

Policy for the Whistleblowing Channel





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1. INTRODUCTION

As the Cellnex Code of Ethics establishes, all Cellnex employees, managers, members of the administration bodies and various stakeholders must base their actions and behaviors on the ethical principles of integrity, honesty, transparency and good faith, as well as the other guiding principles of the Cellnex Group and, in addition, have a duty to cooperate to prevent anyone from acting improperly or without integrity.

In the fulfillment of its legal and statutory functions, the actions of the Board of Directors of the Cellnex Group (hereinafter, the “**Board of Directors**”), are oriented to the consequence of the social interest and the requirements imposed by law, complying and observing in good faith, those ethical aspects that affect and which the Cellnex Group is subjected to.

Furthermore, the Cellnex Committee of Ethics and Compliance (hereinafter, the “**CEC**”), as the body responsible for ensuring respect for business ethics and integrity, as well as compliance with the regulations, both mandatory and voluntary, applicable to Cellnex, and in the development of its functions, is responsible for resolving all queries, communications and notifications that arise with respect to the Cellnex Code of Ethics and its implementing regulations.

In this context, in its firm commitment to highlight the values and ethical principles that inspire the actions of Cellnex, observing at all times the legislation in force, and consolidating a business conduct of reference, the CEC, under the guidelines of the Board of Directors, has upgraded the whistleblowing channel (hereinafter, the “**Whistleblowing Channel**”) replacing the current existing Ethical Channel, in order to enable a means of communication that increases the reporting of any irregular conduct or act contrary to the law or the corporate and good governance system of Cellnex.

Accordingly, this document refers to the procedure, scope and application in the Cellnex¹ Group (hereinafter, “**Cellnex**”) of the communications received through the Whistleblowing Channel, by any of the persons subjected to its Code of Ethics and any other third party that makes use of it (hereinafter and indistinctly, the “**Whistleblower**”), that constitute any kind of violation of the current legislation and/or other internal regulations that they notice within Cellnex.

The Cellnex Group seeks that its employees and third parties related to Cellnex conduct themselves with integrity, ethics and professionalism in relation to the performance of their functions.



¹ The Cellnex Group is considered to be all those companies identified within the Notes to the Consolidated Financial Statements of Cellnex Telecom, S.A. that are controlled or jointly controlled.

The development of the Whistleblowing Channel is in compliance with the following applicable regulations:

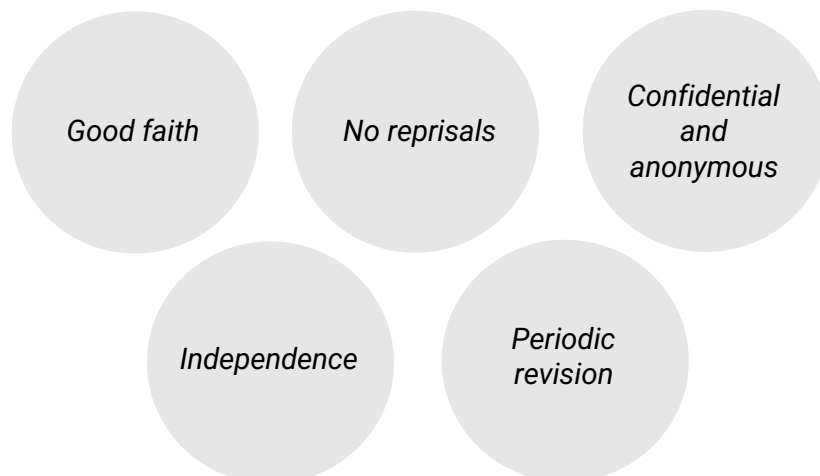
- Recommendation 42.1.c) of the Good Governance Code of Listed Companies, dated June 2020:

Recommendation 42.1.c) of the Good Governance Code of Listed Companies:

"To establish and supervise a mechanism that allows employees and other persons related to the company, such as directors, shareholders, suppliers, contractors or subcontractors, to report any irregularities of potential importance, including financial and accounting irregularities, or of any other nature, related to the company that they may notice within the company or its group. This mechanism must guarantee confidentiality and, in any case, foresee cases in which communications may be made anonymously, respecting the rights of the whistleblower and the accused".

- The "Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of European Union law"², concerning the establishment of mandatory minimum standards and requirements for the operation and management of whistleblowing channels, which companies must implement.

In compliance with the above, the purpose of this Policy has been to develop the implementation of the Whistleblowing Channel, as a tool accessible to Whistleblowers so that they can report, in good faith, without fear of reprisals, confidentially and/or anonymously, any kind of violation of the current legislation and/or other internal regulations that they may notice within Cellnex.



According to the above, and in order to guarantee and safeguard the confidentiality (and, if applicable, the anonymity³) of potential Whistleblowers, and to guarantee higher levels of independence and confidentiality, the management of the Whistleblowing Channel is outsourced to an independent expert third party (hereinafter, the "**Channel Manager**").

² Hereinafter, the "**Whistleblowing Directive**".

³ If so requested by the Whistleblower.

2. SUBJECTIVE AND OBJECTIVE SCOPE OF THE WHISTLEBLOWING CHANNEL

SUBJECTIVE SCOPE

The Whistleblowing Channel is established as a channel accessible both to persons subjected to the Cellnex Code of Ethics and to any other third party wishing to report any possible breach.



All Cellnex employees, regardless their position



Members of the Board of Directors of Cellnex and the Management Bodies of Cellnex's companies



The different stakeholders which operate in each of the Cellnex companies and any other interested third parties

The Whistleblower is granted the protection established in the section 5 of this Policy.

This protection measures also apply to legal representatives of employees, persons assisting the Whistleblower, related persons to the Whistleblower who could be subject of retaliation and legal entities for which the Whistleblower works or with which has any other type of employment relationship or in which it has a significant participation.

Furthermore, the protection measures apply:

1. when the legal relationship has not yet begun, if information about violations has been acquired during the selection process or in other pre-contractual stages;
2. to volunteers, interns, and employees in training periods regardless of whether they receive remuneration or not;
3. after the dissolution of the legal relationship if the information about violations has been acquired during the course of the relationship itself.

