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Supplier Code of Conduct

Prepared by	Ruth Collado; Marissa Serrahima; Anna Villa; Jordi Basañez
Approved by	Sergi Nuñez
	Sergi Tórtola

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1. Background

Cellnex has sustainability as a strategic priority and is committed to creating sustainable and distributed value for stakeholders as part of its business model.

Thus, with this Supplier Code of Conduct ("Code") Cellnex wants to establish a framework of trust and collaboration with its chain of suppliers ("Suppliers") as independent organisations that have a direct impact on the Cellnex value chain, resulting in the continuous improvement of purchasing processes establishing lasting and stable business relationships.

The purpose of this Code is to serve as a guide for compliance by the Cellnex supply chain with the Group's set of established principles of action and values.

2. Purpose and scope

2.1 Purpose

The purchasing process is key for the company due to its high economic, environmental and social impact. Cellnex in this Code includes and promotes some principles of action to reinforce prevention in the materialisation of risks related to the principles of Sustainability.

This Code aims to bring together in a single document the basic references to the set of principles, rules and policies of the Cellnex Group, which must be a reference for Suppliers, in the following areas:

- Ethics and integrity,
- Environment and climate change,
- Human rights,
- Diversity and non-discrimination,
- Working conditions and remuneration,
- Safety and health,
- Information security,
- Risk management,
- Business continuity.

2.2 Scope

The rules referenced and included in this Code are mandatory for all Cellnex Group Suppliers as they fall within the scope of the Code of Ethics and the other rules, regulations and policies that make up the regulatory framework for ethics and compliance of the Cellnex Group.

For this purpose, the following definitions are established in this document:

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- *Cellnex Group / Cellnex*: Companies in which Cellnex Telecom, S.A. directly or indirectly has, or may have, control.
- *Stakeholders-Suppliers*: understood as both direct suppliers and those third parties that are related to Cellnex as members of a business alliance, contractors and subcontractors, consultants and advisors, distributors and intermediaries, and any other similar situations existing within the framework of the Cellnex Group Purchasing process.

3. Normative areas and references

3.1 Ethics and integrity:

a) Basic references:

- Code of Ethics [[link](#)]
- Corruption Prevention Procedure [[link](#)]

b) Basic principles

The Cellnex Group Code of Ethics is the set of rules that, systematically and explicitly, reflect the principles of action established for persons subject to the Cellnex Group. The objectives of the rules are: (i) Establish general guidelines for action and behaviour. (ii) Define a reference ethical framework of mandatory compliance, which must govern the work and professional behaviour of the persons subject to it (iii) Create reference rules of conduct for those stakeholders that are related to any of the Cellnex Group companies (collaborators, suppliers, customers, shareholders, partners, etc.).

In addition to the above, and in the specific area of the fight against corruption, the Corruption Prevention Procedure is based on the following basic principles to be respected and complied with by Suppliers: (i) *Zero tolerance*: Not to allow any type of corruption, extortion or bribery in the performance of business activities. To this end, to promote a preventive culture based on the principle of "zero tolerance" for corruption in business and the commission of illicit acts. (ii) *Culture of integrity*: To integrate and coordinate the control and compliance mechanisms necessary to prevent and combat the possible commission of illegal acts or irregular situations or fraud. (iii) *Legality*: To act at all times pursuant to law and in accordance with the provisions of the Code of Ethics and other internal rules of Cellnex.

Cellnex, in compliance with national and international provisions issued to prevent money laundering, also will not establish business relationships with Suppliers that do not comply with the aforesaid regulations or that do not provide adequate information regarding compliance therewith.

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3.2 Environment and climate change:

a) Basic references: [Link to Environment and Climate Change Policy \(cellnex.com\)](#)

b) Basic principles

Cellnex is committed to comprehensive sustainability management and the fight against climate change, which is a strategic priority and a transversal commitment for the company.

Therefore, Cellnex expects its suppliers to assume this commitment to sustainability and the fight against climate change, with the aim of conducting their activities seeking and promoting a balance between profitability, social development and the reduction of adverse environmental impacts.

Cellnex suppliers must comply with environmental legislation in each of the countries in which they have a presence. This includes compliance with international declarations, conventions and treaties, as well as applicable national, regional and local regulations. Likewise, Suppliers must comply with the Cellnex Environment and Climate Change Policy, as well as the voluntary requirements adopted by the Cellnex Group in environmental matters. Additionally, it is recommended that each Supplier have its own Environmental Policy that includes its commitments reached in terms of integral sustainability management and the fight against climate change, compliance with the respective applicable laws and the identified continuous improvement plans.

