

## Slavery and human trafficking statement 2021

**Modern slavery is a gross violation of human rights, involving such issues as forced labour, bonded labour, trafficking in human beings and child slavery.**

**Cellnex condemns all exploitative work practices, including the use of child labour, and we are fully committed to preventing them, both in areas that come within the Group's activities and in all matters that affect our supply chain.**

In addition, the company implements a policy of transparency in respect of its business and its activities, and so any information relating to this statement, and the document itself, are published on the company's corporate website [www.cellnextelecom.com](http://www.cellnextelecom.com).

Cellnex also undertakes to draft and publish a statement on slavery and trafficking in human beings for each financial year of the organization, as established in the Modern Slavery Act of 2015, passed in the United Kingdom. The statement can also be found on the UK online modern slavery register.

### Cellnex Telecom's activity

Cellnex has made a firm commitment to developing its network, which at the end of 2020 comprised c. 128,524 sites and positions the company to develop new generation networks. It currently provides services in Spain, Italy, Netherlands, United Kingdom, France, Switzerland, Ireland, Portugal, Finland, Austria, Sweden, Denmark and Poland thanks to the investments undertaken to boost its transformation and internationalisation drive.

Cellnex offers to its customers a range of services to guarantee the conditions for reliable and high-quality transmission of voice, data and audiovisual contents.

Cellnex has strategically located infrastructure to offer maximum coverage in both urban and rural settings, providing a service with a high level of quality, availability and network stability thanks to appropriate climate control, assisted power supply systems and automatic alarm detection systems.

In this way, Cellnex offers co-location services in its infrastructure to mobile phone operators so that they can install their wireless broadcasting and telecommunications equipment there. Cellnex Telecom facilitates sharing between the major telephone operators, which allows for the maximum and efficient use of the installed network capacity, minimising redundancy and duplication. Thus, this model is characterised by its reduced impact and presence in the urban area, and therefore improves efficient use of resources such as energy, which in turn reduces the carbon footprint.

Cellnex uses DAS systems and provides DASaaS ("DAS as a Service") using an end-to-end approach, to improve coverage and repeater capacity of the mobile radio signal in specific areas serving mobile operators.

The DAS and Small Cells systems are one of the core infrastructures from which the new 5G communication standard will be rolled out. The roll-out of 5G could deliver social value across the Sustainable Development Goals, mainly by contributing to good health and wellbeing, in addition to enhancing infrastructure, promoting sustainable industrialisation and fostering innovation. Other key areas in which social value can be created through 5G include contributing to responsible consumption, enabling sustainable cities and communities, and promoting decent work and economic growth.

Cellnex provides the infrastructure required to develop a connected society. Cellnex provides integrated and adaptable solutions to make the Smart concept a tangible reality and improve the management of both urban and rural areas.

Cellnex also plays a relevant role in the deployment of safety and emergency networks for the security forces, known as PPDRs (Public Protection And Disaster Relief). This line of activity summarises both the degree of expertise the company's team of professionals and the ruggedness and reliability of the architecture of its networks and equipment.

The company is listed on the continuous market of the Spanish stock exchange and is part of the selective IBEX 35 and EuroStoxx 600 indices. It is also part of the FTSE4GOOD, CDP, Sustainalytics and "Standard Ethics" sustainability indexes. During the first half of 2019

Cellnex Telecom (CLNX SM) was added to the MSCI Europe index, following the May 2019 semi-annual index review.

## Cellnex Telecom's commitments to the prevention of modern slavery

### Environmental Social Governance Policy

Cellnex Telecom's Environmental, Social and Governance ('ESG') policy sets out the basic guidelines and lines of action in this regard. It commits the entire Group and is therefore applicable in all its subsidiaries, as well as in all functional areas of the company.

Cellnex Telecom's ESG policy uses the following international standards as a benchmark, which it adopts as a regulatory framework within which company activities must be carried out:

- Principles of the United Nations Global Compact.
- Guiding Principles on Business and Human Rights (United Nations).
- Sustainable Development Goals (United Nations).
- Task Force on Climate-related Financial Disclosures (TCFD).
- Paris Agreement on Climate Change.
- Business Ambition for 1.5°C (UN Global Compact).
- International Labour Organization's (ILO) Fundamental Conventions.
- OECD Guidelines for Multinational Enterprises (OECD).

In accordance with these standards, the company recognizes three basic principles whose application is transversal in all lines of action and undertakings, and on which their deployment is based:

**Human Rights:** The protection of and respect for Human Rights -as set out in the UN Universal Declaration-, within the Group's sphere of influence and non-complicity in their violation, as well as, when applicable, the reparation of any harm caused.

