



Human Rights 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 performing 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 further develops the guidelines set in the Code of Ethics regarding the commitment to respect and promote internationally recognised human rights in all companies controlled by Cellnex ("Cellnex Group" or the "Group").

2. Reference framework

This Policy takes as a reference the main internationally human rights conventions and standards, as well as European regulations, including:

- International Bill of Human Rights¹, which includes:
 - Universal Declaration of Human Rights
 - International Covenant on Economic, Social and Cultural Rights
 - International Covenant on Civil and Political Rights
- International Labor Organization (ILO) Fundamental Conventions²
- ILO Declaration on Fundamental Principles and Rights at Work
- Ten Principles of the United Nations Global Compact
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- European Corporate Sustainability Reporting Directive (CSRD)
- European Corporate Sustainability Due Diligence Directive (CS3D)
- Modern Slavery Act of the United Kingdom

This Policy builds upon the ethical values of the Group, outlined in the Code of Ethics and the Supplier Code of Conduct of Cellnex. This Policy is also related to the following internal regulations:

- Global Risk Management Policy
- Sustainability Policy
- Occupational Health and Safety Policy
- Equity, Diversity and Inclusion Policy
- Environmental and Climate Change Policy
- Procurement Policy
- Personal Data Protection Policy and
- Stakeholder Engagement Policy
- Corruption Prevention Procedure
- Anti-bribery, Gifts and Hospitality Policy

¹ [International Bill of Human Rights | OHCHR](#)

² Forced Labor Convention (No. 29), Freedom of Association and Protection of the Right to Organize Convention (No. 87), Right to Organize and Collective Bargaining Convention (No. 98), Equal Remuneration Convention (No. 100), Discrimination (Employment and Occupation) Convention (No. 111), Abolition of Forced Labor Convention (No. 105), Minimum Age Convention (No. 138), Occupational Safety and Health Convention (No. 155), Worst Forms of Child Labor Convention (No. 182)

3. Purpose and scope

3.1. Object

This Policy outlines Cellnex overarching approach to protect and promoting human rights.

Cellnex is committed to play an active role in the promotion of human rights, and to work proactively to respect them. This engagement entails preventing or, if appropriate, reducing the negative consequences of its own activities on human rights. Likewise, it shall do its utmost to prevent or reduce the negative consequences on human rights directly related to the activities of third parties with whom the Group is engaged in a business relationship.

3.2. Scope of application

This Policy applies to:

- all the companies that make up Cellnex Group,
- and companies that do not form part of the Group but in which the Company holds an interest, as well as for *joint ventures*, and other entities in which it assumes management, the Company shall also promote the alignment of its regulations with the basic principles regarding respect for human rights contained in this Policy.

4. Basic principles

The Company is firmly committed to respecting human rights and, as part of its due diligence process, adopts and promotes the following fundamental principles:

- **Identify potential impacts:** identify and assess the actual and potential human rights impacts on affected communities and groups that may result from the operations and activities carried out by the company, its subsidiaries or its value chain.
- **Prevent and mitigate:** identify situations and activities and manage, above all, those with a higher risk of violating human rights, in order to develop mechanisms for the prevention of such risk, as well as for mitigation and ultimately remediation of the impacts if they occur.
- **Regular monitoring:** evaluate the effectiveness of the due diligence process on a regular basis using monitoring indicators, with special attention on those activities in which there might be a higher risk of violating human rights.
- **Public reporting:** report the results of the evaluation of the effectiveness of the due diligence processes in the information that the Company periodically publishes and that is available on its corporate website.
- **Grievance mechanisms:** have in place reporting and grievance mechanisms, equipped with adequate guarantees and settlement procedures, in order to respond to potential violations of human rights. These mechanisms should be communicated both to the employees and to relevant stakeholders. To this end, internal management procedures have been established for reporting issues.
- **Corrective measures and remedy:** if a violation of human rights is detected, Cellnex is committed to adopt as soon as possible any corrective measures that provide the affected persons with access to an effective remedy through legitimate processes and active cooperation.

- **Training and awareness:** advance a culture of respect for human rights and actions intended to promote training and awareness-raising in this field directed at Cellnex employees and the other Stakeholders of the Company.
- **Meaningful engagement with stakeholders:** maintain constructive and ongoing engagement with stakeholders during the impact assessment process, the development of preventive mechanisms and corrective measures, and, where appropriate, in the remediation process. This engagement will be guided by transparency, inclusiveness, and respect for the perspectives of affected stakeholders and their legitimate representatives.