In addition, Suppliers shall be responsible for:

- Identifying, understanding, preventing, mitigating and compensating the environmental impacts generated by their activities.
- Having preventive measures in place to avoid or minimise contamination as well as possible impacts on habitats and species, protecting biodiversity in the performance of their activities.
- Integrating carbon management into their environmental policies, measuring the carbon footprint generated by their activities and setting emission reduction targets.
- Adopting circular economy criteria in the organisations' activities, such as life cycle analysis, sustainable use of resources, eco-design, asset life extension and waste minimisation and management.
- Promoting energy efficiency and increasing the use of renewable energies.
- Applying sustainable criteria in the contracting and monitoring of suppliers, extending these good practices to their own supply chains.
- Acting respectfully vis-à-vis society and affected stakeholders in the activities carried out for the Cellnex Group, avoiding situations that have or may have negative consequences on the environment, people's health or the balance of natural systems.

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3.3 Human Rights:

a) Basic references: Link to [Human Rights Policy \(cellnex.com\)](#)

b) Basic principles

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, requiring them to respect, support and promote Human Rights based on:

- Principles of the United Nations Global Compact.
- Guiding Principles on Business and Human Rights (United Nations).
- Fundamental Conventions of the International Labour Organisation (ILO).
- OECD Guidelines for Multinational Enterprises.

In this sense, Cellnex will require the commitment of its Suppliers in aspects such as:

- Ensuring decent working conditions for their employees.
- No discrimination, direct or indirect, for reasons of sex, age, race, religion, or sexual orientation among others, thought, education, social condition, culture, work style, talent, individual quality or special needs such as illness, disability, accident or family situation.
- Providing equal opportunities to promote equity.
- Guaranteeing occupational health and safety, ensuring that there are working conditions that allow workers to carry out their activities safely, guaranteeing that all safety, hygiene, water access, electricity and ventilation measures are in place in accordance with the standards set by the legislation in force in the country of application.
- Respecting trade union and collective bargaining rights, in accordance with the legislation in force in the country of application, without this implying any kind of prejudice.
- Preventing any type of harassment.
- Eliminating the use of forced or child labour.

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.

3.4 Working conditions and remuneration:

a) Basic principles

Cellnex is firmly committed to ensuring compliance with the working conditions established in each country where it operates.

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In this regard, Suppliers who wish to work with Cellnex must comply with the law in force in each country in terms of remuneration, reaching at least the minimum wage established and always respecting working hours, which must not exceed what is established by law.

Likewise, Suppliers shall provide the means for their workers to understand their working and contracting conditions, detailing all the necessary information in writing if necessary.

Similarly, Suppliers must comply with current legislation in the event of termination of any of their employees, respecting the established minimum notice periods, as well as any other point.

3.5 Diversity and non-discrimination:

a) Basic references: Link to the [Equity, Diversity and Inclusion Policy \(cellnex.com\)](#)

b) Basic principles

Cellnex is committed to Equity, Diversity and Inclusion in the workplace, and extends this commitment to all its Suppliers through the Equity, Diversity and Inclusion Policy, which consists of five matters:

1. Gender diversity: promoting parity of opportunity and fostering gender equity.
2. Generational diversity: contributing to the labour integration and coexistence of different generations.
3. Affective-sexual diversity: ensuring an inclusive environment for all employees, regardless of their sexual orientation or identity.
4. Cultural diversity: valuing, respecting and taking advantage of cultural differences as a source of added value.
5. Functional diversity: valuing the unique potential of people with different abilities and harnessing their talents.

In this sense, Cellnex will ensure the commitment of its Suppliers in promoting diversity and non-discrimination.

3.6 3 Health and safety:

a) Basic references: Link to the [Occupational Health and Safety Policy \(cellnex.com\)](#)

b) Basic principles

Guaranteeing protection of the life and physical integrity of people is one of the objectives of the Cellnex Group, which is why the company involves its suppliers in its Occupational Safety and Health (OSH) Policy, with the mutual objective of creating working environments that meet the required levels in terms of OSH. The implementation of the OSH Policy ensures:

- Promotion and protection of the health and well-being of all personnel.
- Facilitation of a safe and healthy work environment.

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- Ensuring the safety of all employees and any person present at Cellnex facilities.

Throughout the value chain Cellnex establishes specific commitments regarding the responsibility of Suppliers, involving all workers to monitor their own health and safety and that of people who may be affected. Therefore, Suppliers shall be responsible for:

- Complying with established OSH standards, procedures and policies, ensuring the performance of assigned tasks in a safe manner, using equipment, materials and PPE correctly.
- Taking the necessary measures and making resources available to eliminate hazards and reduce risks associated with the safety and health of personnel.
- Not altering the operation of or interfering with devices that are provided to safeguard their safety and health.
- Communicating any relevant OSH issues within the organisation, especially any serious and imminent hazards and defects in protection systems.
- Maintaining safe and healthy working conditions in each of the workplaces in such a way as to prevent both injuries and work-related health deterioration.
- Collaborating for the improvement of OSH.