**Stakeholders:** The identification of the organization's stakeholders taking into account the entire value chain of the activity, the development of channels of communication and participation, and direct and

indirect involvement in the identification of material aspects and the appraisal of performance.

**Environment and climate change:** The protection and preservation of the environment, preserving the areas, and their biodiversity, in which the Company activities are carried out, using renewable energies, mitigating of and adapting to climate change, and contributing to sustainable development through an efficient use of resources.

This policy is developed and complemented by means of the company's internal rules of Corporate Governance, such as the Code of Ethics and the Ethical Channel.

The Cellnex Telecom's ESG Policy is materialised, for its development and execution, in the ESG Master Plan of the Cellnex Group. The current ESG Master Plan, which covers the period 2021-2025 constitutes the working framework and tool for systematising the strategic objectives, the indicators linked to monitoring and the actions and programmes being developed for each of the areas of the Plan.

In this regard, the strategic areas which are contained in the ESG Master Plan, are the following:

- Integrity and transparency: "Showing what we are, acting with integrity".
- People management: "Boosting our talent, being diverse and inclusive".
- Contribution to society: "Being a facilitator of social progress".
- Sustainable development: "Growing with a long-term sustainable environmental approach".
- Responsible value chain: "Extending our commitment to the value chain".
- Communication and awareness: "Ensuring the awareness of our responsible way of doing".

Based on the aforementioned defined axes, and through the development of the strategic lines, Cellnex Telecom acquires the following commitments which, in turn, contribute to the achievement of various targets of United Nations Sustainable Development Goals (SDGs) 1, 4, 5, 8, 9, 10, 15 and 17.

### Human Rights Policy

During 2018, Cellnex formalized its Human Rights Policy of application to the entire organisation which

establishes that Cellnex is committed to protecting and respecting Human Rights.

#### The code of ethics and the ethical channel

The Cellnex Group's code of ethics reflects the company's commitment to and involvement with the respect for human rights as a fundamental value of its actions, as well as with the principles regulated by the UN Universal Declaration of Human Rights, among other standards. The company also discloses in this document its total rejection of child labour and forced or compulsory labour and undertakes to respect the freedom of association and collective bargaining.

#### Equity, Diversity and Inclusion Policy

This policy focuses on creating a climate that allows diversity in all of the following areas: gender, age, sexual orientation, culture, race, religion, thought, education, talent, social condition, individual quality, work style, disability, special needs or any other circumstance of its personnel; and at the same time, rejecting any type of discrimination for these reasons that impedes the growth of the Company or that affects the selection, retention, advancement and well-being of its personnel. The Equity, Diversity and Inclusion Policy has been approved by the Board of Directors.

#### United Nations Global Compact

In November 2015 Cellnex Telecom joined the United Nations Global Compact as an expression of its commitment to including the ESG concept into its operational strategy and organisational culture. Each year, Cellnex publishes its COP (Communication of Progress) on the official Global Compact website. Under this agreement, Cellnex undertakes to promote and spread ESG policies and practices based on the 10 key principles promoted by the United Nations, as well as to contribute to the SDGs and an identification of which SDGs are a priority for the company.

### **COVID-19 Global Scenario**

The COVID-19 pandemic constitutes an extraordinary phenomenon that has led to a dramatic loss of human lives worldwide and is affecting societies and economies at their core. In 2020 COVID-19 affected almost all countries and more than 50 million people around the world.

Never before has maintaining connectivity been so important, not only in the many entertainment options offered through streaming or social networks, but also by serving the curricular needs of millions of students, providing information or maintaining work, family or interpersonal options and relations through instant audio-visual communication. Here, telecommunication infrastructures play a fundamental role.

#### Cellnex's response

Cellnex Group deployed a Global Contingency Plan to guarantee the continuity of critical services to its customers in all countries, provide financial support to its suppliers and protect its employees.

In this sense, Cellnex has been able to provide **uninterrupted service** to its customers and carried out several initiatives, including **financial support**, in order to guarantee the relationships with its suppliers.

Since the beginning of the pandemic, Cellnex's priority has been to guarantee the health and safety of employees. Thus, their 1,955 employees around Europe who are not part of the operations team, have been working remotely since the second week of March, one week before the Spanish Government forced companies to telecommute.

In Spain, Cellnex has implemented a specific action plan that includes health, organisational, and risk prevention/H&S measures to reduce the risk of contagion according to the COVID-19 safe protocol. This plan has obtained TÜV **Safe Protocol 19 certification** for the Corporate headquarters and Business Unit Spain in their territorial headquarters.

#### **Social response: Cellnex's COVID-19 Relief Initiative**

In the face of the unprecedented crisis caused by the COVID-19, Cellnex has acted proactively, allocating significant resources and concrete actions in social matters to mitigate the effects of the pandemic.

