

Artificial Intelligence Policy

Table of contents

1. Background	3
2. Reference framework	3
3. Purpose and scope.....	4
4. Governance & Accountability (Cellnex AI Governance Framework)	4
4.1. Governance bodies and oversight	5
4.2. Roles, responsibilities and decision rights	5
4.3. Governance across the AI lifecycle	5
4.4. Transparency, documentation, explainability & traceability of AI systems	6
4.5. Third-party & value chain governance.....	6
5. Responsible AI Requirements & Commitments.....	6
5.1. Risk-based approach and risk assessments	7
5.2. Human oversight and intervention requirements.....	7
5.3. Privacy & data protection requirements	7
5.4. Fairness, diversity & non-discrimination requirements	8
5.5. Technical robustness, resilience & information security requirements.....	8
5.6. Sustainability requirements.....	8
5.7. Acceptable use of AI systems and tools.....	9
5.8. Reporting system (Ethics Channel)	9
5.9. AI literacy, competence, training and awareness.....	9
6. Internal regulatory development	10
7. Approval, review, control and communication of the Policy.....	10
8. Changes control.....	10

1. Background

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

In the exercise of these functions, the Board of Directors is responsible for determining the Company's general policies and strategies and, therefore, has approved this Artificial Intelligence Policy (hereinafter, the "Policy") for all companies in the Cellnex Group.

This policy reflects the importance that Cellnex attaches to ensuring a responsible, ethical, secure and sustainable use of artificial intelligence systems (hereinafter, "AI" or "AI systems") in alignment with regulatory requirements and corporate values throughout the organization.

2. Reference framework

This Policy takes as reference the most relevant international and European regulations, standards and voluntary initiatives on artificial intelligence including, among others, the following:

- The Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonized rules on artificial intelligence (the EU AI Act)
- The Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law
- The United Nations Global Compact Gen AI for the Global Goals Report
- The OECD AI Principles
- The EU guidelines on ethics in artificial intelligence: context and implementation
- The Global System for Mobile Communications Association (GSMA) Responsible AI Maturity Roadmap
- The Global Coalition on Telecommunications (GCOT) Principles on AI adoption in the Telecommunications Industry
- The ISO 27001 and 42001 standards
- Other applicable national or regional legislation, regulatory guidance and sector specific requirements to AI in the jurisdictions where Cellnex operates.

This Policy supports and must be interpreted in conjunction with the Cellnex Code of Ethics and the rest of corporate policies and internal regulations both at group and local levels. Any jurisdiction specific AI internal regulations developed under this Company framework, shall be read together with this Policy. In case of discrepancy between the contents of this Policy and any local regulations of a jurisdiction where Cellnex operates, the stricter rule will apply.

3. Purpose and scope

The purpose of this Policy is to establish the corporate principles and guidelines governing the development, implementation, procurement and use of AI systems at Cellnex, ensuring compliance with all applicable ethical and regulatory standards.

For the purposes of this Policy, an AI system means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

In this context, the Company's strategy is built upon the following key pillars:

- safeguarding fundamental human rights;
- upholding fairness, equality and non-discrimination;
- ensuring transparency, explainability, human oversight and accountability;
- maintaining the highest standards of risk management, security, data integrity and resilience; and
- fostering innovation and growth that aligns with regulatory compliance and sustainability.

This Policy applies to all the legal entities that comprise the Cellnex Telecom group and within each of them to all their directors, managers, and employees, taking into consideration all applicable local regulatory requirements. Also, this Policy applies to all contractors and third party partners and to all AI systems developed, procured or used by Cellnex. The Company will promote compliance and alignment with the principles and guidelines set forth in this Policy among companies that do not form part of the group but in which the Company holds an interest, joint ventures and other entities in which it assumes management, as well as suppliers, business partners and other stakeholders throughout the value chain.

4. Governance & Accountability (Cellnex AI Governance Framework)

Cellnex implements this Policy through an Artificial Intelligence Governance Framework (the "AIGF"), designed to ensure that AI systems are adopted and used responsibly, ethically and securely, in alignment with regulatory requirements and corporate values.

The AIGF establishes the governance bodies, roles and decision rights required to oversee AI initiatives across the organization, including their prioritization, approval, monitoring and continuous improvement.

This governance approach is intended to be consistent with the Company's overall governance model and decision-making forums. Material changes to AI systems, including model retraining, changes in datasets or functional scope, shall be subject to formal change management, reassessment of risks and, where applicable, renewed approval by the AI Oversight Committee.

4.1. Governance bodies and oversight

At Cellnex, an AI Oversight Committee has been established to lead the Company's AI adoption strategy and to ensure that AI-related initiatives are aligned with corporate strategy, adhere to ethical principles, and comply with applicable regulatory frameworks.

The Committee includes representatives from key areas such as the IT team, Corporate Legal, country-level stakeholders and the Global Security team, ensuring a multidisciplinary approach to AI governance.

The AI Oversight Committee meets periodically to review AI initiatives proposed within the organization. During these sessions, proposals are evaluated with the aim of approving and prioritizing their implementation based on alignment with strategic objectives, technical feasibility, and associated risks and potential benefits.

