1c Effective date of plan <u>07/01/1998</u>		2b Employer Identification Number (EIN) <u>65-0723837</u>		2c Plan Sponsor's telephone number <u>617-375-7500</u>		2d Business code (see instructions) <u>531190</u>	
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2d Business code (see instructions) <u>531190</u>											

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	Filed with authorized/valid electronic signature.	10/11/2022	DEBRA OLIVER
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

For Paperwork Reduction Act Notice, see the Instructions for Form 5500.

Form 5500 (2021)
v. 210624

3a Plan administrator's name and address ☒ Same as Plan Sponsor		3b Administrator's EIN	
		3c Administrator's telephone number	
4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report: a Sponsor's name c Plan Name		4b EIN 4d PN	
5 Total number of participants at the beginning of the plan year		5	2505
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines 6a(1) , 6a(2) , 6b , 6c , and 6d).			
a(1) Total number of active participants at the beginning of the plan year.....		6a(1)	1720
a(2) Total number of active participants at the end of the plan year		6a(2)	1839
b Retired or separated participants receiving benefits.....		6b	10
c Other retired or separated participants entitled to future benefits		6c	818
d Subtotal. Add lines 6a(2) , 6b , and 6c		6d	2667
e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.		6e	6
f Total. Add lines 6d and 6e		6f	2673
g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item)		6g	2595
h Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested		6h	125
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item).....		7	
8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions: 2F 2G 2J 2K 2S 2T 3H 2E 3D			
b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:			
9a Plan funding arrangement (check all that apply) (1) ☐ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor		9b Plan benefit arrangement (check all that apply) (1) ☐ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor	
10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)			
a Pension Schedules (1) ☒ R (Retirement Plan Information) (2) ☐ MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary (3) ☐ SB (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary		b General Schedules (1) ☒ H (Financial Information) (2) ☐ I (Financial Information – Small Plan) (3) ☐ <u>0</u> A (Insurance Information) (4) ☒ C (Service Provider Information) (5) ☒ D (DFE/Participating Plan Information) (6) ☐ G (Financial Transaction Schedules)	

Part III Form M-1 Compliance Information (to be completed by welfare benefit plans)

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

11c Enter the Receipt Confirmation Code for the 2021 Form M-1 annual report. If the plan was not required to file the 2021 Form M-1 annual report, enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code _____

SCHEDULE C (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Service Provider Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110
		2021
		This Form is Open to Public Inspection.

For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021		
A Name of plan AMERICAN TOWER RETIREMENT SAVINGS PLAN	B Three-digit plan number (PN) ▶	001
C Plan sponsor's name as shown on line 2a of Form 5500 AMERICAN TOWER CORPORATION	D Employer Identification Number (EIN) 65-0723837	

Part I	Service Provider Information (see instructions)
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You must complete this Part, in accordance with the instructions, to report the information required for **each person** who received, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of monetary value) in connection with services rendered to the plan or the person's position with the plan during the plan year. If a person received **only** eligible indirect compensation for which the plan received the required disclosures, you are required to answer line 1 but are not required to include that person when completing the remainder of this Part.

1 Information on Persons Receiving Only Eligible Indirect Compensation

a Check "Yes" or "No" to indicate whether you are excluding a person from the remainder of this Part because they received only eligible indirect compensation for which the plan received the required disclosures (see instructions for definitions and conditions)..... ☒ Yes ☐ No

b If you answered line 1a "Yes," enter the name and EIN or address of each person providing the required disclosures for the service providers who received only eligible indirect compensation. Complete as many entries as needed (see instructions).

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation
FIDELITY INVESTMENTS INSTITUTIONAL
04-2647786

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

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2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

FIDELITY INVESTMENTS INSTITUTIONAL

04-2647786

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
37 60 64 65	RECORDKEEPER	211222	Yes ☒ No ☐	Yes ☒ No ☐	0	Yes ☒ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

Part I Service Provider Information (continued)

3. If you reported on line 2 receipt of indirect compensation, other than eligible indirect compensation, by a service provider, and the service provider is a fiduciary or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services, answer the following questions for (a) each source from whom the service provider received \$1,000 or more in indirect compensation and (b) each source for whom the service provider gave you a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation. Complete as many entries as needed to report the required information for each source.

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
FIDELITY INVESTMENTS INSTITUTIONAL	60	0
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
BARON SMALL CAP - DST SYSTEMS INC 43-1581814	0.40%	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
FIDELITY INVESTMENTS INSTITUTIONAL	60	0
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
BARON SMALL CAP INST - DST SYSTEMS 43-1581814	0.15%	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
FIDELITY INVESTMENTS INSTITUTIONAL	60	0
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
PARNASSUS CORE EQ IS - ULTIMUS FUN 31-1663251	0.10%	

Part II Service Providers Who Fail or Refuse to Provide Information

4 Provide, to the extent possible, the following information for each service provider who failed or refused to provide the information necessary to complete this Schedule.

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide
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(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

Part III Termination Information on Accountants and Enrolled Actuaries (see instructions)
(complete as many entries as needed)

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
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103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)

Part II Information on Participating Plans (to be completed by DFEs)

(Complete as many entries as needed to report all participating plans)

a Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
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plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN

SCHEDULE H (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Financial Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code). ► File as an attachment to Form 5500.	OMB No. 1210-0110 2021 This Form is Open to Public Inspection
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021		
A Name of plan AMERICAN TOWER RETIREMENT SAVINGS PLAN	B Three-digit plan number (PN) ►	001
C Plan sponsor's name as shown on line 2a of Form 5500 AMERICAN TOWER CORPORATION	D Employer Identification Number (EIN) 65-0723837	

Part I	Asset and Liability Statement
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1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. **Round off amounts to the nearest dollar.** MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.

Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash.....	1a	0	0
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions	1b(1)	0	0
(2) Participant contributions.....	1b(2)	0	0
(3) Other	1b(3)	0	0
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit)	1c(1)	9392004	8495596
(2) U.S. Government securities	1c(2)	0	0
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred	1c(3)(A)	0	0
(B) All other	1c(3)(B)	0	0
(4) Corporate stocks (other than employer securities):			
(A) Preferred	1c(4)(A)	0	0
(B) Common	1c(4)(B)	0	0
(5) Partnership/joint venture interests	1c(5)	0	0
(6) Real estate (other than employer real property)	1c(6)	0	0
(7) Loans (other than to participants)	1c(7)	0	0
(8) Participant loans	1c(8)	3036706	2805952
(9) Value of interest in common/collective trusts	1c(9)	2437371	1650042
(10) Value of interest in pooled separate accounts	1c(10)	0	0
(11) Value of interest in master trust investment accounts	1c(11)	0	0
(12) Value of interest in 103-12 investment entities	1c(12)	0	0
(13) Value of interest in registered investment companies (e.g., mutual funds)	1c(13)	292442048	346335106
(14) Value of funds held in insurance company general account (unallocated contracts).....	1c(14)	0	0
(15) Other.....	1c(15)	0	0

		(a) Beginning of Year	(b) End of Year
1d	Employer-related investments:		
(1)	Employer securities.....	1d(1) 0	0
(2)	Employer real property.....	1d(2) 0	0
e	Buildings and other property used in plan operation	1e 0	0
f	Total assets (add all amounts in lines 1a through 1e)	1f 307308129	359286696
Liabilities			
g	Benefit claims payable	1g 0	0
h	Operating payables	1h 0	0
i	Acquisition indebtedness.....	1i 0	0
j	Other liabilities.....	1j 0	0
k	Total liabilities (add all amounts in lines 1g through 1j)	1k 0	0
Net Assets			
l	Net assets (subtract line 1k from line 1f)	1l 307308129	359286696

Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

		(a) Amount	(b) Total
a	Contributions:		
(1)	Received or receivable in cash from: (A) Employers	2a(1)(A) 7886172	
	(B) Participants	2a(1)(B) 15309946	
	(C) Others (including rollovers).....	2a(1)(C) 2968940	
(2)	Noncash contributions.....	2a(2) 0	
(3)	Total contributions. Add lines 2a(1)(A), (B), (C), and line 2a(2)	2a(3)	26165058
b	Earnings on investments:		
(1)	Interest:		
	(A) Interest-bearing cash (including money market accounts and certificates of deposit).....	2b(1)(A) 956	
	(B) U.S. Government securities	2b(1)(B) 0	
	(C) Corporate debt instruments	2b(1)(C) 0	
	(D) Loans (other than to participants)	2b(1)(D) 0	
	(E) Participant loans.....	2b(1)(E) 145222	
	(F) Other	2b(1)(F) 0	
	(G) Total interest. Add lines 2b(1)(A) through (F).....	2b(1)(G)	146178
(2)	Dividends: (A) Preferred stock.....	2b(2)(A) 0	
	(B) Common stock	2b(2)(B) 0	
	(C) Registered investment company shares (e.g. mutual funds).....	2b(2)(C) 23150299	
	(D) Total dividends. Add lines 2b(2)(A), (B), and (C)	2b(2)(D)	23150299
(3)	Rents	2b(3)	0
(4)	Net gain (loss) on sale of assets: (A) Aggregate proceeds	2b(4)(A) 0	
	(B) Aggregate carrying amount (see instructions).....	2b(4)(B) 0	
	(C) Subtract line 2b(4)(B) from line 2b(4)(A) and enter result	2b(4)(C)	
(5)	Unrealized appreciation (depreciation) of assets: (A) Real estate	2b(5)(A) 0	
	(B) Other	2b(5)(B) 0	
	(C) Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	2b(5)(C)	

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts.....	2b(6)		-52524
(7) Net investment gain (loss) from pooled separate accounts.....	2b(7)		0
(8) Net investment gain (loss) from master trust investment accounts.....	2b(8)		0
(9) Net investment gain (loss) from 103-12 investment entities.....	2b(9)		0
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds).....	2b(10)		30315435
c Other income.....	2c		0
d Total income. Add all income amounts in column (b) and enter total.....	2d		79724446
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers.....	2e(1)	27525664	
(2) To insurance carriers for the provision of benefits.....	2e(2)	0	
(3) Other.....	2e(3)	0	
(4) Total benefit payments. Add lines 2e(1) through (3).....	2e(4)		27525664
f Corrective distributions (see instructions).....	2f		8993
g Certain deemed distributions of participant loans (see instructions).....	2g		0
h Interest expense.....	2h		0
i Administrative expenses: (1) Professional fees.....	2i(1)	0	
(2) Contract administrator fees.....	2i(2)	0	
(3) Investment advisory and management fees.....	2i(3)	0	
(4) Other.....	2i(4)	211222	
(5) Total administrative expenses. Add lines 2i(1) through (4).....	2i(5)		211222
j Total expenses. Add all expense amounts in column (b) and enter total.....	2j		27745879
Net Income and Reconciliation			
k Net income (loss). Subtract line 2j from line 2d.....	2k		51978567
l Transfers of assets:			
(1) To this plan.....	2l(1)		0
(2) From this plan.....	2l(2)		0

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

(1) ☒ Unmodified (2) ☐ Qualified (3) ☐ Disclaimer (4) ☐ Adverse

b Check the appropriate box(es) to indicate whether the IQPA performed an ERISA section 103(a)(3)(C) audit. Check both boxes (1) and (2) if the audit was performed pursuant to both 29 CFR 2520.103-8 and 29 CFR 2520.103-12(d). Check box (3) if pursuant to neither.

