

Document title	Anti-slavery and human trafficking statement		
Document Code	UK-COA-POL-0001	Version 1.0	Date 10.06.22

Anti-slavery and human trafficking statement

Organisational structure

Cellnex UK and its subsidiary UK companies are part of Cellnex Telecom, one of Europe's leading wireless telecommunications and broadcasting infrastructures operators. It provides services in Austria, Denmark, France, Ireland, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the United Kingdom. To develop our network and provide infrastructure for wireless telecommunications, we work with a range of suppliers.

Definitions

- Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

- Human trafficking is when people are brought to (or moved around) a country and forced to work, or do other things, they don't want to do.

Traffickers use violence, threats or false promises of well-paid jobs and a better life, to trick victims into working for them, what's known as [modern slavery](#).

Men, women and children of all ages, and from all backgrounds, can be victims of this crime.

Our Commitment

Cellnex UK is committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain, and we impose the same high standards on our suppliers.

“Modern slavery and human trafficking are unacceptable. We have zero-tolerance within our organisation and supply chain and in our relationships with our customers. We are committed to ensuring that such activity has no place in our industry both now and in the future.”

David Crawford (Managing Director of Cellnex UK)

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Our Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

Human Rights Policy (updated in 2022), Code of Ethics Policy, Procedure for the Prevention of Corruption, ESG Policy, Diversity Equity and Inclusion Policy, each of which can be found on our corporate website www.cellnextelecom.com.

We also operate a global Ethical Channel for whistle-blowers to deal with concerns swiftly and accordingly.

Our 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.

The HRBA is the process by which Cellnex collects the basic information it needs to identify which human rights risks can be avoided, mitigated or remedied. This allows the company to model the impact throughout the global value chain, highlighting the needs and expectations of stakeholders as well as involving the different areas of the company. The assessment process helps build a shared responsibility to address the potential impacts of the underlying and structural causes of human rights non-compliance in accordance with stakeholder and community engagement activities. For Cellnex, it is not just a form of compliance, in which the risks do not necessarily have legal consequences, but rather it implies a very high impact on the reputational and social license to operate.

In this regard, Cellnex signed in 2018 a Corporate [Human Rights Policy](#) as an expression of its strong commitment to the internalisation of Human Rights in the fundamental operations of the business, which, following these premises of due diligence, has been updated early 2022. Under this roadmap, Cellnex is committed to promoting and disseminating the ESG policy and best practices based on the principles promoted by the United Nations (UN).

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 regard, since early 2022, Cellnex have the [Supplier Code of Conduct](#) which wants to establish a framework of trust and collaboration with its chain of suppliers as independent organisations that

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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.

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.

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).

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.

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.

Staff Training and awareness

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.

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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.

Value Chain

In terms of the value chain, Cellnex strategy is based on the new strategic purchasing model that is being defined in the company and which is aligned with one of the main axes of the ESG Master Plan 2021-2025, extending our commitment to the value chain, in which a series of actions are defined to be developed in the area of relations with the supply 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.

This statement was approved by the Managing Director

Signature:



David Crawford

Cellnex UK

Date: 10.06.2022