OBJECTIVE SCOPE



Any kind of infringement that disobeys the current legislation and/or other internal regulations within Cellnex

The infringements of the current legislation include but are not limited to,

1. offenses falling within the scope of application of acts of the European Union indicated in the annex to the directive (EU) 2019/1937, relating to the following sectors: public procurement; services, products and financial markets and prevention of money laundering and financing of terrorism; product safety and compliance; transport safety; environmental protection; radioprotection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of private life and protection of personal data and security of networks and information systems;
2. acts or omissions harming the financial interests of the Union as referred to in Article 325 of the Treaty on the Functioning of the European Union specified in the relevant derived law of the European Union;
3. acts or omissions concerning the internal market, referred to in Article 26, paragraph 2, of the Treaty on the Functioning of the European Union, including violations of the European Union rules on competition and State aid, as well as the violations concerning the internal market connected to acts that violate the rules on corporation tax or the mechanisms whose purpose is to obtain a tax advantage that frustrates the purpose or the aim of the applicable legislation on corporation tax;
4. acts or behaviors that nullify the purpose or the aim of the provisions of the acts of the Union in the sectors indicated in numbers 1), 2) and 3).

All complaints will be taken care of and managed in an adequate and complete manner and must be resolved in accordance with the legally established deadlines.

3. DEFINITIONS

Business Unit: Company or companies of Cellnex located in a specific territory or country

Cellnex: Business group formed by the Companies in which Cellnex Telecom holds, directly or indirectly, control, understanding by control:

- ✓ The holding of the majority of voting rights,
- ✓ The ability to appoint or dismiss the majority of the members of the management body, or
- ✓ The ability to dispose, by virtue of agreements with third parties of the majority of voting rights

Cellnex Code of Ethics: Code containing principles and ethical values of Cellnex Group

Channel Manager: An independent expert third party, who is responsible for the management of the Whistleblowing Channel

Whistleblowing Channel: IT tool used by Cellnex for reporting violations

Whistleblower: Individual who makes a report through internal or external channel



4. CATALOGUE OF RIGHTS AND DUTIES OF THE WHISTLEBLOWER AND THE ACCUSED

The following are the rights and duties of the Whistleblower and the accused.



WHISTLEBLOWER'S RIGHTS

The rights of the Whistleblower are established as follows:

1. ✓ Right to **confidentiality** of the Whistleblower, the accused and any third party mentioned in the complaint.
2. ✓ The right to **anonymity** and to have the data treated confidentially, preventing access to the data by unauthorized personnel who will not process or investigate the complaint.
3. ✓ The right to **receive all the information** on the procedures and deadlines established.
4. ✓ The right to **choose the most appropriate channel of complaint** according to the specific circumstances of the matter, being able to go directly to external channels.
5. ✓ **Receive an acknowledgement** that the complaint has been received and Cellnex will inform the Whistleblower of the outcome of any investigations that may have been carried out.
6. ✓ That an **impartial interlocutor** is designated to handle the complaint and communicate with the Whistleblower, request further information, or answer questions.
7. ✓ **Absence of conflict of interest** in the investigation, whether external, financial, familiar, political, or personal interests, which could interfere with the outcome being ineffective or have a risk of reprisals.
8. ✓ The right **to not provide further information** after the complaint, or to provide it if he/she deems it necessary.
9. ✓ The right to **protection** and the right to benefit from the whistleblower's statute without being held liable for the reported fact, if they reasonably believe that the information is truthful.
10. ✓ **Rights derived from data protection:** access, modification, to object, erasure, restriction of processing and portability (notwithstanding those cases, whereas rights may be limited) and to file a complaint to the pertinent supervisory authority (in Spain, the Spanish Agency for Data Protection [AEPD]).
11. ✓ **Right to make information public**, in accordance with fundamental rights such as freedom of expression and freedom of the media.



WHISTLEBLOWER'S DUTIES

The obligations of the Whistleblower are as follows:

- ✓ Duty to act in good faith. Complaints in bad faith or any abuse of the system could lead to disciplinary actions/sanctions against the Whistleblower or perpetrator of the abuse, as appropriate.
- ✓ The duty to provide evidence, and the data and documents available that are related to the facts denounced.
- ✓ Duty of confidentiality regarding the filing of the complaint and the content of it, as long as there is a pending analysis and resolution for it.



Malicious complaints, with incorrect or misleading information, are not covered, but those containing inaccurate information due to a mistake made in good faith are covered.



RIGHTS OF THE ACCUSED

The rights of the accused are:

- ✓ The right to be notified as soon as possible after the investigation has been carried out and the existence of a breach has been concluded.
- ✓ Right to have access to recorded data, except for the identity of the Whistleblower, and the right to rectify inaccurate or incomplete personal data, in addition to those rights related to data protection.
- ✓ The right to be informed of the resolution or dismissal of the complaint, if applicable.



5. PROTECTION OF THE WHISTLEBLOWER

The Whistleblowing Channel will be regulated by the **principles** of confidentiality, respect, impartiality, proportionality, thorough investigation, and legality.

Any employee who uses the Whistleblowing Channel in good faith (*bona fides*) to report any infraction that violates current legislation and/or other internal regulations within Cellnex, either anonymously or by disclosing their identity, will be fully offered a **guarantee of protection**, meaning that they will have the right to be protected as established in Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23rd, 2019, regarding the protection of people who report violations of the Law of the Union, and in the rest of the current applicable legislation.

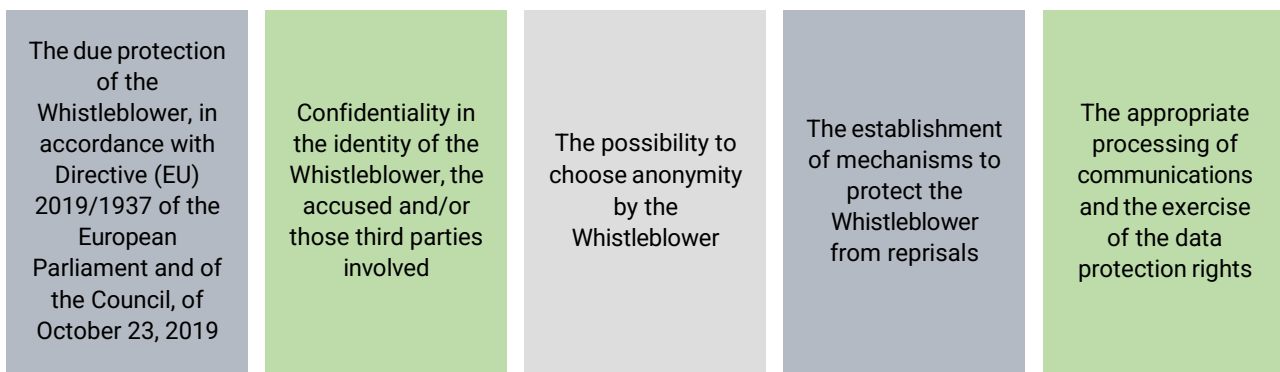
The Whistleblowing Channel is designed to **maintain the Whistleblower's anonymity** with appropriate guarantees.