(1) ☒ DOL Regulation 2520.103-8 (2) ☐ DOL Regulation 2520.103-12(d) (3) ☐ neither DOL Regulation 2520.103-8 nor DOL Regulation 2520.103-12(d).

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: GRAY, GRAY & GRAY LLP

(2) EIN: 04-2088368

d The opinion of an independent qualified public accountant is **not attached** because:

(1) ☐ This form is filed for a CCT, PSA, or MTIA. (2) ☐ It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.).....

	Yes	No	Amount
4a	X		83

	Yes	No	Amount
b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.)			
4b		X	
c Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)			
4c		X	
d Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)			
4d		X	
e Was this plan covered by a fidelity bond?	X		1000000
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?		X	
4f		X	
g Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4g		X	
h Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4h		X	
i Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.)	X		
4i	X		
j Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked and see instructions for format requirements.)			
4j		X	
k Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?			
4k		X	
l Has the plan failed to provide any benefit when due under the plan?			
4l		X	
m If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)			
4m		X	
n If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.			
4n		X	
5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year?..... ☐ Yes ☒ No If "Yes," enter the amount of any plan assets that reverted to the employer this year _____.			
5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)			
5b(1) Name of plan(s)	5b(2) EIN(s)	5b(3) PN(s)	
5c Was the plan a defined benefit plan covered under the PBGC insurance program at any time during this plan year? (See ERISA section 4021 and instructions.) ☐ Yes ☐ No ☐ Not determined If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year _____.			

SCHEDULE R (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Retirement Plan Information This schedule is required to be filed under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6058(a) of the Internal Revenue Code (the Code). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110 2021 This Form is Open to Public Inspection.
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

A Name of plan <u>AMERICAN TOWER RETIREMENT SAVINGS PLAN</u>	B Three-digit plan number (PN) ▶ <u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>AMERICAN TOWER CORPORATION</u>	D Employer Identification Number (EIN) <u>65-0723837</u>

Part I	Distributions
---------------	----------------------

All references to distributions relate only to payments of benefits during the plan year.

1 Total value of distributions paid in property other than in cash or the forms of property specified in the instructions.....	1
2 Enter the EIN(s) of payor(s) who paid benefits on behalf of the plan to participants or beneficiaries during the year (if more than two, enter EINs of the two payors who paid the greatest dollar amounts of benefits): EIN(s): <u>04-6568107</u>	
Profit-sharing plans, ESOPs, and stock bonus plans, skip line 3.	
3 Number of participants (living or deceased) whose benefits were distributed in a single sum, during the plan year	3

Part II	Funding Information (If the plan is not subject to the minimum funding requirements of section 412 of the Internal Revenue Code or ERISA section 302, skip this Part.)
----------------	---

4 Is the plan administrator making an election under Code section 412(d)(2) or ERISA section 302(d)(2)?	☐ Yes	☐ No	☐ N/A
If the plan is a defined benefit plan, go to line 8.			
5 If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions and enter the date of the ruling letter granting the waiver. Date: Month _____ Day _____ Year _____ If you completed line 5, complete lines 3, 9, and 10 of Schedule MB and do not complete the remainder of this schedule.			
6 a Enter the minimum required contribution for this plan year (include any prior year accumulated funding deficiency not waived)	6a		
b Enter the amount contributed by the employer to the plan for this plan year	6b		
c Subtract the amount in line 6b from the amount in line 6a. Enter the result (enter a minus sign to the left of a negative amount)	6c		
If you completed line 6c, skip lines 8 and 9.			
7 Will the minimum funding amount reported on line 6c be met by the funding deadline?	☐ Yes	☐ No	☐ N/A
8 If a change in actuarial cost method was made for this plan year pursuant to a revenue procedure or other authority providing automatic approval for the change or a class ruling letter, does the plan sponsor or plan administrator agree with the change?	☐ Yes	☐ No	☐ N/A

Part III	Amendments
-----------------	-------------------

9 If this is a defined benefit pension plan, were any amendments adopted during this plan year that increased or decreased the value of benefits? If yes, check the appropriate box. If no, check the "No" box.....	☐ Increase	☐ Decrease	☐ Both	☐ No
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Part IV	ESOPs (see instructions). If this is not a plan described under section 409(a) or 4975(e)(7) of the Internal Revenue Code, skip this Part.
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10 Were unallocated employer securities or proceeds from the sale of unallocated securities used to repay any exempt loan?	☐ Yes	☐ No
11 a Does the ESOP hold any preferred stock?	☐ Yes	☐ No
b If the ESOP has an outstanding exempt loan with the employer as lender, is such loan part of a "back-to-back" loan? (See instructions for definition of "back-to-back" loan.)	☐ Yes	☐ No
12 Does the ESOP hold any stock that is not readily tradable on an established securities market?	☐ Yes	☐ No

For Paperwork Reduction Act Notice, see the Instructions for Form 5500.

Schedule R (Form 5500) 2021
v. 201209

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that contributed more than 5% of total contributions to the plan during the plan year (measured in dollars). See instructions. *Complete as many entries as needed to report all applicable employers.*

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

- 14** Enter the number of deferred vested and retired participants (inactive participants), as of the beginning of the plan year, whose contributing employer is no longer making contributions to the plan for:

a The current plan year. Check the box to indicate the counting method used to determine the number of inactive participants: ☐ last contributing employer ☐ alternative ☐ reasonable approximation (see instructions for required attachment).....

14a

b The plan year immediately preceding the current plan year. ☐ Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....

14b

c The second preceding plan year. ☐ Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....

14c

- 15** Enter the ratio of the number of participants under the plan on whose behalf no employer had an obligation to make an employer contribution during the current plan year to:

a The corresponding number for the plan year immediately preceding the current plan year.....

15a

b The corresponding number for the second preceding plan year.....

15b

- 16** Information with respect to any employers who withdrew from the plan during the preceding plan year:

a Enter the number of employers who withdrew during the preceding plan year.....

16a

b If line 16a is greater than 0, enter the aggregate amount of withdrawal liability assessed or estimated to be assessed against such withdrawn employers.....

16b

- 17** If assets and liabilities from another plan have been transferred to or merged with this plan during the plan year, check box and see instructions regarding supplemental information to be included as an attachment..... ☐

Part VI Additional Information for Single-Employer and Multiemployer Defined Benefit Pension Plans

- 18** If any liabilities to participants or their beneficiaries under the plan as of the end of the plan year consist (in whole or in part) of liabilities to such participants and beneficiaries under two or more pension plans as of immediately before such plan year, check box and see instructions regarding supplemental information to be included as an attachment..... ☐

- 19** If the total number of participants is 1,000 or more, complete lines (a) through (c)

a Enter the percentage of plan assets held as:

Stock: _____% Investment-Grade Debt: _____% High-Yield Debt: _____% Real Estate: _____% Other: _____%

b Provide the average duration of the combined investment-grade and high-yield debt:

☐ 0-3 years ☐ 3-6 years ☐ 6-9 years ☐ 9-12 years ☐ 12-15 years ☐ 15-18 years ☐ 18-21 years ☐ 21 years or more

c What duration measure was used to calculate line 19(b)?

☐ Effective duration ☐ Macaulay duration ☐ Modified duration ☐ Other (specify): _____

- 20 PBGC missed contribution reporting requirements.** If this is a multiemployer plan or a single-employer plan that is not covered by PBGC, skip line 20.

a Is the amount of unpaid minimum required contributions for all years from Schedule SB (Form 5500) line 40 greater than zero? ☐ Yes ☐ No

b If line 20a is "Yes," has PBGC been notified as required by ERISA sections 4043(c)(5) and/or 303(k)(4)? Check the applicable box:

☐ Yes.

☐ No. Reporting was waived under 29 CFR 4043.25(c)(2) because contributions equal to or exceeding the unpaid minimum required contribution were made by the 30th day after the due date.

☐ No. The 30-day period referenced in 29 CFR 4043.25(c)(2) has not yet ended, and the sponsor intends to make a contribution equal to or exceeding the unpaid minimum required contribution by the 30th day after the due date.

☐ No. Other. Provide explanation _____

AMERICAN TOWER RETIREMENT SAVINGS PLAN

FINANCIAL STATEMENTS AND SUPPLEMENTAL SCHEDULES
WITH
INDEPENDENT AUDITOR'S REPORT

DECEMBER 31, 2021

NOTIFICATION TO THIRD PARTY USERS OF THIS REPORT

This report was prepared subject to the terms and conditions set forth in an engagement letter. By relying upon this report, all users shall be deemed to agree to the terms and conditions of that engagement letter. Users intending to rely upon this report should contact the issuer to obtain a copy of its applicable terms and conditions. This report is intended for the exclusive use of the clients of the issuer and others to whom the issuer has expressly granted consent.

AMERICAN TOWER RETIREMENT SAVINGS PLAN

INDEX TO FINANCIAL STATEMENTS AND SUPPLEMENTAL SCHEDULES

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Note: All other schedules required by Section 2520.103-10 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA) have been omitted because they are not applicable.

INDEPENDENT AUDITOR'S REPORT

To the Trustees

American Tower Retirement Savings Plan

Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements

We have performed an audit of the accompanying financial statements of **American Tower Retirement Savings Plan**, an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), as permitted by ERISA Section 103(a)(3)(C) [ERISA Section 103(a)(3)(C) audit]. The financial statements comprise the statement of net assets available for benefits as of December 31, 2021, and the related statement of changes in net assets available for benefits for the year then ended, and the related notes to the 2021 financial statements.

Management, having determined it is permissible in the circumstances, has elected to have the audit of **American Tower Retirement Savings Plan's** financial statements performed in accordance with ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's ("DOL") Rules and Regulations for Reporting and Disclosure under ERISA. As permitted by ERISA Section 103(a)(3)(C), our audits need not extend to any statements or information related to assets held for investment of the plan (investment information) by a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency, provided that the statements or information regarding assets so held are prepared and certified to by the bank or similar institution or insurance carrier in accordance with 29 CFR 2520.103-5 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA (qualified institution).

Management has obtained certifications from a qualified institution as of December 31, 2021 and 2020 and for the year ended December 31, 2021, stating that the certified investment information, as described in Note 4 to the financial statements, is complete and accurate.

Opinion on the 2021 Financial Statements

In our opinion, based on our audits and on the procedures performed as described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section—

- the amounts and disclosures in the accompanying financial statements referred to above, other than those agreed to or derived from the certified investment information, are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America ("GAAP").
- the information in the financial statements referred to above related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Basis for Opinion on the 2021 Financial Statements

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section of our report. We are required to be independent of **American Tower Retirement Savings Plan** and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion.

Responsibilities of Management for the 2021 Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with GAAP, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management's election of the ERISA Section 103(a)(3)(C) audit does not affect management's responsibility for the financial statements.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for one year after the date the financial statements are available to be issued.

Management is also responsible for maintaining a current Plan instrument, including all Plan amendments; administering the Plan; and determining that the Plan's transactions that are presented and disclosed in the financial statements are in conformity with the Plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the 2021 Financial Statements

Except as described in the Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements section of our report, our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of **American Tower Retirement Savings Plan's** internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.

- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for a reasonable period of time.

Our audits did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of GAAP.

Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with GAAP.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matter - 2021 Supplemental Schedules Required by ERISA

The supplemental schedules of assets (held at end of year) and delinquent participant contributions are presented for purposes of additional analysis and are not a required part of the financial statements but are supplementary information required by the DOL's Rules and Regulations for Reporting and Disclosure under ERISA. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information included in the supplemental schedules, other than that agreed to or derived from the certified investment information, has been subjected to auditing procedures applied in the audits of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards. For information included in the supplemental schedules that agreed to or is derived from the certified investment information, we compared such information to the related certified investment information.

