



cellnex[®] 2024

Tax Reporting

Driving our tax commitment

Introduction

In 2016, the Board of Directors of Cellnex Telecom, SA (Cellnex) approved the “Tax Strategy” intended to serve as a set of guiding principles for regulatory compliance which address the Group’s tax obligations in the different territories where it operates. It is also intended to foster the Group’s relationships with tax administrations based on the principles of transparency, good faith, loyalty, and mutual trust.

In 2021, as a result of the Group's international growth and the evolution of the international tax environment, the Board of Directors of Cellnex decided to update the Group's guiding principles on tax matters and approved a new document titled “Tax Policy” to replace the document approved in 2016. The change of name also reflects the fact that the concept of a Strategy must be understood as the set of elements that govern an activity and that it is, therefore, a broader concept than just a Policy.

One of the fundamental principles of the Cellnex Group reflected in both documents is collaboration and cooperation with the tax authorities, as well as the commitment with all the stockholders to create from a tax point of view added value for the society, through the direct and indirect tax contribution.

In this regards, the next step to achieve the best practice in tax transparency is to publish this Public Tax Reporting which collects all the relevant tax information that the company usually provides within different reports.

At Cellnex, we believe that this also increases transparency and trust in our relations with the society.



About Cellnex

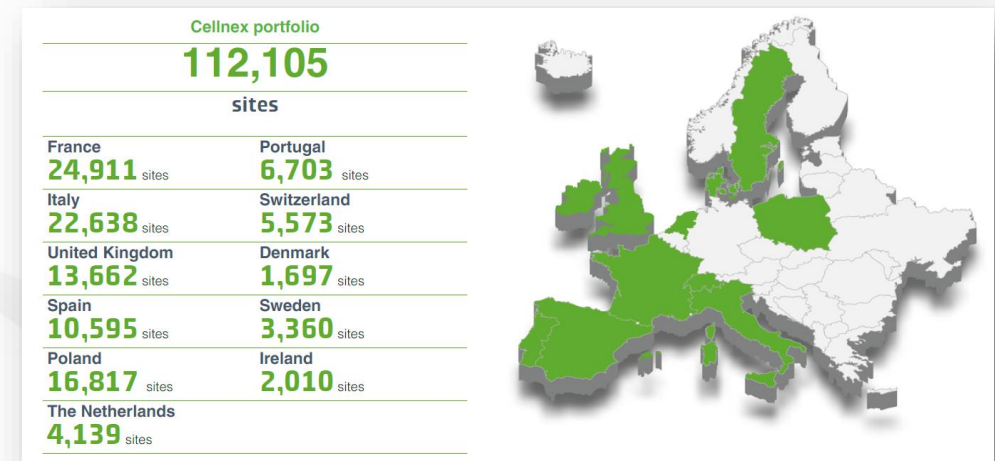
Cellnex is the main neutral and independent infrastructure operator for wireless telecommunication in Europe, focused on neutral and shared management. It has a portfolio of 112,105 sites located in 11 European countries located in France, Italy, United Kingdom, Spain, Poland, the Netherlands, Portugal, Switzerland, Denmark, Sweden, and Ireland ¹.

Cellnex offers its customers telecom infrastructure services for sustainable connectivity, so that they do not have to manage the infrastructures over which their systems operate. Cellnex's neutral host approach enhances its efficiency, creating a model that revolves around multi-operator sites.

The Group's goal is to offer a multitude of opportunities to bring the world closer together through connectivity, guided by the values of **Integrity**, **Commitment**, **Inclusion**, **Intrapreneurship** and **Sustainability**.

These are the business line services provided by Cellnex:

- **Towers:** a wide range of integrated network passive infrastructure services to enable access to the group's telecom infrastructure by telecommunications and broadband network operators to offer their own services to their customers by means of macrocells active equipment.
- **DAS, Small Cells and RAN-as-a-Service:** infrastructure required to tackle coverage and capacity issues in challenging scenarios where macro-cells cannot fully provide the expected performance.
- **Fibre, Connectivity & Housing Services:** data transport through fiber including fibre-to-the-tower, connectivity, backhaul transmission and hosting services in edge data centres infrastructure.
- **Broadcast:** distribution and transmission of television and radio signals, operation and maintenance of broadcasting networks, provision of connectivity for media content and over-the-top broadcasting services and other services.



