

Business Continuity Policy

Index

1. Background	3
2. Reference framework	3
3. Purpose and scope	4
4. Basic principles, commitments and strategic lines	4
5. Methodology	6
6. Approval, monitoring and control	7
7. Contact	8

1. Background

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

In performing these functions, the Board of Directors of Cellnex is responsible for approving the Group's general policies and strategies, and therefore approves this Business Continuity Policy (the "Policy") and reinforces its commitment to its application in all the companies controlled by Cellnex.

For the purposes of this Policy, companies of the Cellnex Group are those companies over which the Company has or may have direct or indirect control, relating to:

- The holding of majority voting rights;
- The power to appoint or dismiss the majority of the members of the Board of Directors;
- The holding of majority voting rights by virtue of agreements made with third parties.

In fulfilling its obligations, the Board of Directors approves this Policy and sets out the strategy for Global Business Continuity and its commitment to the application of best practices based on international reference standards in the countries in which the Company operates.

2. Reference framework

Cellnex will act in accordance with international benchmark standards and voluntary initiatives including, among others:

- The Sustainable Development Goals (SDGs)
- The 10 Principles of the United Nations Global Compact
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Principles for Social Investment
- The OECD Guidelines for Multinational Enterprises
- The Global Reporting Initiative (GRI) Guidelines
- The International Labour Organisation (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

Cellnex is committed to promoting **the achievement of the United Nations' Sustainable Development Goals (SDGs)**, and to **setting its own objectives to contribute to the goals defined**.

Cellnex also considers the needs & objectives of its Global Integrated Management System and the requirements of the ISO standards for business continuity:

- **ISO 22301:2019** Security and resilience - Business continuity management systems - Requirements.

Additionally, the Cellnex business continuity management system will take into account other international standards and established good practice:

- **Good Practice Guidelines 2018 Edition - BCI.**
- **ISO/IEC 27001:2022** Information technology – Security techniques – Information Security management systems - Requirements.

This Policy must be interpreted in accordance with the organisation's internal management policies at a global level, as well as with the provisions of the current internal policies in force in Cellnex.

3. Purpose and scope

Cellnex provides services focused on meeting the needs and expectations of its customers and other stakeholders; therefore, this Policy **focuses on compliance with Business Continuity standards and guidelines** that allow Cellnex to offer products and services aligned with their requirements during potential incidents or disruptive events, by continuously ensuring **business resilience** in order to achieve business excellence.

This Policy governs the way in which the Company operates, to guarantee its compliance with established Business Continuity principles. These principles are **applicable to all the companies that make up the Cellnex Group** and everybody working for, or on behalf of the Company must align to them and be aware of, and comply with this Policy in accordance with their role in the Company and with its customers.

Cellnex takes into account the principles set out in the Company's integrated management system and the requirements of the ISO standards to which the Company is certified, and guarantees the provision of resources, skills, continuous training in technologies and development processes necessary to comply with this Policy and achieve the defined continuity objectives.

4. Basic principles, commitments and strategic lines

Business Continuity is defined as the “capability of an organisation to continue the delivery of products or services within acceptable timeframes at predefined capacity during a disruption”.

[Source: ISO22301:2019 / ISO 22300:2018]

Through advanced planning and preparation, business continuity ensures that Cellnex has the ability to continue to perform its critical processes and activities when an emergency or disruptive event occurs, allowing the Company to continue working to a minimum level.

Cellnex has defined 7 main business continuity strategic objectives:

- **People and its safety.**
- **Focus on critical processes.**
- **Minimise legal issues.**
- **Protect our reputation.**
- **Controlled recovery.**
- **Decision making.**
- **Minimise economic impact.**

1.- People and its safety

The safety of people in general and, particularly our employees, is our first priority. In the process of evaluating an alert, the potential impact of people must be taken into account, in order to ensure people's safety first. This Policy is aligned with the Occupational Health & Safety Policy of the Company.

