



# **Business Travel and Expenses Policy**

## Contents

|           |   |           |
|-----------|---|-----------|
| <b>1</b>  | <b>Introduction .....</b>   | <b>3</b>  |
| 1.1       | Purpose of the Policy .....   | 3         |
| 1.2       | Scope and Application of the Policy .....                               | 3         |
| 1.3       | General Principles .....  | 3         |
| <b>2</b>  | <b>General Travel Rules.....</b>  | <b>4</b>  |
| 2.1       | General Rules .....   | 4         |
| 2.2       | Traveller Obligations.....  | 4         |
| 2.3       | Expected Behaviour during the Trip .....                                | 5         |
| <b>3.</b> | <b>Travel Management .....</b>  | <b>5</b>  |
| 3.1       | Booking and Expenses Settlement Tool .....                              | 5         |
| 3.2       | Travel Agency.....  | 5         |
| 3.3       | Approval Flows and Authorisation Levels .....                           | 6         |
| 3.3.1     | Travel Approval Flows.....  | 6         |
| 3.3.2     | Expenses Approval Flows .....   | 6         |
| <b>4</b>  | <b>Travel Services .....</b>  | <b>7</b>  |
| 4.1       | Flight Reservations.....  | 7         |
| 4.2       | Hotel Reservations .....  | 7         |
| 4.3       | Train Reservations .....  | 7         |
| 4.4       | Car hire reservations .....   | 7         |
| <b>5</b>  | <b>Travel and Representation Expenses .....</b>                         | <b>8</b>  |
| 5.1       | Travel and Accommodation Expenses .....                                 | 8         |
| 5.2       | Meal Expenses.....  | 9         |
| 5.3       | Representation Expenses .....   | 9         |
| 5.4       | Representation Expenses Approval Flows .....                            | 10        |
| 5.5       | Expenses Limits and Conditions .....                                    | 12        |
| 5.6       | Non-reimbursable expenses .....   | 12        |
| 5.7       | Expenses Reports and Submission of Receipts .....                       | 12        |
| <b>6</b>  | <b>Traveller Safety .....</b>   | <b>14</b> |
| 6.1       | Travel Assistance .....   | 14        |
| <b>7</b>  | <b>Approval, review, control and communication of this Policy .....</b> | <b>15</b> |
| <b>8</b>  | <b>ANNEX I: Cellnex Telecom Business Travel Guidelines .....</b>        | <b>16</b> |

## **1 Introduction**

### **1.1 Purpose of the Policy**

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 establishes clear and consistent guidelines for business travel and expenses for all the companies of the Cellnex Telecom Group. This includes ensuring that trips and expenses are carried out efficiently, economically and safely, complying with all internal policies and regulations, while meeting the needs of the company and its employees.

### **1.2 Scope and Application of the Policy**

This Policy is applicable to all staff of the Cellnex Telecom Group companies. The Group Chief Executive Officer and members of the Board of Directors are excluded from the scope of this Policy, as they have a dedicated business travel and expenses Policy.

### **1.3 General Principles**

Current work tools and technologies have led to the creation of virtual collaborative environments, which facilitate meetings from different parts of the world. This has reduced the need for business travel, optimising the use of time and resources and promoting greater efficiency in our work activities.

With this in mind, business travel within the Cellnex Group should be limited to those situations where physical presence is considered necessary/recommended and it is not possible to hold the meeting virtually. Travel is only recommended in the following cases:

1. meetings with clients
2. strategic/critical meetings with a direct impact on the company's objectives
3. implementation of new IT systems
4. employees assigned to a specific project (Commuters) may continue to travel to the country/city to which they are assigned.

Cellnex registered office is in Madrid, but the corporate office is in Barcelona, which means that senior executives (Senior Management and Directors) are required to travel between these cities quite frequently.

These guidelines seek not only to optimise the use of the company's time and resources, but also to reduce the environmental impact associated with travel. In addition, the company encourages the use of collaborative tools which allow productivity to be maintained without the need for frequent travel.

Employees must justify the need for travel by detailing the reasons and expected benefits. It is essential to coordinate each trip with the relevant manager to assess the need for travel and ensure that all possible alternatives are explored before proceeding with travel planning.

In any case, trips must be planned well in advance to ensure availability and cost optimisation, and must comply with general recommendations.

## 2 General Travel Rules

### 2.1 General Rules

- **Discuss** with the relevant manager **whether travel is really necessary**.
- **Book in advance** to ensure the best price (recommendable at least 10 days).
- Cellnex Telecom has agreed rates with hotels in most countries. **Hotels with negotiated rates should be selected.**
- Plan your trip: **avoid last-minute changes** and the associated cancellation costs. If, for exceptional reasons, a change is necessary, the original booking must be cancelled.
- **Flight schedules** should be planned with a **flexibility** of approximately 60 minutes in order to find the best option.
- It is **mandatory** that travel reservations are managed via the Group tool (**SAP Concur**) or the local tool (during a transition period).
- **Group / Team trips** (more than 3 people) must be communicated **as far in advance as possible** (if possible, at least 15 days) and their management may be centralised.
- Whenever possible, **book a train instead of a flight** to reduce our environmental impact.
- For **journeys longer than 400 km**, you should **use public transport** (train, plane, etc.), if possible. If this is not an option, you should **hire a car**, in accordance with this policy, but not use your own vehicle and request payment per km afterwards. Any exceptions to this Policy must be authorised in advance by the Finance Department.
- During periods of **high demand** due to music or sport events, trade fairs, Christmas, Mobile World Congress, **travel requests must be sent** as well **in advance** as possible (even months), in order to ensure availability and accordance with policy, not only to Barcelona, but anywhere.
- In order to safeguard the operational continuity of the company and in line with best practices in the sector, it is **recommended** that for **Senior Executives** (Senior Managers and Directors) belonging to a Group ExCom, Function ExCom or Country ExCom, a maximum number of the same team **per flight is limited to 3**.

