

Human Rights Policy

INDEX

1. Background3

2. Introduction3

3. Purpose and scope.....3

 3.1. Purpose 3

 3.2. Scope..... 4

4. Basic principles.....4

 4.1. Human rights due diligence 4

5. Lines of action and commitments.....5

6. Human rights and the Sustainable Development Goals (SDGs)6

7. Whistleblowing channel and remediation8

8. Implementation and monitoring9

9. Communication and transparency.....9

10. Changes Control9

1. Background

The Board of Directors of Cellnex Telecom, S.A., is responsible for approving the policies and general strategies for the entire group. In the performance of these duties, the Board of Directors approves this Policy and reinforces its commitment to its application in the countries where the company operates.

The Human Rights Policy has been updated in line with the Human Rights Due Diligence and Risk Impacts Assessment, reinforcing Cellnex's commitment to consistently implement action lines that address and protect Human Rights.

2. Introduction

Cellnex is committed to respecting the dignity and fundamental rights. The potential for global connectivity offered by the infrastructures for the transport and transmission of voice, data, radio, and television signals is both a strategy for and an essential instrument in the improvement of equal access to information and communication systems for all.

Connectivity is a key decisive element for the personal and educational development, learning processes, and overall growth of the society. This enables people to outline their own criteria surrounding reality, giving them the liberty to express themselves freely through the availability of and access to network resources that allow them fully to develop as individuals and professionals, overcoming territorial barriers and thus combatting the "digital, social and territorial divides".

Cellnex, as a neutral operator of telecommunications infrastructures in Europe, is signatory of the United Nations Global Compact since 2015. In this context and as an extension of the Human Rights due diligence and risk impacts assessment, Cellnex has updated this Policy to reinforce the company's commitment to Human Rights in accordance with current international standards, detailed in the basic principles section.

3. Purpose and scope

3.1. Purpose

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.

Cellnex confirms its commitment to protect and respect universally recognized Human Rights within the scope of influence of the Group, and to mitigate and remedy any damage that might be caused. These general guidelines define a framework of performance, understood as a minimum requirement to develop the company's activity.

3.2. Scope

This Human Rights Policy constitutes a corporate Policy and, therefore, is applicable to all companies that make up the Cellnex Group¹ in the countries in which it operates. In this connection, the Group's companies and subsidiaries shall adopt the appropriate decisions and their actions will be governed accordingly in order to ensure compliance with the Policy.

4. Basic principles

Cellnex is committed to respect internationally recognized Human Rights and avoid causing or contributing to adverse Human Rights impacts by adhering, at a minimum, to the International Bill of Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The company seeks to address adverse Human Rights impacts in which it is or may be involved by continually working to strengthen its work to promote and respect these rights.

This Policy takes as a reference the main international standards, to which it is committed and which it adopts as the regulatory framework for the limits within which the company's activities must be carried out:

- UN International Bill of Human Rights
- ILO's eight fundamental conventions
- Guiding Principles of the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- The United Nations Convention on the Rights of the Child and Business Principles

Cellnex Telecom's Human Rights Policy is aligned with and complementary to other Cellnex Telecom internal policies and regulations, such as the Environmental, Social and Governance (ESG) Policy, the Equity, Diversity and Inclusion Policy, the Supplier Code of Conduct, the Code of Ethics, the whistleblower channel and the Corruption Prevention procedure, among others.

4.1. Human Rights due diligence

As part of Cellnex's commitment to embrace, support and respect Human Rights within its sphere of influence, Cellnex integrates a set of core values in the areas of Human Rights,

¹ Cellnex Group: Companies over which Cellnex Telecom, S.A. has or may have direct or indirect control, this consisting of:

- Holding the majority of the voting rights,
- The power to appoint or dismiss the majority of the members of the Board of Directors, or
- Holding the majority of the voting rights by virtue of agreements made with third parties.

labor standards, environment and anti-corruption into the way of operation. In order to have a more holistic understanding of its adverse impacts, Cellnex has assessed its Human Rights risks based on its business relationships along its value chain and how it relates to its stakeholders. The objective of this assessment is to identify the most critical and prioritized actual and potential adverse impacts of Cellnex's context, based on the normative framework of the UN Guiding Principles on Business and Human Rights establishing due diligence as an operating principles. As a result, Cellnex has a broader view in order to prevent and mitigate any negative impact of its activities on Human Rights, integrating cross-cutting and specific actions.

Cellnex has updated its Human Rights Policy, aligning its actions with a Human Rights Based Approach in the identification of risks associated with its activities and business relationships in the Environmental, Social and Governance areas.

5. Lines of action and commitments

Based on these basic principles established in section 4, Cellnex is committed to promoting these values, both at the core of its operations and in its sphere of influence, respecting, supporting, and promoting Human Rights. The main line of actions that Cellnex is committed are:

- **Respect, support and promote Human Rights:** Cellnex has expressed its commitment to various international initiatives, such as the United Nations Global Compact, to promote respect for Human Rights in the business and corporate environment, such as freedom of association, effective recognition to collective bargaining, elimination of all forms of forced and compulsory labor, effective abolition of child labor and elimination of discrimination in respect of employment and occupation. The company also has a ESG Master Plan, whose strategic axes are coherent and aligned with respect of Human Rights.
- **Deployment of the action plans identified in the Due Diligence:** Cellnex promotes mutual respect, equal treatment and compliance with labor rights, encouraging fair employment and working conditions, respect for freedom of association and collective bargaining in its own operations and supply chain. Cellnex has zero tolerance for harassment and discrimination and neither tolerates any form of modern slavery or child labor in its own operations and supply chain, and encourages respect for children's rights, personal development and education. Cellnex takes a Human Rights perspective into account when operating in order to manage these risks.

