CODE OF BUSINESS CONDUCT

It is our policy to conduct the business affairs of Anterix Inc. and its subsidiaries (the "**Company**") honestly and ethically. That goal cannot be achieved unless you individually accept your responsibility to promote integrity and demonstrate the highest ethical conduct in all activities. To that end, we have established this Code of Business Conduct (the "**Code**").

Activities that may call into question the Company's reputation or integrity should be avoided. The Company understands that not every situation is black and white. The key to compliance with the Code is exercising good judgment. This means following the spirit of this Code and the law, doing the "right" thing and acting ethically even when the law is not specific. When you are faced with a business situation where you must determine the right thing to do, you should ask the following questions:

- Am I following the spirit, as well as the letter, of any law or Company policy?
- Would I want my actions reported on *60 Minutes* or in the *Wall Street Journal*?
- What would my family, friends or neighbors think of my actions?
- Will there be any direct or indirect negative consequences for the Company?

1. Purpose of the Code

The Company, together with its Board of Directors, adopted this Code in order to:

- promote honest and ethical conduct, including ethical handling of actual or apparent conflicts of interest (including protecting corporate opportunities);
- promote the protection of Company, customer and vendor confidential information;
- encourage full, fair, accurate, timely and understandable disclosure;
- promote the protection and proper use of company assets;
- promote compliance with laws, rules and regulations; and
- encourage the reporting of any unlawful or unethical behavior.

All directors, officers and employees ("**you**") are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in Section 10, Reporting Violations of Company Policies and Enforcement.

2. Scope

The Code applies to every officer, director and employee. We also expect those with whom we do business (including our agents, consultants, suppliers, and customers) to adhere to the Code.

3. Compliance with Laws and Regulations

The Company seeks to comply with both the letter and spirit of the laws and regulations in all countries where it operates.

The Company is committed to full compliance with the laws and regulations of the cities, states and countries where it operates. You must comply with all applicable laws, rules and regulations in performing your duties for the Company. Numerous federal, state and local laws and regulations define and establish obligations with which the Company, its directors, employees and agents must comply.

Although not all employees, officers and directors are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about compliance should be addressed to the Legal Department.

4. Disclosure

It is of paramount importance to the Company that all disclosure in reports and documents that the Company files with, or submits to, the SEC and other public communications made by the Company comply with applicable federal securities laws and SEC rules.

You must take all steps available to assist the Company in these responsibilities consistent with your role within the Company. In particular, you are required to provide prompt and accurate answers to all inquiries made to you in connection with the Company's preparation of its public reports and disclosure.

Each director, officer and employee who is involved in the Company's disclosure process must:

- be familiar with and comply with the Disclosure Policy ;
- be familiar with and comply with the Company's Disclosure Controls and Procedures and its internal control over financial reporting; and
- take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

Each director, officer and employee who contributes to preparing or verifying the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained.

5. Insider Trading

You are prohibited under federal law and the Company's Insider Trading Policy from trading directly or indirectly based on material non-public information. Any person possessing material non-public information about the Company must not engage in transactions involving Company securities until this information has been released to the public or otherwise in accordance with the Insider Trading Policy.

If you have a question concerning the appropriateness or legality of a particular securities transaction, consult with the Company's Chief Legal Officer and Corporate Secretary ("**CLO**").

6. Conflicts of Interest and Corporate Opportunities

You must avoid any situation in which your personal interests conflict or appear to conflict with the Company's interests. You shall handle all actual or apparent conflicts of interest between your personal and professional relationships in an ethical manner.

You should avoid situations in which your personal, family or financial interests conflict or even appear to conflict with those of the Company. You may not engage in activities that compete with the Company or compromise its interests. You owe a duty to the Company not to compromise the Company's legitimate interests and to advance such interests when the opportunity to do so arises in the course of your employment.

You should not take for your own benefit opportunities discovered in the course of employment that you have reason to know would benefit the Company.

Neither you, nor members of your immediate family, are permitted to solicit or accept valuable gifts, payments, special favors or other consideration from customers, suppliers or competitors. Any gift that exceeds a locally nominal value or customary standard (i.e., $50 USD per year) should be turned over to the CLO for appropriate handling. Any exchange of gifts must be conducted so that there is no appearance of impropriety. You must never give gifts to external partners or business associates for the purpose of influencing or affecting a decision.

Conflicts are not always clear-cut. If you become aware of a conflict described above or any other conflict, potential conflict, or have a question as to a potential conflict, you should consult with your manager or the CLO and/or follow the procedures described in Sections 10 and 11 of this Code. If you become involved in a situation that gives rise to an actual conflict, you **must** promptly inform your supervisor or the CLO of the conflict.

7. Confidentiality

All confidential information concerning the Company obtained by you is the property of the Company and must be protected.

