Occupational Health and Safety 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 the exercise of these functions, the Board of Directors of Cellnex is responsible for approving the general policies and strategies of the Group and, therefore, approves the Occupational Health and Safety Policy (hereinafter, the 'Policy'). This Policy was approved following the recommendation of the Appointments, Remuneration and Sustainability Committee.

2. Reference framework

This Policy provides guidelines and principles for the management of Occupational Health and Safety (from now on OHS) matters. It is in line with the European regulations "Corporate Sustainability Reporting Directive (CSRD)", and the "Corporate Sustainability Due Diligence Directive (CSDDD)", together with other recognised international standards and voluntary initiatives including, but not limited to, the following:

- ISO 45001 standard.
- ILO Declaration on Fundamental Principles and Rights at Work.
- The 10 Principles of the United Nations Global Compact.
- United Nations Sustainable Development Goals (SDGs).
- United Nations Guiding Principles on Business and Human Right.
- European Financial Reporting Advisory Group (EFRAG) Guidelines for the implementation of the European Sustainability Reporting Standards (ESRS).
- The Luxembourg Declaration of the European Network on Workplace Health Promotion (ENWHP).

This Policy supports and must be interpreted in conjunction with the Cellnex Telecom Code of Ethics, the Suppliers Code of Conduct and other corporate policies, which are mainly the following:

- Global Risk Management Policy,
- Sustainability Policy,
- Human Rights Policy,
- Equity, Diversity and Inclusion Policy,
- Business Continuity Policy,
- Global Quality Policy,
- Procurement Policy,
- Stakeholder Engagement Policy,
- Policy on the communication of financial, non-financial and corporate information and contacts with shareholders, institutional investors and proxy advisors,
- Policy for the Whistleblowing Channel,
- Other policies established by the internal regulations in force in the areas related to OHS or similar in the different locations where Cellnex Telecom is present.

3. Purpose and scope

3.1. Purpose

For Cellnex Telecom guaranteeing the protection of life and physical safety of people is a priority, being a constituent part of Cellnex Telecom's Sustainability strategy, as well as a transversal commitment that must be present both in the Group's activities and the internal decision-making processes, ensuring:

- Promotion and protection of all personnel's health and wellbeing.
- Provision of a safe, healthy working environment.
- Safety of its collaborators and anyone else present on its premises.

3.2. Scope of application

This policy:

- sets out the basic principles of Cellnex Telecom OHS strategy and commitments,
- applies to all the companies that comprise the Cellnex Group and, within each company, to all departments in relation to all their activities and interactions with their stakeholders along the value chain,
- is aligned with and complemented with Cellnex Telecom's corporate policies and internal regulations.

4. Basic principles

Cellnex adopts and promotes the following basic principles for the achievement of the acquired commitments :

1. **People first**: The Company recognises that the health and safety of our employees and those of third parties is a top priority. Cellnex Telecom undertakes to:
   - Prioritise those actions and maintenance works and continuous improvement of the facilities that guarantee safe and healthy work for all employees, in such a way that both work-related injuries and deterioration in health can be prevented, including potential impacts on the safety of communities, customers and suppliers.
   - Taking the necessary measures and providing the resources to eliminate the hazards and reduce the risks associated with the safety and health of personnel.
2. **Responsible value chain**: Involve clients and suppliers in this Policy with the mutual aim of creating working environments that meet the required OHS levels.
3. **Safety, health and wellbeing culture**: Assume a diverse leading attitude in order to integrate and implement a complete culture of safety, health and wellbeing.
4. **Participation and consultation**: Promote, facilitate and guarantee the consultation and participation of workers and, where they exist, workers' representatives.
5. **Compliance:** Ensure the compliance of regulations, legal requirements and other requirements applicable all in the areas where the Company is present, as well as the provisions of the main international standards related to OHS risks and demand full compliance on the part of suppliers.

6. Continuous improvement:
- Promotes and ensures continued improvement of the OHS Management System through systematic performance evaluation.
- Promotes the necessary adjustments to adapt to future standards or new requirements from clients and society.
- Committed to promoting best practices in OHS in its value chain.