In forming our opinion on the supplemental schedules, we evaluated whether the supplemental schedules, other than the information agreed to or derived from the certified investment information, including their form and content, are presented in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion—

- the form and content of the supplemental schedules, other than the information in the supplemental schedules that agreed to or is derived from the certified investment information, are presented, in all material respects, in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.
- the information in the supplemental schedules related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Other Matter - Auditor's Report on the 2020 Financial Statements

We were engaged to audit the 2020 financial statements of the Plan. As permitted by 29 CFR 2520.103-8 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA, the Plan Administrator instructed us not to perform and we did not perform any auditing procedures with respect to the information certified by a qualified institution. In our report dated October 1, 2021, we indicated that (a) because of the significance of the information that we did not audit, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion and accordingly, we did not express an opinion on the 2020 financial statements, and (b) the form and content of the information included in the 2020 financial statements other than that derived from the certified information were presented in compliance with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

GRAY, GRAY & GRAY, LLP

Gray, Gray & Gray, LLP

Canton, MA
October 10, 2022

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS

	December 31,	
	2021	2020
ASSETS		
Investments, at fair market value:		
Mutual funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	1,635,487	2,354,893
Total investments	356,466,190	304,188,945
Receivables:		
Notes receivable from participants	2,810,461	3,040,860
Participants' contributions	450,180	385,839
Employer's contributions	645,358	598,316
Total receivables	3,905,999	4,025,015
NET ASSETS AVAILABLE FOR BENEFITS	\$ 360,372,189	\$ 308,213,960

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS

YEAR ENDED DECEMBER 31, 2021

ADDITIONS

Additions to net assets attributed to:

Investment income:

Interest and dividends	\$ 23,166,653
Net appreciation in fair value of investments	30,315,436
Total investment income	53,482,089

Interest on notes receivable from participants	145,577
--	---------

Contributions:

Participant deferrals	15,374,288
Participant rollovers	2,968,940
Employer match	7,933,214

Total contributions	26,276,442
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Plan reimbursement revenue	56,949
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Total additions	79,961,057
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DEDUCTIONS

Deductions from net assets attributed to:

Benefits paid to participants	(27,534,658)
Administrative expenses	(268,170)

Total deductions	(27,802,828)
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NET INCREASE	52,158,229
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NET ASSETS AVAILABLE FOR BENEFITS

Beginning of year	308,213,960
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End of year	\$ 360,372,189
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AMERICAN TOWER RETIREMENT SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - DESCRIPTION OF PLAN

The following description of the American Tower Retirement Savings Plan (the “Plan”) provides general information only. Participants should refer to the Summary Plan Description and the Plan documents for a more complete description of the Plan’s provisions.

General Information—The Plan is a defined-contribution plan available to substantially all employees of American Tower Corporation (the “Company” or the “Plan Sponsor”) and its participating subsidiaries. The Company’s Benefits Committee, as Plan Administrator, controls and manages the operation and administration of the Plan. Fidelity Management Trust Company (“Fidelity”) serves as the Trustee of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

Participant Contributions—Participants may contribute through payroll deductions up to 40% of eligible wages, as defined in the Plan, subject to limits set by the Internal Revenue Code of 1986, as amended (the “Code”). In addition, participants age 50 and older may make catch-up contributions. Participants may also contribute amounts representing distributions from other retirement plans. The Plan provides for automatic enrollment for all newly eligible employees. Unless the employee elects otherwise, 3% of the employee’s eligible earnings will be deferred in the Plan subject to the annual contribution limits set by the Code.

Participants may designate a portion, or all, of their deferred contributions as Roth contributions, which can be included in the participant’s gross income.

Employer Contributions—Each year, the Company may make discretionary matching contributions determined by pay period based on a percentage of a participant’s payroll contributions. The Company’s discretionary matching contribution for the year ended December 31, 2021 was 100%, up to a maximum of 5% of a participant’s contributions. The Company may also make additional annual discretionary matching contributions in an amount to be determined at year end by the Company’s Board of Directors. No additional discretionary matching contributions were made in 2021.

Participant Accounts—Individual accounts are maintained for each participant. Each participant’s account is credited with the (i) participant’s contributions, (ii) Company’s discretionary matching contributions, if any, (iii) allocations of additional Company discretionary matching contributions, if any, and (iv) allocations of Plan earnings. Each participant’s account is charged with the participant’s withdrawals and an allocation of Plan losses. Allocations are based on each participant’s earnings or account balances, as defined. The benefit to which a participant is entitled is the benefit that can be provided from his or her vested account.

Investments—Participants direct the investment of their contributions and Company contributions into various investment options offered by the Plan. Unless the employee elects otherwise, contributions will be directed into the age appropriate Freedom Fund. The Plan offers several mutual funds and a common collective trust as investment options for participants. Participants are able to change their existing allocations at their discretion by contacting Fidelity. The Plan Administrator may make periodic updates to the investment options.

Vesting—Participants are immediately vested in their contributions plus actual earnings thereon. Vesting in the Company matching contribution and discretionary matching portion of participants’ accounts (plus actual earnings thereon) occurs at a rate of 25% per year, beginning after one year of service, until a participant becomes fully vested at the end of four years.

Notes Receivable from Participants—Participants may borrow from their accounts a minimum of \$1,000 and a maximum of the lesser of one-half of a participant’s vested account balance or \$50,000, reduced by the highest outstanding loan balance in a

participant's account during the prior twelve-month period. Loans are fully secured by the participant's vested interest in his or her account. Loan terms generally range from one to five years with terms extending to ten years for loans associated with the purchase of primary residence. New participant loans bear interest at the prime rate plus one percent. The interest rate for new loans is updated at the beginning of each month and will apply to all loans withdrawn during the month. The applicable interest rates for outstanding loans ranged from 4.25% to 8.25% as of December 31, 2021 and 4.25% to 8.25% as of December 31, 2020. Principal and interest are paid ratably through payroll deductions.

Payment of Benefits—Total or partial distributions from the Plan are permitted upon a participant's attainment of age 59½, termination of employment, retirement, death or disability. An automatic distribution is made to terminated participants with vested account balances of less than \$1,000 if the participant does not make a timely distribution election following notification. In the case of terminated participants with vested account balances between \$1,000 and \$5,000, an automatic distribution to an individual retirement account is made if the participant does not make a timely distribution election following notification. Withdrawals are also permitted for certain events that result in financial hardship to the participant.

Forfeitures—Unvested Company contributions and earnings thereon that have been forfeited may be applied against administrative expenses of the Plan and used to reduce Company contributions. At December 31, 2021 and 2020, forfeited, non-vested participant accounts totaled \$25,697 and \$9,087, respectively. During the year ended December 31, 2021, Company contributions funded from the forfeiture accounts were \$418,478. During the year ended December 31, 2021, Plan administrative expenses of \$85 were paid from forfeitures.

NOTE 2 - SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting—The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States ("GAAP").

Use of Estimates—The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Accordingly, actual results may differ from those estimates and assumptions and such differences could be material to the accompanying financial statements.

Risks and Uncertainties—The Plan provides investments in mutual funds and a common collective trust that hold investment securities including U.S. Government securities, corporate debt instruments, and corporate stock. Investment securities are, in general, exposed to various risks such as interest rate, credit, and overall market volatility. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statements. The value, liquidity, and related income of these securities are sensitive to changes in economic conditions, delinquencies or defaults, or both, and may be adversely affected by shifts in the market's perception of the issuers and changes in interest rates.

Investment Valuation and Income Recognition—The Plan's investments are stated at fair value. Fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Shares of mutual funds are valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value ("NAV") and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded. The Plan's investment in a common collective trust is reported at fair value using NAV per share as a practical expedient.

Management fees and operating expenses charged to the Plan for investments in the mutual funds and common collective trust are deducted from income earned on a daily basis and are not separately reflected. Consequently, management fees and operating expenses are reflected as a reduction of investment return for such investments.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation includes the Plan's gains and losses on investments bought and sold as well as held during the year.

Expenses—Certain expenses of maintaining the Plan are paid by the Plan, unless otherwise paid by the Company. Expenses that are paid by the Company are excluded from these financial statements. Fees related to the administration of notes receivable from participants are charged directly to the participant's account and are included in administrative expenses. Investment related expenses are included in net appreciation of fair value of investments.

Payment of Benefits—Benefits paid to participants are recorded when paid.

Revenue Credit Program Account—As part of the record keeping and administrative service fee arrangement with Fidelity, Fidelity agrees to reimburse revenue to the Plan in excess of the agreed upon service fee structure. The Plan may use the credit to pay direct and necessary expenses of the Plan or allocate unused credit to eligible participants.

Notes Receivable From Participants—Notes receivable from participants are measured at their unpaid principal balances plus any accrued but unpaid interest. Delinquent participant loans are reclassified as distributions based upon the terms of the Plan document. No allowance for credit losses has been recorded as of December 31, 2021 or 2020.

Uncertain Tax Positions—GAAP requires Plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more-likely-than-not would not be sustained upon examination. The Plan Administrator has analyzed the tax position taken by the Plan, and has concluded that as of December 31, 2021 and 2020, there are no uncertain tax positions taken or expected to be taken that would require recognition of a liability or disclosure in the financial statements. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax period in progress. The Plan Administrator believes it is no longer subject to income tax examination for years prior to [2016].

NOTE 3 - FAIR VALUE MEASUREMENTS

The Plan determines the fair value of its investments based on the fair value hierarchy, which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. Below are the three levels of inputs that may be used to measure fair value:

- Level 1 —Quoted prices in active markets for identical assets or liabilities that the Plan has the ability to access at the measurement date.
- Level 2 —Observable inputs other than Level 1 prices, such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities.
- Level 3 —Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities.

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used for the years ended December 31, 2021 and 2020.

- *Mutual funds* — Public investment vehicles valued at the NAV of shares held by the Plan at year end. The NAV is based on the value of the underlying assets owned by the fund, minus its liabilities, and then divided by the number of shares outstanding.
- *Common/collective trust* — Valued at the NAV of units of a collective trust. The NAV, as provided by the fund manager, is used as a practical expedient to estimate fair value. The NAV is based on the fair value of the underlying investments

held by the fund less its liabilities. This practical expedient would not be used if it is determined to be probable that the fund will sell the investment for an amount different from the reported NAV.

The valuation methodologies as described in Note 2 may produce a fair value calculation that may not be indicative of net realizable value or reflective of future fair values. Furthermore, although the Plan believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

The fair value of the Plan's investments measured on a recurring basis is as follows as of December 31:

	2021		2020	
	Level 1	Total	Level 1	Total
Investments measured at fair value:				
Mutual Funds (1)	\$ 354,830,703	\$ 354,830,703	\$ 301,834,052	\$ 301,834,052
Investments measured at net asset value (2)				
Common/collective trust		\$ 1,635,487		\$ 2,354,893
Total investments at fair value		\$ 356,466,190		\$ 304,188,945

(1) Consists of mutual funds traded on active markets.

(2) In accordance with Subtopic 820-10, certain investments that were measured at NAV per share (it its equivalent) have not been classified in the fair value hierarchy. The fair value amounts in these tables are intended to permit reconciliation of the fair value hierarchy to the line items presented in the statements of net assets available for benefits.

