

# Annex 3.

## GRI Content Index

Indicators	2019 Integrated Annual Report	Perimeter of contents
<b>GENERAL INDICATORS</b>		
<b>COMPANY PROFILE</b>		
102-1	Name of the organisation	Cellnex Telecom, S.A. / Cellnex group
102-2	Activities, brands, products and services	2. Cellnex in 2019: milestones, key figures, business model & prospects / Business Model. / Cellnex group
102-3	Location of headquarters	Juan Esplandiú, 28007 Madrid / Cellnex group
102-4	Location of operations	2. Cellnex in 2019: milestones, key figures, business model & prospects / Milestones and main figures for the year 2019 <ul style="list-style-type: none"> <li>• Growth</li> <li>• Consolidation in Europe</li> </ul> / Cellnex group
102-5	Ownership and legal form	Cellnex Telecom, S.A. / Cellnex group
102-6	Markets served	2. Cellnex in 2019: milestones, key figures, business model & prospects / Business Model. 2. Cellnex in 2019: milestones, key figures, business model & prospects / Milestones and main figures for the year 2019 <ul style="list-style-type: none"> <li>• Growth</li> <li>• Consolidation in Europe</li> </ul> / Cellnex group
102-7	Size of the organisation	2. Cellnex in 2019: milestones, key figures, business model & prospects / Milestones and main figures for the year 2019 <ul style="list-style-type: none"> <li>• Growth</li> <li>• Consolidation in Europe</li> <li>• Market figures</li> <li>• Treasury share</li> <li>• Business performance and results</li> <li>• Business indicators</li> </ul> / Cellnex group
102-8	Information about employees and other workers	4.Sustainable Management of the Value Chain / People Development / People management. / Annex 5. KPI Tables. / Cellnex group
102-9	Organisational structure, value chain, supply chain	2. Cellnex in 2019: milestones, key figures, business model & prospects / Milestones and main figures for the year 2019 / Transformation. Towards a new industrial model. / Cellnex group 4.Sustainable Management of the Value Chain / Add value to society / Suppliers.

Indicators		2019 Integrated Annual Report	Perimeter of contents
102-10	Significant changes in the organisation and its supply chain	4.Sustainable Management of the Value Chain / Add value to society / Suppliers.	Cellnex group
102-11	Precautionary principle or approach	<p>Cellnex has environmental liability insurance in compliance with current legislation and has a provision of 60,000 euros.</p> <p>Note 20 of the Consolidated Financial Statements.</p> <p>2. Cellnex in 2019: milestones, key figures, business model &amp; prospects / Milestones and main figures for the year 2019 / The Cellnex tax contribution/ Value generated and distributed.</p> <p>4.Sustainable Management of the Value Chain / Sustainable development of the business / Monitoring and managing the main risks opportunities and environmental impacts.</p>	Cellnex group
102-12	External initiatives	<p>4.Sustainable Management of the Value Chain / Add value to society / Cellnex's participation in relevant initiatives</p> <ul style="list-style-type: none"> <li>• Significant awards and recognition of Cellnex in 2019.</li> <li>• Cellnex's participation in Sustainability Indices and initiatives.</li> </ul>	Cellnex group
102-13	Membership of associations	4.Sustainable Management of the Value Chain / Add value to society / Cellnex's participation in relevant initiatives / Cellnex action and participation in relevant industry associations.	Cellnex group
<b>STRATEGY</b>			
102-14	Declaration of senior executives responsible for decision-making	1.Interview with the President and CEO.	Cellnex group
102-15	Main impacts, risks and opportunities	3.Governance Model / Risk Management. Annex 2. Risks	Cellnex group
<b>ETHICS AND INTEGRITY</b>			
102-16	Values, principles, standards, and norms of behaviour	3.Governance Model / Ethics and compliance.	Cellnex group
102-17	Mechanisms for assessment and complaint of ethical conduct	3.Governance Model / Ethics and compliance.	Cellnex group
<b>GOVERNANCE</b>			
102-18	Governance structure	3.Governance Model / Corporate governance.	Cellnex group
102-19	Delegation of authority	Section C of the 2019 Annual Corporate Governance Report (Annex 8).	Cellnex group
102-20	Executive responsibility for economic, environmental and social matters	<p>3.Governance Model / Cellnex's Corporate Social Responsibility framework</p> <p>Section H of the 2019 Annual Corporate Governance Report (Annex 8)</p>	Cellnex group
102-21	Consultation with stakeholders on economic, environmental and	5.Bases for the Preparation of the Report / Determining the content of	Cellnex group