### 2.2 Traveller Obligations

Before **travelling abroad**, it is **mandatory** to notify your People department about your trip, including the following information in the email:

- Travel dates
- Work address at destination
- Reason for travel

so they can ensure the required communications to Social Security and Labour authorities are carried out.

In the case of Senior Management and Directors or specific cases who **travel frequently**, it is recommended to request an annual A1 (Social Security) for Europe, and it will only be necessary to report their trips outside the European Union, the United Kingdom or Switzerland.

Please refer to **Annex I** for more information.

### 2.3 Expected Behaviour during the Trip

In order to ensure a safe and secure experience during international travel, it is essential to notify People of your trip in advance, as mentioned in the previous section. This measure allows for:

- **Guaranteed access to medical coverage**
- **Financial protection in the event of an accident at work:** Proper notification facilitates access to benefits such as compensation or subsidies, ensuring the necessary support in unforeseen situations.
- **Regulatory compliance and peace of mind for the company:** by following the necessary procedures, the company complies with its legal obligations and avoids possible penalties, reinforcing its commitment to the well-being of its employees.

## 3. Travel Management

### 3.1 Booking and Expenses Settlement Tool

There is a plan in place to implement **SAP Concur** as the Cellnex Telecom Group travel booking and expenses settlement tool, although this is not completed yet. Therefore, current local Business Travel and Expenses tools in place are the official way to book travel and claim business expenses, until the deployment of **SAP Concur** is completed.

### 3.2 Travel Agency

There is a plan in place to implement a Global Travel Agency for the Cellnex Telecom Group, although this is not completed yet. Therefore, current local travel agencies in place are the official way to book travel, until the deployment of such global Travel agency is completed.

The travel agency's services include:

- Booking flights/hotels/trains/ferries, car hire for all professionals, employees and/or third parties travelling on behalf of Cellnex Group companies, requested through the local travel request tool in place.
- Ensuring that reservations made are in line with the Cellnex Group Business Travel and Expenses Policy (selection of fares and schedules, accommodation with established agreements, etc.).
- Provide travellers with all the necessary documentation for their trip: travel itinerary, accommodation vouchers and flight/train/etc. reservations, as well as information such as entry requirements for the country.

- Provide alerts about flight changes and cancellations, as well as recommendations and advice on destinations and local regulations.

The agency's services do NOT include:

- Managing any requests not made through the Business Travel and Expenses tools in place.
- Issuing boarding passes, except for authorised groups (CEO and Board Members).
- Managing individual requests not related to business and representation travel.
- Managing extraordinary expenses incurred during the trip or stay.

### **3.3 Approval Flows and Authorisation Levels**

Authorisation flows are set according to whether they involve travel or expenses approvals. In all cases, it is essential to follow established protocols to ensure control and transparency in the use of company resources.

#### **3.3.1 Travel Approval Flows**

All travel requests must be approved by the employee's line manager with the exception of Senior Management. This ensures that each trip is justified and that resources are used efficiently.

Travel requests which exceed the limits of the Cellnex Telecom Business Travel and Expenses Policy will also be authorised by the Director of the area, and if approved by the Director, it will be necessary they are also approved by the Finance department. In the case of the Senior Management, they will be authorised by the Finance department, with the exception of the Chief Financial Officer, whose requests will be authorised by the Corporate Secretariat and Non-Executive Secretariat of the Board.

#### **3.3.2 Expenses Approval Flows**

All expenses claims must be approved by the employee's line manager, with the exception of Senior Management, which must be authorised by the CEO (delegation to the Chief Financial Officer if necessary for all Senior Managers, except for the Chief Financial Officer, which could be delegated to the Corporate Secretariat and Non-Executive Secretariat of the Board).

All employees must submit all receipts and invoices for expenses incurred, including transport, accommodation, meals and any other travel-related expenses. It is crucial that these documents are submitted within the deadlines set by the company to ensure reimbursement. It is essential to submit receipts for any expenses, regardless of whether they were paid using the Cellnex Company credit card. In addition, the company reserves the right to audit and review any expenses submitted to ensure compliance with internal policies.

Cellnex will monitor travel and expenses, reviewing and analysing, among others:

- Travel for internal meetings
- Travel and expenses exceeding this Policy
- Expenses paid with Cellnex Credit Card not settled due to lack of evidence (invoices, receipts)
- Kilometres exceeding this Policy

- and any other type of irregular expenses for the activity being performed

This information will be shared with each member of Senior Management for proper monitoring every quarter.

## **4 Travel Services**

### **4.1 Flight Reservations**

All local business travel booking tools are configured to book the best flight options available online according to the traveller's needs, such as departure/arrival airports and departure/arrival times, for example, being aware of the cost of the flight and any extras (seat, luggage, etc.) selected.

All flights under 4:30 hours, not considering stopovers, will be booked in economy class. Flights over 4:30 hours, not including stopovers, if any, could be booked in business class. Business class tickets fares includes flexible fares which allow changes at no additional cost, issuing boarding passes and priority boarding.