The fair value of the Plan's investments measured using the NAV per share practical expedient is as follows as of December 31:

	Fair Value at December 31,		Unfunded Commitments	Redemption Frequency	Other Redemption Restrictions	Redemption Notice Period
	2021	2020				
Fidelity Managed Income Portfolio Class 1	\$ 1,635,487	\$ 2,354,893	None	Daily	None	(1)
(1) 1 day for participant level; up to 12 months for plan level.						

NOTE 4 - CERTIFICATION OF TRUSTEE

The Plan administrator has elected the method of annual reporting compliance permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulation for Reporting and Disclosure under ERISA. Accordingly the trustee certified that the following data included in the accompanying financial statements and supplemental schedule of assets (held at end of year) are complete and accurate as of December 31:

	2021	2020
Mutual Funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	1,635,487	2,354,893
Notes receivable from participants	2,810,461	3,040,860
	<u>\$ 359,276,651</u>	<u>\$ 307,229,805</u>

	Year Ended December 31, 2021
Net appreciation in fair value of investments	\$ 30,315,436
Interest and dividends	\$ 23,166,653
Interest income on notes receivable from participants	\$ 145,577

The Plan's independent auditors did not perform auditing procedures with respect to this information, except for comparing such information to the related information included in the financial statements and supplemental schedule of assets (held at end of year).

NOTE 5 - PLAN TERMINATION AND AMENDMENTS

Although it has not expressed any intention to do so, the Board of Directors of the Company has the right under the Plan to suspend the Company's contributions at any time and to terminate the Plan subject to the provisions set forth in ERISA. In the event of termination of the Plan, or upon complete or partial discontinuance of contributions, the accounts of each affected participant shall become fully vested.

The Board of Directors of the Company also has the right to amend the Plan, in whole or in part, subject to provisions of ERISA (see Note 1).

NOTE 6 - FEDERAL INCOME TAX STATUS

The Internal Revenue Service has determined and informed the Company that the Plan and related trust are designed in accordance with applicable sections of the Code. Although the Plan has been amended since receiving the determination letter, the Plan Administrator believes that the Plan is designed and is currently being operated in compliance with the applicable requirements of the Code. The Plan Sponsor has indicated that it will take the necessary steps, if any, to correct any failure to operate the Plan in compliance with the Code.

NOTE 7 - EXEMPT PARTY-IN-INTEREST TRANSACTIONS

The Plan's investments as of December 31, 2021 and 2020 include shares of mutual funds and a common collective trust held in trust and managed by Fidelity Investments. Fidelity is the Trustee and transactions in such mutual funds and a common collective trust qualify as exempt party-in-interest transactions. Fees paid by the Plan to Fidelity for the year ended December 31, 2021 were \$268,170. Total revenue credit paid by Fidelity to the Plan during 2021 amounted to \$56,949.

Mutual funds managed by FMR LLC (an affiliate of Fidelity Investments and Fidelity and its various affiliates, including Fidelity), owned 7.0 million shares and 9.0 million shares of American Tower Corporation common stock as of December 31, 2021 and 2020, respectively.

NOTE 8 - RECONCILIATION OF FINANCIAL STATEMENTS TO FORM 5500

The following is a reconciliation of net assets available for benefits per the financial statements to amounts reported in the Plan's Form 5500 at December 31:

	2021	2020
Net assets available for benefits per the financial statements	\$ 360,372,189	\$ 308,213,960
Deemed distributions on participants' notes receivable	(4,509)	(4,154)
Participants' contributions receivable	(450,180)	(385,839)
Employer's contributions receivable	(645,358)	(598,316)
Fair value adjustment	14,554	82,478
Net assets per the Form 5500	<u>\$ 359,286,696</u>	<u>\$ 307,308,129</u>

The following is a reconciliation of the net increase in net assets available per the financial statements to net income reported in the Plan's Form 5500 for the year ended December 31, 2021:

Net increase per the financial statements	\$ 52,158,229
Current year participants' contributions receivable	(450,180)
Current year employer's contributions receivable	(645,358)
Prior year participants' contributions receivable	385,389
Prior year employer's contributions receivable	598,316
Change in deemed distributions on participants' notes receivable	(355)
Change in fair value adjustment	<u>(67,474)</u>
Net income per the Form 5500	<u>\$ 51,978,567</u>

NOTE 9 - LATE REMITTANCES

During the plan year ended December 31, 2021, participant contributions and notes receivable from participants repayments in the aggregate amount of \$83 were not remitted within the appropriate time period by the Company. These transactions constitute prohibited transactions as defined by ERISA. The Company is aware of the occurrence and has taken the appropriate steps to correct the situation.

NOTE 10 - SUBSEQUENT EVENTS

[For the year ended December 31, 2021, subsequent events were evaluated through October 10, 2022, the date the financial statements were available to be issued. As of October 10, 2022, no material subsequent events had been identified.]

SUPPLEMENTAL SCHEDULES

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Fidelity Investments	Fidelity Growth Company Fund K	** \$	76,334,261
*	Fidelity Investments	Fidelity 500 Index Fund	** \$	42,894,205
*	Fidelity Investments	Fidelity Freedom K 2040 Fund	** \$	29,548,506
*	Fidelity Investments	Fidelity Freedom K 2035 Fund	** \$	24,324,940
*	Fidelity Investments	Fidelity Freedom K 2045 Fund	** \$	21,351,759
*	Fidelity Investments	Fidelity Freedom K 2050 Fund	** \$	19,088,508
*	Fidelity Investments	Fidelity Freedom K 2030 Fund	** \$	15,767,233
*	Fidelity Investments	Fidelity Freedom K 2055 Fund	** \$	13,045,275
*	Baron	Baron Small Cap Institutional Fund	** \$	9,623,467
*	Fidelity Investments	Fidelity Mid-Cap Stock Fund K	** \$	9,272,926
	Fidelity Investments	Fidelity Worldwide Fund	** \$	8,939,881
	Fidelity Investments	Fidelity Freedom K 2025 Fund	\$	8,564,056
*	Fidelity Investments	Fidelity Government Money Market	** \$	8,495,596
*	Fidelity Investments	Fidelity Low-Priced Stock Fund	** \$	7,831,771
*	Fidelity Investments	Fidelity U.S. Bond Index Advantage Fund	** \$	6,463,525
*	AllSpring	AllSpring Special Mid Cap Value Fund	** \$	6,425,704
*	Fidelity Investments	Fidelity Diversified International K Fund	** \$	5,937,173
	Vanguard	Vanguard Equity-Income Fund Admiral Shares	** \$	5,927,792
	PIMCO Funds	Pimco Total Return Institutional Fund	** \$	3,945,703
	Fidelity Investments	Fidelity Freedom 2060 Fund	** \$	3,837,616
*	Fidelity Investments	Fidelity Extended Market Index Fund	** \$	3,573,421
*	Fidelity Investments	Fidelity Freedom K 2020 Fund	** \$	3,456,924
	American Funds	American Funds EuroPacific Growth Fund	** \$	3,253,293
*	DFA	DFA Emerging Markets Value I Fund	** \$	2,770,241
*	Parnassus	Parnassus Core Equity Fund	** \$	2,429,028
*	Fidelity Investments	Fidelity International Index Fund	** \$	2,185,507
	American Beacon	American Beacon Small Cap Value Fund	** \$	2,178,455

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Vanguard	Vanguard Real Estate Index Fund	** \$	1,683,589
	Fidelity Investments	Fidelity Managed Income Portfolio Class 1	\$	1,635,487
	Fidelity Investments	Fidelity Freedom K 2015 Fund	** \$	1,510,465
	BlackRock	BlackRock High Yield Bond Instl	** \$	1,052,900
	PIMCO Funds	Pimco Low Duration Fund	** \$	860,680
*	Fidelity Investments	Fidelity Freedom K Income Fund	** \$	849,892
	Fidelity Investments	Fidelity Freedom K 2010 Fund	** \$	566,162
	Vanguard	Vanguard Inflation-Protected Securities Fund	** \$	360,124
*	Fidelity Investments	Fidelity Freedom K 2065 Fund	** \$	328,957
*	Fidelity Investments	Fidelity Freedom K 2005 Fund	** \$	151,168
	Participant loans	Interest rates from 4.25% to 8.25% and various maturity dates through 2031	\$— \$	2,805,952
*	Party-in-interest			
**	Cost omitted for participant-directed investments			

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(a) – Schedule of Delinquent Participant Contributions

Total that constitutes nonexempt prohibited transactions

<u>Participant contributions and participant loan repayments transferred late to Plan</u>	<u>Contributions not corrected</u>	<u>Contributions corrected outside VFCP (Voluntary Fiduciary Correction Program)</u>	<u>Contributions pending correction in VFCP</u>	<u>Total fully corrected under VFCP and PTE 2002-51</u>
\$ 83	N/A	\$ 83	N/A	N/A

AMERICAN TOWER RETIREMENT SAVINGS PLAN

FINANCIAL STATEMENTS AND SUPPLEMENTAL SCHEDULES
WITH
INDEPENDENT AUDITOR'S REPORT

DECEMBER 31, 2021

NOTIFICATION TO THIRD PARTY USERS OF THIS REPORT

This report was prepared subject to the terms and conditions set forth in an engagement letter. By relying upon this report, all users shall be deemed to agree to the terms and conditions of that engagement letter. Users intending to rely upon this report should contact the issuer to obtain a copy of its applicable terms and conditions. This report is intended for the exclusive use of the clients of the issuer and others to whom the issuer has expressly granted consent.

AMERICAN TOWER RETIREMENT SAVINGS PLAN

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Note: All other schedules required by Section 2520.103-10 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA) have been omitted because they are not applicable.

INDEPENDENT AUDITOR'S REPORT

To the Trustees

American Tower Retirement Savings Plan

Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements

We have performed an audit of the accompanying financial statements of **American Tower Retirement Savings Plan**, an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), as permitted by ERISA Section 103(a)(3)(C) [ERISA Section 103(a)(3)(C) audit]. The financial statements comprise the statement of net assets available for benefits as of December 31, 2021, and the related statement of changes in net assets available for benefits for the year then ended, and the related notes to the 2021 financial statements.

Management, having determined it is permissible in the circumstances, has elected to have the audit of **American Tower Retirement Savings Plan's** financial statements performed in accordance with ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's ("DOL") Rules and Regulations for Reporting and Disclosure under ERISA. As permitted by ERISA Section 103(a)(3)(C), our audits need not extend to any statements or information related to assets held for investment of the plan (investment information) by a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency, provided that the statements or information regarding assets so held are prepared and certified to by the bank or similar institution or insurance carrier in accordance with 29 CFR 2520.103-5 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA (qualified institution).

Management has obtained certifications from a qualified institution as of December 31, 2021 and 2020 and for the year ended December 31, 2021, stating that the certified investment information, as described in Note 4 to the financial statements, is complete and accurate.

Opinion on the 2021 Financial Statements

In our opinion, based on our audits and on the procedures performed as described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section—

- the amounts and disclosures in the accompanying financial statements referred to above, other than those agreed to or derived from the certified investment information, are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America ("GAAP").
- the information in the financial statements referred to above related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Basis for Opinion on the 2021 Financial Statements

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section of our report. We are required to be independent of **American Tower Retirement Savings Plan** and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion.

Responsibilities of Management for the 2021 Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with GAAP, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management's election of the ERISA Section 103(a)(3)(C) audit does not affect management's responsibility for the financial statements.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for one year after the date the financial statements are available to be issued.