2.- Focus on critical processes

From a business continuity point of view, our main focus is on critical processes, those considered as key in the business impact analysis in order to ensure the continuity of the business. The prioritization is on proactive risk control, in order to minimise interruptions, in line with the Risk Management Policy of the Company.

3.- Minimise legal issues

Identify all potential legal implications in order to avoid or minimise legal issues in case of a continuity interruption situation and to recover normality in the best possible conditions.

4.- Protect our reputation

To increase our resilience as an industrial group it is key to protect Cellnex's image, brand, and credibility towards our main stakeholders.

5.- Controlled recovery

Contain the impact of the interruptions and stabilise in the shortest period of time following a disruption is an objective of the business continuity management system. The implementation of solutions to ensure a phased and controlled resumption of normal activities must be included in the business continuity and disaster recovery plans.

6.- Decision making

Simple, agile and effective decision-making during a crisis as a central point in the business continuity management system, to be trained through tests and exercises.

7.- Minimise economic impact

Minimise the direct and indirect economic costs of disruptions, analysing in advance potential impacts related to the critical resources identified in the business impact analysis.

In Cellnex, Business Continuity is based on the following **Strategic Lines**:



Efficient Response

- Prepare a plan to respond to any incident that could affect the continuity of Cellnex business.
- Detail the specific roles and responsibilities of teams and individuals, to effectively respond when an incident occurs.

Asset protection

- Identify the critical assets (IT, facilities, personnel and supply chain) needed to perform each critical activity.
- Protect assets from vulnerabilities that could cause any interruption and plan a strategy to recover them.

Continuity Culture

- Prepare all personnel on the required response to an incident, to effectively and efficiently recover activities within the required predefined timescales.
- Raise awareness of the importance of business continuity.

Resilience

- Ensure that core business operations are sufficiently robust to minimise interruptions.
- Recover interrupted operations to agreed minimum levels and within agreed timescales.

These strategic lines can be related to some of the Sustainable Development Goals (SDGs) that Cellnex has proposed to achieve:

SDG with Direct Impact¹

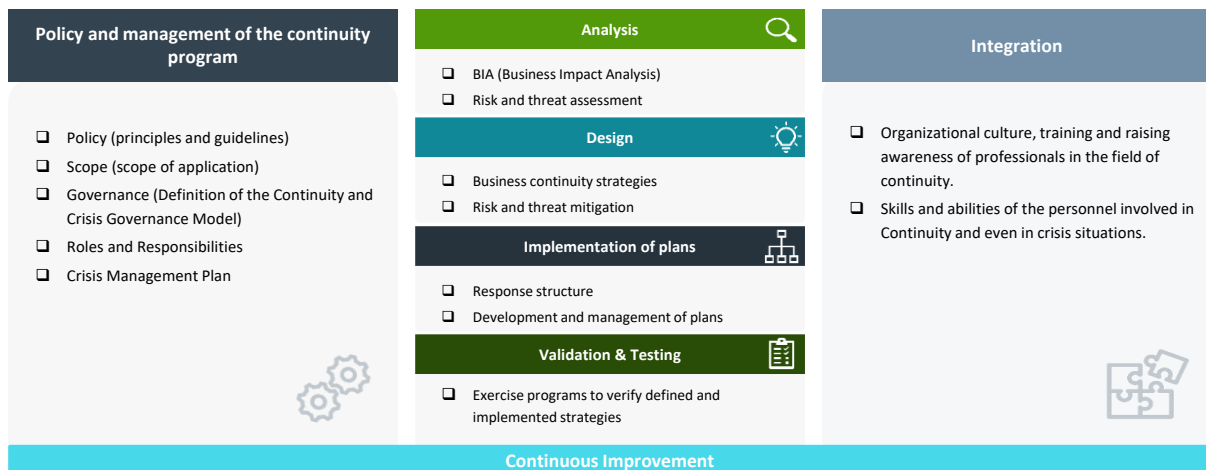
- **Decent Work and Economic Growth (SDG-8):** Identification of plausible disaster scenarios and development of business recovery approaches, allows Cellnex to manage the consequences of undesirable situations and thus avoids further damage.
- **Industry, Innovation and Infrastructure (SDG-9):** Regarding business continuity, knowing the organisation's vulnerabilities and applying deterrence measures has a direct impact on the industry, innovation and infrastructure.
- **Climate action (SDG-13):** Business continuity can be used to prepare for a range of new threats and challenges, including those associated with climate change.

