

Anti-slavery and human trafficking statement

Organisational structure

Cellnex UK Limited and its subsidiary UK companies are part of Cellnex Telecom, one of Europe's leading wireless telecommunications and broadcasting infrastructures operators. The group 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.

This anti-slavery and human trafficking statement is made on behalf of each of the subsidiaries of Cellnex UK Limited, of which On Tower UK Limited had an annual turnover of >£36m during the year reported on. The statement is also relevant for Cignal Infrastructure UK Limited from November 2022 when it was acquired by Cellnex UK Limited in November 2022; the company also had an annual turnover of >£36m during the full financial year ended 31 December 2022.

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."

Alfonso Álvarez (Managing Director of Cellnex UK)

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 [Website](#).

We also operate a global whistleblowing channel to deal with concerns swiftly and accordingly.

Human Rights Policy and Due Diligence

Cellnex updated its [Human Rights Policy](#) in March 2022, reaffirming its commitment to protect and respect universally recognised Human Rights within its sphere of influence and to mitigate and repair any damage that may be caused.

To obtain 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.

This assessment aims to identify the most critical and highest priority actual and potential adverse impacts of Cellnex's context, based on the regulatory framework of the UN Guiding Principles on Business and Human Rights, which establish due diligence as an operating principle.

As a result, Cellnex has a broader view to prevent and mitigate any negative impact of its activities on Human Rights, defining and implementing cross-cutting and specific actions. The due diligence is updated every year to deepen the protection of Human Rights. The Summary of the [Human Rights Due Diligence](#) and Assessment Process is available in the corporate website.

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 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. (Further information: https://www.cellnex.com/app/uploads/2022/06/RUL_GR_020_Supplier-code-of-conduct-V2.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.

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 2022, near than 4,000 hours of training were provided in the field of human rights.

Further actions and sign-off

The results of the adverse impact analysis and due diligence exercise are aligned with the results of the previous exercise and confirm, once again, the existence of several thresholds in which Cellnex's economic activity has a potential impact on the infringe of human rights. The adverse impacts detected are monitored together with the rest of the company's business risks and are grouped under the Human Rights risk, which is included in the Corporate Risk Matrix.

The current evaluation process focuses on strengthening the control environment to ensure adequate coverage of each material risk event and identifying opportunities for continuous improvement.

Therefore, carrying out this due diligence process increases Cellnex's ability to understand, assess and address the adverse impacts that its economic activity can generate in the company's natural and social environment, as well as in its commercial interactions. The current assessment reinforces their focus on preventive actions to maximize positive impacts and proactively minimize negative ones.

(For further information:

https://www.cellnex.com/app/uploads/2023/03/Cellnex_-Due-Diligence_Human_Rights_2022.pdf).

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, during 2022, work has been done on the definition of the Risk Integration and ESG model in the supply chain. This project is aligned with the objectives of the ESG Master Plan for the year 2022. Therefore, together with different areas (Legal, Health & Safety, Security, Sustainability and Quality and Risk Management) the risks associated with the supply chain have been defined, the suppliers have been categorized and a management model has been defined for the inclusion of ESG and risks criteria in the contracting, approval and evaluation of suppliers.

Likewise, during 2022, as in the last two years, the ESG supplier evaluation campaign was again carried out using the Ecovadis platform. For 2022, the supplier categorisation criteria have been taken into account to ensure that all the Group's main suppliers have been assessed by Ecovadis. Once the assessment is completed, feedback is given to suppliers and the areas with the highest risk of non-compliance have been identified.

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 is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Cellnex UK Limited, On Tower UK Limited and Cignal Infrastructure Limited for the financial year commencing 1 January 2022 and ending 31 December 2022.

This statement was approved by the Boards of each of the relevant companies on

Signature: 
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Director

Cellnex UK Limited, On Tower UK Limited and Cignal Infrastructure UK Limited

Date: 27 de junio de 2023