Indicators	2019 Integrated Annual Report	Perimeter of contents	
social matters	the report.		
102-22	Composition of the highest governing body and its committees	3.Governance Model / Corporate governance / The Cellnex Board of Directors. Sections C1.2, C1.3 Y C2 of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-23	Chair of the highest governing body	3.Governance Model / Corporate governance / The Cellnex Board of Directors.	Cellnex group
102-24	Appointment and selection of the highest governing body	3.Governance Model / Corporate governance / Changes in 2019.	Cellnex group
102-25	Conflicts of interest	Section D of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-26	Role of highest governance body in setting purpose, values, and strategy	Section C of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-27	Collective knowledge of the highest governing body	3.Governance Model / Corporate governance.	Cellnex group
102-28	Evaluation of the performance of the highest governance body	3.Governance Model / Corporate governance. Section C.17 of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-29	Identification and management of economic, environmental and social impacts	3.Governance Model / Risk Management. Annex 2. Risks	Cellnex group
102-30	Effectiveness of risk management processes	3.Governance Model / Risk Management. Annex 2. Risks	Cellnex group
102-31	Review of economic, environmental, and social topics	3.Governance Model / Risk Management. Annex 2. Risks	Cellnex group
102-32	Highest governance body's role in sustainability reporting	3.Governance Model / Cellnex's Corporate Social Responsibility framework Section H of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-33	Communicating critical concerns	3.Governance Model / Ethics and compliance.	Cellnex group
102-34	Nature and total number of critical concerns	3.Governance Model / Ethics and compliance.	Cellnex group
102-35	Remuneration policies	Section C of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-36	Process for determining remuneration	Section C of the 2019 Annual Corporate Governance Report (Annex 8)	Cellnex group
102-37	Stakeholders' involvement in remuneration	Section A of the 2019 Annual Report on Remuneration Policy of Board Members	Cellnex group
102-38	Annual total compensation ratio	The salary of the highest paid person not including the CEO is	Cellnex group

Indicators	2019 Integrated Annual Report	Perimeter of contents
	81.27 times higher than the average Cellnex group salary. The ratio is 42.68.	
102-39	Ratio of the percentage increase in total annual compensation	Cellnex group
<p>The variation in the average remuneration of the Group in relation to 2019 was -4%, and the variation in the remuneration of the CEO was 97.5%. The changes correspond to the total remuneration accrued, excluding contributions to pension funds and life insurance premiums.</p>		
<b>STAKEHOLDER ENGAGEMENT</b>		
102-40	List of stakeholder groups	Cellnex group
102-41	Collective bargaining agreements	Cellnex group
102-42	Identifying and selecting stakeholders	Cellnex group
102-43	Approach to stakeholder engagement	Cellnex group
102-44	Key topics and concerns raised	Cellnex group
<b>REPORTING PRACTICES</b>		
102-45	Entities included in the consolidated financial statements	Cellnex group
102-46	Defining report content and topic boundaries	Cellnex group
102-47	List of material topics	Cellnex group
102-48	Restatements of information	Cellnex group
102-49	Changes in reporting	Cellnex group
102-50	Period covered by the report	Cellnex group
102-51	Date of the last report	Cellnex group
102-52	Reporting cycle	Cellnex group
102-53	Contact person for queries regarding the report	Cellnex group
102-54	Claims of reporting in accordance with the GRI Standards	Cellnex group