Management is also responsible for maintaining a current Plan instrument, including all Plan amendments; administering the Plan; and determining that the Plan's transactions that are presented and disclosed in the financial statements are in conformity with the Plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the 2021 Financial Statements

Except as described in the Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements section of our report, our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of **American Tower Retirement Savings Plan's** internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.

- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for a reasonable period of time.

Our audits did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of GAAP.

Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with GAAP.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matter - 2021 Supplemental Schedules Required by ERISA

The supplemental schedules of assets (held at end of year) and delinquent participant contributions are presented for purposes of additional analysis and are not a required part of the financial statements but are supplementary information required by the DOL's Rules and Regulations for Reporting and Disclosure under ERISA. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information included in the supplemental schedules, other than that agreed to or derived from the certified investment information, has been subjected to auditing procedures applied in the audits of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards. For information included in the supplemental schedules that agreed to or is derived from the certified investment information, we compared such information to the related certified investment information.

In forming our opinion on the supplemental schedules, we evaluated whether the supplemental schedules, other than the information agreed to or derived from the certified investment information, including their form and content, are presented in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion—

- the form and content of the supplemental schedules, other than the information in the supplemental schedules that agreed to or is derived from the certified investment information, are presented, in all material respects, in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.
- the information in the supplemental schedules related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Other Matter - Auditor's Report on the 2020 Financial Statements

We were engaged to audit the 2020 financial statements of the Plan. As permitted by 29 CFR 2520.103-8 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA, the Plan Administrator instructed us not to perform and we did not perform any auditing procedures with respect to the information certified by a qualified institution. In our report dated October 1, 2021, we indicated that (a) because of the significance of the information that we did not audit, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion and accordingly, we did not express an opinion on the 2020 financial statements, and (b) the form and content of the information included in the 2020 financial statements other than that derived from the certified information were presented in compliance with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

GRAY, GRAY & GRAY, LLP

Gray, Gray & Gray, LLP

Canton, MA
October 10, 2022

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS

	December 31,	
	2021	2020
ASSETS		
Investments, at fair market value:		
Mutual funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	1,635,487	2,354,893
Total investments	356,466,190	304,188,945
Receivables:		
Notes receivable from participants	2,810,461	3,040,860
Participants' contributions	450,180	385,839
Employer's contributions	645,358	598,316
Total receivables	3,905,999	4,025,015
NET ASSETS AVAILABLE FOR BENEFITS	\$ 360,372,189	\$ 308,213,960

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS

YEAR ENDED DECEMBER 31, 2021

ADDITIONS

Additions to net assets attributed to:

Investment income:

Interest and dividends	\$ 23,166,653
Net appreciation in fair value of investments	30,315,436
Total investment income	53,482,089

Interest on notes receivable from participants	145,577
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Contributions:

Participant deferrals	15,374,288
Participant rollovers	2,968,940
Employer match	7,933,214

Total contributions	26,276,442
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Plan reimbursement revenue	56,949
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Total additions	79,961,057
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DEDUCTIONS

Deductions from net assets attributed to:

Benefits paid to participants	(27,534,658)
Administrative expenses	(268,170)

Total deductions	(27,802,828)
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NET INCREASE	52,158,229
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NET ASSETS AVAILABLE FOR BENEFITS

Beginning of year	308,213,960
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End of year	\$ 360,372,189
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AMERICAN TOWER RETIREMENT SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - DESCRIPTION OF PLAN

The following description of the American Tower Retirement Savings Plan (the “Plan”) provides general information only. Participants should refer to the Summary Plan Description and the Plan documents for a more complete description of the Plan’s provisions.

General Information—The Plan is a defined-contribution plan available to substantially all employees of American Tower Corporation (the “Company” or the “Plan Sponsor”) and its participating subsidiaries. The Company’s Benefits Committee, as Plan Administrator, controls and manages the operation and administration of the Plan. Fidelity Management Trust Company (“Fidelity”) serves as the Trustee of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

Participant Contributions—Participants may contribute through payroll deductions up to 40% of eligible wages, as defined in the Plan, subject to limits set by the Internal Revenue Code of 1986, as amended (the “Code”). In addition, participants age 50 and older may make catch-up contributions. Participants may also contribute amounts representing distributions from other retirement plans. The Plan provides for automatic enrollment for all newly eligible employees. Unless the employee elects otherwise, 3% of the employee’s eligible earnings will be deferred in the Plan subject to the annual contribution limits set by the Code.

Participants may designate a portion, or all, of their deferred contributions as Roth contributions, which can be included in the participant’s gross income.

Employer Contributions—Each year, the Company may make discretionary matching contributions determined by pay period based on a percentage of a participant’s payroll contributions. The Company’s discretionary matching contribution for the year ended December 31, 2021 was 100%, up to a maximum of 5% of a participant’s contributions. The Company may also make additional annual discretionary matching contributions in an amount to be determined at year end by the Company’s Board of Directors. No additional discretionary matching contributions were made in 2021.

Participant Accounts—Individual accounts are maintained for each participant. Each participant’s account is credited with the (i) participant’s contributions, (ii) Company’s discretionary matching contributions, if any, (iii) allocations of additional Company discretionary matching contributions, if any, and (iv) allocations of Plan earnings. Each participant’s account is charged with the participant’s withdrawals and an allocation of Plan losses. Allocations are based on each participant’s earnings or account balances, as defined. The benefit to which a participant is entitled is the benefit that can be provided from his or her vested account.

Investments—Participants direct the investment of their contributions and Company contributions into various investment options offered by the Plan. Unless the employee elects otherwise, contributions will be directed into the age appropriate Freedom Fund. The Plan offers several mutual funds and a common collective trust as investment options for participants. Participants are able to change their existing allocations at their discretion by contacting Fidelity. The Plan Administrator may make periodic updates to the investment options.

Vesting—Participants are immediately vested in their contributions plus actual earnings thereon. Vesting in the Company matching contribution and discretionary matching portion of participants’ accounts (plus actual earnings thereon) occurs at a rate of 25% per year, beginning after one year of service, until a participant becomes fully vested at the end of four years.

Notes Receivable from Participants—Participants may borrow from their accounts a minimum of \$1,000 and a maximum of the lesser of one-half of a participant’s vested account balance or \$50,000, reduced by the highest outstanding loan balance in a

participant's account during the prior twelve-month period. Loans are fully secured by the participant's vested interest in his or her account. Loan terms generally range from one to five years with terms extending to ten years for loans associated with the purchase of primary residence. New participant loans bear interest at the prime rate plus one percent. The interest rate for new loans is updated at the beginning of each month and will apply to all loans withdrawn during the month. The applicable interest rates for outstanding loans ranged from 4.25% to 8.25% as of December 31, 2021 and 4.25% to 8.25% as of December 31, 2020. Principal and interest are paid ratably through payroll deductions.

Payment of Benefits—Total or partial distributions from the Plan are permitted upon a participant's attainment of age 59½, termination of employment, retirement, death or disability. An automatic distribution is made to terminated participants with vested account balances of less than \$1,000 if the participant does not make a timely distribution election following notification. In the case of terminated participants with vested account balances between \$1,000 and \$5,000, an automatic distribution to an individual retirement account is made if the participant does not make a timely distribution election following notification. Withdrawals are also permitted for certain events that result in financial hardship to the participant.

Forfeitures—Unvested Company contributions and earnings thereon that have been forfeited may be applied against administrative expenses of the Plan and used to reduce Company contributions. At December 31, 2021 and 2020, forfeited, non-vested participant accounts totaled \$25,697 and \$9,087, respectively. During the year ended December 31, 2021, Company contributions funded from the forfeiture accounts were \$418,478. During the year ended December 31, 2021, Plan administrative expenses of \$85 were paid from forfeitures.

NOTE 2 - SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting—The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States ("GAAP").

Use of Estimates—The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Accordingly, actual results may differ from those estimates and assumptions and such differences could be material to the accompanying financial statements.

Risks and Uncertainties—The Plan provides investments in mutual funds and a common collective trust that hold investment securities including U.S. Government securities, corporate debt instruments, and corporate stock. Investment securities are, in general, exposed to various risks such as interest rate, credit, and overall market volatility. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statements. The value, liquidity, and related income of these securities are sensitive to changes in economic conditions, delinquencies or defaults, or both, and may be adversely affected by shifts in the market's perception of the issuers and changes in interest rates.

Investment Valuation and Income Recognition—The Plan's investments are stated at fair value. Fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Shares of mutual funds are valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value ("NAV") and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded. The Plan's investment in a common collective trust is reported at fair value using NAV per share as a practical expedient.

Management fees and operating expenses charged to the Plan for investments in the mutual funds and common collective trust are deducted from income earned on a daily basis and are not separately reflected. Consequently, management fees and operating expenses are reflected as a reduction of investment return for such investments.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation includes the Plan's gains and losses on investments bought and sold as well as held during the year.

Expenses—Certain expenses of maintaining the Plan are paid by the Plan, unless otherwise paid by the Company. Expenses that are paid by the Company are excluded from these financial statements. Fees related to the administration of notes receivable from participants are charged directly to the participant's account and are included in administrative expenses. Investment related expenses are included in net appreciation of fair value of investments.

Payment of Benefits—Benefits paid to participants are recorded when paid.

Revenue Credit Program Account—As part of the record keeping and administrative service fee arrangement with Fidelity, Fidelity agrees to reimburse revenue to the Plan in excess of the agreed upon service fee structure. The Plan may use the credit to pay direct and necessary expenses of the Plan or allocate unused credit to eligible participants.

Notes Receivable From Participants—Notes receivable from participants are measured at their unpaid principal balances plus any accrued but unpaid interest. Delinquent participant loans are reclassified as distributions based upon the terms of the Plan document. No allowance for credit losses has been recorded as of December 31, 2021 or 2020.

Uncertain Tax Positions—GAAP requires Plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more-likely-than-not would not be sustained upon examination. The Plan Administrator has analyzed the tax position taken by the Plan, and has concluded that as of December 31, 2021 and 2020, there are no uncertain tax positions taken or expected to be taken that would require recognition of a liability or disclosure in the financial statements. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax period in progress. The Plan Administrator believes it is no longer subject to income tax examination for years prior to [2016].

NOTE 3 - FAIR VALUE MEASUREMENTS

The Plan determines the fair value of its investments based on the fair value hierarchy, which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. Below are the three levels of inputs that may be used to measure fair value:

- Level 1 —Quoted prices in active markets for identical assets or liabilities that the Plan has the ability to access at the measurement date.
- Level 2 —Observable inputs other than Level 1 prices, such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities.
- Level 3 —Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities.

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used for the years ended December 31, 2021 and 2020.

- *Mutual funds* — Public investment vehicles valued at the NAV of shares held by the Plan at year end. The NAV is based on the value of the underlying assets owned by the fund, minus its liabilities, and then divided by the number of shares outstanding.
- *Common/collective trust* — Valued at the NAV of units of a collective trust. The NAV, as provided by the fund manager, is used as a practical expedient to estimate fair value. The NAV is based on the fair value of the underlying investments

held by the fund less its liabilities. This practical expedient would not be used if it is determined to be probable that the fund will sell the investment for an amount different from the reported NAV.