All flight requests must be authorised by the employee's line manager, as detailed in section 3.3 of this document. In the event of requesting a flight exceeding this Policy or exceeding the economic limits according to the company's guidelines (configured in the tool), the reason for requesting that flight and not one within policy must be explained in full.

### **4.2 Hotel Reservations**

Cellnex Telecom has agreements with hotels in most of the cities where it is present, so priority should be given to booking hotels with agreements and always through the local business travel booking tools.

If there is no agreed rate or availability, the maximum category accepted will be 4 stars, or the local equivalent, for any category of employee. If a hotel reservation is no longer needed, cancellation must be arranged as well in advance as possible.

All hotel requests must be authorised by the employee's line manager, as detailed in section 3.3 of this document. In the event of requesting a hotel exceeding this Policy, the reason for requesting that hotel and not one within policy must be explained in full, and should be approved by the Finance Department

Please refer to **your local policy** for more information.

### **4.3 Train Reservations**

All journeys under 4:30h hours will be booked in standard class. Journeys over 4:30h hours can be booked in standard or business class. This type of ticket includes seat and carriage selection.

All train requests must be authorised by the employee's line manager, as detailed in section 3.3 of this document. In the event of requesting a train exceeding this Policy, the reason for requesting that train and not one within policy must be explained in full.

### **4.4 Car hire reservations**

Cellnex Telecom has agreements with most car rental providers to ensure all employees have the suitable resources to perform their duties effectively during business trips.

It is important to note that it is mandatory to always return the vehicle with a full tank of fuel to avoid additional charges. Cars from categories Economic (E) and Standard (R) are allowed. Premium and Luxury categories, convertible and two-seater cars are not allowed. 4x4 vehicles are not allowed, unless absolutely necessary due to terrain conditions.

All car hire requests must be authorised by the employee's line manager, as detailed in section 3.3 of this document. In the event of requesting a car exceeding this Policy, the reason for requesting that car and not one within policy must be explained in full.

It is possible to use a private vehicle for journeys of under 400 km and to settle the mileage travelled. For journeys over 400 km, public transport must be used whenever possible, such as train or plane, or a rental car if public transport it's not possible. This measure seeks to ensure efficiency and comfort on long journeys. If an exception to this Policy is required, it must be authorised in advance by the Finance Department. In the absence of such prior authorisation, Cellnex will not reimburse mileage in excess of that permitted by company Policy. This Policy aims to optimise resources and ensure that business travel is conducted in an orderly manner and in accordance with corporate guidelines.

By following these guidelines, the company not only promotes responsible and efficient use of resources, but also ensures that all employees have access to adequate and safe means of transport to perform their professional duties in an optimal manner.

## **5 Travel and Representation Expenses**

Cellnex Telecom reimburses necessary expenses related to the company's activity incurred by the employee in the performance of their duties, provided that they are duly justified and documented in the corresponding expenses report. All expenses must be paid by the highest-ranking employee in the company.

The following is a description of the expenses that may be settled as travel/business expenses.

### **5.1 Travel and Accommodation Expenses**

Accommodation bookings for business trips must be made exclusively through the company's designated local travel agency. This ensures that all internal procedures are followed and that both employees and the company benefit from preferred corporate rates and more favourable conditions. It is strongly recommended that hotel reservations are made as early as possible, as this not only increases the range of accommodation options available but also allows access to more competitive prices and helps avoid last-minute issues.

Additionally, making bookings in advance through official channels contributes to better administrative management and facilitates accurate monitoring of travel expenses, ensuring all reservations are properly documented and authorised in line with corporate rules. Should an exception be required due to justified circumstances, it is essential to obtain prior written approval from the Finance department.

All necessary and reasonable expenses incurred in carrying out your responsibilities will be reimbursed according to this Policy. Business travel should be conducted efficiently, with efforts

made to reduce costs wherever feasible. Transport and/or accommodation reservations made on a personal basis will not be reimbursed.

**Parking:** Parking expenses due to business trips/business meetings.

**Personal Car Mileage:** Mileage travelled for journeys of less than 400 km/250 miles in your own vehicle for work purposes.

**Petrol:** Fuel expenses due to business trips/business meetings. If personal car mileage is claimed, fuel cannot be settled, as it is included in the mileage concept.

**Taxi & Public Transport:** where available, public transport should be used. Taxis should only be used in circumstances where there is no alternative, usually airport/train stations to/from the office.

**Tolls:** The use of tolls roads should only be used if absolutely necessary.

## 5.2 Meal Expenses

Meal expenses on weekends/public holidays will not be accepted unless they have been previously authorised and duly justified.

5.2.1 Travel Meal: Meal expenses incurred by the employee in the course of their professional activity in hospitality establishments and duly justified. When possible, hotels are to be booked on a room + breakfast basis. The evening meal allowance is for the purchase of food and a maximum of one alcoholic beverage (e.g. one glass of wine/one beer). Alcohol is not authorised at lunch and alcohol only expenses claims will be rejected. Please refer to **your local policy** for more information.

5.2.2 Department Meals: Department meals are considered to be those which take place occasionally (1 per quarter and per Senior Manager member) with team members belonging to Cellnex Group companies, sometimes outside normal working hours or on a non-working day. These department meals must be limited to a maximum of 3-4 per year, including team meals at Christmas or in summer, and celebrations for milestones achieved/projects completed. The most senior employee at the event must pay the bill and submit the expense claim.

