



Occupational Health and Safety Policy

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1. Background

The Board of Directors of Cellnex Telecom, S.A. (hereafter "Cellnex Telecom", the "Company" or the "Organisation") is responsible for determining the general policies and strategies of the Company, and has approved the Occupational Health and Safety ("OHS") Policy for all companies in the Cellnex Group.

For the purposes of this Policy, the companies of the Cellnex Group are those over which Cellnex Telecom, S.A. has or may have direct or indirect control; i.e.

- Holding the majority of voting rights,
- The power to appoint or dismiss the majority of the members of the administrative body, or
- Holding the majority of voting rights by virtue of agreements entered into with third parties.

The Board of Directors establishes the Occupational Health and Safety strategy and its commitment to apply best practices in those countries in which the Company operates, this being based on recognised international standards.

2. Reference framework

Cellnex Telecom will proceed in accordance with recognised international standards and voluntary initiatives including, but not limited to, the following:

- The guidelines established by the **International Labour Organization** with regard to Occupational Health and Safety.
- The 10 Principles of the United Nations **Global Compact**.
- The **Luxembourg Declaration** of the European Network on Workplace Health Promotion (ENWHP).
- The Guidelines of the **Global Reporting Initiative** (GRI).
- The **Sustainable Development Goals** (SDG) promoted by the United Nations.

It also takes into account that established in the Management System and the requirements of the ISO standards for which the Company has been certified.

The OHS Policy must be interpreted in combination with the Organisation's existing internal management policies at a global level, as well as that established by the internal regulations in force in the areas related to OHS and Occupational Risk Prevention and similar in the different locations where Cellnex Telecom is present.

Cellnex Telecom is committed to promoting **the achievement of the United Nations Sustainable Development Goals (SDG)** and to **establishing its own goals in order to contribute to the targets defined**.

3. Purpose and scope

Guaranteeing the protection of life and physical safety of people is one of Cellnex Telecom's goals, so the OHS Policy ensures the following:

- Promotion and protection of all personnel's health and welfare
- Provision of a safe, healthy working environment
- Safety of its collaborators and anyone else present on its premises.

This document therefore establishes Cellnex Telecom's basic guidelines and lines of action within the field of OHS, which enable the essential OHS principles and commitments within the Organisation to be formalised and specified, as well as their communication to stakeholders and progressive integration within all the Cellnex Group's systems and operational processes.

The principles and commitments established in this Policy apply in general and must be taken into account in each of the projects, businesses and activities carried out by the Company.

4. Basic principles

- Maintain **safe, healthy working conditions** at each of the work centres controlled by the Company, in such a way that both work-related injuries and deterioration in health can be prevented.
- Take the necessary measures and provide the resources to **eliminate the hazards and reduce the risks** associated with the safety and health of personnel.
- Assume **a diverse leading attitude** in order to integrate and implement a **complete culture of safety, health and well-being**.
- Promote, facilitate and guarantee the consultation and participation of workers and, where they exist, workers' representatives.
- Ensure **the compliance of regulations**, legal requirements and other requirements applicable all in the areas where the Company is present, as well as the provisions of the main international standards related to OHS risks.
- Promote and ensure **continued improvement of the OHS Management System** through systematic performance evaluation.
- Make the necessary adjustments to **adapt to future standards** or new requirements from clients and society.
- Involve clients and suppliers in this Policy with the mutual aim of creating working environments that meet the required OHS levels.

5. Strategic lines and commitments

Cellnex Telecom establishes specific commitments grouped under nine lines of work:

5.1. Planning, evaluation and control

The Global Management System department will establish, review and adjust, as appropriate, the control measures, policies, plans and procedures established in the field of OHS, and undertakes to:

- Set OHS goals and targets.
- Monitor, measure, analyse and assess performance and progress in meeting targets.
- Ensure continuous monitoring of OHS, control work-related accidents and incidents.

- Report, investigate and communicate the conclusions of accident and incident investigations, thereby passing on the lessons learned in order to incorporate corrective and preventive actions.
- Define and provide the necessary resources to establish, implement, maintain and improve continuously.
- Define and carry out internal audit processes.
- Guarantee mechanisms to control access to the centres.

5.2. Risk Management

In order to carry out appropriate risk management in the field of OHS, Cellnex Telecom will establish controls to identify, analyse and minimise risks and eliminate hazards, thereby reducing incidents, accidents, injuries and illnesses related to its business activities. It therefore undertakes to:ⁱⁱ

- Assess the risks and identify the dangers resulting from or associated with labour activities being carried out and establish the appropriate measures to avoid or mitigate them.
- Guarantee safe working conditions at the work centres by applying maintenance programmes to the infrastructures, devices, materials and protective equipment in accordance with the applicable legal and regulatory standards.
- Encourage the identification and reporting of hazards among its workers and those of third parties.

5.3. Leadership and responsibility

Cellnex Telecom is committed to promoting leadership, responsibility and involvement of the Company in integrating the OHS Policy in all its business processes, supporting the establishment of measures that guarantee the goals in this area are fulfilled and defining strategies that promote a culture of prevention, well-being and health at all levels and for all activities carried out by the Company. It also undertakes that the management team shall:

- Exercise leadership, responsibility and commitment regarding the OHS management system.
- Ensure an OHS policy is established, implemented and updated, this Policy being appropriate to the purpose, size, context and nature of the risks and opportunities.

5.4. Consultation and participation

The Company encourages its workers to ask questions and participate in OHS matters in order to identify potential improvements, promote excellence and ensure that the personnel at all levels feel represented. Cellnex Telecom therefore undertakes to:

- Establish, implement and maintain procedures for worker consultation and involvement.