The valuation methodologies as described in Note 2 may produce a fair value calculation that may not be indicative of net realizable value or reflective of future fair values. Furthermore, although the Plan believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

The fair value of the Plan's investments measured on a recurring basis is as follows as of December 31:

	2021		2020	
	Level 1	Total	Level 1	Total
Investments measured at fair value:				
Mutual Funds (1)	\$ 354,830,703	\$ 354,830,703	\$ 301,834,052	\$ 301,834,052
Investments measured at net asset value (2)				
Common/collective trust		\$ 1,635,487		\$ 2,354,893
Total investments at fair value		\$ 356,466,190		\$ 304,188,945

(1) Consists of mutual funds traded on active markets.

(2) In accordance with Subtopic 820-10, certain investments that were measured at NAV per share (it its equivalent) have not been classified in the fair value hierarchy. The fair value amounts in these tables are intended to permit reconciliation of the fair value hierarchy to the line items presented in the statements of net assets available for benefits.

The fair value of the Plan's investments measured using the NAV per share practical expedient is as follows as of December 31:

	Fair Value at December 31,		Unfunded Commitments	Redemption Frequency	Other Redemption Restrictions	Redemption Notice Period
	2021	2020				
Fidelity Managed Income Portfolio Class 1	\$ 1,635,487	\$ 2,354,893	None	Daily	None	(1)
(1) 1 day for participant level; up to 12 months for plan level.						

NOTE 4 - CERTIFICATION OF TRUSTEE

The Plan administrator has elected the method of annual reporting compliance permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulation for Reporting and Disclosure under ERISA. Accordingly the trustee certified that the following data included in the accompanying financial statements and supplemental schedule of assets (held at end of year) are complete and accurate as of December 31:

	2021	2020
Mutual Funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	1,635,487	2,354,893
Notes receivable from participants	2,810,461	3,040,860
	<u>\$ 359,276,651</u>	<u>\$ 307,229,805</u>

	Year Ended December 31, 2021
Net appreciation in fair value of investments	\$ 30,315,436
Interest and dividends	\$ 23,166,653
Interest income on notes receivable from participants	\$ 145,577

The Plan's independent auditors did not perform auditing procedures with respect to this information, except for comparing such information to the related information included in the financial statements and supplemental schedule of assets (held at end of year).

NOTE 5 - PLAN TERMINATION AND AMENDMENTS

Although it has not expressed any intention to do so, the Board of Directors of the Company has the right under the Plan to suspend the Company's contributions at any time and to terminate the Plan subject to the provisions set forth in ERISA. In the event of termination of the Plan, or upon complete or partial discontinuance of contributions, the accounts of each affected participant shall become fully vested.

The Board of Directors of the Company also has the right to amend the Plan, in whole or in part, subject to provisions of ERISA (see Note 1).

NOTE 6 - FEDERAL INCOME TAX STATUS

The Internal Revenue Service has determined and informed the Company that the Plan and related trust are designed in accordance with applicable sections of the Code. Although the Plan has been amended since receiving the determination letter, the Plan Administrator believes that the Plan is designed and is currently being operated in compliance with the applicable requirements of the Code. The Plan Sponsor has indicated that it will take the necessary steps, if any, to correct any failure to operate the Plan in compliance with the Code.

NOTE 7 - EXEMPT PARTY-IN-INTEREST TRANSACTIONS

The Plan's investments as of December 31, 2021 and 2020 include shares of mutual funds and a common collective trust held in trust and managed by Fidelity Investments. Fidelity is the Trustee and transactions in such mutual funds and a common collective trust qualify as exempt party-in-interest transactions. Fees paid by the Plan to Fidelity for the year ended December 31, 2021 were \$268,170. Total revenue credit paid by Fidelity to the Plan during 2021 amounted to \$56,949.

Mutual funds managed by FMR LLC (an affiliate of Fidelity Investments and Fidelity and its various affiliates, including Fidelity), owned 7.0 million shares and 9.0 million shares of American Tower Corporation common stock as of December 31, 2021 and 2020, respectively.

NOTE 8 - RECONCILIATION OF FINANCIAL STATEMENTS TO FORM 5500

The following is a reconciliation of net assets available for benefits per the financial statements to amounts reported in the Plan's Form 5500 at December 31:

	2021	2020
Net assets available for benefits per the financial statements	\$ 360,372,189	\$ 308,213,960
Deemed distributions on participants' notes receivable	(4,509)	(4,154)
Participants' contributions receivable	(450,180)	(385,839)
Employer's contributions receivable	(645,358)	(598,316)
Fair value adjustment	14,554	82,478
Net assets per the Form 5500	<u>\$ 359,286,696</u>	<u>\$ 307,308,129</u>

The following is a reconciliation of the net increase in net assets available per the financial statements to net income reported in the Plan's Form 5500 for the year ended December 31, 2021:

Net increase per the financial statements	\$ 52,158,229
Current year participants' contributions receivable	(450,180)
Current year employer's contributions receivable	(645,358)
Prior year participants' contributions receivable	385,389
Prior year employer's contributions receivable	598,316
Change in deemed distributions on participants' notes receivable	(355)
Change in fair value adjustment	<u>(67,474)</u>
Net income per the Form 5500	<u>\$ 51,978,567</u>

NOTE 9 - LATE REMITTANCES

During the plan year ended December 31, 2021, participant contributions and notes receivable from participants repayments in the aggregate amount of \$83 were not remitted within the appropriate time period by the Company. These transactions constitute prohibited transactions as defined by ERISA. The Company is aware of the occurrence and has taken the appropriate steps to correct the situation.

NOTE 10 - SUBSEQUENT EVENTS

[For the year ended December 31, 2021, subsequent events were evaluated through October 10, 2022, the date the financial statements were available to be issued. As of October 10, 2022, no material subsequent events had been identified.]

SUPPLEMENTAL SCHEDULES

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Fidelity Investments	Fidelity Growth Company Fund K	** \$	76,334,261
*	Fidelity Investments	Fidelity 500 Index Fund	** \$	42,894,205
*	Fidelity Investments	Fidelity Freedom K 2040 Fund	** \$	29,548,506
*	Fidelity Investments	Fidelity Freedom K 2035 Fund	** \$	24,324,940
*	Fidelity Investments	Fidelity Freedom K 2045 Fund	** \$	21,351,759
*	Fidelity Investments	Fidelity Freedom K 2050 Fund	** \$	19,088,508
*	Fidelity Investments	Fidelity Freedom K 2030 Fund	** \$	15,767,233
*	Fidelity Investments	Fidelity Freedom K 2055 Fund	** \$	13,045,275
*	Baron	Baron Small Cap Institutional Fund	** \$	9,623,467
*	Fidelity Investments	Fidelity Mid-Cap Stock Fund K	** \$	9,272,926
	Fidelity Investments	Fidelity Worldwide Fund	** \$	8,939,881
	Fidelity Investments	Fidelity Freedom K 2025 Fund	\$	8,564,056
*	Fidelity Investments	Fidelity Government Money Market	** \$	8,495,596
*	Fidelity Investments	Fidelity Low-Priced Stock Fund	** \$	7,831,771
*	Fidelity Investments	Fidelity U.S. Bond Index Advantage Fund	** \$	6,463,525
*	AllSpring	AllSpring Special Mid Cap Value Fund	** \$	6,425,704
*	Fidelity Investments	Fidelity Diversified International K Fund	** \$	5,937,173
	Vanguard	Vanguard Equity-Income Fund Admiral Shares	** \$	5,927,792
	PIMCO Funds	Pimco Total Return Institutional Fund	** \$	3,945,703
	Fidelity Investments	Fidelity Freedom 2060 Fund	** \$	3,837,616
*	Fidelity Investments	Fidelity Extended Market Index Fund	** \$	3,573,421
*	Fidelity Investments	Fidelity Freedom K 2020 Fund	** \$	3,456,924
	American Funds	American Funds EuroPacific Growth Fund	** \$	3,253,293
*	DFA	DFA Emerging Markets Value I Fund	** \$	2,770,241
*	Parnassus	Parnassus Core Equity Fund	** \$	2,429,028
*	Fidelity Investments	Fidelity International Index Fund	** \$	2,185,507
	American Beacon	American Beacon Small Cap Value Fund	** \$	2,178,455

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Vanguard	Vanguard Real Estate Index Fund	** \$	1,683,589
	Fidelity Investments	Fidelity Managed Income Portfolio Class 1	\$	1,635,487
	Fidelity Investments	Fidelity Freedom K 2015 Fund	** \$	1,510,465
	BlackRock	BlackRock High Yield Bond Instl	** \$	1,052,900
	PIMCO Funds	Pimco Low Duration Fund	** \$	860,680
*	Fidelity Investments	Fidelity Freedom K Income Fund	** \$	849,892
	Fidelity Investments	Fidelity Freedom K 2010 Fund	** \$	566,162
	Vanguard	Vanguard Inflation-Protected Securities Fund	** \$	360,124
*	Fidelity Investments	Fidelity Freedom K 2065 Fund	** \$	328,957
*	Fidelity Investments	Fidelity Freedom K 2005 Fund	** \$	151,168
	Participant loans	Interest rates from 4.25% to 8.25% and various maturity dates through 2031	\$— \$	2,805,952
*	Party-in-interest			
**	Cost omitted for participant-directed investments			

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(a) – Schedule of Delinquent Participant Contributions

Total that constitutes nonexempt prohibited transactions

<u>Participant contributions and participant loan repayments transferred late to Plan</u>	<u>Contributions not corrected</u>	<u>Contributions corrected outside VFCP (Voluntary Fiduciary Correction Program)</u>	<u>Contributions pending correction in VFCP</u>	<u>Total fully corrected under VFCP and PTE 2002-51</u>
\$ 83	N/A	\$ 83	N/A	N/A

AMERICAN TOWER RETIREMENT SAVINGS PLAN

FINANCIAL STATEMENTS AND SUPPLEMENTAL SCHEDULES
WITH
INDEPENDENT AUDITOR'S REPORT

DECEMBER 31, 2021

NOTIFICATION TO THIRD PARTY USERS OF THIS REPORT

This report was prepared subject to the terms and conditions set forth in an engagement letter. By relying upon this report, all users shall be deemed to agree to the terms and conditions of that engagement letter. Users intending to rely upon this report should contact the issuer to obtain a copy of its applicable terms and conditions. This report is intended for the exclusive use of the clients of the issuer and others to whom the issuer has expressly granted consent.

AMERICAN TOWER RETIREMENT SAVINGS PLAN

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Note: All other schedules required by Section 2520.103-10 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA) have been omitted because they are not applicable.

INDEPENDENT AUDITOR'S REPORT

To the Trustees

American Tower Retirement Savings Plan

Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements

We have performed an audit of the accompanying financial statements of **American Tower Retirement Savings Plan**, an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), as permitted by ERISA Section 103(a)(3)(C) [ERISA Section 103(a)(3)(C) audit]. The financial statements comprise the statement of net assets available for benefits as of December 31, 2021, and the related statement of changes in net assets available for benefits for the year then ended, and the related notes to the 2021 financial statements.

Management, having determined it is permissible in the circumstances, has elected to have the audit of **American Tower Retirement Savings Plan's** financial statements performed in accordance with ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's ("DOL") Rules and Regulations for Reporting and Disclosure under ERISA. As permitted by ERISA Section 103(a)(3)(C), our audits need not extend to any statements or information related to assets held for investment of the plan (investment information) by a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency, provided that the statements or information regarding assets so held are prepared and certified to by the bank or similar institution or insurance carrier in accordance with 29 CFR 2520.103-5 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA (qualified institution).