## 5.3 Representation Expenses

These are expenses incurred by employees exclusively for the purpose of carrying out a commercial or promotional activity in which the company is represented, for example, before a customer, supplier or other stakeholders. These expenses shall always be incurred in accordance with the principles of prudence, reasonableness and scrupulous compliance with the provisions of the Procedure for the Prevention of Corruption and the Anti-Bribery, Gifts and Entertainment Policy.

5.3.1 Business meals: Representation expenses for meals are those incurred in the context of interactions with third parties in the Company's interest, when such meals are essential

for business purposes, provided that they take place in hospitality establishments and are duly supported with the required documentation in the corresponding expense report.

Please refer to **your local policy** for more information.

5.3.2 Invitations and hospitality: Expenses for invitations and hospitality (e.g. events, entertainment, etc.) are considered to be those incurred in by the company in the context of a commercial, business or promotional activity, within the usual social and courtesy practices, duly justified and authorised in accordance with the Anti-Bribery, Gifts and Hospitality Policy.

5.3.3 Gifts and Presents: Expenses for gifts and presents for representation purposes are considered to be those incurred in the context of a commercial, business or promotional activity, duly justified and authorised, and whose market value does not exceed the limits established in the Anti-Bribery, Gifts and Hospitality Policy.

#### 5.4 Representation Expenses Approval Flows

Representation expenses have specific flows in place to ensure compliance with Cellnex’s ethical standards and anti-bribery policies. In this regard, differentiated authorization and approval workflows are established depending on the type of expense and whether it arises from a commercial interaction with the private sector (sales representatives, clients, suppliers, etc.) or the public sector (public officials as defined in the Anti-Bribery, Gifts and Hospitality Policy):

##### 5.4.1 Business meals

For business meals with individuals from the private sector, expense approval will be carried out solely by the line manager.

For business meals with individuals from the public sector, the employee must request prior authorization via email from their line manager, CC’ing the Compliance Department. The line manager must explicitly authorize the meal and, if applicable, approve the expense afterwards. The Compliance Department will act as a negative authorizer: it will only respond to deny authorization. If no response is given, the meal will be considered authorized.

A business meal with the public sector shall be deemed as such whenever at least one of the guests is a public officer, as defined in the Anti-Bribery, Gifts and Hospitality Policy.

In both cases, the spending limits for representation meals outlined in **your local policy** will apply.

|                | <b>Request</b> | <b>Authorization for the action</b>   | <b>Expense approval</b> |
|----------------|----------------|---------------------------------------|-------------------------|
| Private Sector | Employee       | N/A                                   | Line manager            |
| Public Sector  | Employee       | Line manager<br>Compliance (negative) | Line manager            |

#### 5.4.2 Invitations and hospitality

For invitations and hospitality, the employee must always request prior authorization via email from their line manager, CC'ing the Compliance Department. The line manager must explicitly authorize the invitation or hospitality and, if applicable, approve the expense afterwards.

If the invitation or hospitality is directed to a person from the private sector, the Compliance Department will act as a negative authorizer: it will only respond to deny authorization. If no response is given, the invitation or hospitality will be considered authorized.

If the invitation or hospitality is directed to a person from the public sector, the Compliance Department must explicitly authorize it. No invitation or hospitality will be offered out without such authorization.

|                | <b>Request</b> | <b>Authorization for the action</b>   | <b>Expense approval</b> |
|----------------|----------------|---------------------------------------|-------------------------|
| Private Sector | Employee       | Line manager<br>Compliance (negative) | Line manager            |
| Public Sector  | Employee       | Line manager<br>Compliance            | Line manager            |

#### 5.4.3 Gifts and Presents

To offer gifts or presents to individuals from either the private or public sector, the employee must, in all cases, request prior authorization via email from their line manager, CC'ing the Compliance Department. The line manager must explicitly authorize the delivery of the gift or present and, if applicable, approve the expense afterwards.

The Compliance Department must also issue express authorization in all cases. Under no circumstances may the gift or present be offered or delivered without prior authorization from the Compliance Department.

Corporate gifts bearing Cellnex branding and of negligible value (e.g., notebooks, pens, informational brochures, mugs, thermal bottles, tote bags, backpacks, etc.) are excluded from this approval workflow.

|                | <b>Request</b> | <b>Authorization for the action</b> | <b>Expense approval</b> |
|----------------|----------------|-------------------------------------|-------------------------|
| Private Sector | Employee       | Line manager<br>Compliance          | Line manager            |
| Public Sector  | Employee       | Line manager<br>Compliance          | Line manager            |

### 5.5 Expenses Limits and Conditions

Depending on the country and the meal, limits have been defined within Cellnex Group Business Travel and Expenses Policy, which will be reviewed annually or as required. It is essential that employees adhere to these limits to ensure the responsible use of company resources and to facilitate the reimbursement process.

Please refer to **your local policy** for more information.

Exceptions are employees in International Assignments and relocated staff, whose limits are set out in the international assignment policy, and contract staff, whose meal expenses are managed through allowances, are excluded.

Furthermore, it is important to note that any expenses which are not properly justified and documented will not be reimbursed. All employees must ensure that they submit the relevant receipts and invoices within the deadlines set by the company. This includes, but is not limited to, transport, accommodation, meals and other travel-related expenses. The company reserves the right to audit and review any expenses submitted to ensure compliance with internal policies. Further information on expenses claims can be found in section 5.5 of this document.