Confidentiality in the identity of the Whistleblower, the accused and/or those third parties involved in the complaint is guaranteed, as well as any information from which their identities can be directly or indirectly disclosed, in accordance, where applicable, with applicable data protection regulations, including the General Data Protection Regulation (GDPR). For further information on the processing of personal data, please consult section 8. If the identity of the Whistleblower is revealed, Cellnex People department will safeguard the job security of the individuals that said disclosure belongs to, taking the agreed measures to guarantee the Whistleblower rights.

Likewise, in those cases when the Whistleblower agrees to revealing their identity, the resolution reports of the complaints will not include any reference to the identity of the Whistleblower, the accused, or any third parties involved in the complaint.

Any action against the Whistleblower, which may represent some sort of threat, discrimination, or retaliation for filing a complaint will, where appropriate, be considered an infringement in accordance with the current applicable legislation.

The appropriate **processing of communications**, and the exercise of the **data protection rights** in accordance with the applicable legislation, including GDPR, are guaranteed.



6. USE OF THE WHISTLEBLOWING CHANNEL

The Whistleblowing Channel is available 365 days a year, always guaranteeing maximum confidentiality and the possibility of reporting anonymously.

Furthermore, in order to facilitate the presentation and handling of the complaint received through the Whistleblowing Channel, Cellnex has made available to Whistleblowers a form which includes all the necessary information (hereinafter, the **"Form"**)⁴.

Complaints can be made through the following channels enabled by Cellnex through the Channel Manager, an independent expert third party, who is responsible for the management of the Whistleblowing Channel according to the following technical means for reporting:

TECHNICAL MEANS FOR REPORTING

Application and web form via link (URL) on the Corporate Intranet and Corporate website.

E-mail address:
es_cellnex.whistleBchannel@pwc.com

Mailing address for the Channel Management Offices: Torre PwC.
Paseo de la Castellana, 259 B - 28046 Madrid (Spain)

Phone call to the following number: +34 915 685 340

In order for Whistleblower protection measures to apply, the communication must be made through the authorized channels where the necessary measures have been adopted to achieve high levels of confidentiality or, if the Whistleblower so wishes, anonymity.

If the report is made via an unrecorded phone line or another unrecorded voice messaging system, the report is documented in writing by a detailed account of the conversation by the Channel Manager. The Whistleblower can verify, correct, and confirm the content of the transcription through their own signature.

The Whistleblower's communication of the complaint must meet certain minimum requirements in order to be processed and to be able to carry out the subsequent investigation of the events that have occurred, when necessary. Specifically, the complaint must contain the information detailed below:

MINIMUM REQUIREMENTS FOR THE COMPLAINT

1. Identification of the Whistleblower⁵, unless they choose to remain anonymous.
2. A description, as solid as possible, of detailed events that occurred, whenever possible:
 - Any kind of infringement that disobeys the current legislation and/or

⁴ See **Annex I** for a summary outline of the Whistleblowing Channel procedure.


⁵ However, in those cases in which an anonymous complaint is received, a confidential report will be made ex officio to assess the real significance of the facts, in compliance with the Good Governance Code of Listed Companies published by the CNMV in June 2020.

other internal regulations within Cellnex.


- Persons allegedly involved.
- Approximate dates of the occurrence of the events described above (as accurate as possible).
- Means through which the unlawful conduct has been carried out.
- Affected business area.
- Customers on which there is impact, if any.
- Economic loss, if any, or estimate thereof.

3. When possible, documents, witnesses, or any evidence, in whatever format, shall be provided to support the complaint of the facts that have occurred.

In order to obtain all the necessary data for the evaluation, investigation and resolution of the complains, they must contain the minimum requirements detailed in the previous section.



When the complaint has not been made anonymously, if necessary, the Channel Manager may contact the Whistleblower for further information or to request documentation.



In the event that the complaint is outside the target scope, the Channel Manager will inform Cellnex of this circumstance. In this context, the Committee of Ethics and Compliance will proceed to file the complaint, and the resolution will be communicated to the Whistleblower.

7. MANAGEMENT OF THE WHISTLEBLOWING CHANNEL

The procedure for the use of the Whistleblowing Channel consists of the following three phases:

Phases of the procedure for using the Whistleblowing Channel:



Complaints made through the enabled channels are received by the Channel Manager as the independent expert third party who has been appointed as responsible of its management.

7.1 RECEPTION OF COMPLAINTS

The reception of the complaints shall be carried out by the Channel Manager and their assistance will consist of:

1. Reception of all complaints received through the channels enabled by Cellnex⁶ that form the Whistleblowing Channel⁷ in order to obtain all the information necessary to evaluate the alleged irregularity.

In addition, an acknowledgement of receipt of the complaint will be issued to the Whistleblower within a maximum period of three days from receipt of the complaint.

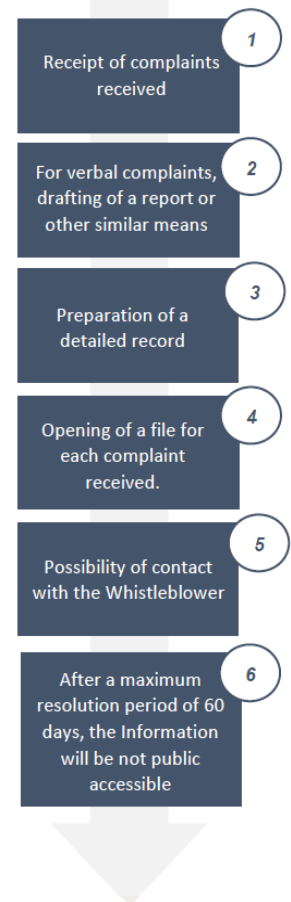
Those complaints that do not comply with the minimum necessary requirements will be proposed to be filed, and the proposal to file them will be submitted to the decision-making body (the CEC), which will decide on the matter.

2. Preparation of a detailed record of all complaints received, regardless of the channel through which they are received, as well as the information and/or documentation corresponding to them.
3. Opening of a file for each complaint received.
4. Consider the possibility of contacting the Whistleblower in order to expand on the information or documentation provided by the Whistleblower.
5. Once the maximum resolution period of 60 days has elapsed, the information contained in each complaint will not be publicly accessible in the tool in order to guarantee the confidentiality of the information provided⁸.

In the event of a report submitted to a subject other than the one dedicated to its receipt, the report must be transmitted, within seven days of its receipt, to the Channel Manager, giving simultaneous notice of the transmission to the Whistleblower also indicating that the forwarding must be carried out through the same channels provided for the report. In this case it can be indicated that reports not received through the Whistleblowing Channel may be at risk in terms of the protection of confidentiality.