¹ Austria was part of the Cellnex Group until 19 December 2024.

Message from the Chief Financial Officer

2024 has been another year of transformation for Cellnex, as the company continues to implement the strategic roadmap defined at the end of 2023 and presented in our Capital Market Day in March 2024. Significant progress has been made, and key appointments within the Senior Management team have further strengthened our ability to execute this vision.

From a tax function perspective, it remains essential to emphasize that these changes do not and will not alter Cellnex's unwavering commitment to transparency and responsibility as a taxpayer. Taxes continue to be a fundamental pillar of our ESG framework, reflecting our dedication to ethical and sustainable business practices.

As we move forward, we remain fully aligned with the United Nations Sustainable Development Goals. Our responsible tax practices play a key role in fostering economic stability and ensuring the fair distribution of wealth, contributing to decent work and economic growth. Through our contributions, we help fund critical public infrastructure and services, supporting innovation and long-term economic resilience. We are committed to strengthening institutions by promoting accountability, anti-corruption efforts, and fair governance, reinforcing our dedication to peace, justice, and strong institutions.

Our responsibility as a taxpayer is not just about compliance; it is about commitment. Commitment to sustainable growth, to ethical business conduct, and to the societies in which we operate. As a testament to this dedication and our drive for continuous improvement, we present this Annual Tax Reporting, which outlines our approach to tax responsibility and transparency. The following pages provide a comprehensive overview of the key elements that define our tax strategy and governance.

Raimon Trias

Group Chief Financial Officer



*"We are embarking on the next chapter of Cellnex's growth, building on the strong fundamentals since our IPO in 2015. Guided by a strong commitment to our customers, our shareholders and **sustainability**, we are now focused on improving efficiency, simplifying our portfolio and business, and capturing key growth opportunities," highlights essential growth opportunities"*

Marco Patuano
Chief Executive Officer
Capital Markets Day

Tax strategy: our key pillars

Tax Policy

The Tax Policy applies to all Group companies and all employees, as well as to the members of the Board of Directors and Senior Management and is also available to stakeholders on the Group's website.

The Tax Policy is based on the following principles:

- **Regulatory compliance and tax risk prevention.**
- **Economic substance**
- **Transparency and cooperation with Tax Administrations**

The Cellnex Group's **Audit and Risk Management Committee** is responsible for reviewing the Tax Policy periodically and making recommendations or proposals to the Board of Directors for any changes or improvements it deems necessary.

Also is responsible for evaluating its effectiveness and adopting the appropriate measures for its proper operation, reporting its findings to the Board of Directors.

Tax Governance

The **Tax Compliance Committee** will ensure proper compliance with the Tax Policy by establishing the necessary internal control mechanisms and rules, reporting thereon to the Audit and Risk Management Committee.

The Tax Compliance Committee is structured as a collegiate body composed of a Chairperson (as independent), three members and a Secretary (the latest without voting rights).

The role of Chairman, appointed by the Board of Directors of Cellnex Telecom on the recommendation of the Audit and Risk Management Committee, is held by a person external to Cellnex with vast experience and recognised prestige in the field of taxation, whether in the public or private sector.

The members are the Chief Financial Officer of the Group, the Global Tax Director and the Head of Corporate Risk Management.

This collegiate structure, chaired by a third party outside the Cellnex Group, guarantees the independence, integrity, commitment and competence, and ensures that its decisions are adopted independently.



Relationship with Tax Authorities

Tax Transparency

One of the fundamental principles of the Cellnex Group is the collaboration and cooperation with the tax authorities.

In this regard, on 18 December 2020, Cellnex Group informed its intention to adhere to the Code of Good Tax Practices in Spain, as compromise of tax transparency and collaborative approach.