4.2. Roles, responsibilities and decision rights

Cellnex assigns clear accountability for AI initiatives to ensure that responsibility for outcomes remains with the business and functional owners. AI systems are used to support and enhance decision-making and operational effectiveness, but they do not replace human accountability.

If a Cellnex team proposes the implementation of an AI initiative, it must be submitted to the AI Oversight Committee by the management area under whose responsibility or influence the initiative falls, for approval by the Committee.

The Committee conducts an initial assessment to confirm alignment with strategic objectives and technical feasibility, and to ensure that the initiative can be governed and controlled appropriately.

As part of decision rights, Cellnex establishes approval expectations for AI systems prior to deployment, and expects oversight and documentation to be in place to support compliance and auditability.

4.3. Governance across the AI lifecycle

Cellnex applies governance throughout the lifecycle of AI initiatives, from initial proposal and prioritization to implementation and ongoing monitoring

To achieve consistent governance across the lifecycle, the AI Oversight Committee drives pillars such as: (i) awareness and training for ethical AI use, (ii) demonstrable business case and process efficiency, (iii) strategic partnerships, (iv) regulatory and ethical compliance, (v) efficient AI governance, and (vi) ongoing monitoring and evaluation of processes and outcomes.

Cellnex tracks AI initiatives across defined maturity stages (e.g., analysis, PoC, implementation, operation & evolution), enabling appropriate oversight and visibility as initiatives progress.

4.4. Transparency, documentation, explainability & traceability of AI systems

Cellnex is committed to maintaining appropriate levels of transparency, traceability, documentation and auditability for AI systems, proportionate to their use and risk profile. This ensures that systems can be meaningfully overseen, assessed and scrutinized by users, auditors, regulators and other relevant stakeholders.

Cellnex maintains an updated inventory of authorized AI systems and their intended purposes, enabling oversight of how each system contributes to the organization and supporting governance and accountability processes. The inventory of authorized AI systems shall be formally owned and maintained by the Global Security Department and shall, at a minimum, include: system owner, purpose, risk classification, data categories used, third-party involvement, approval status and lifecycle stage.

AI systems shall be documented in a manner that supports effective governance, including information necessary to understand their purpose, logic, behavior, inputs and decision-making criteria. This level of documentation enables explainability and ensures that decisions and system outputs can be interpreted, reviewed and justified.

Transparency also requires that relevant datasets, processes and system components are recorded and traceable, facilitating disclosure where appropriate and allowing for meaningful scrutiny and informed use throughout the AI system lifecycle.

4.5. Third-party & value chain governance

Cellnex applies governance and accountability not only to internally developed AI systems, but also to AI systems acquired from or operated by suppliers and business partners.

This includes assessing AI systems provided by third parties and ensuring that risk management, regulatory compliance, security and resilience expectations are addressed through appropriate safeguards.

Where relevant, Cellnex may require specific documentation and assurances from suppliers and business partners, incorporate contractual safeguards, and perform audits or periodic controls to ensure proper risk management and impact mitigation.

This includes ensuring the protection and return of confidential information, even after the contractual relationship has ended, where applicable.

5. Responsible AI Requirements & Commitments

Cellnex is committed to ensuring that AI systems are developed, procured, implemented and used responsibly, ethically, securely and sustainably, in alignment with regulatory requirements and corporate values.

Ensuring organization-wide compliance requires a risk-based approach supported by governance, controls, training, oversight and effective reporting mechanisms.

5.1. Risk-based approach and risk assessments

Cellnex shall apply a risk-based approach to AI systems across their lifecycle, identifying, assessing and mitigating risks associated with their development, procurement, implementation and use.

A comprehensive AI risk management framework will define procedures for identifying, assessing and mitigating risks, taking into account both inherent risks and emerging risks resulting from AI's fast-evolving nature, with continuous evaluation and adaptation.

All initiatives involving AI shall be identified, classified, inventoried and managed according to their level of risk, including the categorization of AI systems as prohibited, high-risk, limited-risk or minimal-risk systems, as applicable.

The appropriate controls shall be designed and applied to minimize these risks. Additional requirements shall apply to AI systems classified as high-risk, including but not limited to: documented risk management processes, data governance controls, technical documentation, automatic logging capabilities, reinforced human oversight mechanisms, accuracy and robustness thresholds, and post-deployment monitoring.

Cellnex shall implement quick response mechanisms to react and recover from incidents involving AI systems and shall conduct periodic audits to verify compliance with this framework and confirm that AI systems operate in a safe, ethical and responsible manner.

5.2. Human oversight and intervention requirements

AI systems used at Cellnex shall preserve human oversight and intervention, especially when outputs relate to critical functions and strategic decisions.

Humans shall have the possibility to review, escalate and, where appropriate, override AI outputs or decisions through suitable procedures and failover mechanisms, in order to prevent or minimize risks (including risks to health and safety, fundamental rights, the environment, privacy, intellectual property, reputation and corporate assets). This oversight shall be performed by the persons on behalf of or with the relevant knowledge and expertise of the functions or processes where an AI system intervenes.