In this regard, the company has set up several collaborative projects in the countries where it operates under the project "Cellnex's COVID-19 Relief Initiative", a fund of 10 million euros over 2020-2021, 5 million of which is earmarked for medical research (a cellular immunotherapy project led by the Clínic-IDIBAPS Hospital) and 5 million for social action projects with NGOs, especially focused on the most

fragile and exposed groups and people, and to facilitate digital inclusion.

## Actions in Cellnex Group during 2020 in relation to slavery and human trafficking

In 2020, the company's ESG strategy set out in the company's 2016-2020 CSR Master Plan was renewed by defining a new ESG Master Plan (2021-2025) at Group level, taking into account the evolution of the company in recent years and its growth and internationalisation process, updating the ESG diagnosis done in the past to show the current state of the company in ESG matters and the new trends and expectations of stakeholders.

Likewise, a new materiality analysis was performed for Cellnex at Group level, allowing the company to know which aspects are most relevant to it in the field of ESG.

The ESG Master Plan and the current Cellnex CSR Policy were updated by the new ESG Policy to include the new aspects identified in the internal and external diagnosis and the positioning that the company wants to achieve. ESG Policy was drawn up in line with the Good Governance recommendations of the CNMV (Spanish Securities Market Commission). Both documents are aligned with Sustainable Development Goals.

The company is committed to the application of best practices in the countries in which it operates and based on international reference standards. For this reason, ESG criteria have been introduced in Due Diligence. In this way, Cellnex requires knowledge of the ESG policies and practices of the companies with which it works or will work.

The Appointments and Remuneration Committee (ARC) has been renamed as the Nominations, Remunerations and Sustainability Committee (NRSC), being the highest governing body responsible for ensuring compliance with the commitments established in the ESG Policy, as well as the actions which may derive from it.

In addition, the company's senior managers are committed to through specific ESG-related objectives. Specifically, in 2020 an objective was set for this group (15% of the variable remuneration) which consists of evaluating and monitoring the efforts made by the

Group in the area of ESG, based on a combination of the general score obtained in a selection of ESG indexes in which Cellnex Telecom participates.

Likewise, in 2020 the Ethics and Compliance Committee continued to advance on disseminating and communicating the Group's Code of Ethics through various actions according to the geographical area

In addition, the training relating to the Code of Ethics has been incorporated into the Group's Intranet and is always available to all Group employees.

### Diversity Plan

An Equity, Diversity and Inclusion Policy that establishes the guidelines and lines of action in this area for the entire Cellnex Group, was defined & approved by the Board of Directors in December 2019. Along with the policy, Cellnex has drafted an Equity, Diversity and Inclusion Programme that defines the lines of action, commitments and strategic lines.

The Equity, Diversity and Inclusion Programme was rolled out across the countries during 2020.

The policies and criteria for recruitment in most Cellnex countries have been reviewed and updated, ensuring non-discrimination on the basis of gender, age, sexual orientation or gender identity, race, religion, thought or social status or disability.

A Protocol against harassment and discrimination based on sexual orientation or gender identity has been defined.

An inclusive language manual was also defined, including the five diversity axes of Cellnex (gender, generational, affective-sexual, cultural and functional).

A Monitoring and Evaluation Committee will ensure that Cellnex complies with the Equality Plan, by evaluating the Plan annually.

### Being a facilitator of social progress

As part of its social commitment, Cellnex promotes several projects in collaboration with different organisations such as Seres Foundation, Cancer Fund for Children or Best Foundations.

One of the main initiatives in this regard is the "Solidarity Euro", a Project initiated in Spain and then

launched globally under the name of Solidarity Gift. In this project, Cellnex Telecom collaborators are invited to donate one EUR (or equivalent) per month from their payroll. After two years, participants can propose social projects in their countries to which they would like the accumulated money raised to be donated. A campaign will be organised to select which of the various projects proposed in the business unit will receive the money raised. The initiative has now been upgraded with a Matching Gift in which Cellnex will match the contribution made by employees.

Beyond this initiative, some countries collaborate with international and local organisations, increasing their commitment to society and promoting a more sustainable and inclusive environment.

#### **Access to communications**

Cellnex brings connectivity even to rural areas without incurring high costs through 5G (Zero-Emissions Rural Site or 5G-Lean project among others).

Cellnex Ireland has identified low connectivity areas (black spots) and is working together with the local community to improve the connectivity of the area. Invested over €10m in new telecommunications infrastructure.

With the aim to connect people, especially people and collectives at risk of social exclusion, Cellnex provides connectivity to social housing (E.g. Casa Bloc project or project with the 3rd social sector)

#### **Quality Education and Digitalisation**

Cellnex has collaborated with Universities & Foundations in several projects (ESADE Foundation, The BEST Foundation and IESE).