5. Commitments and lines of action

Cellnex Telecom's OHS strategy is deeply integrated into our strategic axes and lines of the Sustainability strategy. This strategy reflects our commitment to create a secure and healthy workplace environment and guaranteeing the safety of both employees and individuals on our premises. Through the development of the strategic lines, Cellnex Telecom acquires the following commitments which, in turn, contribute to the achievement of various goals of United Nations Sustainable Development Goals (SDGs) 3, 8 and 11[1]:

5.1. Planning, evaluation and control

Through a group-wide OHS management system Cellnex Telecom establishes, reviews and adjusts, as appropriate, the control measures, policies, plans and procedures established in the field of OHS, and undertakes to[2,3]:
- Set OHS objectives and targets consistent with this policy and monitor their performance and progress.
- Report, investigate and communicate the conclusions of accident and incident, thereby passing on the lessons learned.
- Define and provide the necessary resources to establish, implement, maintain and improve continuously.
- Define and carry out internal audit processes.
- Guarantee mechanisms to control access to the workplaces.
- Maintain an adequate system to select, monitor and assess the performances of suppliers and contractors, in order to ensure the highest standards of OHS in the performance of their activities.
- Partner with procurement to ensure OHS is included in the critical suppliers contracts.

5.2. Risk Management

Cellnex Telecom identifies, assesses and prioritises risks and hazards, prevents and mitigates potential risks, eliminates actual risks and repairs adverse effects caused in its operations, thereby avoiding incidents, accidents, injuries and illnesses related to its business activities. It therefore undertakes to[2,3]:
- Assess the risks and identify the arising from or associated with the work activities performed and establish appropriate measures to avoid or mitigate them.
- Guarantee safe working conditions at the workplaces by applying maintenance programmes to the infrastructures, devices, materials and protective equipment in accordance with the applicable legal and regulatory standards.
- Engage with stakeholders in the process of identification and assessment of the impacts, risks and opportunities (IROs) along the value chain.

- Engage with stakeholders to ensure Cellnex Telecom standards are met in the preventive and corrective action plans, ensuring the adoption of appropriate measures to remedy adverse effects, and, where appropriate, in the development of qualitative and quantitative indicators for monitoring.
- Encourage the identification and reporting of hazards among its workers and those of third parties.

5.3. Leadership and responsibility

Cellnex Telecom is committed to fostering a culture of leadership, responsibility, and involvement across the company in the integration of this policy into all business processes. Furthermore, the management team is required to demonstrate leadership, responsibility and commitment in relation to the OHS management to ensure the implementation of this policy accordingly to the purpose, size, context and nature of the risks and opportunities.

5.4. Consultation and participation

Cellnex Telecom encourages its workers to engage in open dialogue and participate in matters pertaining to OHS in order to identify potential areas for improvement, promote excellence, and ensure that personnel at all levels feel represented. It is the policy of Cellnex Telecom to:
- Provide and arrange for the necessary mechanisms, time and resources to facilitate consultation and participation, encouraging the seeking of opinions and the involvement of all levels within the organisation in the decision-making process.
- Provide support for the establishment and operation of Health and Safety Committees or similar in all locations where it is present, and encourage participation in them.

5.5. Responsibility of the team and third parties

It is the responsibility of all Cellnex Telecom employees, as well as those of its clients, suppliers and subcontractors, to ensure their own health and safety, as well as that of any individuals who may be affected. It is therefore their responsibility to:
- Comply with the OHS standards, procedures and policies established, ensuring that the tasks assigned are performed safely and correctly using equipment, materials and protective equipment.
- Report within the organisation any relevant OHS issues, especially any serious, imminent hazard or defects in any protection system.
- Collaborate to improve OHS.

