



Stakeholder Engagement Policy

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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 general policies and strategies of the Group and, therefore, approves this Policy which establishes the strategic framework for the Company's relations with its respective Stakeholders, in the countries in which it operates, and reinforces its commitment to its application in all companies controlled by Cellnex ("Cellnex Group" or the "Group").

2. Reference framework

This policy provides guidelines and principles for maintaining and strengthening the relationship of Cellnex with its stakeholders. It takes as a reference the international standard *"AA1000 Stakeholder Engagement Standard, 2015"*, as well as the European regulations *"Corporate Sustainability Reporting Directive (CSRD)"*, and *"Corporate Sustainability Due Diligence Directive (CSDDD)"*, together with other international standards such as:

- 10 Principles of the United Nations Global Compact.
- Paris Agreement on climate change.
- United Nations Guiding Principles on Business and Human Rights.
- United Nations Sustainable Development Goals (SDGs).
- United Nations Principles for Social Investment.
- OECD Guidelines for Multinational Enterprises.
- Core Conventions of the International Labour Organisation (ILO).
- European Financial Reporting Advisory Group (EFRAG) Guidelines for the implementation of the European Sustainability Reporting Standards (ESRS).

This policy supports and must be interpreted in conjunction with Cellnex Code of Ethics and other corporate policies, carrying out the commitments in relation to the stakeholders established in these policies, which are mainly the following:

- Policy on the communication of financial, non-financial and corporate information and contacts with shareholders, institutional investors and proxy advisors,
- Global Risk Management Policy,
- Environmental, Social and Governance (ESG) Policy,
- Environment and Climate Change Policy,
- Occupational Health & Safety Policy,
- Equity, Diversity and Inclusion Policy,
- Human Rights Policy,
- Global Quality Policy,
- Procurement Policy.

3. Purpose and scope

3.1. Object

The purpose of this policy is to define Cellnex's stakeholder relationship model in order to incorporate stakeholder expectations into the company's strategy.

For Cellnex it is important to maintain a close relationship with the stakeholders who are directly or indirectly involved in the company's business activity and, therefore, also have the capacity to influence, directly or indirectly, the development of the Company.

3.2. Scope of application

This policy outlines Cellnex overarching approach to engagement with our stakeholders, and the coordination of such. This policy has been put in place to ensure that the stakeholder engagement is applied consistently across all Cellnex operations.

This policy:

- sets out the basic principles of engagement with our Stakeholders
- applies to all the companies that make up the Cellnex Telecom Group and within each company to all departments and business units regarding all their activities and interactions with its Stakeholders in the whole value chain.

4. Cellnex Stakeholders

Stakeholders are those individuals, groups of individuals or organizations that impact or could be impacted by Cellnex activities.

At Cellnex Stakeholders are grouped into the following categories:

- Customers
- Employees
- Investors, shareholders and ratings
- Landlords ¹
- Suppliers
- Public administration, associations, regulators and business partners
- Media
- Communities and Non-Governmental Organisations (NGOs)

5. Basic principles

The Company adopts and promotes the following basic principles to engage with its Stakeholders:

- **Value creation:** Cellnex seeks to engage with its Stakeholders to create sustainable and shared value, addressing the economic, social and environmental impacts that may affect its Stakeholders as a result of the Company's activities.
- **Open dialogue and active listening:** Cellnex defines the process of participation and involvement of Stakeholders needed to inform the decision making processes, and

¹ Owners of land on which telecommunications infrastructure is located

promotes the implementation of bidirectional communication channels that respond to their needs and expectations.

- **Responsibility:** Cellnex builds its relations with Stakeholders based on the principles of ethics and integrity as drivers of credibility and mutual trust.
- **Transparency:** Cellnex promotes transparency as a basis for establishing a trusting and lasting relationship with its Stakeholders.
- **Continuous improvement:** Cellnex regularly monitors and reviews the dialogue mechanisms with its Stakeholders in order to improve them.

These principles comply with the applicable legal regulations and each department of the Company is committed to adapt to future regulations that may arise.

6. Lines of action

Based on the basic principles set out above, the lines of action and commitments of this policy are established in line with the company's strategy.

The lines of action and commitments established in this policy contribute to the achievement of the United Nations Sustainable Development Goals (SDGs), in particular SDG 17 Partnership for the goals.

6.1.1. Identify and prioritise relevant Stakeholders

Identifying and classifying all its Stakeholders according to their potential impact or level of influence on the company. Cellnex will prioritise the efforts required to engage with its Stakeholders according to their relevance. This will enable to allocate the resources needed to engage with them more efficiently. The list of Stakeholders will be reviewed periodically in the context of the double materiality assessment.

6.1.2. Understand and manage the expectations of key Stakeholders

Promoting an open dialogue with its Stakeholders, based on active listening and providing responses to topics relevant to each Stakeholder, need and expectations. Cellnex will define a relationship model with each Stakeholder group tailored its needs and expectations and in line with the Company strategy.

To this end, the Company will use various channels and instruments including direct contact and through Stakeholder's representatives, surveys, approach and disclosure through the Company's corporate website and social media, among others.

6.1.3. Engage with stakeholders in the process of identification and assessment of the impacts, risks and opportunities (IROs) along the value chain

Ensuring Stakeholders participation to identify, assess and manage the company's impacts, risks and opportunities. Cellnex will measure the positive and negative impacts in the value chain to implement action plans that mitigate risks, increase opportunities and generate value for all the Company Stakeholders and for the environment.

7. Stakeholder management responsibilities

The ESG Department and Corporate Communications & Public Affairs are responsible for ensuring compliance with this Policy, with the contribution of all the departments and business units of the company in the planning and execution of the different Stakeholder engagement activities, each department within its respective scope of competencies, functions and responsibilities.

8. Communication and transparency

Cellnex is committed to periodically sharing its progress in observing and applying the basic principles of this policy with all internal and external parties, upholding the principle of transparency.

The Company commits to make its Stakeholders aware of the various channels for communication, complaints, participation and dialogue at their disposal.

Cellnex promotes awareness of and compliance with the commitments set out in this Policy, which will be permanently available on the website.

9. Approval, monitoring and control

Among the responsibilities of the Board of Directors of Cellnex Telecom is the approval of the corporate policies and, consequently, of the Stakeholder Relations Policy.

The Nominations, Remunerations and Sustainability Committee is the body responsible for periodically monitoring the level of application and development of this policy.

Madrid, 1st October 2024