

Anti-Slavery and Human Trafficking Statement

Organisational Structure

Cellnex UK Limited and its subsidiary UK companies are part of Cellnex Telecom, one of Europe's leading wireless telecommunications and broadcasting infrastructures operators. The Group provides services in Denmark, France, Ireland, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the United Kingdom. To develop our network and provide infrastructure for wireless telecommunications, we work with a range of suppliers. Austria was part of the Cellnex Group until 19 December 2024.

This anti-slavery and human trafficking statement is made on behalf of Cellnex UK Limited and each of its subsidiaries, of which On Tower UK Limited and Cignal Infrastructure UK each had an annual turnover of >£36m during the year reported on.

Definitions

- **Modern slavery** is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.
Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.
- **Human trafficking** is when people are brought to (or moved around) a country and forced to work, or do other things, they don't want to do. Traffickers use violence, threats or false promises of well-paid jobs and a better life, to trick victims into working for them.
- **Our Commitment**

Cellnex UK is committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain, and we impose the same high standards on our suppliers.

"Modern slavery and human trafficking are unacceptable. We have zero-tolerance within our Organisation and supply chain and in our relationships with our customers. We are committed to ensuring that such activity has no place in our industry both now and in the future."

Gianluca Landolina (Country CEO of Cellnex UK)

Our Policies

As part of our commitment to combating modern slavery, we have implemented, among others, the following policies:

Human Rights Policy; Code of Ethics; Anti-Bribery, Gifts and Hospitality Policy; Diversity, Equity and Inclusion Policy; the Sustainability Policy; and the Policy for the Whistleblowing Channel were updated during 2024. Each of these are available on our [website](#).

Cellnex has a global [Whistleblowing Channel](#) in place to deal with concerns swiftly and appropriately.

Assessing and managing risk - Human Rights Policy and Due Diligence

Cellnex's [Human Rights Policy](#) affirms its commitment to protect and respect universally recognised human rights within its sphere of influence and to mitigate and repair any damage that may be caused.

While awaiting the publication of the European Union's Human Rights Due Diligence Directive, during 2024 Cellnex proactively conducted preliminary assessments. As part of this initiative, the Company commits to regularly sharing its progress in adhering to human rights principles with internal and external right holders, thereby prioritising transparency and accountability.

Cellnex voluntarily conducts an annual Human Rights Due Diligence exercise, following the regulatory framework outlined by the OECD and the UN Guiding Principles on Business and Human Rights. The objective of this assessment is to pinpoint the most critical and highest priority actual as well as potential adverse impacts across Cellnex's entire value chain.

In 2024 the assessment was aligned with the Corporate Sustainability Reporting Directive (CSRD) / ESRS requirements. This exercise provided a holistic view of the Organisation's operations, highlighting overlaps and gaps in human rights considerations within the broader context of sustainability. By adopting this integrated approach, Cellnex can be more effective at identifying and mitigating risks, ensuring that human rights considerations are adequately addressed within the broader framework of ESG risks. The summary of the [Human Rights Due Diligence and Assessment Process](#) is available in the corporate website.

Cellnex has adopted a [Supplier Code of Conduct](#) that acts as a framework of trust and collaboration with its chain of suppliers as independent organisations that have a direct impact on the Cellnex value chain, resulting in the continuous improvement of purchasing processes establishing lasting and stable business relationships. The purpose of this Code is to serve as a guide for compliance by the Cellnex supply chain with the Group's set of established principles of action and values.

The rules referenced and included in this Code are mandatory for all Cellnex Group Suppliers as they fall within the scope of the Code of Ethics and the other rules, regulations and policies that make up the regulatory framework for ethics and compliance of the Cellnex Group. In this sense, Cellnex will require the commitment of its Suppliers in several aspects such as ensuring decent working conditions for their employees, no discrimination, providing equal opportunities to promote equity, guaranteeing occupational health and safety, preventing any type of harassment or eliminating the use of forced or child labour, among others. Suppliers shall promote compliance with all the aforementioned points as well as support work-life balance by implementing appropriate measures in accordance with applicable regulations.

