

# Annex 3. Index of contents required by Law 11/2018

Information requested by Law 11/2018	Materiality	Equivalent GRI disclosure (2021 version if not stated otherwise)	Section of the Integrated Annual Report 2022 and/or direct response	Page number of the Integrated Annual Report 2022
<b>General Information</b>				
Brief description of the group's business model, which will include: 1. its business environment, 2. its organisation and structure, 3. the markets in which it operates, 4. its goals and strategies, 5. The main factors and trends that may affect its future evolution		2-1	<ul style="list-style-type: none"> <li>Name of the organisation: Cellnex Telecom, S.A.</li> <li>Ownership and legal form: Cellnex Telecom, S.A.</li> <li>Location of headquarters: Juan Esplandiú, 28007 Madrid</li> <li>Location of operations: 1. Cellnex: Driving sustainable telecom connectivity / 1.2. Connectivity solutions / Global presence</li> </ul>	20-24
	Material	2-6	<ul style="list-style-type: none"> <li>Activities: 1. Cellnex: Driving sustainable telecom connectivity / 1.2. Connectivity solutions</li> <li>Value chain: 6.Value Chain - Extending our commitment to the value chain</li> <li>Business relationships:                             <ol style="list-style-type: none"> <li>1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment / Stakeholders</li> <li>2. Governance - Showing what we are, acting with integrity / Business Perspective</li> <li>2. Governance - Showing what we are, acting with integrity / Investors relations</li> </ol> </li> </ul>	15-52; 216-229; 68-77; 124; 125-133
		2-7	3. People - Boosting our talent, being diverse and inclusive / 3.1 People strategy Annex 6. KPI Tables	136-137; 281-282
		2-22	Interview with the Chairman and the CEO 2. Governance - Showing what we are, acting with integrity / 2.1 Corporate Governance	5-8; 80-87
	Reporting framework used	Material	1-3	This report has been prepared with reference to the GRI Standards. 7. Basis for the preparation of the Report / 7.2 Reporting Scope
Materiality	Material	3-1 3-2	1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment / Double materiality analysis	55-58
<b>Policies</b>				
A description of the policies that the group applies regarding these issues, which will include: 1.) due diligence procedures applied to the identification, evaluation, prevention and mitigation of significant risks and impacts 2.) verification and control procedures, including what measures have been taken	Material	3-3 2-23 2-24	<ol style="list-style-type: none"> <li>1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment</li> <li>2. Governance - Showing what we are, acting with integrity                             <ol style="list-style-type: none"> <li>2.1 Corporate Governance</li> <li>2.2 Global Management System</li> </ol> </li> <li>3. People – Boosting our talent, being diverse and inclusive                             <ol style="list-style-type: none"> <li>3.5 Diversity and inclusion</li> <li>3.6 Safety and well-being at our core</li> </ol> </li> <li>4. Society - Being a facilitator of social progress / 4.4 Commitment to Human Rights</li> <li>5. Environment - Growing with a long-term sustainable environmental approach                             <ol style="list-style-type: none"> <li>5.1 Strategy and environmental positioning</li> <li>5.2 Monitoring and management of the main environmental risks, opportunities, and impacts</li> <li>5.4 Conservation of resources</li> <li>5.5 Carbon footprint and climate change</li> </ol> </li> <li>6. Value chain- Extending our commitment to the value chain                             <ol style="list-style-type: none"> <li>6.1 Customers</li> <li>6.2 Suppliers</li> </ol> </li> </ol>	53-54; 80-92; 93-101; 152-157; 158-163; 185; 188-191; 192-195; 198-203; 204-208; 217-223; 224-229