The necessary **technical and organizational measures** will be adopted to ensure strict compliance with data protection regulations.

In the event that the complaint concerns one of the members of the CEC, the Channel Manager will proceed to notify the other members of the CEC (with the exception of the member about whom the complaint concerns) of the receipt of the complaint. This member will, in no case, participate in the examination and investigation of the complaint, nor in its resolution.







⁶ In the event that the complaint is made verbally, the Channel Manager will proceed to document the complaint by registering it on the platform provided for this purpose.

⁷ In this sense, the processing of personal data will be carried out in a way that guarantees their privacy and in any case in compliance with the current and applicable legislation.

⁸ The information will be kept in accordance with the periods established in the applicable regulations, including data protection regulations.

7.2 PRELIMINARY ASSESSMENT AND REPORTING

The Channel Manager will conduct a preliminary evaluation of the information contained in the Complaint record, in order to assess the completeness of the complaint, the preliminary analysis of the facts reported in the light of the evidence provided by the Whistleblower, as well as their urgency. In accordance with the above, the complaints will be classified according to four priority levels:

LEVEL	DESCRIPTION
Priority I⁹ 	<p>Group I: Harassment in the workplace, child, forced or compulsory labor, discrimination, freedom of association and the right to collective bargaining, health and safety, working conditions or violation of respect for the person, their dignity and/or human rights.</p> <p>Group II a): Bribery, Corruption, Financial fraud, accounting fraud, diversion of corporate funds, environmental crime, non-financial information fraud, theft, espionage or sabotage, breaches of confidentiality obligations, financial abuses by suppliers or customers, significant deficiencies or weaknesses in internal control systems or any other audit or accounting related matters and other applicable law violations, including European Union law under the Whistleblowing Directive, whose effect on financial statements reporting or reputation with customers is >300,000€.</p>
Priority II 	<p>Group II b): Bribery, Corruption, Financial fraud, accounting fraud, diversion of corporate funds, environmental crime, non-financial reporting fraud, theft, espionage or sabotage, breaches of confidentiality obligations, financial abuse by suppliers or customers, significant deficiencies or weaknesses in internal control systems or any other auditing or accounting matters, and other applicable law violations, including European Union law under the Whistleblowing Directive, whose effect on financial statements reporting or reputation with customers is <300,000€.</p>
Priority III 	<p>The rest of the communications received.</p>
Priority IV 	<p>Those communications that are considered to be archived.</p>

As we will develop below, once the Channel Manager classifies the complaint according to the four priority levels stated above, and after a preliminary analysis of the facts reported, the Channel Manager will proceed to transfer the information and documentation gathered to the CEC as the decision-making body (hereinafter, the “**Decision-Making Body**”) of the Whistleblowing Channel.

⁹ For those complaints classified as “*Priority I*”, the Channel Manager will carry out a **priority investigation** and the subsequent preparation of an **ad hoc report**.

7.3 INVESTIGATION, RESOLUTION AND COMMUNICATION TO THE WHISTLEBLOWER

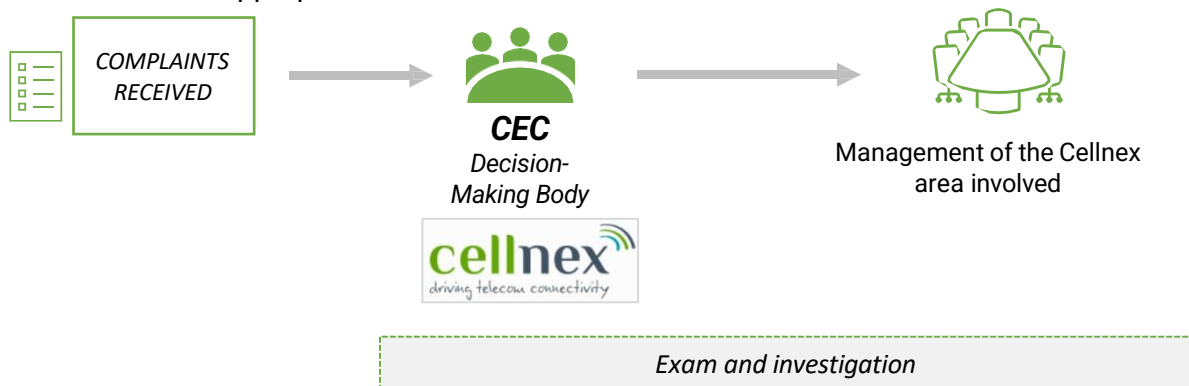


Investigation

The **CEC** will assume the role of the Whistleblowing Channel's Decision-Making Body, being the committee responsible for ensuring that all complaints received through the Whistleblowing Channel are independently analyzed, studied and resolved.

In this regard, after receiving the information and classification of the complaints by the Channel Manager, the CEC, if deemed necessary, may entrust the investigation of the complaint to the **Cellnex Management** of the area involved according to the scope of the complaint, which will include the result of the investigation in a Conclusions Report that will be submitted to the CEC for it to decide on the resolution of the complaint.

To this end, it shall adopt the appropriate tests in each case, in order to clarify the facts that have occurred, and may entrust to the Management(s), if deemed appropriate, the practice of the relevant and appropriate tests in each case.



In any case, the resolution of the complaint would be always notified to the Whistleblower by the Channel Manager.

Resolution

Once the investigation of the complaints has been carried out, the CEC, as the Decision-Making Body¹⁰ and in accordance with its Regulation¹¹, will be in charge of issuing a final resolution that closes the procedure, based on the investigations.

Term for resolution of complaints

The term for the Whistleblowing Channel's Decision – Making Body to issue a resolution of the complaint must be

- *within a period **not exceeding two months** from the acknowledgement of receipt or,*
- *if no acknowledgement of receipt was sent to the Whistleblower, within **two months** from the expiration of the three-day period after the complaint was made once the complaint has been resolved.*

Communication to the Whistleblower

Subsequent to the resolution by the CEC (Cellnex Whistleblowing Channel Decision – Making Body), the Channel Manager will be responsible for communicating the resolution to the Whistleblower.



The communication **must be sent within a period not exceeding three days** from the **date of the resolution**.

7.4. COMPLAINTS WITH FISCAL AND TAX NATURE. COMPLAINTS SUBJECT TO NATIONAL LEGISLATION

Aiming to reinforce the ethics, integrity and compliance culture, aligned with the UNE 19602 requirements, Cellnex created a specific body of Tax Compliance Committee (“**TCC**”) in 2021.