Effectiveness

Cellnex seeks to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains. The Company aims to do this by continuously evolving the way in which it seeks to identify and mitigate risks in its working relationships with third parties and assess risks within the Organisation.

Based on the due diligence study, the risk of human rights breach have been identified as a corporate risk for the Company, thus becoming a priority on Cellnex's corporate agenda, guaranteeing a direct channel for reporting (our Whistleblowing Channel) irregular situations and protecting people against events that may affect their normal development and quality of life.

Moreover, the Risk Management area, in coordination with the Environmental, Social and Governance area, is responsible for monitoring the Human Rights Due Diligence process, with the participation of the different areas of the Company, and is also responsible for promoting, measuring, and reporting the development and implementation of the Human Rights Policy on a global and local scale. Cellnex undertakes to maintain a transparent management model for human rights management risk, and to regularly share it with the internal management bodies and with the main stakeholders.

Staff Training and Awareness

We aim to educate all our staff to recognise modern slavery and human trafficking risks in our business and supply chains. This is achieved through annual mandatory training and encouraging employees to identify and report any suspected acts of slavery and human trafficking. In 2024, nearly 1,766 hours were devoted to human rights training across the Group.

Monitoring and Evaluation

A Due Diligence process and a Human Rights Impact Assessment (HRIA) have been carried out to identify, mitigate, or remedy potential human rights risks. The assessment was conducted based on the *HRIA Guidelines for the Information and Communication Technology (ICT) Sector*, which provides a sector-specific framework for evaluating human rights impacts. Identifying the rights of affected individuals (*right-holders*) and the responsibilities of those accountable (*duty-bearers*) is the starting point for putting Cellnex's human rights commitments into practice. This approach enables Cellnex to map human rights impacts across its global value chain, highlight stakeholder needs and expectations, and engage multiple areas of the company.

The results of this assessment are aligned with the results of the previous exercise and confirm, once again, the existence of several thresholds in which Cellnex's economic activity could have a potential impact on the infringement of human rights. The adverse impacts identified are monitored together with the rest of the Company's business risks and are grouped under the Human Rights risk, which is included in the Corporate Risk Matrix.

The current evaluation process focuses on strengthening the control environment and identifying opportunities for continuous improvement and reinforces their focus on preventive actions to maximise positive impacts and proactively minimise negative ones.

It is noteworthy that the actions derived from this assessment align with the commitments outlined in Cellnex's Corporate Human Rights Policy, as well as the commitments made with its stakeholders and global value chain.

Hence, conducting this due diligence process enhances Cellnex's capability to comprehend, evaluate, and address the risk events arising from its economic activities within the Company's natural and social environment, as well as in its commercial interactions.

(For further information: [Human Rights Due Diligence and Assessment Process](#)).

Value Chain

In terms of the value chain, Cellnex strategy is based on the new strategic purchasing model that is being defined in the Company and which is aligned with one of the main axes of the ESG Master Plan 2021-2025, extending our commitment to the value chain, in which a series of actions are defined to be developed in the area of relations with the supply chain.

In this sense, supplier selection, approval and evaluation processes are considered critical within the procurement process. In 2024, Cellnex has further integrated ESG criteria into its supplier selection and contracting processes, ensuring that sustainability is a key consideration in all its sourcing decisions. Also in 2024, as in the previous four years, the ESG supplier assessment campaign was conducted using the Ecovadis platform. Once the assessment is complete, feedback is provided to suppliers and the areas with the highest risk of non-compliance are identified.

Together, these two projects aim to change the way the Company approaches the purchasing process and to transfer Cellnex's strategic objectives to the supply chain.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Cellnex UK Limited, On Tower UK Limited and Cignal Infrastructure UK Limited for the financial year commencing 1 January 2024 and ending 31 December 2024.

This statement was approved by the Boards of each of the relevant companies on the date stated below.

Signature:

A handwritten signature in black ink, appearing to read "Gianluca Landolina".

Gianluca Landolina

Director

Cellnex UK Limited, On Tower UK Limited and Cignal Infrastructure UK Limited

Date: 26 June 2025