5.6. Wellbeing

The company incorporates wellbeing into its corporate strategy and operations as a cultural element through a single model for everybody based on culture, behaviors and leadership. It therefore commits to promote the development of targeted programmes for the promotion of

wellbeing at work in accordance with the regulations of each country in which Cellnex Telecom operates, focusing on[4]:

- The necessary measures to avoid or minimise risks of a physical or psychological nature.
- Provide support for initiatives that enhance the work-life balance, ensuring the right to disconnect from work and promoting flexible work arrangements.
- Provide medical services wherever required.
- Guaranteeing access to all legally required medical check-ups in the workplace.

5.7.   Safe mobility

With the aim of reducing accidents caused by its workers' commuting, raising awareness regarding the prevention of traffic accidents and improving the mobility of workers, partners, suppliers and clients, Cellnex Telecom undertakes to[5]:

- Continue to improve and emphasise road safety.
- Foster the adoption of local mobility plans.
- Encourage the use of technology to avoid unnecessary travel.

5.8.   Communication and training

In order to foster an OHS culture Cellnex Telecom is committed to:

- Make everyone aware of their roles, responsibilities and obligations regarding OHS.
- Ensure the workers have the skills, abilities and aptitudes required to prevent and control the hazards associated with carrying out their work.
- Provide all personnel with informative documents on working procedures with specific hazards, the use of personal protective equipment (PPE) and other similar aspects.
- Prioritize communication as a key tool to promote and adopt practices and measures that promote OHS.
- Provide adequate communication channels so that anyone can report situations in which the safety of the personnel could be at risk.

5.9.   Information management

To appropriately manage OHS information, the Company undertakes to:

- Use innovative technological tools to improve the quality of OHS information in the workplace.
- Provide appropriate access to clear, understandable and relevant information on the subject.
- Guarantee better and faster access to information for clients and suppliers.

6.   Governance and Accountability

- Leadership: The OSH strategy is led by Senior Management, driven by the Nomination, Remuneration and Sustainability Committee and approved by the Board of Directors, ensuring commitment and oversight at the highest level.

- Integration: The OHS strategy is embedded within the Sustainability strategy, aligning with broader sustainability goals.
- Collaboration: The strategy is defined collaboratively between Group People Department with the input from the Corporate and Business Units of the company, ensuring local relevance and global consistency.
- Reporting: Periodical progress reports on the OHS strategic lines and progress to the executive committee and Nomination, Remuneration and Sustainability Committee.
- Communication and transparency: Cellnex Telecom is committed to sharing its progress in observing and applying the basic principles of this policy with all internal and external interested parties in accordance with the principle of transparency. To this end the company will publish OHS performance indicators included in the company reports following international reporting standards. Cellnex Telecom will promote awareness of and compliance with the commitments set out in this policy, which will be permanently available on the website.

7. Approval, monitoring and control

The Board of Directors of Cellnex Telecom is responsible for the approval of this Policy, as well as any amendments thereto. Approval or modification of this Policy will seek the favorable recommendation of the Appointments, Remuneration and Sustainability Committee.

The Appointments, Remuneration and Sustainability Committee is the body in charge of periodically supervising the degree of application and development of this Policy.

The Senior Management of Cellnex Telecom undertakes to periodically monitor the progress of the necessary strategic lines of action arising from the implementation of this Policy, which will be reported periodically to the Appointments, Remuneration and Sustainability Committee.

8. Contact

Any questions related to this Occupational Health and Safety Policy may be directed to the Group People Department.

25th February 2025

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[1] **SDG 3:** *Ensuring healthy lives and promote wellbeing for all at all ages.*
SDG 8: *Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.*
SDG 11: *Make cities and human settlements inclusive, safe, resilient and sustainable.*
[2] **SDG Target 8.8**. *Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.*
SDG Target 8.5. *By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.*
[3] **SDG Target 3.9** *By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.*
[4] **SDG Target 3.5** *Strengthen the prevention and treatment of substance abuse, including narcotic drug abuse and harmful use of alcohol.*
[5] **SDG Target 3.6** *By 2020, halve the number of global deaths and injuries from road traffic accidents.*
SDG Target 11.2 *By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.*