

Slavery and human trafficking statement 2024

Modern slavery is a gross violation of human rights, involving such issues as forced labour, bonded labour, human trafficking 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](#).

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

Cellnex is the main infrastructure operator for wireless telecommunication in Europe and as such is committed to establishing an efficient, impartial, high-quality telecommunications platform with innovative management practices to propel digitalisation across Europe.

Cellnex has made a firm commitment to developing its network, which at the end of 2023 comprised c. 127.000 sites –including forecast roll-outs up to 2030– and positions the company to develop new generation networks. It currently provides services in Spain, Italy, Netherlands, United Kingdom, France, Switzerland, Ireland, Portugal, Austria, Sweden, Denmark and Poland thanks to the investments undertaken to boost its transformation and internationalisation drive.

Cellnex offers its customers telecom infrastructure services for sustainable connectivity so that customers do not have to manage the infrastructures and networks over which their systems operate. Cellnex's

neutral host approach enhances its efficiency, creating a model that revolves around multioperator sites.

Cellnex's range of services are aimed at ensuring the necessary conditions for reliable and high-quality transmission for both fibre and wireless telecommunications.

It also develops solutions in the fields of Mission Critical Private networks, Connectivity services, Infrastructure management, Smart Cities and Internet of Things (IoT) solutions.

Cellnex, which is listed on the Spanish Stock Exchange, is part of the selective IBEX35 and Euro Stoxx 100 and enjoys outstanding positions on the main sustainability indices such as CDP, Sustainalytics, FTSE4Good, MSCI and DJSI Europe.

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 Group, as part of its mission to foster a robust culture of compliance, has updated its complaints channel, the "Whistleblowing Channel", in 2022, to comply with the EU Whistleblowing Directive and reinforce the confidentiality and anonymity features.

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

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.

While awaiting the publication of the European Union's Human Rights Due Diligence Directive, Cellnex has proactively conducted preliminary assessments. As part of this initiative, the company commits to regularly sharing its progress in adhering to human rights principles with internal and external right holders, thereby prioritising transparency and accountability.

Cellnex voluntarily conducts an annual Human Rights Due Diligence exercise, following the regulatory framework outlined by the OECD and the UN Guiding Principles on Business and Human Rights. The objective of this assessment is to pinpoint the most critical and highest priority actual as well as potential adverse impacts across Cellnex's entire value chain.

In 2023, Cellnex sought to proactively improve upon previous analyses by incorporating inputs from the recent CSRD GAP Analysis. This exercise provided a holistic view of the organisation's operations, identifying overlaps and gaps in human rights

considerations within the broader context of sustainability

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.

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.

Cellnex adopted a [Supplier Code of Conduct](#), that acts as a framework of trust and cooperation for the Organisation with its value chain, resulting in the continuous improvement of procurement processes and, establishing long-lasting stable business relationships. As such, the Supplier Code of Conduct 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. 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, Cellnex is committed to controlling risks and effectively managing the impacts of its business relationships with partners, suppliers, and contractors.

In 2023, the model for integrating risks and ESG criteria in the supply chain has started to be implemented. In cooperation with the various areas the risks associated with the supply chain were defined, suppliers were categorised and a management model was defined for the inclusion of ESG and risk criteria in the sourcing, contracting, qualification and evaluation of suppliers.

Likewise, during 2023, as in the last three years, the ESG supplier evaluation campaign was again carried out using the Ecovadis platform. Once the assessment is completed, feedback is given to suppliers and the

areas with the highest risk of non-compliance have been identified.

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 2023, near than 4,000 hours devoted to human rights-related training across the Group.

Further actions and sign-off

The results of the adverse impact analysis and due diligence exercise consistent with those of the previous evaluation, reaffirming the presence of various thresholds where Cellnex's economic activities may potentially impact 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.

It's noteworthy that the actions derived from this assessment align with the commitments outlined in Cellnex's Corporate Human Rights Policy, which was updated in 2022, as well as the commitments made with its stakeholders and global value chain.

Hence, conducting this due diligence process enhances Cellnex's capability to comprehend, evaluate, and address the risk events arising from its economic activities within the company's natural and social environment, as well as in its commercial interactions. The current assessment further strengthens the Group's emphasis on preventive actions to maximize positive impacts and proactively minimise negative ones.

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



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and Compliance