Taking into account the mentioned above, the main goal of the TCC is to achieve Cellnex's Best Practices by supervising its operation and effectiveness within the tax and fiscal framework¹².

In addition, it is a collegiate body, governed by Cellnex's Audit and Risk Management Committee (hereinafter, “**ARMC**”), composed of: (i) a president, (ii) three members and (iii) a technical secretary (without voting rights)¹³.

In alignment with the scope of the Whistleblowing Channel for complaints of a fiscal and tax nature, the CEC shall entrust the TCC their examination and investigation. Subsequently, the TCC shall notify the CEC of its resolution, which will issue a final resolution.

In case of complaints subject to national legislative mandatory requirements, the relevant Annex of this Policy will apply.

¹⁰ In the case of complaints of a fiscal and tax nature, the CEC shall entrust their examination and investigation to the TCC, which shall notify the CEC of its resolution.


¹¹ Regulations of the Committee of Ethics and Compliance.

¹² Following compliance, since FY-20 Cellnex is adhered to the Best Practices Tax Code.


¹³ It is worth highlighting that unlike the other members, the president of TCC is an independent third-party-expert who holds an extensive background in the fiscal and tax field.

7.5. DEVELOPMENT OF PERIODIC REPORTS

Moreover, the Channel Manager shall prepare periodic reports on the complaints registered, which shall be reported to the CEC, in accordance with the following:

 *Fortnightly report of complaints*

- ✓ *Number of complaints received*
- ✓ *Date of access to the platform*
- ✓ *Login/read/modify history*
- ✓ *User's name*

 *Monthly report of complaints*

- ✓ *Description of the complaint*
- ✓ *Status of the complaint*
- ✓ *Communications made*
- ✓ *Classification of the complaint based on the four levels of priority*
- ✓ *Documentation provided by the Whistleblower*



8. PERSONAL DATA INFORMATION

8.1 DATA CONTROLLER

Without prejudice to the cases when a complaint is made anonymously, provided data of the Whistleblower who initiated the procedure, as well as those collected throughout the investigation of the same, will be processed as joint data controllers, by:

- Cellnex Telecom, S.A. (hereinafter, “**CELLNEX TELECOM**”) as the parent company of the Cellnex Group, with address for the purposes of notifications at Passeig de la Zona Franca 105 (Torre Llevant), 08038 Barcelona.
- The Cellnex Group affiliate that maintains the employment, commercial or professional relationship with the informant or the Whistleblower.

The Cellnex Group has appointed a Data Protection Officer, who will ensure that your data is processed appropriately and will resolve any doubts or queries that may arise. You can contact the Data Protection Officer at the indicated postal address or at the following email address: personaldata@cellnextelecom.com

You can find further information about the essential aspect of the joint controllership agreement by sending an email to the following email address: personaldata@cellnextelecom.com

8.2 ORIGIN OF PERSONAL DATA

The data subject is informed that the Whistleblowing Channel may process personal data obtained: (i) directly from the Whistleblowers themselves when they file a complaint, when formulating possible allegations, or at any other time during the investigation, and (ii) indirectly, data may be collected by any of the individuals involved in the investigation.

8.3 PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We will process your personal data for the exclusive purpose of processing and managing the complaints received and, if appropriate, investigating the facts that are the subject of the complaint and taking the appropriate legal actions, if applicable. All this, in order to avoid committing any act or conduct that could be contrary to the law, including Cellnex's corporate and good governance system, in accordance with the Cellnex Code of Ethics. The legal basis for data processing is compliance with a legal obligation of the Cellnex Group in those companies of the Cellnex Group that are required to have an internal information system. In the case of those companies of the Cellnex Group that are not bound by law, the legal basis is the fulfillment of a mission carried out in the public interest.

8.4 DISCLOSURE OF PERSONAL DATA

If the provided information allows identification, these personal data will not be transferred to any third parties with the exception of cases where it is mandatory by law or when it is necessary to protect the legal interests of the Cellnex Group or third parties. Notwithstanding the foregoing, we inform that personal data may be accessed (1) by those who performed the internal control and compliance functions, (2) by CELLNEX TELECOM personnel with human resource management and control functions when disciplinary measures could be

taken against a worker, (3) as well as by third parties acting on behalf of the Cellnex Group when it is essential for the provision of a specific service related to this reporting channel. Under the said scenario, the Cellnex Group will regularize the relationship with the data processor in accordance with the GDPR provisions.

We inform you that when personal data is made available to the Cellnex Group companies located in countries outside the European Economic Area, such data transfers are carried out to countries that have an adequacy decision in accordance with the GDPR (consult the list on our website).

8.5 RETENTION OF PERSONAL DATA

Personal data, as well as employees and third-party data that have been provided through the complaints channel system, will be retained for the necessary period of time to comply with legal obligations.

If the complaint is subject to application of Spanish regulations, after 3 months from receipt of the complaint without investigative actions, the data will be suppressed from the Whistleblowing Channel, unless the retention purpose is to keep evidence that could support the crime prevention model. In cases where an investigation is initiated, the data may continue to be processed after this period during the investigation of the complaint and the processing of the corresponding procedures until its conclusion and, in any case, with a maximum of 10 years, being subsequently duly blocked during the periods that derive from the legal actions prescription.

If the complaint is subject to application of Italian regulations, the documentation is kept for the time necessary to process the report and, in any case, no later than 5 years after the date of communication of the final result of the procedure, in compliance with the Italian regulation.

If the complaint is subject to application of Polish regulations, the documentation shall be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the conclusion of any proceedings initiated by such actions.

8.6 DATA PROTECTION RIGHTS

The data subject can exercise the rights of access, rectification, erasure, opposition, limitation or portability by contacting the Data Protection Officer through the email address personaldata@cellnextelecom.com. However, if an investigation is underway regarding the reported facts, or judicial or extrajudicial actions are being carried out regarding them, your rights of erasure and to object may be limited to comply with legal obligations. In any case, the right to file a claim can be exercised with the Spanish Data Protection Agency (AEPD) or the relevant supervisory authority (for more information, consult the following websites: <https://www.edpb.europa.eu/>, <https://ico.org.uk/> or <https://www.edoeb.admin.ch/>).

9. DISCIPLINARY REGIME

The present Policy for the Whistleblowing Channel is considered a mandatory compliance standard, and its violation will constitute an infringement thereof.

Non-compliance with the provisions set forth herein, as well as with the rest of the internal and external regulations of Cellnex, may lead to the application of disciplinary measures in accordance with the Cellnex Disciplinary System and the labor legislation applicable in each of the countries where Cellnex operates, without prejudice to other responsibilities that the offender may have incurred.

