

Slavery and human trafficking statement 2025

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 2024 comprised c. 112.105 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, Sweden, Denmark and Poland. Austria was part of the Cellnex Group until 19 December 2024. These advancements have been made possible thanks to strategic investments supporting its transformation and internationalisation.

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.

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. In response to the Company's geographical expansion and ongoing evolution, the Board of Directors approved the updated Code of Ethics in July 2024. This was done with the aim of standardising ethical policies across the group, creating a coherent and cross-referenced internal body of law applicable to all entities within Cellnex.

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.

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.

The Policy for the Whistleblowing Channel and the Anti-Bribery, Gifts and Hospitality Policy were updated during 2024 to ensure that the Company remains vigilant in promoting transparency and combating bribery and other unethical practices.

Sustainability Policy

Cellnex Telecom's Sustainability policy establishes the basic guidelines and lines of actions 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.

Updated in 2024, this policy provides guidelines and principles for the management of sustainability matters, in line with the European regulations "Corporate Sustainability Reporting Directive (CSRD)", and the "Corporate Sustainability Due Diligence Directive (CSDDD)", together with other international standards, and must be interpreted in conjunction with the Cellnex Code of Ethics, the Suppliers Code of Conduct and other corporate policies.

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 2024 the assessment was aligned with the Corporate Sustainability Reporting Directive (CSRD) / ESRS

requirements. This exercise provided a holistic view of the Organisation's operations, highlighting overlaps and gaps in human rights considerations within the broader context of sustainability. By adopting this integrated approach, Cellnex can be more effective at identifying and mitigating risks, ensuring that human rights considerations are adequately addressed within the broader framework of ESG risks.

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 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 (ESG) 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 2024, Cellnex has further integrated ESG criteria into its supplier selection and contracting processes, ensuring that sustainability is a key consideration in all its sourcing decisions. Also in 2024, as in the previous four years, the ESG supplier assessment campaign was conducted using the Ecovadis platform. Once the assessment is complete, feedback is provided to suppliers and the areas with the highest risk of non-compliance are 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. In

2024, nearly 1,766 hours were devoted to human rights training across the Group.

Further actions and sign-off

The Due Diligence and a Human Rights Impact Assessment (HRIA) have been carried out taking into account the HRIA's Guidelines for the Information and Communication.

The results of this assessment are aligned with the results of the previous exercise and confirm, once again, the existence of several thresholds in which Cellnex's economic activity could have a potential impact on the infringement of human rights. The adverse impacts identified 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.

In this sense, the current evaluation process focuses on strengthening the control environment and identifying opportunities for continuous improvement and reinforces their focus on preventive actions to maximise positive impacts and proactively minimise negative ones.

It is noteworthy that the actions derived from this assessment align with the commitments outlined in Cellnex's Corporate [Human Rights Policy](#) 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.

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



Virginia Navarro

General Council and Vice-Secretary of the Board of Directors. Chair of the Committee of Ethics and Compliance