

Slavery and human trafficking statement 2020

Modern slavery is a gross violation of human rights, involving such issues as forced labour, bonded labour, trafficking in human beings and child slavery.

Cellnex Telecom condemns all exploitative work practices, including the use of child labour, and we are fully committed to preventing them, both in areas that come within the Group's activities and in all matters that affect our supply chain.

In addition, the company implements a policy of transparency in respect of its business and its activities, and so any information relating to this statement, and the document itself, are published on the company's corporate website www.cellnextelecom.com.

Cellnex Telecom also undertakes to draft and publish a statement on slavery and trafficking in human beings for each financial year of the organization, as established in the Modern Slavery Act of 2015, passed in the United Kingdom.

Cellnex Telecom's activity

Cellnex has made a firm commitment to developing its network, which currently comprises more than 50,000 sites and positions the company to develop new generation networks. It provides services in Italy, Netherlands, United Kingdom, France, Switzerland, Ireland, Portugal and Spain thanks to the investments undertaken to boost its transformation and internationalisation drive.

Offers to its customers a range of services to guarantee the conditions for reliable and high-quality transmission of voice, data and audiovisual contents.

It also develops solutions in the field of "smart city" projects that optimise services to the citizen via networks and services that facilitate municipal management. In this area, Cellnex Telecom is deploying a network of intelligent communications that permits a connection between objects, and therefore the development of a solid ecosystem for the Internet of Things (IoT).

Cellnex Telecom also plays a relevant role in the deployment of safety and emergency networks for the security forces, known as PPDRs (Public Protection And Disaster Relief). This line of activity summarises both the degree of expertise the company's team of professionals and the ruggedness and reliability of the architecture of its networks and equipment.

The company is listed on the continuous market of the Spanish stock exchange and is part of the selective IBEX 35, EuroStoxx 600 and MSCI Europe indices. It is also part of the FTSE4GOOD, CDP, (A List Climate Change), Sustainalytics and "Standard Ethics" sustainability indexes.

Cellnex Telecom's commitments to the prevention of modern slavery

Corporate Responsibility Policy

Cellnex Telecom's Corporate Responsibility policy sets out the basic guidelines and lines of action in this regard. It commits the entire Group and is therefore applicable in all its subsidiaries, as well as in all functional areas of the company.

Cellnex Telecom's CR policy uses the following international standards as a benchmark, which it adopts as a regulatory framework within which company activities must be carried out:

- Principles of the United Nations Global Compact.
- Guiding Principles on Business and Human Rights (United Nations).
- Core Conventions of the International Labour Organization (ILO).
- OECD Guidelines for Multinational Enterprises.

In accordance with these standards, the company recognizes two basic principles whose application is transversal in all lines of action and undertakings, and on which their deployment is based:

Human Rights: The protection of and respect for Human Rights -as set out in the Universal Declaration-, within the Group's sphere of influence and non-complicity in their violation, as well as, when applicable, the reparation of any harm caused.

Stakeholders: The identification of the organization's stakeholders taking into account the entire value chain of the activity, the development of channels of communication and participation, and direct and indirect involvement in the identification of material aspects and the appraisal of performance.

This policy is developed and complemented by means of the company's internal rules of Corporate Governance, such as the Code of Ethics and the Ethics Channel.

The Cellnex Telecom's CSR Policy is concretized, for its development and execution, in the CR Master Plan of the Cellnex Group. The strategic areas which are contained in the CSR Master Plan, are: Ethic Management and good corporate governance, Development of people, Sustainable Business Development, Contribution of value to society, Communication and reporting and Governance of Corporate Responsibility.

Human Rights Policy

During 2018, Cellnex formalized its Human Rights Policy of application to the entire organisation which establishes that Cellnex is committed to protecting and respecting the Human Rights.

The code of ethics and the ethical channel

The Cellnex Group's code of ethics reflects the company's commitment to and involvement with the respect for human rights as a fundamental value of its actions, as well as with the principles regulated by the Universal Declaration of Human Rights. The company also discloses in this document its total rejection of child labour and forced or compulsory labour and undertakes to respect the freedom of association and collective bargaining.

Equity, Diversity and Inclusion Policy

This policy focuses on creating a climate that allows diversity in all of the following areas: gender, age, sexual orientation, culture, race, religion, thought, education, talent, social condition, individual quality, work style, disability, special needs or any other circumstance of its personnel; and at the same time, rejecting any type of discrimination for these reasons that impedes the growth of the Company or that affects the selection, retention, advancement and well-

being of its personnel. The Equity, Diversity and Inclusion Policy has been approved by the Board of Directors.

United Nations Global Compact

In November 2015 Cellnex Telecom joined the United Nations Global Compact as an expression of its commitment to including the corporate social responsibility concept into its operational strategy and organisational culture. United Nations Global Compact is an international voluntary initiative that includes more than 8,000 companies and institutions across 135 countries. Under this agreement, Cellnex Telecom undertakes to promote and spread corporate sustainability policies and practices based on the 10 key principles promoted by the United Nations, focusing on the areas of human rights, labour standards, environment and combating corruption in business activities. Cellnex' commitment to the United Nations Global Compact is part of its Corporate Responsibility (CR) programme.

Actions in Cellnex Group during 2019 in relation to slavery and human trafficking

The company is committed to the application of best practices in the countries in which it operates and based on international reference standards. For this reason, CSR criteria have been introduced in Due Diligence. In this way, Cellnex requires knowledge of the CSR policies and practices of the companies with which it works or will work.