SDG with Indirect Impact²

- **Good Health and Well-Being (SDG-3):** The Company priority is to guarantee the safety of the people and its employees.
- **Life on land (SDG-15):** Cellnex has a line of action to minimize its impact on natural areas and biodiversity as part of its ESG strategic plan.
- **Partnership for the goals (SDG-17):** Cellnex actively collaborates with different organisations outside the Company with the aim of contributing to the achievement of the SDGs.

5. Methodology

The methodology adopted by Cellnex in terms of business continuity is aligned with international standards, based on the following life cycle:



- **Policy and management of the continuity program:** establishes the organization’s policy relating to business continuity and defines how this Policy should be implemented in the company within a business continuity management system. This stage requires senior

¹
 Goal 8: Promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
 Goal 9: Building resilient infrastructure, promoting inclusive and sustainable industrialization and fostering innovation.
 Goal 13: Take urgent action to combat climate change and its impacts.

²
 Goal 3: Ensuring healthy living and promoting well-being for all at all ages.
 Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.
 Goal 17: Strengthen the means of implementation and revitalize the global partnership for sustainable development.

management action, support and commitment to set up and review the Business Continuity Policy.

- **Analysis:** reviews and assesses the strategic objective of the Company in order to identify the critical products and services, processes, activities and resources. A risk assessment is carried out with a business continuity approach, in order to identify most common disaster scenarios.
- **Design:** identifies and selects appropriate solutions to determine how continuity can be achieved in the event of an incident and/or crisis.
- **Implementation of plans:** implements the solutions agreed in the design stage. The implementation is achieved through business continuity plans and disaster recovery plans to meet continuity requirements and solutions. A skilled response structure is needed to manage continuity in case of incident and/or crisis.
- **Validation and testing:** confirms the business continuity management system meets the objectives set in the Policy and the efficacy of the continuity plans ensuring the organization's resilience.
- **Integration:** defines how to integrate business continuity awareness into business as usual activities and organizational culture.
- **Continuous improvement:** ensures the effectiveness of the business continuity management system, identifying improvement actions.

6. Approval, monitoring and control

The Policy has been validated by the Executive Committee, reflecting their commitment to achieving resilience and continuity of business processes and activities.

The Audit and Risk Management Committee is the body responsible for monitoring compliance with this Policy and has reviewed it before its approval.

As the body responsible for reviewing corporate governance, the Nominations, Remunerations and Sustainability Committee has recommended the approval of this Policy to the Board of Directors.

The business continuity management system implemented in Cellnex and this Policy are subject to **ongoing review**. As such, this Policy will be reviewed annually, as a minimum, or whenever substantial changes occur to the Company.

The Policy will be **available to all stakeholders** identified in the business continuity management system, and will be published on the corporate website in addition to the Company's intranet.

Changes made to the Policy, as approved by the Board of Directors, must be **communicated to everybody working for, or on behalf of the Company** and, where appropriate, additional training should be provided.

Applicability and Non-compliance: Cellnex employees and everybody working for, or on behalf of the Company, have an obligation to know, understand and comply with this Policy, regardless of the country or region in which they are located.

7. Contact

Any questions regarding this Policy may be directed to the Business Continuity Team within the Risk Management & Business Continuity functional area in Cellnex.

Madrid, 27 June 2024.