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<b>Risks</b>				
The main risks related to these issues related to the activities of the group, including, where relevant and proportionate, their business relationships, products or services that may have negative effects in those areas, and how the group manages these risks, explaining the procedures used to detect and evaluate them according to national, European or international reference frameworks for each subject. Information on the impacts that have been detected must be included, offering a breakdown of them, in particular on the main risks in the short, medium and long term.	Material	3-3	1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment 2. Governance - Showing what we are, acting with integrity / 2.2 Global Management Systems / Risk Management 4. Society - Being a facilitator of social progress / 4.4 Commitment to Human Rights 5. Environment - Growing with a long-term sustainable environmental approach / 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts Annex 1. Risks	53-77; 97-101; 185; 192-195; 237-260
<b>Environmental Issues</b>				
<b>General information</b>				
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, health and safety, environmental assessment or certification procedures.	Material	3-3 2-23	1.2 Connectivity solutions / Regulatory context / Exposure to electromagnetic fields 2. Governance - Showing what we are, acting with integrity / 2.2 Global Management Systems 5. Environment - Growing with a long-term sustainable environmental approach / 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts Annex 1. Risks	50-52; 93-101; 192-195; 237-260
Resources dedicated to the prevention of environmental risks.	Material	2-23	2. Governance - Showing what we are, acting with integrity / 2.2 Global Management Systems 5. Environment - Growing with a long-term sustainable environmental approach / 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts. Annex 1. Risks Consolidated Financial Statements / Note 22.	93-101; 192-195; 237-260
The application of the precautionary principle, the amount of provisions and guarantees against environmental risks.	Material	2-23	2. Governance - Showing what we are, acting with integrity / 2.2 Global Management Systems 5. Environment - Growing with a long-term sustainable environmental approach / 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts Annex 1. Risks Consolidated Financial Statements / Note 22 Cellnex has environmental liability insurance, in accordance with current legislation, of €20Mn	93-101; 192-195; 237-260
<b>Pollution</b>				
Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, taking into account any form of air pollution specific to an activity, including noise and light pollution.	Not material	3-3 302-4 (2016) 305-5 (2016)	Although it is a non-material topic and it is not mandatory to report this topic, information is disclosed in: 5. Environment - Growing with a long-term sustainable environmental approach 5.2 Monitoring and management of the main environmental risks, opportunities and impacts 5.4 Conservation of resources 5.5 Carbon footprint and climate change 7. Basis for the preparation of the Report / 7.3 Carbon Footprint: Scope & Calculation methodology for CO2 emissions	192-195; 198-203; 204-208; 233-234
<b>Circular economy and prevention and waste managements</b>				
Waste: Prevention, recycling, reuse, other forms of recovery and waste disposal.	Not material	3-3 306-2 (2020)	Although it is a non-material topic and it is not mandatory to report this topic, information is disclosed in 5. Environment - Growing with a long-term sustainable environmental approach / 5.4 Conservation of resources / Responsible and circular resource management Annex 6. KPI Tables	202-203; 299
Actions to fight food waste	Not material	-	As it is a non-material topic, it is not applicable to report this information.	-

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<b>Sustainable use of resources</b>				
Water consumption and water supply according to local limitations	Not material	303-1 (2018) 303-2 (2018) 303-5 (2018)	Although it is a non-material topic and it is not mandatory to report this topic, information is disclosed in: 5. Environment - Growing with a long-term sustainable environmental approach / 5.4 Conservation of resources / Responsible and circular resource management Annex 6. KPI Tables	202; 296
Consumption of raw materials and the measures adopted to improve the efficiency of their use.	Not material	-	As it is a non-material topic, it is not applicable to report this information.	-
Consumption, direct and indirect, of energy,	Material	3-3 302-1 (2016) 302-2 (2016)	5. Environment - Growing with a long-term sustainable environmental approach / 5.4 Conservation of resources / Energy management Annex 6. KPI Tables	198-201; 293-295
Measures taken to improve energy efficiency.	Material	3-3 302-4 (2016)	5. Environment - Growing with a long-term sustainable environmental approach / 5.4 Conservation of resources / Energy management Annex 6. KPI Tables	198-201; 293-295
Use of renewable energies	Material	3-3 302-2 (2016)	5. Environment - Growing with a long-term sustainable environmental approach / 5.4 Conservation of resources / Energy management Annex 6. KPI Tables	198-201; 293-295
<b>Climate change</b>				
The important elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces.	Material	3-3 305-1 (2016) 305-2 (2016) 305-3 (2016) 305-4 (2016)	5. Environment - Growing with a long-term sustainable environmental approach / 5.5 Carbon footprint and climate change 7. Basis for the preparation of the Report / 7.3 Carbon Footprint: Scope & Calculation methodology for CO2 emissions Annex 6. KPI Tables	204-208; 233-234; 297-298
The measures adopted to adapt to the consequences of Climate Change.	Material	3-3 201-2 (2016)	5. Environment - Growing with a long-term sustainable environmental approach 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts 5.5 Carbon footprint and climate change	192-195; 204-208
The reduction goals established voluntarily in the medium and long term to reduce greenhouse gas emissions and the means implemented for that purpose.	Material	3-3 305-5 (2016)	5. Environment - Growing with a long-term sustainable environmental approach / 5.5 Carbon footprint and climate change	204-208
<b>Biodiversity</b>				
The measures taken to preserve or restore biodiversity.	Not material	3-3	Although it is a non-material topic and it is not mandatory to report this topic, information is disclosed in 5. Environment - Growing with a long-term sustainable environmental approach / 5.6 Nature and biodiversity	209-214
Impacts caused by activities or operations in protected areas.	Not material	304-1 (2016) 304-2 (2016)	Although it is a non-material topic and it is not mandatory to report this topic, information is disclosed in 5. Environment - Growing with a long-term sustainable environmental approach / 5.6 Nature and biodiversity	209-214
<b>Social issues and related to employees</b>				
<b>Employment</b>				
Total number and distribution of employees by sex, age, country and professional category.	Material	3-3 2-7 405-1 (2016)	3. People - Boosting our talent, being diverse and inclusive / 3.1 People strategy Annex 6. KPI Tables	136; 279-285
Total number and distribution of work contract modalities.	Material	2-7	Annex 6. KPI Tables	279-285
Annual average of permanent, temporary and part-time contracts by sex, age and professional category	Material	2-7 405-1 (2016)	The annual average of contracts by type do not present seasonality throughout the year, so only the workforce breakdown by type of contract is disclosed at the end of the reporting year. Annex 6. KPI Tables	281-282
Number of dismissals by sex, age and professional classification.	Material	401-1 (2016)	Annex 6. KPI Tables	285