In addition, the company's senior managers are committed to the corporate social responsibility through specific ESG-related objectives. Specifically, in 2019 an objective was set for this group which consists of evaluating and monitoring the efforts made by the Group in the area of ESG (Environment, Social and Governance), based on a combination of the general score obtained in a selection of ESG indexes in which Cellnex Telecom participates

In 2019 the Social Corporate Responsibility (CSR) Policy and information on compliance on the company website have been updated.

Likewise, in 2019 the Ethics and Compliance Committee continued to advance on disseminating and

communicating the Group's Code of Ethics through various actions according to the geographical area

In addition, taking advantage of the launch of the new intranet at Group level, the training relating to the Code of Ethics has been incorporated into it. In this way, training is always available to all Group employees. Given the importance of training in the area of compliance, it is planned to encourage this aspect and to distribute it more widely via the intranet

In 2019 has been created a new site for the Ethical Channel on the corporate website (<https://www.cellnextelecom.com/en/ethical-channel/>).

SA8000 certification

In 2019, the company carried out an internal audit as part of the process to obtain SA8000 certification for all the Group. In this sense, Cellnex Italy maintain SA8000 certification and created a new "Social Performance Team" committee that holds meetings at least twice a year, or more if they receive grievances to discuss and to solve.

Diversity Plan

We are currently working to make diversity part of our business. In 2019 we carried out an Initial diagnosis about diversity and inclusion in which we analysed the national and international context, regulatory framework, initiatives and awards and we drew up a benchmarking including companies in the telecommunications sector and companies from other leading sectors in this field, as well as examining the starting point in which the company finds itself.

As a result of this analysis, we have prepared an Equity, Diversity and Inclusion Policy that establishes the guidelines and lines of action in the area of Diversity, Equality and Inclusion for the entire Cellnex Group.

Along with the policy, we have drafted an Equity, Diversity and Inclusion Programme, defining the lines of action, commitments and strategic lines. At Cellnex we understand diversity in a broad sense and, therefore, we consider that our programme has to go beyond gender diversity and include other types of diversities such as generational, affective-sexual, cultural or functional diversity, with the aim of

integrating the diversity of the society in which we live and having diverse talents.

Cellnex' Volunteers program

In Cellnex we have a significant group of volunteers who contribute their ideas, skills, knowledge and time to developing solidarity projects. This year, we wanted to go one step further, creating a platform that not only recognises the work of these volunteers but also promotes further corporate volunteer activity and Cellnex as a socially responsible company, increasing our social contribution.

The purpose of Cellnex' social action was defined through the programme, and the company's social action and volunteer projects were planned strategically for three years. It will also serve as a platform for the future creation of the Cellnex Foundation.

The Cellnex social projects and volunteer programme was created to improve our social environment by promoting the development of young people in vulnerable situations through education and inserting them into the world of work, promoting innovation and technology.

The first project launched called "Cellnex Youth Challenge" is an educational and on-the-job training project in which Cellnex and its employees are closely linked to the La Mercè secondary school, offering support to vocational training students in telecommunications through motivation, mentoring, transmission of knowledge, experience and employability.

The initiative is aimed at several of the school's courses. The programme covers all students involved in vocational training in telecommunications, with 67 young people benefitting from this initiative during this first academic year.

The main goal of the project is to reduce the school drop-out rate and promote youth employment, but it also has several secondary cross-cutting objectives. These include empowering students, using their skills to perform projects and involving of company volunteers and teachers to motivate students on their way to training and employment. This year 64 volunteers participated in the initiative.

Actions in the supply chain during 2019 in relation to slavery and human trafficking

For Cellnex it is essential that suppliers should be familiar with corporate policies and ensure compliance with all of them. They can access Cellnex policies on purchasing, quality, environment, occupational risk prevention, information security, corporate responsibility, Human Rights and R&D + innovation as well as our Code of Ethics on the Cellnex corporate website. Suppliers must comply with their specific requirements in carrying out their work, and make the standards and requirements known to all their contracted and subcontracted personnel.

Cellnex established a Procurement Policy, which promotes a guide for action in the procurement process that goes beyond product and service price and quality to impact social, ethical, environmental, privacy and continuous improvement aspects in the performance of Cellnex Group suppliers.

Cellnex' companies apply a procedure for evaluating and selecting suppliers to ensure they are aligned and compliant with corporate policies and ethos.

Cellnex has a system for evaluating, selecting and monitoring suppliers that includes an internal procedure setting out the criteria and phases to be followed to become a Cellnex supplier.

An evaluation of the main suppliers is carried out in terms of Corporate Social Responsibility. In 2019, the method for conducting the CSR survey for suppliers was improved to increase participation so as to be able to collect information from a greater number of suppliers and obtain sufficient critical mass to take action for continuous improvement. The survey includes labour, risk prevention, social, environmental, quality and human rights aspects. The survey also explicitly requires suppliers to accept Cellnex's Code of Ethics and recommends that they ensure that their subcontractors respect and apply it.

Along with the survey, Cellnex has informed its suppliers that it is in the process of certification (SA8000 Certification) and has sent its corporate social responsibility policy, as well as the requirements of the SA 8000 standard to make its suppliers aware of Cellnex' commitment to corporate social responsibility.

The Cellnex Group's General Conditions include in its provisions a clause referred to the Group's Code of Ethics in order to require suppliers to declare knowledge and full compliance with its contents. Additionally, it is also compulsory for suppliers to inform their employees and, if applicable, their subcontractors of the existence and content of the Code of Ethics and to ensure that they comply with it. Moreover, such clause has also been included in the employment contracts of all the new hires of the Group.



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