5. Human Rights Commitments

5.1. Commitments with global labour standards

- **Child labour is rejected:** Cellnex respects children's rights and rejects child labour, pursuant to the provisions of ILO Convention 138 where minimum working age shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Cellnex, to the best of its knowledge, refrains from working with suppliers that are using child labour in their operations.
- **Forced labour is rejected:** Cellnex neither uses nor support the use of forced labour of any kind, as defined in ILO Convention 29, directly or indirectly. The term 'forced labour' or 'involuntary labour', according to the ILO Convention 29 refers to all work or services for which a person has not offered themselves voluntarily or willingly. Examples are (but are not limited to), human trafficking, slavery, debt bondage, and identification retaining. Cellnex employees are free to resign subject to a reasonable notice period.

Cellnex joined UN Global Compact in 2015, and adhered to its principle 4, according to which, businesses should uphold the elimination of all forms of forced and compulsory work or work done under coercion.

- Respect for **freedom of association** and **collective bargaining:** Cellnex acknowledges the right of its employees to strike, unionize, associate and collective bargain and will provide collaboration with the necessary means so that employees can exercise their rights. In addition, constructive dialogue will be promoted to guarantee workplace stability.
- **Zero tolerance policy for harassment:** Cellnex shall strive for its employees to have a work environment free of harassment in any of its forms or any other threatening, abusive, exploiting or sexually coercive behaviour.
- Protecting **workers' health and safety:** Every employee at Cellnex works in a healthy and safe environment. Cellnex is committed to create and keep a safe work environment for all employees and any person present at Cellnex facilities. The Company also undertakes to grant the necessary means to protect its employees, minimizing occupational hazards and complying with applicable legislation and international standards. Cellnex promotes a preventive approach to health and safety and encourages employee participation in continuous improvement. The Group's suppliers shall also provide their employees with a safe and healthy workplace.
- **Fair working conditions:** Cellnex treats its employees with respect and pays their remuneration in accordance with the applicable statutory provisions, including

minimum wages, overtime and benefits. The weekly working hours and overtime shall not exceed the statutory limit set forth in the laws and regulations of each country. Cellnex undertakes to promote measures that are intended to promote secure employment, working times, adequate wages, equal pay for work of equal value, pay transparency in accordance with applicable law and international standards, social dialogue and work-life balance.

- **Discrimination is rejected:** Cellnex rejects any form of discrimination, respecting its employees' diversity and offering equal opportunities both to access a job position and internal promotion. No one employed at the Group will be subject to discrimination on grounds of gender, age, nationality, culture, race, sexual orientation, disability, religion, thought, education, talent, social condition, special needs or any other reason that could cause discrimination.
- **Right to data protection and privacy:** Cellnex respects the rights of all the persons with whom it interacts, to their intimacy, data protection and privacy, and it shall make an appropriate use of the personal data and information gathered in all the countries where it operates, paying special attention to the data of its employees, customers and landlords.
- **Human rights in cyberspace – artificial intelligence and data science:** Cellnex believes that new technologies must be used for the good of humanity and that artificial intelligence (AI) and data science can generally benefit its customers and employees when based on a human-centred design. Cellnex is committed to promote the use of AI and new technologies while ensuring transparency, fairness and accountability and to implement the needed privacy and security safeguards and appropriate governance when leveraging AI and other digitally innovative systems.
- **Conflict minerals:** Cellnex commits to performing due diligence so it does not use any products which are directly or indirectly financing arming groups involved in the mining and trading of 'conflict materials' and associated with human rights abuse. The company commits its suppliers to respect all national legislation and regulations, and more generally, the laws and regulations to the prohibition or restriction of use of certain products or substances.
- **Equity, diversity and inclusion:** As set out in the Group Equity, Diversity and Inclusion Policy, Cellnex is committed to creating an inclusive and equitable workplace, a place where everyone belongs and thrives. We achieve this by providing equal opportunities to everyone, and ensuring that every employee is healthy, safe, and supported to perform at their best.
- **Development of competences and employability:** Cellnex is committed to its employees to ensure development of competencies and employability. Cellnex provides regular development to its employees (education, experience, exposure) on topics that it finds relevant to the business and to the function of the employee and his/her/their expected behaviour as a professional.
- **Human rights activities within the value chain:** Cellnex is committed to ensuring that human rights are respected not only in its own operations but throughout its value chain, ensuring non-discrimination, fair treatment, and protection against exploitation or forced labor. The Group considers that a company should seek to provide decent

work not only to its own employees but the same should be extended to its value chain, including vulnerable groups such as migrant workers.

Cellnex is engaged to put in place due diligence actions to integrate respect for human rights throughout its value chain. The Company has put in place a Supplier Code of Conduct that includes applicable human rights standards regarding labour practices, health and safety, and the environment.