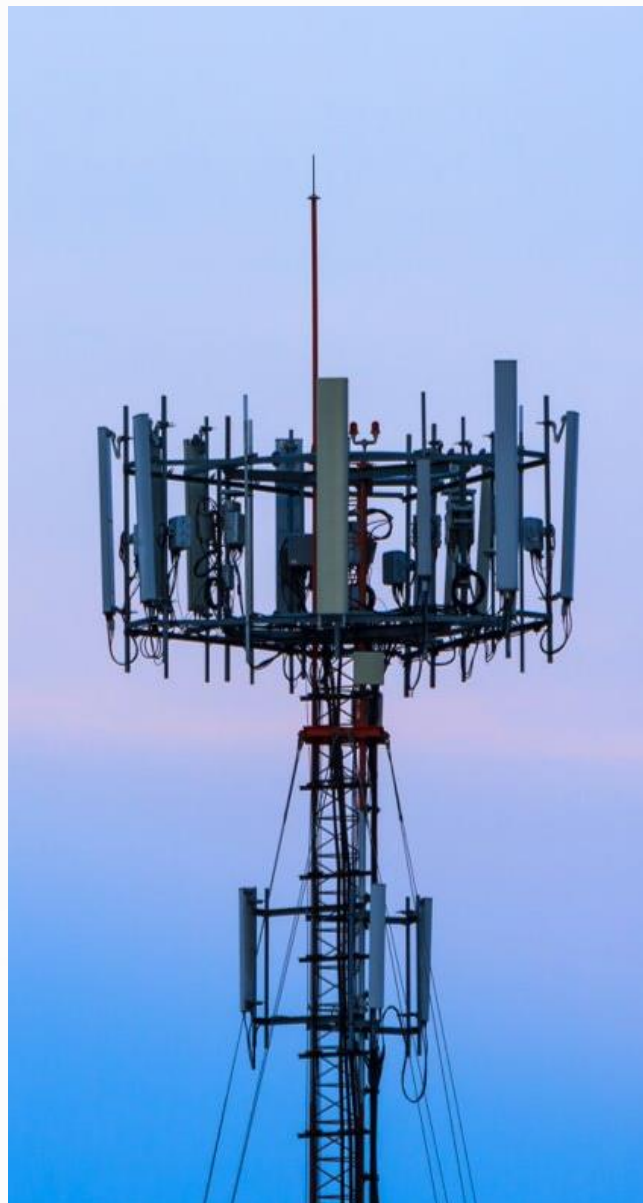
Since then, Cellnex has been preparing an annual Tax Transparency Report. The Cellnex Group believes that adhering to the Code of Good Tax Practices necessarily entails the submission of this document which provides comprehensive tax-related information. Indeed, adherence to the Code of Good Tax Practices must be accompanied by a sign of goodwill on the part of the taxpayers who choose this option, which is why, following the recommendation, the Cellnex Group presents this document every year from 2020.

On the other hand, Cellnex has achieved the maximum recognition from transparency point of view, for the Spanish listed companies, after reviewing the public tax information by Fundación Haz, an independent foundation focused on transparency matters.

Tax Cooperation

In line with that established in the Group's Tax Policy, Cellnex is aware of the importance of following the principle of responsible legislative compliance and uses all the means provided by the Tax Authorities to reach this purpose.

In this sense, on 19 February 2024 Cellnex requested for an Advance Pricing Agreement (APA) together with the Spanish Tax Authorities regarding the valuation methodology of the fee charged to the Group entities running the towering business. Cellnex and the Spanish Tax Authorities continue to analyse and negotiate this APA procedure.



We do not engage in aggressive tax planning or artificial structuring that lacks business purpose or economic substance.

Our industrial role, governance model and business structure conduct our tax activities, accompanied with the clear understanding, and disclosing the facts and circumstances to the tax authorities. If jurisdictions offer public tax incentives, they are carefully considered. Conversely, we refrain from discretionary tax arrangements.

The Group try to generate value for each stakeholder through the balance between the legitimate fiscal interest and the interest of the Group in a practicable and legally secure tax law.

For this reasons, we pay taxes in the jurisdictions where we operated based on the value created there and the economic reality of our business

Non Cooperative Tax Jurisdictions

There are no Cellnex Group companies in countries classified as non-cooperative jurisdictions, as identified by list of non-tax cooperative regimes issued by the European Union.

However, if the Group were to operate in such jurisdictions, the Cellnex Group's own Tax Policy establishes controls and limitations prohibiting from operating in non-cooperative jurisdictions for the purpose of avoiding the tax obligations that would otherwise be applicable and from using opaque and/or artificial structures, processes or systems designed to prevent the tax authorities from knowing who is ultimately responsible for the business activities or who is the actual owner of the assets or rights involved. The potential existence in the future of Cellnex Group companies in these territories would only be possible for business reasons.