### 5.6 Non-reimbursable expenses

- Meals not associated with the expenses described in the previous points, are taken outside normal working hours or on a non-working day.
- Traffic and parking fines.
- Fuel charges not associated with a work trip.
- Day-to-day costs, such as daily commuting to work.
- Purchases on-board the aircraft, except food and non-alcoholic drinks.
- Minibar alcohol-related charges.
- Expenses related to IT devices, telephones and laptops.
- Personal expenses.
- Laundry services (except for professional stays larger than 5 days).
- Spa and entertainment services.
- Any other expenses not included in the list that do not correspond to the nature and basis of the professional activity.

### 5.7 Expenses Reports and Submission of Receipts

Once the trip has been completed, all associated expenses must be settled using the local Business Travel and Expenses tool in use. Individual expenses reports for non-routine trips are required, while monthly settlements for routine trips/expenses without trip are allowed.

Expense reports must be submitted no later than the 15th day of the month following the month in which the expenses were incurred in. Otherwise, the reimbursement of expenses will be delayed. It is essential that employees keep accurate records and submit their expenses reports on time to ensure an efficient workflow and avoid any financial inconvenience for both parties.

**IMPORTANT: The deadline for submitting these expenses is the end of each tax year. Any expenses submitted after this date will not be reimbursed. This Policy is crucial for the Cellnex Group's accounting and budget management.**

Expenses reports must include detailed information for each item to be settled, such as location, reason, dates, attendees/dining guests, partial amounts and itineraries, among others. This information is necessary so that these expenses are easily identifiable and can be approved without any issues. In addition, all necessary supporting documents, such as invoices and receipts, must be attached to back up each expenses reported.

It is important that invoices or expenses receipts do not contain any amendments or deletions and are attached to the expenses report. If an expenses receipt is lost, a duplicate should be obtained, as expenses cannot be settled without a receipt and screenshots of bank charges will not be accepted as proof of expenses. In case of lost, another evidence has to be submitted to prove the expense comply with company policy.

Expenses paid with a Cellnex company credit card must be reported within the tool, attaching the expense receipt. These expenses will be reviewed to identify those not settled due to lack of evidence, and those not justified, will be considered personal expenses, and reimbursement will be requested to the employee (prioritizing payroll deductions if it is ok from a legal point of view).

When entertainment or representation expenses include guests, the full name and company of Cellnex guests must be provided, along with the establishment's expenses receipt, not the bank card payment receipt.

For taxi expenses, the receipt indicating the service details (itinerary and business purposes) must be attached, not the bank card payment receipt.

For all expenses incurred by employees that exceed €100 (VAT included), an invoice must be requested from the supplier and attached as proof of expenditure, in order to facilitate VAT recovery by the company.

It is important that all employees follow these guidelines to ensure proper management of resources and maintain transparency in all financial transactions. Any expenses outside of established policies or without proper documentation will be thoroughly reviewed and may be rejected. Therefore, attention to detail and timeliness in submitting expenses reports are essential to the smooth operation of the reimbursement process.

Once the expenses report has been completed and reviewed, it will be sent to the employee's line manager for review and authorisation. This process ensures the proper management and control of expenses, promoting transparency and accountability in the handling of company resources.

**Both the employee, who submits the expenses report, and the employee's line manager, responsible for reviewing and approving the expenses report, must ensure that the expenses included are sufficiently detailed, duly justified and accredited, and that they comply with the rules and procedures established by the company. It is not possible to delegate the review and authorisation of expenses reports to third parties.**

Once the expenses report has been approved, the process of reimbursing the expenses begins. During this process, the report may be returned to the employee if, during the review, it is considered that information is missing or that it is not sufficiently detailed.

## **6 Traveller Safety**

### **6.1 Travel Assistance**

All companies within the Cellnex Telecom group must provide travel assistance coverage for each employee. Please contact your local People department for further information.

Additionally, it is essential to highlight that companies have a duty of care towards their employees when they travel on behalf of the company. This duty involves the obligation to ensure the safety, well-being, and integrity of employees during their business trips. To fulfil this commitment, companies must identify and assess potential risks associated with travel, provide adequate information and training, and offer resources and support in case of incidents or emergencies. Fulfilling the duty of care not only protects employees but also strengthens the company's social responsibility and helps maintain trust and engagement within the team. For this reason, it is imperative to follow established travel policies, use official channels to manage incidents, and promptly communicate any situation that may affect the traveller's safety or health.

When travelling, keep safety, wellbeing, and environmental impact in mind. Choose your hotel, transport, and travel times carefully.

## **7 Internal Regulatory Development**

The Group Finance Department at the Group level, and, where applicable, the corresponding local areas shall be responsible for developing the principles contained in this policy through the preparation and approval of the necessary internal regulations, in accordance with the procedures established for this purpose

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

|                      |   |
|----------------------|---|
| <b>Approval</b>      | On the prior recommendation of the Nominations, Remuneration and Sustainability Committee, the Board of Directors of Cellnex Telecom, S.A. approved this Business Travel and Expenses Policy on 16 December 2025.   |
| <b>Review</b>        | The Group Finance Department will review and propose updates to this Policy whenever deemed necessary or when significant changes occur that may affect its content or application.                                 |
| <b>Control</b>       | The Group Finance Department are responsible for ensuring and monitoring compliance with this Policy, in collaboration with the relevant corporate areas and business units within the company.                     |
| <b>Communication</b> | The Group Finance Department undertakes (i) to periodically communicate the principles of this Policy through the relevant training and awareness initiatives and (ii) to attend any queries regarding this Policy. |