It is the responsibility of Cellnex's CEC to ensure compliance with the Policy for the Whistleblowing Channel.

10. APPROVAL, REVIEW, DIFFUSION AND AWARENESS

Approval

This Policy for the Whistleblowing Channel has been approved by Cellnex's Board of Directors at the Board meeting held on 1st October 2024, being in force since that date.

Review

The Committee of Ethics and Compliance will periodically review the content of this Policy, ensuring that it includes the applicable international recommendations and best practices, and will propose modifications and updates that contribute to its development and continuous improvement.

Diffusion

Likewise, it will be the obligation of the Committee of Ethics and Compliance to promote the dissemination and application of this Policy.

Awareness

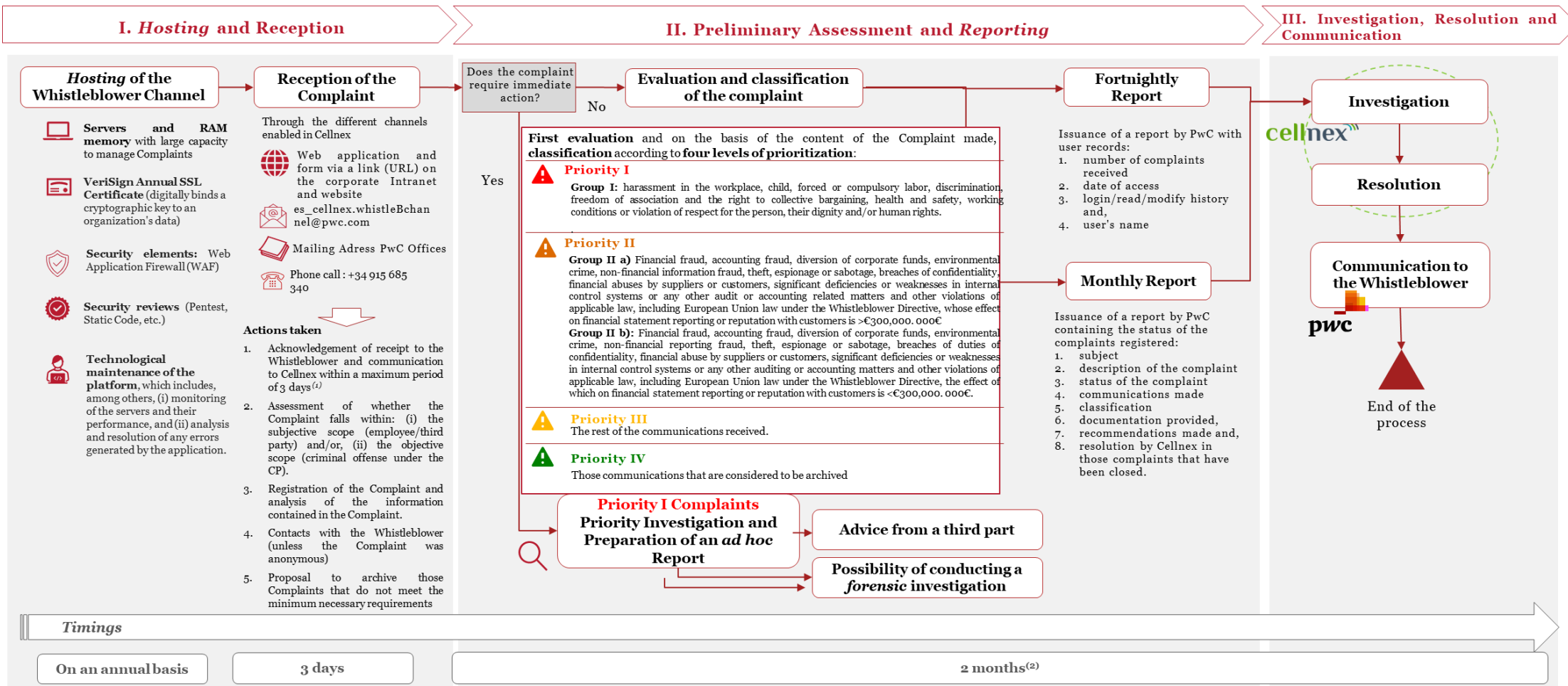
Cellnex will promote knowledge of the ethical principles, obligations and standards of conduct derived from the Policy for the Whistleblowing Channel to all members of the Group.

11. VERSION CONTROL

Version	Elaborated by	Validity
1	Committee of Ethics and Compliance	24/03/2022
2	Committee of Ethics and Compliance	01/10/2024

ANNEX I – SUMMARY OUTLINE OF THE WHISTLEBLOWING CHANNEL PROCEDURE

Below is a graphic summary of the Whistleblowing Channel Policy, from receipt to communication of the resolution to the Whistleblower.



⁽¹⁾ In the event that one or more of the members of the Ethics and Compliance Committee is involved in a complaint, such affected member(s) shall be excluded from the communication process.

⁽²⁾ The term for the Whistleblowing Channel's Decision – Making Body to issue a resolution of the complaint must be: (i) within a period not exceeding two months from the acknowledgement of receipt or, (ii) if no acknowledgement of receipt was sent to the Whistleblower, within two months from the expiration of the three-day period after the complaint was made once the complaint has been resolved.

ANNEX II – COMPLAINT FORM TO BE COMPLETED BY THE WHISTLEBLOWER

*Mandatory complaint data				
Whistleblower's data	Name			
	Surname			
	NIF			
	Phone number			
	E-mail address			
	Relationship with the entity			
Complaint data	Type of complaint* (According to the four priority levels: I,II,III,IV, described in the Policy for the Whistleblowing Channel)			
	Matter*			
	What happened? *			
	Which individuals or companies are involved? Is any company within the Cellnex Group involved?			
	Where did it happen?			
	Approximate date of the reported events* (as accurate as possible)			
	Attachments			
	Is anyone in the organization aware of the facts?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>	Does it have an economic impact?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>
	Do the facts described affect customers and/or suppliers?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>		Approximate quantification of the impact (in euros):
	Have you previously attempted to report the facts?	Yes <input type="checkbox"/> No <input type="checkbox"/>		

Without prejudice to the cases when a complaint is made anonymously, provided data of the whistleblower who initiated the procedure, as well as those collected throughout the investigation of the same, will be processed as joint data controllers, by:

- Cellnex Telecom, S.A. (hereinafter, "CELLNEX TELECOM") as the parent company of the Cellnex Group, with address for the purposes of notifications at Passeig de la Zona Franca 105 (Torre Llevant), 08038 Barcelona.
- The Cellnex Group affiliate that maintains the employment, commercial or professional relationship with the informant or the whistleblower.