- Provide and arrange for the mechanisms, time and resources required to facilitate consultation and participation, thereby encouraging opinions to be sought and the involvement of all levels within the Organisation in the decision-making process.
- Support the establishment and operation of Health and Safety Committees or similar in all locations where it is present and encourage participation in them.

5.5. Responsibility of the team and third parties

All Cellnex Telecom's workers, as well as those of its clients, suppliers and subcontractors, must oversee their own health and safety and that of any people who may be affected. They must therefore:

- Comply with the OHS standards, procedures and policies established, ensuring that the tasks assigned are performed safely and correctly using equipment, materials and PPE.
- Not tamper or interfere with devices provided to safeguard their health and safety.
- Report within the Organisation any relevant OHS issues, especially any serious, imminent hazard or defects in any protection system.
- Collaborate to improve OHS.

5.6. Complete health and well-being

Cellnex Telecom sees the concept of health regarding its workers as a complete state of well-being in physical, occupational, emotional, spiritual, social, intellectual and environmental terms. The Company integrates health within its corporate strategy and action as a cultural element covering the entire Organisation and seeks to achieve greater levels of labour welfare and sustainability. It therefore undertakes to:

- Promote the development of strategic plans for the Promotion of Health at Work (PHW) that encompass, within a single framework, all the actions carried out with the aim of increasing the well-being of its workers, also adopting the necessary preventive and corrective measures to avoid or minimise risks of a physical or psychological nature, in accordance with the regulations of each country in which Cellnex Telecom operates.
- Promote and improve a healthy business approach through specific programmes and actions that encourage healthy habits.ⁱⁱⁱ
- Ensure access to medical services and regular medical check-ups as required by the regulations applicable in each country.
- Support actions that improve the work-life balance, guaranteeing the right to disconnect from work and promoting flexible formulas for work.

5.7. Culture of prevention: communication and training

In order to encourage an OHS culture and to ensure all the Company's personnel are aware of the health and safety measures in their workplace, Cellnex Telecom undertakes to:

- Make everyone aware of their roles, responsibilities and obligations in achieving the OHS goals, as well as provide them with information regarding the hazards inherent in their job.
- Ensure the personnel have the skills, abilities and aptitudes required to perform their tasks properly.
- Provide all personnel with informative documents on working procedures with specific hazards, the use of personal protective equipment (PPE) and other similar aspects.
- Detect individual needs and develop the abilities and skills required to prevent and control the hazards associated with carrying out their work.
- Prioritise communication as a key tool to promote and adopt practices and measures that promote OHS.
- Provide adequate communication channels so that anyone can report situations in which the safety of the personnel could be at risk.
- Encourage personnel to be proactive, carrying out communication campaigns and training on the prevention and protection measures and activities to be adopted.
- Leading through a socially responsible, diverse and inclusion attitude, in order to integrate and implement a complete culture of safety, health and well-being.

5.8. Information management

To appropriately manage OHS information, the Company undertakes to:

- Use innovative technological tools to improve the quality of OHS information in the workplace.
- Provide appropriate access to clear, understandable and relevant information on the subject.
- Guarantee better and faster access to information for clients and suppliers.

5.9. Safe mobility

With the aim of reducing accidents caused by its workers' movements, raising awareness regarding the prevention of traffic accidents and improving the mobility of workers, partners, suppliers and clients, Cellnex Telecom will include aspects of labour-related mobility in the Company's goals. It therefore undertakes to:^{iv}

- Continue to improve and emphasise road safety.
- Design Mobility Plans and keep them up-to-date.
- Carry out efficient, responsible and safe driving campaigns aimed at its personnel.

In addition and in relation to the commitment acquired by Cellnex with the achievement of the **Sustainable Development Objectives**, the Occupational Health and Safety Management System focuses on the contribution of the following objectives:



- **Goal 3:** Ensuring healthy lives and promote well-being for all at all ages.
- **Goal 8:** Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- **Goal 5:** Achieve gender equality and empower all women and girls.
- **Goal 9:** Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.
- **Goal 10:** Reduce inequality within and among countries.
- **Goal 11:** Make cities and human settlements inclusive, safe, resilient and sustainable.

6. Approval, monitoring and control

The objectives in terms of Occupational Health and Safety defined by the Company are consistent with this policy, aligned with Cellnex Telecom's process model, reviewed periodically by the Management Team and updated according to their evolution and environment. Likewise, the Global Management System Department of Cellnex Telecom undertakes to carry out periodic monitoring of the degree of progress of all the strategic lines of action derived from the implementation of this Policy.

Amongst the responsibilities of the Global Management System Department, is to ensure the monitoring of compliance and application of this Policy, as well as its periodically review in order to be able to make the appropriate adjustments for its correct implementation throughout the Cellnex group and adapting it to any new organisational, environmental or market requirements that may arise, and to communicate this to the Cellnex Group companies and make it available to interested and affected parties at all times.

Cellnex promotes knowledge of and compliance with the commitments established in this Policy, which will be permanently available on the website.

Consequences of non-compliance: All Cellnex Telecom employees have an obligation to know, understand and comply with the terms of this Policy regardless of the country or region in which they are located. In addition, they must report any possible impact or non-compliance on the matter.

7. Contact

Any questions related to this Occupational Health and Safety Policy can be addressed to the Health and Safety Area - Management System Department.

Madrid, 26th March 2021

ⁱSDG Target 8.8. *Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment*

SDG Target 8.5. *By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value*

ⁱⁱSDG Target 3.9 *By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination*

ⁱⁱⁱSDG Target 3.5 *Strengthen the prevention and treatment of substance abuse, including narcotic drug abuse and harmful use of alcohol*

^{iv}SDG Target 3.6 *By 2020, halve the number of global deaths and injuries from road traffic accidents*

SDG Target 11.2 *By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons*