



Report on Income Tax  
Information (EU Public  
Country by Country  
Report) 2025



## Report on Income Tax Information (EU Public Country by Country Report) – Financial Year 2025

Pursuant to the provisions of Section One.1 of the Eleventh Additional Provision of Law 22/2015, of 20 July, on Auditing (hereinafter, the “LAC”), Cellnex Telecom, S.A. is required to publish and make publicly accessible a report on Corporate Income Tax, or taxes of an identical or similar nature, at the consolidated level of the ultimate parent company, relating to the 2025 financial year.

### 1. General information

Name of ultimate parent of group / of standalone company	Cellnex Telecom, S.A.
Country of registered office of ultimate parent undertaking	Spain
Date of start of financial year	01/01/2025
Date of end of financial year	31/12/2025
Reporting currency	EUR

The reported information is communicated on the basis of the instructions for reporting information referred to in Article 14 of the Corporate Income Tax Regulations, approved by Royal Decree 634/2015 of 10 July, and its implementing provisions, as well as those regulating Order HFP/1978/2016 of 28 December, which approves Model 231 for the Country-by-Country Report.

## 2. Overview of information on a country-by-country basis (in euros)

Tax jurisdiction	Country code	Revenues	Profit (loss) before Income Tax	Income Tax paid – on cash basis	Income Tax accrued – current year	Accumulated earnings	Number of employees
SPAIN	ES	1,344,611,335	(5,830,398)	46,205,455	(3,529,408)	394,615,947	1,071
ITALY	IT	897,244,382	42,168,508	122,877,118	2,675,361	840,640,002	233
NETHERLANDS	NL	170,397,171	45,402,341	9,505,312	11,936,490	174,534,122	106
FRANCE	FR	982,118,313	(154,657,733)	7,783,582	1,930,728	(18,025,063)	303
PORTUGAL	PT	209,028,030	31,824,106	10,401,799	8,874,146	323,519,027	51
POLAND	PL	630,665,943	22,744,747	17,680,892	16,088,698	343,623,522	424
DENMARK	DK	44,526,581	13,642,651	–	(1,749)	(591,288,523)	20
SWEDEN	SE	75,006,566	29,482,482	2,688,508	1,622,511	148,460,853	25
AUSTRIA	AT	4,706,282	4,641,828	–	–	(470,496,751)	–
IRELAND	IE	11,077,543	4,309,338	–	226,357	36,322,392	6
BELGIUM	BE	3,780,000	180,000	44,600	45,000	–	1
All other tax jurisdictions (aggregated basis)	–	908,947,583	61,702,659	10,160,160	67,901,758	(332,881,159)	321
<b>Total Cellnex Group</b>		<b>5,282,109,729</b>	<b>95,610,529</b>	<b>227,347,426</b>	<b>107,769,892</b>	<b>849,024,369</b>	<b>2,561</b>

For the purpose of preparing the Report on Income Tax Information (EU Public Country by Country Report), the information contained in the reporting packages of each of the entities belonging to the Cellnex Group has been used, as prepared for the consolidated financial statements. This information refers to accounting prepared under IFRS, as applied by the parent company, without considering certain consolidation adjustments (mainly the elimination of intercompany balances and transactions or Purchase Price Allocation - PPAs).

This information covers the period from 1 January or from the time the company joins the Cellnex Group, until the end of the financial year on 31 December (see comments in Spain, Austria and Ireland).

Revenues are reported under IFRS, including revenues with related parties and financial income, and excluding intragroup dividends.

Profit (loss) before Income Tax excludes intragroup dividends.

The non-distributed earnings in a negative sign (losses) of certain companies are compensated with the positive results of the rest of entities in the same jurisdiction. The accumulated earnings include the profit (loss) of the year and include the amount of reserves considered as non-distributable, according to the local legislation.

The information included in Income Tax paid (on cash basis) may include payments to the Tax Authorities and refunds from the Tax Authorities. If the amount is in a positive sign, it means that the amount paid exceeds the refunds received. If negative, it means that the amount of the refunds received exceeds the amount paid.

The information reported in Income Tax accrued in a positive sign refers to current tax expense. If negative, it refers to current tax income. Income tax accrued does not include the tax effect of dividends.

The average number of employees of the year is reported.

### Spain, Netherlands, France, Poland and Denmark

Dividends received by the entities are excluded from revenues, profit (loss) before Income Tax and Income Tax accrued figures.

### Denmark, Sweden and Poland

The average exchange rate of the year 2025 has been used for the profit and loss accounts, and the ending exchange rate as of 31 December 2025 for the balance sheet accounts.

### Spain

The dividends distributed in 2025 are charged to share premium.

On February 5<sup>th</sup>, 2025 MBA Datacenters, S.L. was sold.

### Netherlands

On May 15<sup>th</sup>, 2025 Radio Netwerk Nederland, B.V. was acquired.

On Tower Netherlands 3, B.V. is present in the Netherlands and Belgium and, for the purposes of Corporate Income Tax, is considered a permanent establishment in Belgium.

### Belgium

On Tower Netherlands 3, B.V. is present in the Netherlands and Belgium and, for the purposes of Corporate Income Tax, is considered a permanent establishment in Belgium.

### Austria

On June 27<sup>th</sup>, 2025 Cellnex Austria GmbH was liquidated.

### Ireland

On February 28<sup>th</sup>, 2025 Cellnex Ireland Ltd., On Tower Ireland Ltd. and Cignal Infrastructure Ltd. were sold.

### 3. List of subsidiaries and activities

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Spain	ES	Cellnex Telecom, S.A.	Research and Development; Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Spain	ES	Cellnex Finance Company, S.A.	Internal Group Finance
Spain	ES	Cellnex Telecom España, S.L.U.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Spain	ES	Cellnex Nordics, S.L.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Spain	ES	Celland Estate Management, S.L.U.	Other
Spain	ES	Retevisión-I, S.A.U.	Research and Development; Administrative, Management or Support Services; Provision of Services to Unrelated Parties; Holding Shares or Other Equity Instruments
Spain	ES	Tradia Telecom, S.A.U.	Research and Development; Administrative, Management or Support Services; Provision of Services to Unrelated Parties; Holding Shares or Other Equity Instruments
Spain	ES	On Tower Telecom Infraestructuras, S.A.U.	Provision of Services to Unrelated Parties
Spain	ES	Metrocall, S.A.	Provision of Services to Unrelated Parties
Spain	ES	Adesal Telecom, S.L.	Provision of Services to Unrelated Parties
Spain	ES	Zenon Digital Radio, S.L.	Provision of Services to Unrelated Parties
Spain	ES	Xarxa Oberta de Comunicació i Tecnologia de Catalunya, S.A.	Provision of Services to Unrelated Parties
Spain	ES	MBA Datacenters, S.L.	Provision of Services to Unrelated Parties
Italy	IT	Cellnex Italia, S.p.A.	Administrative, Management or Support Services; Provision of Services to Unrelated Parties; Holding Shares or Other Equity Instruments
Netherlands	NL	Cellnex Netherlands, B.V.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Netherlands	NL	Towerlink Netherlands, B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Shere Masten B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Breedlink B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Alticom B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	On Tower Netherlands 2, B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	On Tower Netherlands 3, B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Broadcast Technology, B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Signal Infrastructure Netherlands, B.V.	Provision of Services to Unrelated Parties
Netherlands	NL	Radio Netwerk Nederland B.V.	Provision of Services to Unrelated Parties

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
France	FR	Cellnex France Groupe, S.A.S.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
France	FR	Cellnex France, S.A.S.	Administrative, Management or Support Services; Provision of Services to Unrelated Parties; Holding Shares or Other Equity Instruments
France	FR	Towerlink France, S.A.S.	Provision of Services to Unrelated Parties
France	FR	Nexloop France, S.A.S	Provision of Services to Unrelated Parties
France	FR	Springbok Mobility	Provision of Services to Unrelated Parties
France	FR	On Tower France S.A.S.	Provision of Services to Unrelated Parties
France	FR	Compagnie Foncière ITM 1	Provision of Services to Unrelated Parties
France	FR	Hivory, S.A.S.	Provision of Services to Unrelated Parties
France	FR	Cellnex France Infrastructures, S.A.S.	Provision of Services to Unrelated Parties
France	FR	Celland Estate Management France S.A.S.	Other
Portugal	PT	CLNX Portugal, S.A.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Portugal	PT	OMTEL, Estruturas de Comunicações, S.A.	Provision of Services to Unrelated Parties
Portugal	PT	On Tower Portugal, S.A.	Provision of Services to Unrelated Parties
Portugal	PT	Towerlink Portugal, S.A.	Provision of Services to Unrelated Parties
Portugal	PT	Celland Estate Management Portugal S.A.	Other
Poland	PL	Cellnex Poland sp z.o.o.	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Poland	PL	On Tower Poland, S.p.z.o.o.	Provision of Services to Unrelated Parties
Poland	PL	Towerlink Poland, S.p.z.o.o.	Provision of Services to Unrelated Parties
Poland	PL	Cignal Infrastructure Poland sp. z.o.o.	Other
Poland	PL	Remer Sp. z o.o.	Provision of Services to Unrelated Parties
Sweden	SE	Cellnex Sweden, AB	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Sweden	SE	On Tower Sweden, AB	Provision of Services to Unrelated Parties
Denmark	DK	Cellnex Denmark ApS	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Denmark	DK	OnTower Denmark ApS	Provision of Services to Unrelated Parties
Austria	AT	Cellnex Austria GmbH	Other
Ireland	IE	Cellnex Ireland Limited	Administrative, Management or Support Services; Holding Shares or Other Equity Instruments
Ireland	IE	On Tower Ireland Limited	Provision of Services to Unrelated Parties
Ireland	IE	Cignal Infrastructure Limited	Administrative, Management or Support Services; Provision of Services to Unrelated Parties; Holding Shares or Other Equity Instruments

## DISCLAIMER

### Basis of Preparation of the Report and Reconciliation with Other Public Financial Information

The obligation to disclose the EU Public Country by Country Report ("PCbCR") arises from the Directive (EU) 2021/2101 of the European Parliament and of the Council of 24 November 2021, amending Directive 2013/34/EU as regards disclosure of income tax information by certain undertakings and branches, which requires large multinational groups to publish country-by-country financial and tax information.

Within this regulatory context, Cellnex Telecom, S.A. (the "**Company**") has prepared its PCbCR for the financial year 2025 (the "**Report**") in compliance with the Eleventh Additional Provision (*Disposición Adicional Undécima*) of Law 22/2015, of 20 July, on Statutory Auditing (*Ley de Auditoría de Cuentas*, "**LAC**"), which transposes into Spanish law the abovementioned Directive.

Given that the PCbCR is prepared on the basis of individual reporting packages under IFRS – without applying consolidation adjustments such as the elimination of intercompany balances and transactions or Purchase Price Allocations – the resulting figures inherently differ from those presented in consolidated financial statements and other public financial disclosures. This is a structural feature of the reporting framework, not a reflection of any inconsistency in the underlying financial data.

As a consequence of the former, the financial information contained in this Report is not directly comparable with other publicly available financial information of the Cellnex Group, including, without limitation, the 2025 Consolidated Annual Accounts and the 2025 Integrated Annual Report, due to differences in the basis of preparation, scope, and methodology mandated by the corresponding applicable regulations. These differences cannot be considered as discrepancies or inconsistencies in the financial reporting, but rather as the natural and expected result of complying with separate and complementary disclosure obligations that serve different purposes and apply different aggregation and presentation criteria.

This Report is an unaudited report, as permitted by the applicable regulation.