Management has obtained certifications from a qualified institution as of December 31, 2021 and 2020 and for the year ended December 31, 2021, stating that the certified investment information, as described in Note 4 to the financial statements, is complete and accurate.

Opinion on the 2021 Financial Statements

In our opinion, based on our audits and on the procedures performed as described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section—

- the amounts and disclosures in the accompanying financial statements referred to above, other than those agreed to or derived from the certified investment information, are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America ("GAAP").
- the information in the financial statements referred to above related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Basis for Opinion on the 2021 Financial Statements

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the 2021 Financial Statements section of our report. We are required to be independent of **American Tower Retirement Savings Plan** and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion.

Responsibilities of Management for the 2021 Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with GAAP, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management's election of the ERISA Section 103(a)(3)(C) audit does not affect management's responsibility for the financial statements.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for one year after the date the financial statements are available to be issued.

Management is also responsible for maintaining a current Plan instrument, including all Plan amendments; administering the Plan; and determining that the Plan's transactions that are presented and disclosed in the financial statements are in conformity with the Plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the 2021 Financial Statements

Except as described in the Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements section of our report, our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of **American Tower Retirement Savings Plan's** internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.

- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about **American Tower Retirement Savings Plan's** ability to continue as a going concern for a reasonable period of time.

Our audits did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of GAAP.

Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with GAAP.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matter - 2021 Supplemental Schedules Required by ERISA

The supplemental schedules of assets (held at end of year) and delinquent participant contributions are presented for purposes of additional analysis and are not a required part of the financial statements but are supplementary information required by the DOL's Rules and Regulations for Reporting and Disclosure under ERISA. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information included in the supplemental schedules, other than that agreed to or derived from the certified investment information, has been subjected to auditing procedures applied in the audits of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards. For information included in the supplemental schedules that agreed to or is derived from the certified investment information, we compared such information to the related certified investment information.

In forming our opinion on the supplemental schedules, we evaluated whether the supplemental schedules, other than the information agreed to or derived from the certified investment information, including their form and content, are presented in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion—

- the form and content of the supplemental schedules, other than the information in the supplemental schedules that agreed to or is derived from the certified investment information, are presented, in all material respects, in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.
- the information in the supplemental schedules related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Other Matter - Auditor's Report on the 2020 Financial Statements

We were engaged to audit the 2020 financial statements of the Plan. As permitted by 29 CFR 2520.103-8 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA, the Plan Administrator instructed us not to perform and we did not perform any auditing procedures with respect to the information certified by a qualified institution. In our report dated October 1, 2021, we indicated that (a) because of the significance of the information that we did not audit, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion and accordingly, we did not express an opinion on the 2020 financial statements, and (b) the form and content of the information included in the 2020 financial statements other than that derived from the certified information were presented in compliance with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

GRAY, GRAY & GRAY, LLP

Gray, Gray & Gray, LLP

Canton, MA
October 10, 2022

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS

	December 31,	
	<u>2021</u>	<u>2020</u>
ASSETS		
Investments, at fair market value:		
Mutual funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	<u>1,635,487</u>	<u>2,354,893</u>
Total investments	<u>356,466,190</u>	<u>304,188,945</u>
Receivables:		
Notes receivable from participants	2,810,461	3,040,860
Participants' contributions	450,180	385,839
Employer's contributions	<u>645,358</u>	<u>598,316</u>
Total receivables	<u>3,905,999</u>	<u>4,025,015</u>
NET ASSETS AVAILABLE FOR BENEFITS	<u><u>\$ 360,372,189</u></u>	<u><u>\$ 308,213,960</u></u>

AMERICAN TOWER RETIREMENT SAVINGS PLAN

STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS

YEAR ENDED DECEMBER 31, 2021

ADDITIONS

Additions to net assets attributed to:

Investment income:

Interest and dividends	\$ 23,166,653
Net appreciation in fair value of investments	30,315,436
Total investment income	53,482,089

Interest on notes receivable from participants	145,577
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Contributions:

Participant deferrals	15,374,288
Participant rollovers	2,968,940
Employer match	7,933,214

Total contributions	26,276,442
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Plan reimbursement revenue	56,949
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Total additions	79,961,057
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DEDUCTIONS

Deductions from net assets attributed to:

Benefits paid to participants	(27,534,658)
Administrative expenses	(268,170)

Total deductions	(27,802,828)
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NET INCREASE	52,158,229
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NET ASSETS AVAILABLE FOR BENEFITS

Beginning of year	308,213,960
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End of year	\$ 360,372,189
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AMERICAN TOWER RETIREMENT SAVINGS PLAN

NOTES TO FINANCIAL STATEMENTS

NOTE 1 - DESCRIPTION OF PLAN

The following description of the American Tower Retirement Savings Plan (the “Plan”) provides general information only. Participants should refer to the Summary Plan Description and the Plan documents for a more complete description of the Plan’s provisions.

General Information—The Plan is a defined-contribution plan available to substantially all employees of American Tower Corporation (the “Company” or the “Plan Sponsor”) and its participating subsidiaries. The Company’s Benefits Committee, as Plan Administrator, controls and manages the operation and administration of the Plan. Fidelity Management Trust Company (“Fidelity”) serves as the Trustee of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

Participant Contributions—Participants may contribute through payroll deductions up to 40% of eligible wages, as defined in the Plan, subject to limits set by the Internal Revenue Code of 1986, as amended (the “Code”). In addition, participants age 50 and older may make catch-up contributions. Participants may also contribute amounts representing distributions from other retirement plans. The Plan provides for automatic enrollment for all newly eligible employees. Unless the employee elects otherwise, 3% of the employee’s eligible earnings will be deferred in the Plan subject to the annual contribution limits set by the Code.

Participants may designate a portion, or all, of their deferred contributions as Roth contributions, which can be included in the participant’s gross income.

Employer Contributions—Each year, the Company may make discretionary matching contributions determined by pay period based on a percentage of a participant’s payroll contributions. The Company’s discretionary matching contribution for the year ended December 31, 2021 was 100%, up to a maximum of 5% of a participant’s contributions. The Company may also make additional annual discretionary matching contributions in an amount to be determined at year end by the Company’s Board of Directors. No additional discretionary matching contributions were made in 2021.

Participant Accounts—Individual accounts are maintained for each participant. Each participant’s account is credited with the (i) participant’s contributions, (ii) Company’s discretionary matching contributions, if any, (iii) allocations of additional Company discretionary matching contributions, if any, and (iv) allocations of Plan earnings. Each participant’s account is charged with the participant’s withdrawals and an allocation of Plan losses. Allocations are based on each participant’s earnings or account balances, as defined. The benefit to which a participant is entitled is the benefit that can be provided from his or her vested account.

Investments—Participants direct the investment of their contributions and Company contributions into various investment options offered by the Plan. Unless the employee elects otherwise, contributions will be directed into the age appropriate Freedom Fund. The Plan offers several mutual funds and a common collective trust as investment options for participants. Participants are able to change their existing allocations at their discretion by contacting Fidelity. The Plan Administrator may make periodic updates to the investment options.

Vesting—Participants are immediately vested in their contributions plus actual earnings thereon. Vesting in the Company matching contribution and discretionary matching portion of participants’ accounts (plus actual earnings thereon) occurs at a rate of 25% per year, beginning after one year of service, until a participant becomes fully vested at the end of four years.

Notes Receivable from Participants—Participants may borrow from their accounts a minimum of \$1,000 and a maximum of the lesser of one-half of a participant’s vested account balance or \$50,000, reduced by the highest outstanding loan balance in a

participant's account during the prior twelve-month period. Loans are fully secured by the participant's vested interest in his or her account. Loan terms generally range from one to five years with terms extending to ten years for loans associated with the purchase of primary residence. New participant loans bear interest at the prime rate plus one percent. The interest rate for new loans is updated at the beginning of each month and will apply to all loans withdrawn during the month. The applicable interest rates for outstanding loans ranged from 4.25% to 8.25% as of December 31, 2021 and 4.25% to 8.25% as of December 31, 2020. Principal and interest are paid ratably through payroll deductions.

Payment of Benefits—Total or partial distributions from the Plan are permitted upon a participant's attainment of age 59½, termination of employment, retirement, death or disability. An automatic distribution is made to terminated participants with vested account balances of less than \$1,000 if the participant does not make a timely distribution election following notification. In the case of terminated participants with vested account balances between \$1,000 and \$5,000, an automatic distribution to an individual retirement account is made if the participant does not make a timely distribution election following notification. Withdrawals are also permitted for certain events that result in financial hardship to the participant.

Forfeitures—Unvested Company contributions and earnings thereon that have been forfeited may be applied against administrative expenses of the Plan and used to reduce Company contributions. At December 31, 2021 and 2020, forfeited, non-vested participant accounts totaled \$25,697 and \$9,087, respectively. During the year ended December 31, 2021, Company contributions funded from the forfeiture accounts were \$418,478. During the year ended December 31, 2021, Plan administrative expenses of \$85 were paid from forfeitures.

NOTE 2 - SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting—The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States ("GAAP").

Use of Estimates—The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Accordingly, actual results may differ from those estimates and assumptions and such differences could be material to the accompanying financial statements.

Risks and Uncertainties—The Plan provides investments in mutual funds and a common collective trust that hold investment securities including U.S. Government securities, corporate debt instruments, and corporate stock. Investment securities are, in general, exposed to various risks such as interest rate, credit, and overall market volatility. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statements. The value, liquidity, and related income of these securities are sensitive to changes in economic conditions, delinquencies or defaults, or both, and may be adversely affected by shifts in the market's perception of the issuers and changes in interest rates.

Investment Valuation and Income Recognition—The Plan's investments are stated at fair value. Fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Shares of mutual funds are valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value ("NAV") and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded. The Plan's investment in a common collective trust is reported at fair value using NAV per share as a practical expedient.

Management fees and operating expenses charged to the Plan for investments in the mutual funds and common collective trust are deducted from income earned on a daily basis and are not separately reflected. Consequently, management fees and operating expenses are reflected as a reduction of investment return for such investments.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation includes the Plan's gains and losses on investments bought and sold as well as held during the year.

Expenses—Certain expenses of maintaining the Plan are paid by the Plan, unless otherwise paid by the Company. Expenses that are paid by the Company are excluded from these financial statements. Fees related to the administration of notes receivable from participants are charged directly to the participant's account and are included in administrative expenses. Investment related expenses are included in net appreciation of fair value of investments.

Payment of Benefits—Benefits paid to participants are recorded when paid.

Revenue Credit Program Account—As part of the record keeping and administrative service fee arrangement with Fidelity, Fidelity agrees to reimburse revenue to the Plan in excess of the agreed upon service fee structure. The Plan may use the credit to pay direct and necessary expenses of the Plan or allocate unused credit to eligible participants.

Notes Receivable From Participants—Notes receivable from participants are measured at their unpaid principal balances plus any accrued but unpaid interest. Delinquent participant loans are reclassified as distributions based upon the terms of the Plan document. No allowance for credit losses has been recorded as of December 31, 2021 or 2020.

Uncertain Tax Positions—GAAP requires Plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more-likely-than-not would not be sustained upon examination. The Plan Administrator has analyzed the tax position taken by the Plan, and has concluded that as of December 31, 2021 and 2020, there are no uncertain tax positions taken or expected to be taken that would require recognition of a liability or disclosure in the financial statements. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax period in progress. The Plan Administrator believes it is no longer subject to income tax examination for years prior to [2016].