#### **Volunteers**

In Cellnex we have a significant group of volunteers who contribute their ideas, skills, knowledge and time to developing solidarity projects.

The Cellnex social projects and volunteer programme was created to improve the company's social environment by promoting the development of young people in vulnerable situations through education and inserting them into the world of work, promoting innovation and technology.

The first project launched called "Cellnex Youth Challenge". During the academic year 2019-2020 a group of 66 volunteers participated as coaches in this project, an initiative with young people at very high risk of social exclusion in Barcelona that aims to reduce school dropout rates and promote youth employability.

The Cellnex volunteers were responsible for running a mentoring process, offering students a direct connection to the world of work to encourage them to continue studying and increase their employability through 800 hours of training and mentoring and other activities such as visits to teaching centres, lectures or workshops. They also took part in mentoring sessions focused on improving self-esteem, looking to the future and fostering STEM (science, technology, engineering and maths) vocations.

Following the success of this edition, in which 89% of students declared that the coach helped them to continue studying and 100% of the volunteers would repeat, the programme will be extended to Madrid and Rome and an online option made available.

#### **Creation of The Cellnex Foundation**

In December 2020, the Board of Directors approved the creation of the Cellnex Foundation, in response to the firm desire of Cellnex Telecom to take a further step towards contributing to an environment that is better connected and socially responsible as a comprehensive initiative to complement the Corporate Social Responsibility of the company. The Cellnex foundation has the clear mission of being a dynamic tool at the service of people with a view of making a significant contribution to transforming realities.

The Foundation has the purpose of promoting actions aimed at people and entities through technology and telecommunications, such as innovation, connectivity, reducing the digital gap, mobility and the Internet of Things -IoT -, among other. To this end, the Foundation will focus on the challenges arising from the three gaps: Digital gap, Territorial gap, and Social gap.

#### **Actions in the supply chain during 2020 in relation to slavery and human trafficking**



For Cellnex it is essential that suppliers should be familiar with corporate policies and ensure compliance with all of them. They can access Cellnex policies on purchasing, quality, environment, occupational risk prevention, information security, corporate responsibility, Human Rights and R&D + innovation as well as our Code of Ethics on the Cellnex corporate website. Suppliers must comply with these specific requirements in carrying out their work, and make the standards and requirements known to all their contracted and subcontracted personnel.

Cellnex established a Procurement Policy, which promotes a guide for action in the procurement process that goes beyond product and service price and quality to impact social, ethical, environmental, privacy and continuous improvement aspects in the performance of Cellnex Group suppliers.

Cellnex is extremely committed to ethics and human rights, including in its supply chain, which represents the greatest potential risk, yet is the biggest area to make a positive impact. To this end, Cellnex applies an audit process to find out their supplier's position and schedule any necessary actions to avoid problems in this regard.

For Occupational Risk Prevention, Cellnex Spain establishes coordination requirements between the company and its suppliers of works and services to comply with the obligations established in the Spanish Law on Prevention of Occupational Risks and other complementary regulations. It has specific guidelines for suppliers accessing the company's facilities, mainly those involved in installations and maintenance projects, and customer colocation services.

### **Evaluation & monitoring of suppliers**

Cellnex' companies apply a procedure for evaluating and selecting suppliers to ensure they are aligned and compliant with Cellnex's corporate policies and ethos.

In 2020 Cellnex partnered with EcoVadis to perform the evaluation of its suppliers. The EcoVadis Rating covers a broad range of non-financial management systems including Environmental, Labour & Human Rights, Ethics and Sustainable Procurement impacts. EcoVadis provides an outsourced sustainability management platform that helps Cellnex to invite its trading partners to be rated; manage trading partners' performance; and drive continuous improvement.

None of the impacts detected in the evaluations was considered serious and therefore it has not been necessary to implement corrective actions in this regard. If significant impacts were detected, joint improvement plans would have been implemented with suppliers.

Under the ESG Master Plan, Cellnex will define a model for the analysis and evaluation of the risk associated with suppliers, including ESG-related factors to gain a deeper insight into the supplier's business and operations, and thus build stronger relationships with suppliers.

The Cellnex Group's General Conditions include in its provisions a clause referred to the Group's Code of Ethics in order to require suppliers to declare knowledge and full compliance with its contents. Additionally, it is also compulsory for suppliers to inform their employees and, if applicable, their subcontractors of the existence and content of the Code of Ethics and to ensure that they comply with it. Moreover, such clause has also been included in the employment contracts of all the new hires of the Group.

(Further information: [Integrated Annual Report](#)).



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