Confidential information includes all non-public information (regardless of source) that might be useful to competitors or harmful to the Company or its customers or suppliers if disclosed. You must maintain the confidentiality of such information entrusted to you by the Company, its customers and its suppliers, except when disclosure is authorized by the Company or required by law.

Your obligation with respect to confidential information extends beyond the workplace. In that respect, it applies to communications with your family members and continues to apply even after your employment or director relationship with the Company terminates.

8. Fair Dealing

You should endeavor to deal honestly with the Company's customers, suppliers, competitors, and employees.

Under federal and state laws, the Company is prohibited from engaging in unfair methods of competition, and unfair or deceptive acts and practices. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing.

9. Protection and Proper Use of Company Assets

You should endeavor to protect the Company's assets and ensure their proper use.

Company assets, both tangible and intangible, are to be used only for legitimate business purposes of the Company and only by authorized employees or consultants. Intangible assets include intellectual property such as trade secrets, patents, trademarks and copyrights, business, marketing and service plans, engineering and manufacturing ideas, designs, databases, Company records, salary information, and any unpublished financial data and reports. Unauthorized alteration, destruction, use, disclosure or distribution of Company assets violates Company policy and this Code. Theft or waste of, or carelessness in using, these assets directly impacts the Company's operations and profitability and will not be tolerated.

The Company provides computers, voice mail, electronic mail (e-mail), and internet access to certain employees to achieve the Company's business objectives. As a result, the Company has the right to access, reprint, publish, or retain any information created, sent or contained in any of the Company's computers or e-mail systems of any Company equipment. You may not use e-mail, the Internet or voice mail for any illegal purpose or in any manner that is contrary to the Company's policies or the standards embodied in this Code.

10. Reporting Violations of Company Policies and Enforcement

The Company's efforts to ensure observance of, and adherence to, the goals and policies outlined in this Code mandate that you promptly bring to the attention of the CLO or, if appropriate, the Chair of the Audit Committee any material transaction, relationship, act, failure to act, occurrence or practice that you believe, in good faith, is inconsistent with, in violation, or reasonably could be expected to give rise to a violation, of this Code.

You should report any violation or suspected violation of this Code to the appropriate Company personnel or via the anonymous and confidential reporting procedures outlined in the Reporting Violations and Complaints Policy that supplements this Code.

The Company must ensure prompt and consistent action against violations of this Code.

a. If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board of Directors.

b. If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor or the Chief Compliance Officer determines that a violation of this Code has occurred, the supervisor or the Chief Compliance Officer will report such determination to the CLO.

c. Upon receipt of a determination that there has been a violation of this Code, the Board of Directors or the CLO will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

11. Waivers

Each of the Board of Directors (in the case of a violation by a director or executive officer) and the CLO (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code. Any waiver for a director or an executive officer shall be disclosed as required by SEC and Nasdaq rules.

12. Compliance Procedures

The Code is based on the Company's core values, good business practices and applicable law. The existence of a Code, however, does not ensure that directors, officers and employees will comply with it or act legally and ethically. To achieve optimal legal and ethical behavior, you must know and understand the Code as it applies to you and others. You must champion the Code and assist others in knowing and understanding it.

The Company has established this Code as part of its overall policies and procedures. We note that this Code sets forth general principles of conduct and ethics and is intended to work in conjunction with the specific policies and procedures that are covered in separate specific policy statements, such as the Insider Trading Policy and the Related Party Policy, and you should refer to those policies and procedures for more detail in the specified context. To the extent that other Company policies and procedures conflict with this Code, you should follow this Code.

Administration of The Code

The Legal Department administers the Code. All employees are responsible for consulting and complying with the current version. If you have questions regarding the Code, please contact the Legal Department.

Related Policies: Disclosure Controls and Procedures, Disclosure Policy, Insider Trading Policy, Related Party Policy and Procedure, Reporting Violations and Complaints

Templates and Forms: None.

Reference Material and Additional Guidance: None.

Acknowledgment of Receipt and Review

I acknowledge that I read the Code of Business Conduct, understood it, and agree to comply with it. I understand that Anterix has the maximum discretion permitted by law to interpret, administer, change, modify, or delete the Code at any time, with or without notice. I also understand that any delay or failure by Anterix to enforce any work policy or rule will not constitute a waiver of Anterix's right to do so in the future. I understand that neither the Code nor any other communication by a management representative or any other employee, whether oral or written, is intended in any way to create a contract of employment. I understand that unless I have a written employment agreement signed by an authorized Anterix representative, **I am employed at will, and the Code does not modify my at-will employment status**. If I have a written employment agreement signed by an authorized Anterix representative and the Code conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will control.

Owner: Legal Department

Effective Date

This Code is effective as of June 9, 2014

Revision History: April 23, 2021

03/12/2025