## 9 ANNEX I: Cellnex Telecom Business Travel Guidelines



### Business and work trips: main legal requirements

Global Mobility  
Compensation & Rewards

Barcelona, October 2025



#### 1. Scope of the Report

- This report aims to provide a brief overview of the **immigration requirements** that both EU and non-EU citizens should comply with, when performing activities in the listed EU countries, Switzerland and the United Kingdom. Those countries are considered from a perspective of a host company.
- The information provided in this report differentiates between **work trips** and **business trips**, depending on the purpose of the trip. You can find more information in the next slide.
- Please note the information contained in this report is not extensive, therefore we advise to analyse each international trip beforehand to confirm the extent of the activity to be performed at the host country and if any of the requirements can be waived.
- In the following slides you will find the actions to be carried out by each home country when they send an employee away, within the EU. We also consider Switzerland and the United Kingdom as they are countries from the Cellnex portfolio.

## 2. Business Trip vs Work Trips

As mentioned in the previous slide, the information provided differentiates between business trips and work trips. In this sense it is important to know that all the following activities can be considered a **business trip**:

- Meetings and consultations
- Research conducted on behalf of a legal entity from the home country
- Marketing research
- Training sessions (limited to observation, familiarization and classroom instruction only)
- Trade fairs and exhibitions
- Sales: representatives of a supplier taking orders or negotiating the sale of services or goods.
- Purchasing: buyers purchasing goods or services for the entity of the country of origin.
- Commercial transactions.

It is also important to mention that short-term business visitors do not receive remuneration from the country where they are staying temporarily.

Any other activity which does not fall under one of the categories above is subject to be considered a work trip.

Global Mobility

## 3. Labour and Social Security Requirements

### A1 Home Social Security Certificate

- **The employer (home company) will need to apply for an A1 certificate of coverage in the home country before any international business or work trip takes place.** Information required are details of the home company, details of the employee and dates/destination of the trip.
- The A1 certificate relates to the Social Security legislation, which applies to the employee who is travelling to another EU country (and the UK) and certifies that the employee has no obligations to pay contributions in the host country. It must be provided by employer, and home company will be responsible in case there is any penalty that arise for lack of A1 certificate or submission after the deadline.
- The lack of an A1 certificate can also have important consequences for the employee in case of accident, and also an important impact from a social security benefits perspective.
- Once the home company has received the A1 certificate from the local social security, this document must be sent to the host company, in case there is an inspection at the host offices.

### Posted Workers Notification to Labour Host Authority

- **The PWN must be submitted by the employer (home company) in the host country before any international business or work trip takes place.** In such communication, details of the employee travelling are included, together with contact details of a representative of the home company and a representative of the beneficiary of the employee's service (host company).
- Both, home company and host company are co-responsible in case there is any penalty that arise for lack of submission or submission after the deadline.

Global Mobility

## 4. Overview per Host Country - Denmark

| Country | Business trips  |  | Work trips   |  |
|---------|---|--|--|--|
|         | EU citizens   | Non-EU citizens  | EU citizens  | Non-EU citizens  |
| DENMARK | <p>No registration is required for EU citizens for business trips to Denmark up to 3 consecutive months in a calendar year.</p> <p>There is no legal duty to notify Danish Labour Authorities about business trips.</p> | <p>Non EU Citizens can enter Denmark with a <b>valid residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> | <p>If a EU citizen is assigned to work in Denmark for more than 3 continuous months, an <b>EU-national registration must be completed.</b></p> <p>A labour notification to Danish Authorities (RUT) is mandatory, prior to the trip.</p> | <p>A work permit is usually required if the main purpose is to create/change a product, or if you contribute to the output of a company in any way.</p> <p>Employees who are posted from an EU based company to Denmark, can apply for an International Assignment visa (Visa der Ebt visa).</p> <p>A labour notification to Danish Authorities (RUT) is mandatory, prior to the trip.</p> |

Global Mobility

#### 4. Overview per Host Country - France

| Country | Business trips  |  | Work trips   |   |
|---------|---|--|--|---|
|         | EU citizens   | Non-EU citizens  | EU citizens  | Non-EU citizens   |
| FRANCE  | <p>No registration is required for EU citizens for business trips to France up to 3 consecutive months in a calendar year.</p> <p>According to the Posted Workers Directive, the days spent in France under a business trip must be notified to the French Labour Authority, prior to the first day of visit.</p> | <p>Non EU Citizens can enter France with a valid residence card issued by any EU country to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>A labour notification to French Authorities is mandatory, prior to the trip.</p> | <p>If a EU citizen is assigned to work in France for more than 3 continuous months, local registration must be completed.</p> <p>A labour notification to French Authorities is mandatory, prior to the trip (Déclaration de détachement préalable).</p> | <p>A work permit is usually required to work in France. Posted workers which meet the criteria set below, can be eligible for a Van der Elst visa:</p> <ul style="list-style-type: none"> <li>• employed by a company established in an EU country,</li> <li>• valid work and residence permit in the EU country of regular employment and residence,</li> <li>• seconded temporarily to France from the EU employer to provide services to one of their client or an entity of the group in France.</li> </ul> <p>In any case, a labour notification to French Authorities is mandatory, prior to the trip (Déclaration de détachement préalable).</p> |