5.3. Privacy & data protection requirements

AI systems operating at Cellnex shall guarantee privacy and data protection by complying with applicable privacy regulations and internal policies, with specific attention to GDPR and Cellnex's Personal Data Protection Policy.

Cellnex shall deploy AI systems with robust data governance practices (including privacy by design, impact assessments, data minimization and continuous monitoring) and privacy-preserving technologies (including encryption and anonymization), as applicable.

5.4. Fairness, diversity & non-discrimination requirements

AI systems operating at Cellnex shall uphold fairness, avoid exclusion and unequal treatment, and strive to prevent or minimize unwanted biases to achieve equitable outcomes that take into account the needs of diverse user groups.

AI systems shall be conceived and deployed with consideration for the full range of ethnic, gender, sexual, social and cultural identities and realities, as well as of human abilities and requirements, and shall ensure accessibility for persons with disabilities.

Where relevant, stakeholders that may be directly or indirectly affected by AI systems will be consulted and involved in their development, procurement or implementation.

5.5. Technical robustness, resilience & information security requirements

AI systems operating at Cellnex shall be technically robust and secure, protecting their functionalities against cyber threats (including malicious use, unexpected interruptions or failures, and unauthorized access) while maintaining operational stability and data integrity throughout their lifecycle.

AI systems should minimize failures and vulnerabilities through continuous monitoring, validation and post-deployment maintenance, enabling iterative improvements and proactive risk prevention.

AI systems shall also comply with Cellnex's Information Security Policy and the corporate cybersecurity regulatory framework, ensuring the application of appropriate technical and organizational safeguards to protect confidentiality, integrity and service continuity in all circumstances.

5.6. Sustainability requirements

AI systems operating at Cellnex shall pursue positive social change and encourage sustainability and environmental responsibility.

AI systems should, by design, incorporate social impact monitoring and minimization, environmental considerations, energy efficiency, resource optimization and carbon footprint reduction, and must comply with Cellnex's Sustainability and Environment and Climate Change Policies.

Equivalent sustainability expectations shall be promoted for AI systems deployed by suppliers and business partners throughout the value chain.

5.7. Acceptable use of AI systems and tools

Only AI systems and tools expressly authorized by Cellnex may be used in the corporate context.

The use of professional credentials for identification and/or authentication in unauthorized AI tools is strictly prohibited, and the use of AI tools from personal devices to carry out company-related activities is forbidden.

Reviewing outputs generated by AI systems is essential to ensure results are accurate, reliable and free from biases, and no output should be used if it discriminates against or harms individuals based on protected attributes or could cause harm to health, safety or human rights.

Cellnex has a zero-tolerance approach to any use of AI systems or tools for unlawful purposes, prohibited practices under relevant regulations or in ways that undermine ethical standards, individuals' rights, safety, security, privacy or market integrity. These instances will be thoroughly investigated, remediated and subject to the appropriate measures under the Cellnex's Disciplinary System

Cellnex's internal rules governing user responsibilities further specify how AI tools may be used, including limitations on the type/classification of information that may be entered into AI tools, restrictions on the use of personal accounts for Company-related purposes and further operational prohibitions.

5.8. Reporting system (Ethics Channel)

Cellnex maintains dialogue with stakeholders to support responsibility and accountability for AI systems and their outcomes, enabling concerns to be raised regarding potential incidents or negative impacts.

The Ethics Channel is Cellnex's secure platform to receive, investigate and handle concerns or reports regarding this Policy, guaranteeing strict confidentiality, anonymity, no retaliation, assurance of individual's rights and personal data protection.

The Ethics Channel is available through the following link: <https://www.cellnex.com/ethics-channel>

5.9. AI literacy, competence, training and awareness

Cellnex shall implement organization-wide literacy and training plans to improve knowledge and awareness around the use of AI technologies, ensuring that teams understand AI technologies and have appropriate competences to manage them responsibly, ethically and effectively.

All personnel shall be informed about Cellnex's AI strategy, the potential risks associated with AI, and the principles and guidelines set out in this Policy and the internal regulations developed under it.

Employees granted licenses to use specific AI tools shall receive role-appropriate training, and for AI-related projects it shall be mandatory that project teams have training appropriate to the scope of the project.

6. Internal regulatory development

The Global Security 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.

7. Approval, review, control and communication of the Policy

Approval	On the prior recommendation of the Audit and Risk Management Committee, the Board of Directors of Cellnex Telecom, S.A. approved this Artificial Intelligence Policy on 29/04/2026.
Review	The Global Security Department will review and propose updates to this Policy whenever deemed necessary or when significant changes occur that may affect its content or application.
Control	The Global Security Department is responsible for ensuring compliance with this Policy, in collaboration with all corporate areas and business units within the Company. Each area actively contributes to the application of the established principles and commitments, ensuring that operational and strategic practices are aligned with Cellnex's responsible and ethical AI objectives.
Communication	The Global Security Department undertakes to periodically communicate its progress in complying with this Policy to all internal and external stakeholders, in line with this principle of transparency. It will also promote awareness and compliance with this Policy, which will be permanently available on the Company's website.

8. Changes control

Version	Elaborate by	Validity
1	Global Security Department	29/04/2026