Indicators		2019 Integrated Annual Report	Perimeter of contents
102-55	GRI content index	Annex 3. GRI Context Index	Cellnex group
102-56	External assurance	Annex 6. Independent Limited Verification Report	Cellnex group
<b>MANAGEMENT APPROACH</b>			
103-1 <sup>3</sup>	Explanation of the material topic and its Boundary	5.Bases for the Preparation of the Report <ul style="list-style-type: none"> <li>• Reporting scope.</li> <li>• Determining the content of the report.</li> </ul>	Cellnex group
103-2 <sup>(1)</sup>	The management approach and its components		
103-3 <sup>(1)</sup>	Evaluation of the management approach		
<b>ECONOMIC STANDARDS</b>			
<b>MARKET PRESENCE</b>			
201-1	Direct economic value generated and distributed	2.Cellnex in 2019: milestones, key figures, business model & prospects / Milestones and main figures for the year 2019 / The Cellnex tax contribution.	Cellnex group
<b>MARKET PRESENCE</b>			
202-2	Proportion of senior executives hired from the local community	100% of Cellnex Spain management comes from the local community.	Spain
<b>INDIRECT ECONOMIC IMPACTS</b>			
203-1	Investments in infrastructure and supported services	2.Cellnex in 2019: milestones, key figures, business model & prospects <ul style="list-style-type: none"> <li>• Business performance and results.</li> <li>• Business indicators.</li> </ul>	Cellnex group
<b>PROCUREMENT PRACTICES</b>			
204-1	Proportion of procurement from local suppliers	4.Sustainable Management of the Value Chain / Add value to society / Suppliers.	Cellnex group
<b>ANTI-CORRUPTION</b>			
205-2	Communication and training about anti-corruption policies and procedures	3.Governance Model / Ethics and compliance / Main responsibilities of Cellnex's Committee of Ethics and Compliance. The money-laundering issue is addressed in the Cellnex Corruption Prevention Procedure.	Cellnex group
205-3	Confirmed incidents of corruption and actions taken	3.Governance Model / Ethics and compliance / Main responsibilities of Cellnex's Ethics and Compliance Committee.	Cellnex group
<b>UNFAIR COMPETITION</b>			
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	In FY 2019, Cellnex received no complaints for anti-competitive or monopolistic practices, nor have the	Cellnex group

<sup>3</sup> The management approach for each Standard is included in the section specified for its specific indicators.

Indicators	2019 Integrated Annual Report	Perimeter of contents
	market or competition supervisory authorities initiated procedures ex officio. Likewise, it received no final judgments or any other type of sanction for such practices.	
<b>ENERGY</b>		
302-1	Energy consumption in the organisation	4.Sustainable Management of the Value Chain / Sustainable development of the business / Sustainable use of resources. Cellnex group
302-2	Energy consumption outside the organisation	4.Sustainable Management of the Value Chain / Sustainable development of the business / Sustainable use of resources. Cellnex considers all the energy consumed in its operating facilities as internal consumption. Cellnex group
302-4	Reduction of energy consumption	4.Sustainable Management of the Value Chain / Sustainable development of the business / Sustainable use of resources / Energy efficiency. Cellnex group
<b>BIODIVERSITY</b>		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	4.Sustainable Management of the Value Chain / Sustainable development of the business / Biodiversity. Spain / Italy / Netherlands
304-2	Significant impacts of activities, products and services on biodiversity	4.Sustainable Management of the Value Chain / Sustainable development of the business / Biodiversity. Spain / Italy / Netherlands
<b>EMISSIONS</b>		
305-1	Direct GHG emissions (scope 1)	4.Sustainable Management of the Value Chain / Sustainable development of the business / Carbon footprint and climate change. Cellnex group
305-2	Indirect GHG emissions when generating energy (scope 2)	4.Sustainable Management of the Value Chain / Sustainable development of the business / Carbon footprint and climate change. Cellnex group
305-3	Other indirect GHG emissions (scope 3)	4.Sustainable Management of the Value Chain / Sustainable development of the business / Carbon footprint and climate change. Cellnex group
305-5	Reduction of GHG emissions	4.Sustainable Management of the Value Chain / Sustainable development of the business <ul style="list-style-type: none"> <li>• Sustainable use of resources.</li> <li>• Carbon footprint and climate change.</li> </ul> Cellnex group
<b>ENVIRONMENTAL COMPLIANCE</b>		
307-1	Non-compliance environmental laws with and	There were no environmental complaints in 2019. Cellnex group