#### 4. Overview per Host Country - Italy

| Country | Business trips   |  | Work trips  |   |
|---------|--|--|---|---|
|         | EU citizens  | Non-EU citizens  | EU citizens   | Non-EU citizens   |
| ITALY   | <p>No registration is required for EU citizens for business trips to Italy up to 3 consecutive months in a calendar year.</p> <p>According to the Posted Workers Directive, the days spent in Italy under a business trip must be notified to the Italian Labour Authority, prior to the first day of visit.</p> | <p>Non EU Citizens can enter Italy with a valid residence card issued by any EU country to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>A labour notification to Italian Authorities is mandatory, prior to the trip.</p> | <p>If a EU citizen is assigned to work in Italy for more than 3 continuous months, registration at their local Police Station must be completed.</p> <p>A labour notification to Italian Authorities is mandatory, prior to the trip.</p> | <p>A work permit is usually required and must be approved prior to enter Italy and take up any substantial gainful activity.</p> <p>A labour notification to Italian Authorities is mandatory, prior to the trip.</p> |

#### 4. Overview per Host Country – The Netherlands

| Country         | Business trips  |  | Work trips  |   |
|-----------------|---|--|---|---|
|                 | EU citizens   | Non-EU citizens  | EU citizens   | Non-EU citizens   |
| THE NETHERLANDS | <p>No registration is required for EU citizens for business trips to The Netherlands unless the stay exceeds 4 months in a period of 6 months. In that case, a municipality registration is required.</p> <p>According to the Posted Workers Directive, the days spent in The Netherlands under a business trip must be notified to the Dutch Labour Authority, prior to the first day of visit, depending on the nature of the trip.</p> | <p>Non EU Citizens can enter The Netherlands with a valid residence card issued by any EU country to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>A labour notification to Dutch Authorities is mandatory, prior to the trip.</p> | <p>If a EU citizen is assigned to work in The Netherlands for more than 4 continuous months in a period of 6 months, local registration must be completed.</p> <p>A labour notification to Dutch Authorities is mandatory, prior to the trip.</p> | <p>A work and residence permit is needed to take up any substantial gainful activity.</p> <p>If the trip exceeds 4 months in a period of 6 months, registration at municipality must be completed.</p> <p>A labour notification to Dutch Authorities is mandatory, prior to the trip.</p> |

#### 4. Overview per Host Country - Poland

| Country       | Business trips   |   | Work trips  |   |
|---------------|--|---|---|---|
|               | EU citizens  | Non-EU citizens   | EU citizens   | Non-EU citizens   |
| <b>POLAND</b> | <p>No registration is required for EU citizens for business trips to Poland up to <b>3 consecutive months</b> in a calendar year.</p> <p>According to the Posted Workers Directive, the days spent in Poland under a business trip must be notified to the Polish Labour Authority, prior to the first day of visit.</p> | <p>Non EU Citizens can enter Poland with a <b>valid residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>A labour notification to Polish Authorities is mandatory, prior to the trip.</p> | <p>If a EU citizen is assigned to work in Poland for more than <b>3 continuous months</b>, registration at their local Immigration Office must be completed.</p> <p>Failing to do so may result in significant financial penalties.</p> <p>A labour notification to Polish Authorities is mandatory, prior to the trip.</p> | <p>A work and residence permit is needed to take up any gainful activity.</p> <p>In any case, a notification must be made before Polish Labour Authorities prior to the movement.</p> |

#### 4. Overview per Host Country - Portugal

| Country         | Business trips  |   | Work trips   |   |
|-----------------|---|---|--|---|
|                 | EU citizens   | Non-EU citizens   | EU citizens  | Non-EU citizens   |
| <b>PORTUGAL</b> | <p>No registration is required for EU citizens for business trips to Portugal up to <b>3 consecutive months</b> in a calendar year.</p> <p>No need to notify short-term trips to Portuguese Labour Authority.</p> | <p>Non EU Citizens can enter Portugal with a <b>valid residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>A labour notification to Portuguese Authorities is mandatory, prior to the trip.</p> | <p>If a EU citizen is assigned to work in Portugal for more than <b>3 continuous months</b>, registration at their local Immigration Office must be completed.</p> <p>A labour notification to Portuguese Authorities is mandatory, prior to the trip.</p> | <p>A work permit is usually required and must be approved prior to enter Portugal and take up any substantial gainful activity.</p> <p>A labour notification to Portuguese Authorities is mandatory, prior to the trip.</p> |

#### 4. Overview per Host Country - Spain

| Country      | Business trips   |  | Work trips   |   |
|--------------|--|--|--|---|
|              | EU citizens  | Non-EU citizens  | EU citizens  | Non-EU citizens   |
| <b>SPAIN</b> | <p>No registration is required for EU citizens for business trips to Spain up to <b>3 consecutive months</b> in a calendar year.</p> | <p>Non EU Citizens can enter Spain with a <b>valid passport or residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> <p>Work authorization is not required for business trips.</p> | <p>If a EU citizen is assigned to work in Spain for more than <b>3 continuous months</b>, registration at their local Police Station must be completed.</p> <p>A labour notification to Spanish Authorities is mandatory only if the trip exceeds 8 consecutive days or more than 8 non-consecutive days to work in the same project, prior to the trip.</p> | <p>A work permit/visa is usually required and must be approved prior to enter Spain and take up any substantial gainful activity.</p> <p>The most suitable types of permits for this kind of displacements are:</p> <ul style="list-style-type: none"> <li>• Work and residence permit for intracompany transferees, if the applicant is not an EU resident.</li> <li>• Van der Elst Visa, if the applicant is an EU resident.</li> </ul> |