The Cellnex Group has appointed a Data Protection Officer, who will ensure that your data is processed appropriately and will resolve any doubts or queries that may arise. You can contact the Data Protection Officer at the indicated postal address or at the following email address: personaldata@cellnextelecom.com

You can find more information about the essential aspects of the joint controllership agreement by sending an email to the following email address: personaldata@cellnextelecom.com

The data subject is informed that the Whistleblowing Channel may process personal data that is obtained:(i) directly from the whistleblowers themselves when they file a complaint, when formulating possible allegations, or at any other time during the investigation, and (ii) indirectly, data that may be collected by any of the individuals involved in the investigation.

We will process your personal data for the exclusive purpose of processing and managing the complaints received and, if appropriate, investigating the facts that are the subject of the complaint and taking the appropriate

Whistleblowing Channel Cellnex Telecom



legal actions, if applicable. All this, in order to avoid committing any act or conduct that could be contrary to the law, including Cellnex's corporate and good governance system, in accordance with the Cellnex Code of Ethics. The legal basis for data processing is compliance with a legal obligation of the Cellnex Group in those companies of the Cellnex Group that are required to have an internal information system. In the case of those companies of the Cellnex Group that are not bound by law, the legal basis is the fulfillment of a mission carried out in the public interest.

If the provided information allows identification, these personal data will not be transferred to any third parties with the exception of cases where it is mandatory by law or when it is necessary to protect the legal interests of the Cellnex Group or third parties. Notwithstanding the foregoing, we inform that personal data may be accessed (1) by those who performed the internal control and compliance functions, (2) by CELLNEX TELECOM personnel with human resource management and control functions when disciplinary measures could be taken against a worker, (3) as well as by third parties acting on behalf of the Cellnex Group when it is essential for the provision of a specific service related to this reporting channel. Under the said scenario, the Cellnex Group will regularize the relationship with the data processor in accordance with the GDPR provisions.

We inform you that when personal data is made available to the Cellnex Group companies located in countries outside the European Economic Area, such data transfers are carried out to countries that have an adequacy decision in accordance with the GDPR (see the list on our website).

Personal data, as well as employees and third-party data that have been provided through the complaints channel system, will be retained for the necessary period of time to comply with legal obligations. If the complaint is subject to application of Spanish regulations, after three months from receipt of the complaint without investigative actions, the data will be suppressed from the Whistleblowing Channel, unless the conservation purpose is to keep evidence that could support the crime prevention model. In cases where an investigation is initiated, the data may continue to be processed after this period during the investigation of the Complaint and the processing of the corresponding procedures until its conclusion, and, in any case, with a maximum of 10 years, being subsequently duly blocked during the periods that derive from the legal actions prescription. If the complaint is subject to application of Italian regulations, the documentation is kept for the time necessary to process the report and, in any case, no later than 5 years after the date of communication of the final result of the procedure. If the complaint is subject to application of Polish regulations, the documentation shall be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the conclusion of any proceedings initiated by such actions.

The data subject can exercise the rights of access, rectification, erasure, opposition, limitation or portability by contacting the Data Protection Officer through the email address personaldata@cellnextelecom.com. However, if an investigation is underway regarding the reported facts, or judicial or extrajudicial actions are being carried out regarding them, your rights of erasure and to object may be limited to comply with legal obligations. In any case, the right to file a claim can be exercised with the Spanish Data Protection Agency (AEPD) or the relevant supervisory authority (for further information, consult the following websites: <https://www.edpb.europa.eu/>, <https://ico.org.uk/> or <https://www.edoeb.admin.ch/>).

ANNEX III – EXTERNAL AUTHORITIES AND WHISTLEBLOWING CHANNELS

Additionally to Cellnex’s Whistleblowing Channel hereby we provide the list¹⁴ of external authorities and channels in a country by country basis:

Country	External Authority	External Channel
Spain	Oficina Antifrau de Catalunya	https://denunciesanonimes.antifrau.cat/#/?lang=es
Italy	Autorità Nazionale Anticorruzione (ANAC)	https://whistleblowing.anticorruzione.it/#/

¹⁴ This list will be periodically reviewed and updated.

ANNEX IV – SPAIN’S BUSINESS UNIT

In addition to the provisions of this Policy for the Whistleblowing Channel, the business units located in Spain must observe the aspects set forth in this Annex.

I. Appointment of a Responsible Manager for the Whistleblowing Channel

The Board of Directors of each entity is responsible for appointing a Responsible Manager for the management of the Whistleblowing Channel, as well as for their dismissal or removal, who can be common and shared with the other companies of the Group. If it is decided to appoint a collegiate body to be responsible, the management powers must be delegated to a physical person.

All appointments, dismissals and/or removals either of the physical person appointed as Responsible Manager, or of any of the members of the collegiate body, must be notified to the Autoridad Independiente de Protección del Informante (AAI) or to the regional authorities in the matter, within a period of 10 working days with an explanation, in case of dismissal, of the reasons behind that decision.

The Responsible Manager should hold a directive position within the entity and shall serve in an independent capacity to the Board of Directors.

II. Referral to the Public Prosecutor’s Office in case there is a suspicion of a crime

When the investigation of a complaint indicates the possibility of the commission of a criminal offense, the information should be referred to the Public Prosecutor’s Office immediately.

In the event that the complaint concerns the financial interest of the European Union, the information should be referred to the European Public Prosecutor’s Office.

ANNEX V – POLAND'S BUSINESS UNIT

In addition to the provisions of this Policy for the Whistleblowing Channel, the business units located in Poland must observe the aspects set forth in this Annex.

I. Objective Scope

Complaints regarding unlawful conduct related to business units located in Poland that fall under the scope of Article 3.1 of the Polish Whistleblower Protection Act of 14 June 2024, i.e., those that concern:

- (i) corruption;
- (ii) public procurement;
- (iii) financial services, products and markets;
- (iv) prevention of money laundering and terrorist financing;
- (v) product safety and compliance;
- (vi) transport safety;
- (vii) protection of the environment;
- (viii) radiation protection and nuclear safety;
- (ix) food and feed safety;
- (x) animal health and welfare;
- (xi) public health;
- (xii) consumer protection;
- (xiii) protection of privacy and personal data;
- (xiv) security of network and information systems;
- (xv) breaches affecting the financial interests of the State Treasury of the Republic of Poland, a Polish government unit and the European Union;
- (xvi) breaches relating to the European Union internal market, including breaches of public law competition rules, State aid rules and rules of corporate taxation;
- (xvii) constitutional freedoms and rights of individuals and citizens in their interactions with public authorities;

– will be considered under the rules set out in this Annex V.