Cellnex believes that in order to have a significant impact, it is necessary to identify the vulnerable hot spots / high risks in the value chain. The company has deployed a variety of measures to assess its suppliers (including on-site audits) and to rectify any potential violation that may exist. In case human rights violations are identified, the Group is engaged to support its business partners along its value chain to remediate the situation. However, it reserves the right to terminate the relationship with the business partners depending on the severity and resolution of the malpractice.

5.2. Commitments with global non-labour standards

- Respect for **minorities** and **communities' rights**: Cellnex undertakes to respect the rights of local communities in such areas where it conducts its business activity, and to respect the local laws, culture and uses, undertaking to maintain an open dialogue with its stakeholders and paying special attention to the more vulnerable groups.
- Right to **health**: Cellnex undertakes to take the required courses of action to ensure that its services do not represent a hazard to the health and safety of local communities.
- Right to a **healthy environment**: Cellnex is committed to fight climate change and protect the environment as these are connected with the human rights crisis. Also, access to a healthy environment has been recognized as a Human Right by the United Nations Human Rights Council. The Company is committed to promoting responsible environmental conducts among its employees, suppliers and customers as stated in the Group's Environmental and Climate Change Policy.
- Contribution to the **fight against corruption**: Cellnex undertakes to fight corruption in all its forms, both directly and indirectly, including extortion and bribery, pursuant to Principle 10 of UN Global Compact. This commitment is further elaborated in the Company's Code of Ethics, the Corruption Prevention Procedure and the Anti-bribery, Gifts and Hospitality Policy.

6. Stakeholders' expectations

The following principles shall apply in the relation of Cellnex with its stakeholders in order to address their expectations:

- **Employees**: Cellnex undertakes to respect all its employees' Human and Labour Rights, in particular those set forth as fundamental, as defined in ILO Conventions. In turn, all employees of the Group must show strict respect for the human rights recognised under applicable legal provisions in the conduct of their activities and shall particularly endeavour to ensure compliance with this Policy. The Company expects all of its professionals to act as a first line of defence for human rights, reporting any potential impact thereon or breach of the Company's policies through the Whistleblowing Channel.

- **Suppliers:** Cellnex believes that its suppliers are a key ally for compliance with this Policy and thus assume a shared responsibility therewith and must also show strict respect for the human rights recognised by applicable legal provisions and the highest international standards in carrying out their business activities. In this regard, suppliers shall respect the commitments regarding labour practices, health and safety, and the environment, as well as their other commitments regarding respect for human rights as set out in the Suppliers Code of Conduct (e.g. data privacy).
- **Customers and landlords:** Cellnex respects the human rights of its customers and landlords and undertakes to communicate with them in a clear and transparent manner and to provide safe infrastructure and services that meet high standards for quality and health & safety. The Group rejects any form of discrimination against its customers and landlords, and will respect at all times their right to privacy, protecting and making an appropriate use of their personal data.
- **Business partners:** Cellnex's business partners shall respect and promote the internationally recognized human rights in the performance of their activities. In this regard, Cellnex shall do its utmost to promote the observance of this obligation. For such purposes, business partners shall be deemed to be any company engaged in business with Cellnex by means of any manner of joint venture.
- **Local communities:** Cellnex supports the respect of human rights in any local, national or international community where it operates.

7. Grievance mechanisms

Cellnex has a permanent dialogue with its stakeholders, allowing these latter to raise their concerns and expectations about respect and promotion of human rights by the Group.

The Whistleblowing Channel, available on the Company's website (www.cellnex.com), is the preferred confidential channel to receive, investigate and handle through to completion any concerns or reports received within the scope of this Policy.

These concerns or reports shall be handled in accordance with the Group's internal regulations, in particular, the Policy for the Whistleblowing Channel available on the Company's website (www.cellnex.com).

8. Approval, review, control and communication of this Policy

Approval	On the prior recommendation of the Nominations, Remuneration and Sustainability Committee, the Board of Directors of Cellnex Telecom, S.A. approved the update of this Human Rights Policy on 16th December 2025.
Review	The Sustainability Department will review this Policy according to the evolution of the Company's sustainability strategy, when significant changes occur that may affect its content or application, or when legal and regulatory may occur.
Control	<p>The Board of Directors will periodically oversee the implementation of this Policy through the Corporate Nomination and Remuneration Committee (CNRS).</p> <p>The Sustainability Department is responsible for the implementation of this Policy in coordination with all relevant corporate areas, in particular: Compliance, Risk Management, People, Procurement and Information Security.</p>
Communication	The Sustainability Department undertakes to periodically communicate the progress in complying with this Policy to all internal and external stakeholders, in line with the principle of transparency. It will also promote awareness to ensure that this Policy, which will be permanently available on the company's website, is duly understood and implemented in Cellnex's activities and throughout the organisation.