

HUMAN RIGHTS POLICY

Background

The Board of Directors of Cellnex Telecom, S.A., is responsible for approving the policies and general strategies for the whole group.

In the performance of these duties, the Board of Directors approves this Policy, and its commitment of application in the countries where the company operates.

Introduction

The potential for ubiquitous and permanent connectivity offered by infrastructures for the transport and transmission of voice, data, radio and television signals is both a strategy and a decisive and essential instrument in improving access to information and communication systems in equal conditions for all.

It is a key decisive element for their personal development, their education and learning process, and their growth and maturing as citizens able to form their own criteria about reality, with the liberty to express themselves freely and with availability and access to network resources to allow them fully to develop as individuals and professionals, overcoming territorial barriers, thus combating the "digital divide". A society that is territorially balanced, economically competitive, and rich and diverse thanks to equal access to training, culture and scientific knowledge is a society that not only complies with human rights, but also commits to rolling out the necessary instruments to spread and preserve such rights.

Consistent with this, Cellnex Telecom, as an operator of telecommunications infrastructures in Europe, joined the United Nations Global Compact, which commits the business and corporate world to respecting and promoting human rights. Likewise, company policies such as Corporate Governance, Corporate Social Responsibility or its Code of Ethics, reflect the Cellnex's proactive commitment to the reference framework, principles and values set out in the Universal Declaration of Human Rights.

On the basis of these premises, the Board of Directors of Cellnex Telecom uses this policy to reinforce and explicitly state the company's commitment to human rights in accordance with current international standards.

Cellnex shall ensure that all its employees and managers, and its stakeholders in all the countries in which it operates, are familiar with and are aware of the company's commitment to these principles and their implications in daily practice.

1. Purpose and scope

1.1 Purpose. This document formalises Cellnex's commitment to human rights, which are part of its own values and principles, taking the main international standards as a point of reference.

Cellnex ensures and is committed to protecting and respecting universally recognised fundamental human rights within the scope of influence of the Group and ensuring that it is not complicit in violating such rights, as well as remedying any damage that may be caused.

1.2 Scope. This Human Rights Policy is corporate in scope and covers the range of businesses and activities developed by Cellnex and the Group's companies in the various countries in which it operates. In this connection, the Group's companies and subsidiaries shall adopt the appropriate decisions and their actions will be governed accordingly in order to ensure compliance with the policy.

2. Basic principles

The Human Rights Policy is a requirement that must be fulfilled by all companies operating under the umbrella of Cellnex Telecom. The Chief Executive Officer of each company must ensure that internal regulations are developed and/or adapted in accordance with this policy and with the applicable legal framework in each case.

This policy is based on key international standards, to which it is committed and which it adopts as a framework regulating the limits in which the company's activity must be performed:

- The International Charter of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and its two optional protocols.
- Principles of the UN Global Compact.
- Guiding Principles on Business and Human Rights (United Nations).
- Fundamental agreements of the International Labour Organization (ILO).
- Guidelines for Multinational Enterprises (OECD).

This policy is aligned with and complementary to other internal Corporate Governance policies and regulations of Cellnex Telecom, such as the Corporate Responsibility Policy, the Code of Ethics, the Ethical Channel or the procedure for the prevention of corruption.

3. Lines of action and commitments

Based on the basic principles set out above, Cellnex Telecom is committed to promoting these values, both in the Cellnex Group and among its stakeholders:

- 1- Respect, support and promote human rights. Cellnex Telecom has expressed its commitment to various international initiatives, such as the United Nations Global Compact, to promote respect for human rights in the business and corporate environment. Furthermore, the company has a CR Master Plan, whose strategic lines are coherent and aligned with respect for human rights.
- 2- Promote these values internally. Cellnex Telecom has various internal policies and rules regarding:
 - Corporate Responsibility Policy
 - Ethical Code and Channel

- Procedure for preventing corruption
- Disciplinary system
- Equality Plan
- Collective agreements
- Information Security Policy
- Talent Management Model

This is how Cellnex shows its commitment to its employees by ensuring, inter alia, decent working conditions, non-discrimination, equality, promoting training and development, health and safety, trade union rights and collective bargaining, and preventing any type of harassment.

These commitments are disclosed to all members of the Cellnex Group through internal communication channels.

Likewise, the company is committed to promoting policies and behaviour based on the principles of diversity and equality, rejecting any type of discrimination based on age, race, gender, religion, disability, sexual orientation, political ideology or social origin.

3- Promote these values externally.

- Customers: Integrate social and environmental risks into the activity cycle and into decision-making; report the performance of the activity in a transparent, expedient and secure way; respect confidentiality, the right to privacy and customer data privacy.
- Suppliers: Disclose knowledge of the company's Code of Ethics and other policies and regulations related to social, environmental and corporate governance principles, as well as promoting respect for human rights; monitor the activity of suppliers in ethical, social, and environmental matters, and adopt the appropriate measures as necessary.

Local community and society at large. Cellnex is committed to cooperating with local authorities, complying with the legal framework, respecting internationally recognised human rights, and promoting the dissemination of the principles and values set forth in the Universal Declaration.

Cellnex shall try to ensure that its complaint mechanisms - accessible to all its stakeholders through the Cellnex Group corporate website - comply with the eight effectiveness criteria specified in point 31 of the "Guiding Principles on Business and Human Rights".¹

4. Implementation, monitoring and control

Implementation of this policy in the Cellnex Group begins with the assimilation and respect of the principles set out in the Code of Ethics and Disciplinary System, as well as the effective roll-out of the Corporate Responsibility Policy.

Integrating the company's corporate culture and values, including those described in this policy, into the daily activity and the behaviour of the members of the Cellnex group is achieved by dissemination and training via various internal communication channels.

Monitoring the implementation of this policy, and updating it on a regular basis, corresponds to Cellnex Telecom's Public and Corporate Affairs Department, under the instruction and supervision of the Board of Directors.

In this connection, it is the Board of Directors' Appointments and Remuneration Committee (CNR), in accordance with the functions assigned in the by-laws of the Board of Directors, which is the highest governance body responsible for enforcement of the commitments established in this policy, as well as the actions emanating from it.

Barcelona, 21 February 2018

ⁱ [Guiding Principles on Business and Human Rights](#). The effectiveness criteria of the complaint mechanisms must be:

- a) Legitimate: to develop the trust of the stakeholders at which they are aimed and to respond to the proper development of claims processes;
- b) Accessible: familiar to all the concerned groups at which they are aimed and provide due assistance to those who may have special difficulties in accessing these;
- c) Predictable: have a clear and well-known procedure, with an indicative calendar of each stage, and clarify any available processes and results, as well as the means to supervise implementation;
- d) Fair: ensure that victims have reasonable access to the sources of information, advice and expertise required to engage in a complaint process under equal conditions, with full information and respect;
- e) Transparent: keep the parties to a complaint or claim informed of its progression, and provide sufficient information on the performance of the mechanism with a view to fostering trust in its effectiveness and safeguard the public interest at stake;
- f) Compatible with the rights: ensure that the results and reparations are in accordance with internationally recognised human rights;
- g) A source of ongoing learning: adopt the appropriate measures to identify experiences in order to improve the mechanism and prevent future grievances and damages; Operational-level mechanisms should also
- h) Based on participation and dialogue: consult the stakeholders at which they are aimed about their design and operation, with special attention paid to dialogue as a means of addressing and resolving grievances.