NOTE 3 - FAIR VALUE MEASUREMENTS

The Plan determines the fair value of its investments based on the fair value hierarchy, which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. Below are the three levels of inputs that may be used to measure fair value:

- Level 1 —Quoted prices in active markets for identical assets or liabilities that the Plan has the ability to access at the measurement date.
- Level 2 —Observable inputs other than Level 1 prices, such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data for substantially the full term of the assets or liabilities.
- Level 3 —Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities.

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used for the years ended December 31, 2021 and 2020.

- *Mutual funds* — Public investment vehicles valued at the NAV of shares held by the Plan at year end. The NAV is based on the value of the underlying assets owned by the fund, minus its liabilities, and then divided by the number of shares outstanding.
- *Common/collective trust* — Valued at the NAV of units of a collective trust. The NAV, as provided by the fund manager, is used as a practical expedient to estimate fair value. The NAV is based on the fair value of the underlying investments

held by the fund less its liabilities. This practical expedient would not be used if it is determined to be probable that the fund will sell the investment for an amount different from the reported NAV.

The valuation methodologies as described in Note 2 may produce a fair value calculation that may not be indicative of net realizable value or reflective of future fair values. Furthermore, although the Plan believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

The fair value of the Plan's investments measured on a recurring basis is as follows as of December 31:

	2021		2020	
	Level 1	Total	Level 1	Total
Investments measured at fair value:				
Mutual Funds (1)	\$ 354,830,703	\$ 354,830,703	\$ 301,834,052	\$ 301,834,052
Investments measured at net asset value (2)				
Common/collective trust		\$ 1,635,487		\$ 2,354,893
Total investments at fair value		\$ 356,466,190		\$ 304,188,945

(1) Consists of mutual funds traded on active markets.

(2) In accordance with Subtopic 820-10, certain investments that were measured at NAV per share (it its equivalent) have not been classified in the fair value hierarchy. The fair value amounts in these tables are intended to permit reconciliation of the fair value hierarchy to the line items presented in the statements of net assets available for benefits.

The fair value of the Plan's investments measured using the NAV per share practical expedient is as follows as of December 31:

	Fair Value at December 31,		Unfunded Commitments	Redemption Frequency	Other Redemption Restrictions	Redemption Notice Period
	2021	2020				
Fidelity Managed Income Portfolio Class 1	\$ 1,635,487	\$ 2,354,893	None	Daily	None	(1)
(1) 1 day for participant level; up to 12 months for plan level.						

NOTE 4 - CERTIFICATION OF TRUSTEE

The Plan administrator has elected the method of annual reporting compliance permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulation for Reporting and Disclosure under ERISA. Accordingly the trustee certified that the following data included in the accompanying financial statements and supplemental schedule of assets (held at end of year) are complete and accurate as of December 31:

	2021	2020
Mutual Funds	\$ 354,830,703	\$ 301,834,052
Common/collective trust	1,635,487	2,354,893
Notes receivable from participants	2,810,461	3,040,860
	<u>\$ 359,276,651</u>	<u>\$ 307,229,805</u>

	Year Ended December 31, 2021
Net appreciation in fair value of investments	\$ 30,315,436
Interest and dividends	\$ 23,166,653
Interest income on notes receivable from participants	\$ 145,577

The Plan's independent auditors did not perform auditing procedures with respect to this information, except for comparing such information to the related information included in the financial statements and supplemental schedule of assets (held at end of year).

NOTE 5 - PLAN TERMINATION AND AMENDMENTS

Although it has not expressed any intention to do so, the Board of Directors of the Company has the right under the Plan to suspend the Company's contributions at any time and to terminate the Plan subject to the provisions set forth in ERISA. In the event of termination of the Plan, or upon complete or partial discontinuance of contributions, the accounts of each affected participant shall become fully vested.

The Board of Directors of the Company also has the right to amend the Plan, in whole or in part, subject to provisions of ERISA (see Note 1).

NOTE 6 - FEDERAL INCOME TAX STATUS

The Internal Revenue Service has determined and informed the Company that the Plan and related trust are designed in accordance with applicable sections of the Code. Although the Plan has been amended since receiving the determination letter, the Plan Administrator believes that the Plan is designed and is currently being operated in compliance with the applicable requirements of the Code. The Plan Sponsor has indicated that it will take the necessary steps, if any, to correct any failure to operate the Plan in compliance with the Code.

NOTE 7 - EXEMPT PARTY-IN-INTEREST TRANSACTIONS

The Plan's investments as of December 31, 2021 and 2020 include shares of mutual funds and a common collective trust held in trust and managed by Fidelity Investments. Fidelity is the Trustee and transactions in such mutual funds and a common collective trust qualify as exempt party-in-interest transactions. Fees paid by the Plan to Fidelity for the year ended December 31, 2021 were \$268,170. Total revenue credit paid by Fidelity to the Plan during 2021 amounted to \$56,949.

Mutual funds managed by FMR LLC (an affiliate of Fidelity Investments and Fidelity and its various affiliates, including Fidelity), owned 7.0 million shares and 9.0 million shares of American Tower Corporation common stock as of December 31, 2021 and 2020, respectively.

NOTE 8 - RECONCILIATION OF FINANCIAL STATEMENTS TO FORM 5500

The following is a reconciliation of net assets available for benefits per the financial statements to amounts reported in the Plan's Form 5500 at December 31:

	2021	2020
Net assets available for benefits per the financial statements	\$ 360,372,189	\$ 308,213,960
Deemed distributions on participants' notes receivable	(4,509)	(4,154)
Participants' contributions receivable	(450,180)	(385,839)
Employer's contributions receivable	(645,358)	(598,316)
Fair value adjustment	14,554	82,478
Net assets per the Form 5500	<u>\$ 359,286,696</u>	<u>\$ 307,308,129</u>

The following is a reconciliation of the net increase in net assets available per the financial statements to net income reported in the Plan's Form 5500 for the year ended December 31, 2021:

Net increase per the financial statements	\$ 52,158,229
Current year participants' contributions receivable	(450,180)
Current year employer's contributions receivable	(645,358)
Prior year participants' contributions receivable	385,389
Prior year employer's contributions receivable	598,316
Change in deemed distributions on participants' notes receivable	(355)
Change in fair value adjustment	<u>(67,474)</u>
Net income per the Form 5500	<u>\$ 51,978,567</u>

NOTE 9 - LATE REMITTANCES

During the plan year ended December 31, 2021, participant contributions and notes receivable from participants repayments in the aggregate amount of \$83 were not remitted within the appropriate time period by the Company. These transactions constitute prohibited transactions as defined by ERISA. The Company is aware of the occurrence and has taken the appropriate steps to correct the situation.

NOTE 10 - SUBSEQUENT EVENTS

[For the year ended December 31, 2021, subsequent events were evaluated through October 10, 2022, the date the financial statements were available to be issued. As of October 10, 2022, no material subsequent events had been identified.]

SUPPLEMENTAL SCHEDULES

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Fidelity Investments	Fidelity Growth Company Fund K	** \$	76,334,261
*	Fidelity Investments	Fidelity 500 Index Fund	** \$	42,894,205
*	Fidelity Investments	Fidelity Freedom K 2040 Fund	** \$	29,548,506
*	Fidelity Investments	Fidelity Freedom K 2035 Fund	** \$	24,324,940
*	Fidelity Investments	Fidelity Freedom K 2045 Fund	** \$	21,351,759
*	Fidelity Investments	Fidelity Freedom K 2050 Fund	** \$	19,088,508
*	Fidelity Investments	Fidelity Freedom K 2030 Fund	** \$	15,767,233
*	Fidelity Investments	Fidelity Freedom K 2055 Fund	** \$	13,045,275
*	Baron	Baron Small Cap Institutional Fund	** \$	9,623,467
*	Fidelity Investments	Fidelity Mid-Cap Stock Fund K	** \$	9,272,926
	Fidelity Investments	Fidelity Worldwide Fund	** \$	8,939,881
	Fidelity Investments	Fidelity Freedom K 2025 Fund	\$	8,564,056
*	Fidelity Investments	Fidelity Government Money Market	** \$	8,495,596
*	Fidelity Investments	Fidelity Low-Priced Stock Fund	** \$	7,831,771
*	Fidelity Investments	Fidelity U.S. Bond Index Advantage Fund	** \$	6,463,525
*	AllSpring	AllSpring Special Mid Cap Value Fund	** \$	6,425,704
*	Fidelity Investments	Fidelity Diversified International K Fund	** \$	5,937,173
	Vanguard	Vanguard Equity-Income Fund Admiral Shares	** \$	5,927,792
	PIMCO Funds	Pimco Total Return Institutional Fund	** \$	3,945,703
	Fidelity Investments	Fidelity Freedom 2060 Fund	** \$	3,837,616
*	Fidelity Investments	Fidelity Extended Market Index Fund	** \$	3,573,421
*	Fidelity Investments	Fidelity Freedom K 2020 Fund	** \$	3,456,924
	American Funds	American Funds EuroPacific Growth Fund	** \$	3,253,293
*	DFA	DFA Emerging Markets Value I Fund	** \$	2,770,241
*	Parnassus	Parnassus Core Equity Fund	** \$	2,429,028
*	Fidelity Investments	Fidelity International Index Fund	** \$	2,185,507
	American Beacon	American Beacon Small Cap Value Fund	** \$	2,178,455

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(i) – Schedule of Assets (Held at End of Year)

(a)	(b)	(c)	(d)	(e)
	<u>Identity of Issuer, Borrower, Lessor or Similar Party</u>	<u>Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value</u>	<u>Cost</u>	<u>Current Value</u>
*	Vanguard	Vanguard Real Estate Index Fund	** \$	1,683,589
	Fidelity Investments	Fidelity Managed Income Portfolio Class 1	\$	1,635,487
	Fidelity Investments	Fidelity Freedom K 2015 Fund	** \$	1,510,465
	BlackRock	BlackRock High Yield Bond Instl	** \$	1,052,900
	PIMCO Funds	Pimco Low Duration Fund	** \$	860,680
*	Fidelity Investments	Fidelity Freedom K Income Fund	** \$	849,892
	Fidelity Investments	Fidelity Freedom K 2010 Fund	** \$	566,162
	Vanguard	Vanguard Inflation-Protected Securities Fund	** \$	360,124
*	Fidelity Investments	Fidelity Freedom K 2065 Fund	** \$	328,957
*	Fidelity Investments	Fidelity Freedom K 2005 Fund	** \$	151,168
	Participant loans	Interest rates from 4.25% to 8.25% and various maturity dates through 2031	\$— \$	2,805,952
*	Party-in-interest			
**	Cost omitted for participant-directed investments			

AMERICAN TOWER RETIREMENT SAVINGS PLAN

SUPPLEMENTAL SCHEDULES REQUIRED BY ERISA AND THE DEPARTMENT OF LABOR

DECEMBER 31, 2021

PLAN NUMBER: 001 EIN: 650723837

Schedule H, Line 4(a) – Schedule of Delinquent Participant Contributions

Total that constitutes nonexempt prohibited transactions

<u>Participant contributions and participant loan repayments transferred late to Plan</u>	<u>Contributions not corrected</u>	<u>Contributions corrected outside VFCP (Voluntary Fiduciary Correction Program)</u>	<u>Contributions pending correction in VFCP</u>	<u>Total fully corrected under VFCP and PTE 2002-51</u>
\$ 83	N/A	\$ 83	N/A	N/A