Transfer Pricing (TP)

All the Group related party transactions have an organizational and economic rationale and are measured in accordance with the OECD TP Guidelines and the arm's length principle.

The economic analysis of the transactions detailing the TP policy applied in each case is included in the relevant Local File, that is disclosed to the relevant tax authorities, when required.



Tax Audits

Spain

- **May 2024:** General tax audit proceedings initiated in relation to the Corporate Income Tax (CIT) of Cellnex Telecom, S.A. (Spanish tax group) relating to periods 2019 to 2022, as well as Value Added Tax and Withholding Taxes relating to periods from May 2020 to December 2022. Procedure at an initial stage. No material impact expected to arise.

France

- **June 2024:** General tax audit for Ivory and On Tower France (2021-2023).
- **December 2024:** 2021 audit closed with immaterial impact; 2022 and 2023 are still ongoing but no material findings are expected.

Italy

- **February 2025:** Cellnex Italia received a request for clarifications regarding transactions with CK Hutchison Networks Italia (2019-2022).

Tax Litigations

Spain

- **July 2018:** Initiation of general tax inspection for CIT (2015-2016) and VAT (2015-2016).
- **January 2021:** Cellnex appealed VAT assessments to the Economic-Administrative Court, securing a bank guarantee.
- **August 2023:** Court rejected Cellnex's claims; appeal filed with the National High Court in October 2023.

Netherlands

- **December 2021:** Dutch Tax Authorities issued initial assessments on Real Estate Transfer Tax for 2016 acquisitions.
- **January 2025:** First Instance District Court ruled in favor of tax authorities; Cellnex to continue litigation at the Court of Appeal.

Total Tax Contribution and Sustainability

In 2024, the Cellnex Group contributed a total of **€560 million** in respect of tax payments, levies, rates and similar. The amount of taxes paid in 2023 was of €466 million.

According to the OECD methodology, this amount can be broken down as follows:

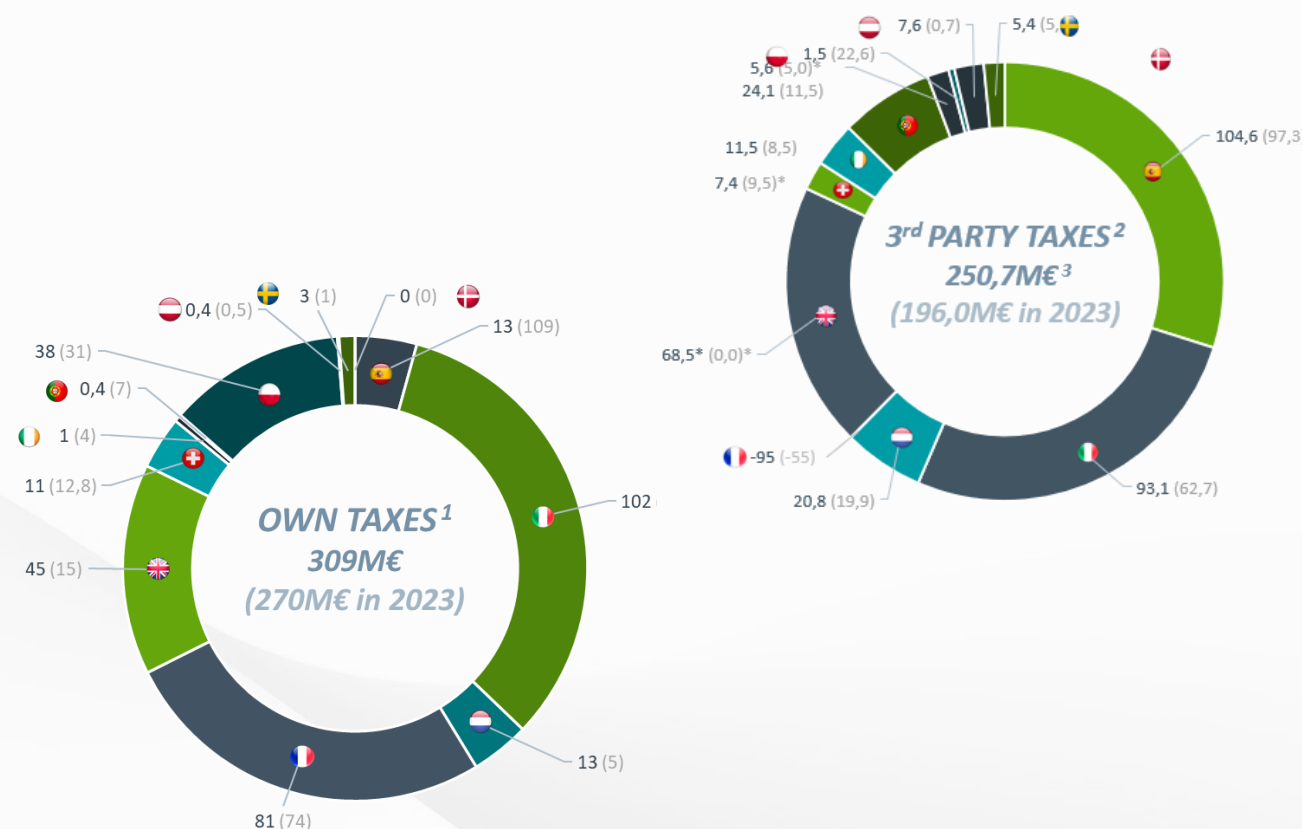
- (i) Own Taxes¹: €309M
- (ii) Third Party Taxes²: €251M