#### 4. Overview per Host Country - Sweden

| Country | Business trips   |   | Work trips   |  |
|---------|--|---|--|--|
|         | EU citizens  | Non-EU citizens   | EU citizens  | Non-EU citizens  |
| SWEDEN  | <p>No registration is required for EU citizens for business trips to Sweden up to 3 consecutive months in a calendar year.</p> <p>No need submit a labour communication to inform about business travel stays in Sweden.</p> | <p>Non EU Citizens can enter Sweden with a <b>valid residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Stay is limited to 90 days in a 180 days period (general Schengen rule).</p> | <p>If a EU citizen is assigned to work in Sweden for more than 3 continuous months, local registration must be completed.</p> <p>A labour notification to Swedish Work Environment Authority (SWEA) is mandatory, prior to the trip.</p> | <p>A work permit is usually required and must be approved prior to enter Sweden and take up any substantial gainful activity.</p> <p>A labour notification to Swedish Work Environment Authority (SWEA) is mandatory, prior to the trip.</p> |

#### 4. Overview per Host Country - Switzerland

| Country     | Business trips   |  | Work trips  |   |
|-------------|--|--|---|---|
|             | EU citizens  | Non-EU citizens  | EU citizens   | Non-EU citizens   |
| SWITZERLAND | <p>No work authorization is required for attending business meetings.</p> <p>The activities below are not considered business meetings:</p> <ul style="list-style-type: none"> <li>✓ Meeting up with colleagues and clients to discuss specific evaluation of work result and to instruct on way forward.</li> <li>✓ Participation on presentation as a presenter.</li> <li>✓ Training «on the job»</li> </ul> | <p>Non EU Citizens can enter Switzerland a <b>valid residence card issued by any EU country</b> to attend:</p> <ul style="list-style-type: none"> <li>✓ business meetings;</li> <li>✓ Conferences, trainings</li> <li>✓ negotiating contracts.</li> </ul> <p>Business travellers will need their passport and their original residence card.</p> | <p>Depending on the length of the posting:</p> <ul style="list-style-type: none"> <li>• <b>Up to 8 days</b>, an online announcement is required, 8 days prior to the trip.</li> <li>• <b>Up to 4 months in a row</b> or 120 days spread over a year, a work permit must be processed without a quota.</li> </ul> <p>In both cases, local registration is not required.</p> <ul style="list-style-type: none"> <li>• <b>L permit</b> valid to work up to 12 months (extendable for additional 12 months until reach 24 months). Local registration is mandatory. No quota applies.</li> <li>• <b>B permit</b> up to a year and may be extended under certain conditions. Local registration is mandatory. No quota applies.</li> </ul> | <p>Depending on the length of the posting:</p> <ul style="list-style-type: none"> <li>• <b>Up to 8 days</b>, an online announcement is required. If non-EU/EFTA citizen has been working in the EU the previous 12 months.</li> <li>• <b>L permit</b> valid to work up to 12 months (extendable for additional 12 months until reach 24 months). This is conditioned to a quota, meaning that restrictions apply.</li> <li>• <b>B permit</b> up to a year and may be extended under certain conditions. This is conditioned to a quota.</li> <li>• In both <b>L and B permits</b>, local residence registration is mandatory.</li> <li>• Quota restrictions will be assessed in terms of salary, qualifications, overall Swiss economical interest and lack of local Swiss/EU skilled workers.</li> </ul> |

#### 4. Overview per Host Country – United Kingdom

| Country        | Business trips  |                 | Work trips   |  |
|----------------|---|-----------------|--|--|
|                | EU citizens   | Non-EU citizens | EU citizens  | Non-EU citizens                                |
| UNITED KINGDOM | <p>There are no differences now between EU citizens and non-EU citizens. Both can enter the UK for business purposes as visitors. Please note a Standard Visitor Visa is required to visit the UK for up to 6 months for a business trip or meeting or to do a short course or training. European citizens must apply for an electronic travel authorisation (ETA).</p> <p>Only British or Irish passport holders and those with permission to live, work or study in the UK are exempt to apply for a Visa.</p> <p>More information can be found here <a href="#">Get an electronic travel authorisation (ETA) to visit the UK</a>; <a href="#">Apply for an ETA - GOV.UK</a></p> <p>A visa-exempt visitor can stay for up to 6 months within any 12-month period without a visa. This can be spread across multiple trips.</p> <p>In any case, an assessment of the real purpose of the trip will be carried out at the UK border control and some documents will be required.</p> <p>Employment is strictly prohibited under a Visitor Visa.</p> |                 | <p>A work permit is needed except for those who already applied for the EU Settlement Scheme or Irish citizens, who can legally perform any work without a prior labour authorization.</p> | <p>A work permit is required in all cases.</p> |

#### 5. Appendix: Van der Elst rulings

Non-EEA nationals whose usual place of work is in another EU country can seek entry to certain EU countries, under the Van der Elst ruling, which was issued by the Court of Justice of the EU.

This ruling allows a non-EEA national who is legally employed by a company in an EU country to perform services in another European country on a project for a short time. As a result, a non-EEA national can seek permission to remain for up to a maximum of 12 months to work in the EU on behalf of their European employer.

However, please note that not all EU countries have recognized this ruling.