3.7 Information Security:

a) Basic references: Link to Information Security Policy (cellnex.com)

b) Basic principles

Information is a very important asset for Cellnex, and it is necessary to guarantee the confidentiality, integrity and availability of this information in accordance with the recognised standards of Information Security management in the provision of the service as an operator of Telecommunications infrastructure to Operators, Broadcasters, Public Administrations and Local Authorities.

Therefore, Cellnex adopts the measures contained in its Information Security Policy to identify and protect information assets against unauthorised access, modifications, communications or destruction, whether intentional or accidental, ensuring that they are used only for purposes approved by the Group.

In connection with the foregoing, Suppliers must sign, whenever required by Cellnex, the corresponding confidentiality and data protection agreements in accordance with the applicable data protection regulations.

Additionally, Suppliers commit to:

- Comply with data protection, privacy and information security laws applicable in the countries in which they operate.
- Protect and respect all Cellnex intellectual property rights.

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- Not use, in any case, the information provided to them for any purpose other than that for which it was provided to them.

3.8 Business Continuity

a) Basic principles: One of Cellnex’s main priorities is to guarantee Business Continuity and the continuity of the services provided to its customers.

Cellnex identifies, evaluates and establishes plans for the handling of risks related to its suppliers, as well as the criteria to ensure the continuity of the service or products provided and extends them to its suppliers through:

- the requirements specifications in bids and contracts,
- audits of critical suppliers for business continuity,
- and common business continuity tests.

Cellnex suppliers must be aware of the business continuity requirements established with Cellnex and ensure that they can meet them through Cellnex’s evaluation of the services/products provided.

3.9 Risk Management

a) Basic principles

Cellnex has established a Risk Management Model based on anticipation, independence, commitment to the group’s business objectives and the involvement of all stakeholders. Through risk management, Cellnex identifies, evaluates and establishes risk mitigation plans related to the basic principles of this Code, which are essential for the proper development of Cellnex’s business.

In this regard, Cellnex suppliers must analyse and evaluate the risks related to the services provided to Cellnex and implement the necessary actions to mitigate them.

4. Compliance with the Supplier Code of Conduct

As indicated above, the content of this Code falls within the framework established by the Code of Ethics and Corporate Policies defined by Cellnex and represents only minimum standards of action, which must be subject to and complemented by due compliance by Suppliers with any applicable legislation, as well as updates and internal regulatory developments of the Cellnex Group itself.

In order to facilitate its implementation and promote knowledge of and compliance with the commitments established in this Code, it will be made available to them on the Supplier Portal and in those other spaces enabled for this purpose in their corresponding digital resources. In

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addition, any Supplier that so requests shall be provided with the necessary information in connection with the requirements set forth in this Code.

5. Complaints channel ("Ethics Channel")

The Cellnex Group, in its mission to foster a strong culture of compliance, has implemented a Complaints Channel, the "**Ethics Channel**".

The Ethics Channel is a communication tool accessible to all Group employees and stakeholders, including Suppliers, which allows them to confidentially and anonymously report any potentially significant irregularities they may notice within the Group's companies.

Through the Ethics Channel, all subject persons and stakeholders, thus including Suppliers, can:

- Inquire about the interpretation of the Code of Ethics of the Cellnex Group and other applicable internal regulations.
- Communicate conduct that may imply a breach of the Code of Ethics, of internal regulations or, in general, of the laws in force applicable to the Group (among others, crimes and irregularities related to financial, accounting, labour or human rights matters).

Both the people who make up the Cellnex Group and third parties with which the Group is related, thus including Suppliers, must cooperate with the early detection and communication, through the Ethics Channel, of those behaviours that may involve a violation of applicable regulations, especially when such conduct may result in criminal liability for Cellnex.

The Ethics Channel is accessible as follows:

- Through the e-mail canal.ético@cellnextelecom.com, by filling out the form available on the website.
- By mail to the attention of the Chairman of the Ethics and Compliance Committee (Ref. Canal Ético – Passeig de la Zona Franca 105, 08038 Barcelona).

Complaints received through the Ethics Channel will be managed by the Group's Ethics and Compliance Committee, which will evaluate them and decide on the necessary actions to be taken in each case. Such reports shall be confidential and anonymous.

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6. Record of changes

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1	Rut Collado	Procurement	28/01/22	Creation
2	Rut Collado	Procurement	26/05/22	Links updated