As it can be shown opposite, the amount of Own Taxes has been higher than the amount of this concept in 2023. The amount of Third Party Taxes has been also higher than the amount of this concept in 2023.

As established in the Tax Policy of the Group, Cellnex is committed to the attainment of the Sustainable Development Goals established by United Nations, the aim of which is to eradicate poverty, protect the planet and ensure the prosperity of all mankind as part of a new sustainable development agenda. Specifically, the goals which are directly linked to taxation are goals Eight (decent work and economic growth), Ten (reduction of inequalities) and Seventeen (partnerships as a means of achieving goals), although the Group is committed to them all.

The tax contribution by Cellnex pursues the accomplishment of the above.

In 2024 Cellnex Group paid into the Treasury a total amount of 560M€



(1) Own taxes include CIT, Social Security (company), Radio Spectrum Tax and other autonomic, and local taxes.

(2) Third-party taxes include Social Security (employees), withholding tax on salary payments, VAT, and other withholding taxes (over real estate, capital income, etc.).

(3) FR had VAT refunds worth 99M€ (55M€ in 2023). UK and PT had refunds in 2023, but due to a change of VAT reporting criteria they were not considered.



Measures for ensuring a global minimum level of taxation

The OECD's/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS) published the Pillar Two regulatory framework, designed to address the tax challenges arising from the digitalisation of the global economy.

The legislation has entered into force for the Group in the financial year beginning January 1, 2024 and, given the countries that have transposed or committed to transpose the legislation, the Group has carried out an assessment of the potential impact that the Complementary Tax (Pillar Two) may have.

The analysis of Transitional Safe Harbours is based on the 2024 Qualified Financial Statements, i.e. the reporting package and accounts used to prepare the Consolidated Financial Statements of Cellnex Telecom, S.A. and Subsidiaries. The Group has carried out an analysis as of December 31, 2024 and does not have a material exposure to the complementary tax of Pillar Two, applying the transitory safe ports and the Minimum Domestic Tax.

In addition, the IASB and AASB have issued amendments to IAS 12 'Income Taxes' introducing a mandatory temporary exception to the requirements of IAS 12 under which disclosure of deferred tax assets and liabilities related to the OECD/G20 proposed Pillar Two regulatory framework is not required. In line with this amendment, the Group has applied this exception in the consolidated financial statements for the year ended December 31, 2024.

Break Down of the income tax payment by country

2024

													Total
Income from sales to third parties	627	869	847	698	555	147	188	166	40	65	61	90	4,353
Income from intra-group operations with other tax jurisdictions	80	-	1	1	-	-	1	1	-	-	-	-	84
Tangible assets other than cash and cash equivalent	820	5,494	1,741	1,302	1,755	157	628	270	109	175	-	-	12,451
Corporate income tax accrued on gains/losses	46	62	245	172	45	18	14	16	-	-	9	31	658
Corporate income tax paid	(16)	64	93	15	18	11	-	10	-	3	1	-	199