Based on the conclusions of the Human Rights Due Diligence and Risk Impacts Assessment Cellnex is implementing transversal and specific action plans to prevent and manage risks.

- **Internal and external promotion:** Cellnex promotes values and commitments to Human Rights internally and externally across all areas within its sphere of influence, from its relationships with employees, suppliers, customers, the wider society and the environment where operates. These commitments are made known to all employees of the Cellnex Group through internal communication channels, as well as to the stakeholders through the corporate website and communication plan.

Likewise, the company is committed to promoting policies and behavior based on the principles of diversity and equality, rejecting any type of discrimination based on age, race, gender, religion, disability, sexual orientation, political ideology, or social origin.

6. Human rights and the Sustainable Development Goals (SDGs)

The analysis of the relationship between Human Rights and Sustainable Development Goals (SDGs) to which Cellnex contributes, enables to have a better understanding of the challenges faced by the company, in its efforts to align and reflect aspects such as the existence or not of child labor, the type of relationship with the local population or possible confluences with vulnerable groups, as well as the quality of labor treatment.

Following the four Pillars of the [UN Global Compact](#), the commitment of Cellnex in terms of Human Rights contribute to the following sustainable development goals:

1. EQUAL RIGHTS

Non-discrimination and equal rights



2. LABOR

Extending Cellnex commitment referred to labor along the entire value chain



3. ANTI-CORRUPTION AND BRIBERY

Transparency and access to information



4. ENVIRONMENT

Respect for the environment



1. EQUAL RIGHTS - Non-discrimination and equal rights



- **SDG 1 – No poverty:** Fight against poverty, the company's objective includes the eradication of extreme poverty through the implementation of social protection measures and ensuring equal access for men and women to economic resources. This promotes the right to an adequate standard of living, the right to social security and equal rights for women in economic life.
- **SDG 5 – Gender equality:** Commitment to the right to non-discrimination and gender equality, by eliminating all forms of discrimination and violence against women. Promote the use of information and communication technologies to empower this right, to fair and satisfactory working conditions.
- **SDG 10 – Reduced inequalities:** Integration of good business practices to endorse the reduction of social, political and economic inequalities in its outcomes. Promoting the elimination of discriminatory laws, policies and practices and the adoption of fiscal, salary and social protection guidelines to achieve equality.
- **SDG 12 – Responsible consumption and production:** Ensure equal access to communications for the society, promoting a fair and sustainable management and an adequate standard of living.

2. LABOR - Extending Cellnex commitment referred to labor along the entire value chain



- **SDG 4 – Quality education:** Respect the right to education is guaranteed through specific and transversal actions to promote access to inclusive, equitable and quality education.
- **SDG 8 – Decent work and economic growth:** Promoting decent working conditions and economic growth, creating jobs that encourages the realization of social and economic dimensions of sustainable development.
- **SDG 9 – Industry, innovation and infrastructure:** Promoting the right of access to information, infrastructure, and adequate resources. Seeking to build a resistant and resilient infrastructure, raising inclusive and sustainable industrialization and fostering innovation.
- **SDG 17 – Partnership for the goals:** Contributing to the sustainable development of alliances for the goals.

3. ANTI-CORRUPTION AND BRIBERY - Transparency and access to information



- **SDG 16 – Peace, justice and strong institutions:** Boosting peace, justice, and solid institutions in the development of its economic activity, while contribute to substantially reducing corruption and bribery in all its forms. Promoting the development of effective, responsible, and transparent institutions by integrating diligent conduct.

4. ENVIRONMENT - Respect for the environment



- **SDG 7 – Affordable and clean energy:** Achieve more affordable, sustainable and clean energy in the operations.
- **SDG 13 – Climate action:** Commitment to fight against climate change aiming to facilitate the transition to renewable energies and prevent the adverse impacts. Promoting an environmental dimension of sustainable development that enhances an adequate standard of living.

7. Whistleblowing channel and remediation

Cellnex's internal and external stakeholders may report any case of non-compliance with the Code of Ethics, including Human Rights breaches, in which Cellnex or any of its representatives are believed to be involved. Complaints may be reported through the internal and publicly available complaint channel outlined in the Code of Ethics. Cellnex aims to provide or cooperate in the mitigation or remediation of negative impacts on Human Rights when economic activity has caused or contributed to them and seeks to play a role in the management of adverse impacts on human right that are directly related to its operations, services, or business relationships.

Complaints received through the whistleblower channel will be managed by the Committee of Ethics and Compliance, the Group's body responsible for proactively ensuring respect for business ethics and integrity and the effective operation of the Cellnex compliance system. These reports will be confidential and anonymous. Given the importance of the whistleblower channel as a powerful communication tool for reporting irregularities of potential importance by employees and stakeholders of the Cellnex Group, the company works continuously to improve this mechanism according to the United Nations Guiding Principles on Business and Human Rights, and relevant applicable legislation.

8. Implementation and monitoring

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 this 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.

9. Communication and transparency

Cellnex is committed to sharing its progress on the observation and implementation of the Human Rights Principles on a regular basis with both internal and external stakeholders, upholding the principle of transparency.

Cellnex monitors, and reports annually, on the progress of these Human Rights commitments and the integration of these principles throughout its operations and value chain in the Integrated Annual Report.

10. Changes Control

Version	Elaborate by	Department	Validity	Changes
1	Marissa Serrahima	Corporate & Public Affairs	14/03/2019	New Policy
2	Andrés Toribio	Risk Management	24/03/2022	Update

Madrid, 24 March 2022.