All remaining complaints will be considered according to the rules described in the Policy.

II. Appointment of a Responsible Unit

The Management Board of each business unit located in Poland is responsible for appointing a Polish Responsible Unit ("**Polish Responsible Unit**"), which will be responsible for receiving complaints and taking follow-up actions regarding complaints within the aforementioned objective scope. The Polish Responsible Unit, will serve in an independent capacity from the Management Board and should be impartial in carrying out the tasks assigned to it. Information on who currently performs the function of the Polish Responsible Unit can be found on the Polish Business Unit website.

All individuals performing tasks within this Unit will receive written authorization to handle complaints. These individuals are obligated to maintain confidentiality regarding all information and personal data obtained during the receipt, verification, and follow-up of internal complaints, even after the termination of their employment or other legal relationship.

- III. Referral to the Polish Responsible Unit in case there is a complaint concerning facts within the scope of the Polish Whistleblower Protection Act of 14 June 2024 (Article 3.1)

Methods for Submitting Internal Complaints

A Whistleblower wishing to make a complaint may use the dedicated channels described in section 6 of this Policy. All these channels allow communication in Polish and the option to submit complaints anonymously. Anonymous complaints are handled in the same manner as those in which the Whistleblower provides their personal information.

In the case of a telephone call, it may be recorded with the Whistleblower's consent. Otherwise, a transcript of the conversation will be prepared by the entity receiving the complaint.

The complaint submitted through the means for complaining described in section 6 will be received by the Channel Manager (definition can be found in section 3). A complaint falling under the aforementioned objective scope will be entrusted to the Polish Responsible Unit for investigation and resolution.

The Whistleblower may also request a meeting with the Polish Responsible Unit to submit their complaint in person. This meeting will be arranged within 14 days of receiving the Whistleblower's request. The meeting may be recorded with the Whistleblower's consent, or a transcript may be prepared. The Whistleblower may review, correct, and approve the meeting minutes by signing them.

Receipt and Processing of Internal Complaints

Upon receipt of a complaint, the Polish Responsible Unit will take follow-up action with due diligence and full respect for the Whistleblower protection principles outlined in this Policy, particularly in sections 4 and 5. However, in contrast to the Policy, the handling of complaints and follow-up actions – including verification of the internal complaint, further communication with the Whistleblower, requesting additional information and providing feedback to the Whistleblower – are the responsibility of each Polish Responsible Unit entity separately. The Polish Responsible Unit will carry out its tasks with support of the CEC (definition can be found in section 1), which will have an advisory role, and will inform the CEC about the resolution of the complaints. Any other person involved in the proceedings or with access to information related to the complaint must be authorized in writing by the Polish Responsible Unit. In particular, the Whistleblower's personal data, which could lead to their identification, will not be disclosed to unauthorized persons, except with the Whistleblower's express consent.

The Channel Manager will notify the Whistleblower of the receipt of the complaint within 7 days, unless the Whistleblower has not provided a contact address. Subsequently, within a maximum of 3 months, the Polish Responsible Unit will inform the Whistleblower via the Channel Manager or directly about the planned or undertaken follow-up actions and the reasons for such actions.

Internal Register

Within each company, a Polish Responsible Unit maintains an internal register, which includes:

1. complaint number;
2. subject of the unlawful conduct;
3. personal data of the Whistleblower and the person to whom the complaint relates, necessary for the identification of these persons;
4. contact address of the Whistleblower;

5. date of the complaint;
6. information about the follow-up actions taken;
7. date of the case closure.

Data Retention

Personal data processed in connection with the receipt of a complaint or follow-up action and documents relating to that complaint will be stored for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the conclusion of any proceedings initiated by such actions. Personal data that is not relevant to the processing of the complaint will not be collected and, if accidentally collected, will be deleted immediately. The deletion of such personal data will take place within 14 days of the conclusion that it is not relevant to the case.

External Reporting

A Whistleblower has the right to make an external complaint. Information about an unlawful conduct within the aforementioned objective scope may, in any case, be complained to the Polish Commissioner for Human Rights or a relevant Polish or European Union public authority, bypassing the internal complaining procedure. External complaining may be made from 25 December 2024, when the provisions on external complaining come into force.

ANNEX VI – ITALY'S BUSINESS UNIT

In addition to the provisions of this Policy for the Whistleblowing Channel, the Business Units located in Italy must observe the aspects set forth in this Annex.

I. Objective Scope

The Whistleblower located in Italy who reports unlawful conduct relevant under Legislative Decree March 10, 2023, No. 24 and Legislative Decree June 8, 2001, No. 231, or violations of the organization management and control model adopted by Cellnex Italia, will follow this Annex.

II. Appointment of a Responsible Manager

The Board of Directors of each Italian entity is responsible for appointing a Responsible Manager ("Supervisory Body" or "Organismo di Vigilanza – OdV –") for the management of complaints falling under the aforementioned objective scope, as well as for their dismissal or removal. If it is decided to appoint a collegiate body to be responsible, the management powers must be delegated to a physical person that has not a conflict of interest. The Responsible Manager should hold a directive position of the entity who shall serve in an independent capacity of the Board of Directors.

III. Referral to the OdV in case there is a complaint concerning facts within the scope of Legislative Decree No. 231/2001 and Legislative Decree No. 24/2023

When, according to the previous objective scope, the complaints concern facts falling under the Legislative Decree No. 24/2023, concern violations of the 231 Model, the company procedures, the system of delegations and powers, the Cellnex Code of Ethics and/or unlawful acts from which the commission of a predicate offense and liability pursuant to Legislative Decree No. 231/2001 may result, even if only potentially, the Channel Manager shall entrust the complaint to the OdV and follow the specific local Policy [POL_IT_005_Gestione delle segnalazioni delle violazioni interne - Whistleblowing].

IV. Use of the Whistleblowing Channel

With reference to the Whistleblower located in Italy, the following exceptions apply to the general framework:

- a) The e-mail address is excluded from the means of reporting regulated in section 6 of this Policy.
- b) In case a complaint is submitted via mailing address, the Whistleblower must adhere to the following instructions:
 - i. If the report is filled anonymously, it must be placed in a sealed envelope that bears the word "confidential" on the outside to the Channel Manager (e.g. "confidential to the Channel Manager").
 - ii. If the Whistleblower wishes to reveal their identity, the report must be placed in two sealed envelopes. The first with the identifying data of the Whistleblower along with a photocopy of the identification document. The second with the report, so as to separate the Whistleblower's identifying data from the report. Both must then be placed in a third sealed envelope that bears the word "confidential" on the outside to the Channel Manager (e.g. "confidential to the Channel Manager").