

Slavery and human trafficking statement 2022

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.

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. A specific Cellnex UK statement can also be found on the UK's online modern slavery register.

Cellnex Telecom

Cellnex Telecom is the main infrastructure operator for wireless telecommunication in Europe.

Cellnex has made a firm commitment to developing its network, which at the end of 2021 comprised c. 130.000 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.

It also develops solutions in the field of "smart city" projects that optimise services to the citizen via networks and services that facilitate municipal management, and plays a relevant role in the

deployment of safety and emergency networks for the security forces, known as PPDRs (Public Protection And Disaster Relief).

The company is listed on the continuous market of the Spanish stock exchange and is part of the selective IBEX 35 and EuroStoxx 100 indices. It is also present in the main sustainability indexes, such as CDP (Carbon Disclosure Project), Sustainalytics, FTSE4Good, MSCI and Standard Ethics.

Cellnex Telecom's commitments to the prevention of modern slavery

The code of ethics and the Whistleblowing channel

Cellnex's [Code of Ethics](#) is the fundamental regulation that governs the Cellnex Group and which establishes general conduct guidelines which must be complied with.

The Code of Ethics, together with other rules, regulations and policies that compose the Group's regulatory framework in terms of ethics and compliance, sets out the values, commitments and standards that must be respected by all people subject to it as well as by the stakeholders of the Cellnex Group, and respects both human rights and specific labour rights.

The Cellnex [Whistleblowing Channel](#) is a communication tool accessible to any of the persons subjected to its Code of Ethics and any other third party that makes use of it which allows them to report, in good faith, without fear of reprisals, confidentially and anonymously, any kind of violation of the current legislation and/or other internal regulations that they may notice within Cellnex.

Environmental, Social & Governance (ESG) Policy

Cellnex Telecom's [ESG policy](#) establishes the basic guidelines and lines of action regarding the Cellnex Telecom's ESG strategy which allow the formalisation and implementation of the concept of ESG within the framework of the organisation, its communication thereof to stakeholders and the progressive systematisation in all systems and operational processes of the Cellnex Group.

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 Whistleblowing Channel.

The Cellnex Telecom's ESG Policy is materialised, for its development and execution, in the [ESG Master Plan](#) of the Cellnex Group.

[Human Rights Policy & Due Diligence](#)

As part of the ESG agenda, in 2021 Cellnex carried out a [Due Diligence](#) process and Risk Impact Assessment on Human Rights with the aim of updating the business strategy and providing it with greater depth and scope.

In order to identify and assess relevant risk events and measure the nature and scope of risks to human rights, the methodology has been inspired by the "Human Rights Business Approach" (HRBA), a normative working methodology based on internationally recognized Human Rights, the UN Guiding Principles Interpretive Guide, and the OECD Due Diligence Guidance for Responsible Business Conduct.

Following this, on March 2022, Cellnex renewed its [Human Rights Policy](#). This document formalizes Cellnex's commitment to respect and promote Human Rights in its business activities and value chain, including partners, employees, and other stakeholders, using the main international standards as a point of reference.

Effectiveness

Cellnex seeks to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains. The company aims to do this by continuously evolving the way in which it seeks to identify and mitigate risks in its working relationships with third parties and assess risks within the organisation. –

Based on the due diligence study, the risk of Human Rights breach have been identified as a corporate risk for the Company, thus becoming a priority on Cellnex's corporate agenda, guaranteeing a direct channel for reporting irregular situations and protecting people

against events that may affect their normal development and quality of life.

Moreover, the Risk Management area, in coordination with the Environmental, Social and Governance area, is responsible for monitoring the Human Rights due diligence process, with the participation of the different areas of the Company, and is also responsible for promoting, measuring, and reporting the development and implementation of the Human Rights Policy on a global and local scale. Cellnex undertakes to maintain a transparent management model for Human Rights management risk, and to regularly share it with the internal management bodies and with the main stakeholders.

Supply Chain

Cellnex is committed to the protection of and respect for universally recognised fundamental Human Rights, within its sphere of influence, and non-complicity in their violation, and wants to extend the same to all its Suppliers.

In this regards, at the beginning of 2022 Cellnex adopted a [Code of Conduct for Suppliers](#) that acts as a framework of trust and cooperation for the Organisation with its value chain. Its aims to bring together in a single document the key references to the set of principles, rules and policies of Cellnex Group, that govern suppliers in different areas which one of this is The Human rights. The Cellnex commitment is to the protection of and respect for universally recognised fundamental human rights, within its sphere of influence and non-complicity in the violation there of and wishes to extend this commitment to all its Suppliers, requiring them to respect, support and promote Human Rights. In this sense, Cellnex will require the commitment of its Suppliers in several aspects such as ensuring decent working conditions for their employees, no discrimination, providing equal opportunities to promote equity, guaranteeing occupational health and safety, preventing any type of harassment or eliminating the use of forced or child labour, among others. (Further information: <https://www.cellnextelecom.com/content/uploads/2>

[022/02/RUL GR 020 Supplier-code-of-conduct-V1.pdf](#)). Encouraging compliance with all these points and promoting a balance between work and personal responsibilities, Suppliers shall promote work-life balance measures to achieve this balance in accordance with applicable regulations.

In terms of strategy, a new strategic purchasing model is being defined in the company which is aligned with one of the main axes of the ESG Master Plan 2021-2025, extending our commitment to the value chain.

In this sense, supplier selection, approval and evaluation processes are considered critical within the purchasing process. Therefore, in 2021, a project was launched to redefine the model in line with the Company's objectives in terms of ESG, Risks, Quality, Compliance and Information Security. This process is part of the action defined in the ESG Master Plan on the definition of a model for the analysis and assessment of the risk associated with suppliers, including factors related to ESG and the definition and identification of critical suppliers. As such, the strategic purchasing model must include the criteria defined in the supplier selection, approval and evaluation model. Together both projects seek to transform the way in which the Company undertakes the purchasing process and aim to transfer Cellnex's strategic objectives to the supply chain.

Staff Training

We aim to educate all our staff to recognise modern slavery and human trafficking risks in our business and supply chains. This is achieved through training and encouraging employees to identify and report any suspected acts of slavery and human trafficking. During 2021, more than 2,000 hours of training were provided in the field of Human Rights.

Further actions and sign-off

Derived from the summary of the adverse impact analysis and due diligence exercise, Cellnex's Human

Rights agenda will provide a new set of business risks that until now were not monitored, and which from this year will be tracked and grouped under the Human Rights risk included in the corporate risk matrix. This new approach increases Cellnex's ability to understand, assess and address the negative impacts that economic activity can generate on the company's natural and social environment and business interactions, as well as its focus on preventive actions to maximise positive impacts and proactively minimise negative ones.

At the Due Diligence nine main opportunities of improvement have been identified, four are transversal and five are specifics. The transversal are highlights areas of opportunities where greater potential benefits in terms of realization of human rights may be achieved. (For further information:

https://www.cellnextelecom.com/content/uploads/2022/04/Cellnex_Human-Rights-Due-Diligence_v220302-2.pdf).

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



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