Indicators	2019 Integrated Annual Report	Perimeter of contents
regulations		
<b>SUPPLIER ENVIRONMENTAL ASSESSMENT</b>		
308-1	New suppliers that were screened using environmental criteria	4.Sustainable Management of the Value Chain / Add value to society / Suppliers / Evaluation, selection and monitoring of suppliers. Spain / Italy / France/ Switzerland
<b>EMPLOYMENT</b>		
401-1	New employee hires and employee turnover	Annex 5. KPI Tables Cellnex group
<b>WORKER-COMPANY RELATIONS</b>		
402-1	Minimum notice periods regarding operational changes	Cellnex Spain: 2 weeks, following the established pre-notification periods. Cellnex Italia follows the periods laid down in the agreement of the Telecommunications Collective. Cellnex France: varies between 1 and 3 months, depending on the case. In Switzerland, the Netherlands and the UK, we comply with the minimum notice periods established by local law in each case. Cellnex group
<b>OCCUPATIONAL HEALTH AND SAFETY</b>		
403-1	Worker representation on formal worker-company health and safety committees	4.Sustainable Management of the Value Chain / People development / Occupational health and safety. Spain / Italy
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Annex 5. KPI Tables 4.Sustainable Management of the Value Chain / People development / Occupational health and safety / Accident rate. Cellnex Group
403-4	Health and safety topics covered in formal agreements with trade unions	4.Sustainable Management of the Value Chain / People development / Occupational health and safety. Spain / Italy
<b>TRAINING AND TEACHING</b>		
404-1	Average hours of training per year per employee	Annex 5. KPI Tables 4. Sustainable Management of the Value Chain / People development / Training. Cellnex group
404-2	Programmes to improve employee skills and transition assistance programmes	4.Sustainable Management of the Value Chain / People development / Training. Cellnex group
<b>DIVERSITY AND EQUAL OPPORTUNITY</b>		
405-1	Diversity of governing bodies and employees	During 2019, Cellnex has employed 14 people with different capacities. Annex 5. KPI Tables 3.Governance Model / Corporate governance. Cellnex group
405-2	Ratio of basic salary and remuneration of women to men	Annex 5. KPI Tables Cellnex group
406-1	Incidents of discrimination and corrective actions taken	3. Governance Model / Ethics and compliance / Main Cellnex group

Indicators	2019 Integrated Annual Report	Perimeter of contents
	responsibilities of Cellnex's Ethics and Compliance Committee.	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<p>3. Governance Model</p> <ul style="list-style-type: none"> <li>• Ethics and compliance</li> <li>• Cellnex's Corporate Social Responsibility framework.</li> </ul> <p>4.Sustainable Management of the Value Chain / Add value to society / Suppliers</p>
408-1	Operations and suppliers with significant risk of using child labour	<p>3. Governance Model</p> <ul style="list-style-type: none"> <li>• Ethics and compliance</li> <li>• Cellnex's Corporate Social Responsibility framework.</li> </ul> <p>4.Sustainable Management of the Value Chain / Add value to society / Suppliers</p>
409-1	Operations and suppliers at significant risk for incidents of child labour	<p>3. Governance Model</p> <ul style="list-style-type: none"> <li>• Ethics and compliance</li> <li>• Cellnex's Corporate Social Responsibility framework.</li> </ul> <p>4.Sustainable Management of the Value Chain / Add value to society / Suppliers</p>
<b>HUMAN RIGHTS ASSESSMENT</b>		
412-2	Employee training on human rights policies or procedures	Cellnex has dedicated 2,369 hours in human rights training.
<b>LOCAL COMMUNITIES</b>		
413-1	Operations with local community engagement, impact assessments, and development programmes	<p>4.Sustainable Management of the Value Chain / Add value to society / Social contribution / Donations.</p> <p>4.Sustainable Management of the Value Chain / Sustainable development of the business / Electromagnetic emissions</p>
<b>SUPPLIER ENVIRONMENTAL ASSESSMENT</b>		
414-1	New suppliers that were screened using social criteria.	4.Sustainable Management of the Value Chain / Add value to society / Suppliers / Evaluation, selection and monitoring of suppliers.
<b>PUBLIC POLICY</b>		
415-1	Political contributions	Only financial contributions have been made only by Cellnex France, to an entity dedicated to the lobbying body (Boury Tallon), to the tune of EUR 72.354,31.
<b>CUSTOMER HEALTH AND SAFETY</b>		
416-1	Assessment of the health and	4.Sustainable Management



Indicators	2019 Integrated Annual Report	Perimeter of contents
	safety impacts of product and service categories	of the Value Chain / Add value to society <ul style="list-style-type: none"> <li>• Information security management.</li> <li>• Customers.</li> </ul>
<b>CUSTOMER PRIVACY</b>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	4.Sustainable Management of the Value Chain / Add value to society / Information security management. Cellnex group
<b>SOCIOECONOMIC COMPLIANCE</b>		
419-1	Non-compliance with laws and regulations in the social and economic area	There have been no sanctions during 2019. Cellnex group