



Sustainability Policy

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1. Background

The Board of Directors of Cellnex Telecom, S.A. (hereinafter, "Cellnex" or the "Company"), is the highest representative body of the entity, responsible for the direction, administration, management and control of the business.

In the exercise of these functions, the Board of Directors of Cellnex is responsible for approving the general policies and strategies of the Group and, therefore, approves this Policy which establishes the framework for the Company's sustainability strategy, in the countries in which it operates, and reinforces its commitment to its application in all the companies controlled by Cellnex ("Cellnex Group" or the "Group").

2. Reference framework

This policy provides guidelines and principles for the management of sustainability matters. It is in line with the European regulations "*Corporate Sustainability Reporting Directive (CSRD)*", and the "*Corporate Sustainability Due Diligence Directive (CSDDD)*", together with other international standards such as:

- 10 Principles of the United Nations Global Compact.
- Paris Agreement on climate change.
- United Nations Guiding Principles on Business and Human Rights.
- United Nations Sustainable Development Goals (SDGs).
- OECD Guidelines for Multinational Enterprises.
- Core Conventions of the International Labour Organisation (ILO).
- European Financial Reporting Advisory Group (EFRAG) Guidelines for the implementation of the European Sustainability Reporting Standards (ESRS).

This policy supports and must be interpreted in conjunction with the Cellnex Code of Ethics, the Suppliers Code of Conduct and other corporate policies, which are mainly the following:

- Environment and Climate Change Policy,
- Energy Policy,
- Human Rights Policy,
- Occupational Health & Safety Policy,
- Equity, Diversity and Inclusion Policy,
- Global Risk Management Policy,
- Business Continuity Policy,
- Global Quality Policy,
- Procurement Policy,
- Tax Policy,
- Personal Data Protection Policy,
- Information Security Policy,
- Stakeholder Engagement Policy
- Policy on the communication of financial, non-financial and corporate information and contacts with shareholders, institutional investors and proxy advisors,
- Policy for the Whistleblowing Channel

3. Purpose and scope

3.1. Purpose

Digital connectivity is essential to drive sustainable development. To unlock the opportunities of digital connectivity Cellnex provides and manages wireless telecommunications infrastructures that are efficient and sustainable. As an industrial group, Cellnex facilitates access to neutral and shared infrastructures that enable the connectivity of people and territories, thus driving digitalisation in Europe.

The purpose of Cellnex is to create endless opportunities to bring the world closer through telecom connectivity.

Sustainability is one of Cellnex's core values, along with commitment, integrity, inclusion and intrapreneurship.

The purpose of this policy is to establish the basic guidelines and lines of action for the integration of environmental, social and governance factors into the strategy of Cellnex, to measure and manage the impact on society and the environment and to extend this commitment throughout the value chain.

3.2. Scope of application

This policy outlines Cellnex's overarching approach to environmental, social and governance issues that must be met by all companies operating under the Cellnex Group umbrella.

4. Basic principles

The Company adopts and promotes the following basic principles:

- **Integrity and transparency:** Showing who we are, acting with integrity
- **People first:** Providing a safe working environment, nurturing talent and diversity
- **Protecting the environment:** Providing telecommunications infrastructure with a long-term environmentally sustainable approach
- **Responsible value chain:** Extending our sustainability commitments to the value chain
- **Innovation:** Harnessing the power of new technologies to manage our infrastructures
- **Social value:** Being a facilitator of social progress through resilient connectivity solutions
- **Stakeholder engagement:** Working with our stakeholders to create value

5. Lines of action

Based on the above principles, the lines of action and commitments in this policy are established in accordance with the company's strategy.

The lines of action and commitments set out in this policy support the United Nations Sustainable Development Goals (SDGs) and the principles of the Global Compact in the areas of human rights, labour regulations, environment and anti-corruption.

5.1. Conduct a responsible business

Establish guidelines on relevant environment, social and governance issues, such as:

- Environment; environmental management, climate change mitigation and adaptation, energy management, protection of natural capital and biodiversity, and efficient use of resources.
- Social; human rights, working conditions, health and safety, talent management, diversity, equal opportunities and social innovation and support to vulnerable groups.
- Governance; ethical behaviour, corporate governance best practices, anti-bribery and anti-corruption, tax compliance, business continuity, information security and supply chain management.

5.2. Comply with regulations

Ensure compliance with applicable laws in all jurisdictions in which Cellnex operates. Periodically review the effectiveness of the procedures and control systems designed to prevent compliance risks in its activities.

5.3. Integrate sustainability in the operations

Integrate sustainability into all processes of the Cellnex industrial model, involving all areas of the business, ensuring the availability of the necessary resources and taking into account the needs and expectations of stakeholders. Communicate this culture to customers, suppliers, partners and other stakeholders.

5.4. Manage sustainability risks and opportunities proactively

Consider sustainability risks and opportunities when developing strategies and making decisions. Have a risk management system in place to ensure that the necessary tools are available to identify, assess and monitor risks and opportunities of all types.

5.5. Consider the impact of the company on people and environment

Consider the impact of Cellnex on its own employees, value chain employees, local communities, and society as a whole.

Reduce and avoid greenhouse gas emissions to mitigate climate change. Promote energy efficiency and support energy transition.

Create social value in the short and long term maximising positive impacts and minimising negative impacts on people and on the environment. Promote the universal access to telecommunications and the use of technology as a mechanism to reduce inequalities.

6. Management responsibilities

The ESG department is responsible for ensuring compliance with this policy, with the input from the Corporate and Business Units of the company and in collaboration with the ESG Committee. Cellnex is committed to applying a continuous improvement approach to its sustainability management. To this end the sustainability objectives will be established and periodically reviewed to monitor the implementation of the company's sustainability strategy.

7. Communication and transparency

Cellnex is committed to sharing its progress in complying with and applying the principles of this policy with all internal and external stakeholders on a regular basis, in accordance with the principle of transparency. To this end the company will publish sustainability performance indicators included in the company reports in accordance with European reporting standards and international regulations.

Cellnex will promote awareness of and compliance with the commitments set out in this policy, which will be permanently available on the website.

8. Approval, monitoring and control

Among the responsibilities of the Board of Directors of Cellnex Telecom is the approval of the corporate policies and, consequently, of the Sustainability Policy.

The Nominations, Remunerations and Sustainability Committee is the body responsible for periodically monitoring the level of application and development of this policy.

8th November 2024