Information requested by Law 11/2018	Materiality	Equivalent GRI disclosure (2021 version if not stated otherwise)	Section of the Integrated Annual Report 2022 and/or direct response	Page number of the Integrated Annual Report 2022
The average remunerations and their evolution disaggregated by sex, age and professional classification or equal value.	Material	405-2 (2016)	Annex 6. KPI Tables	286-287
Salary gap, the remuneration of equal or average positions in the company	Material	3-3 405-2 (2016)	Annex 6. KPI Tables	286
The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long term savings forecast systems and any other perception disaggregated by sex.	Material	3-3 2-19 405-2 (2016)	Annex 6. KPI Tables Consolidated Financial Statements / Note 24 Annual Corporate Governance Report / 5.11 Remuneration for the Board of Directors and interests held by the members of the Board of Directors in share capital. Annual Report on the Remuneration of Directors 2022 / 4. Remuneration in 2022	286-287
Implementation of labour disconnection measures.	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core / Well-being at Cellnex	158-159
Employees with disabilities	Material	405-1 (2016)	Cellnex had 26 employees with different abilities in 2022, 19 in 2021.	-
<b>Work organisation</b>				
Organisation of working time	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core	158-163
Number of hours of absenteeism.	Material	403-9 (2018)	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core Annex 6. KPI Tables	158-163; 291
Measures designed to facilitate the enjoyment of conciliation and encourage joint responsibility of these by both parents	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core	158-163
<b>Health and safety</b>				
Conditions of health and safety at work.	Material	3-3 403-1 (2018) to GRI 403-8 (2018)	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core	158-163
Work accidents, in particular their frequency and seriousness, occupational diseases, disaggregated by sex.	Material	403-9 (2018) 403-10 (2018)	3. People - Boosting our talent, being diverse and inclusive / 3.6 Safety and well-being at our core Annex 6. KPI Tables	158-163; 291
<b>Social relations</b>				
Organisation of social dialogue, including procedures for informing and consulting staff and negotiating with them.	Material	3-3 402-1 (2016)	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Social dialogue	150-151
Percentage of employees covered by collective agreement by country.	Material	2-30	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Social dialogue Annex 6. KPI Tables	150-151; 282
Balance of collective agreements, particularly in the field of health and safety at work.	Material	403-1 (2018) 403-4 (2018)	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Social dialogue Annex 6. KPI Tables	150-151; 282
Mechanisms and procedures that the company has to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Social dialogue	150-151
<b>Training</b>				
The policies implemented in the field of training	Material	3-3 404-2 (2016)	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Talent Academy Annex 6. KPI Tables	147-148; 289-290
The total amount of training hours by professional categories.	Material	404-1 (2016)	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Talent Academy Annex 6. KPI Tables	147-148; 289-290
<b>Accessibility</b>				
Universal accessibility for people with disabilities	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.5 Diversity and inclusion	152-157

Information requested by Law 11/2018	Materiality	Equivalent GRI disclosure (2021 version if not stated otherwise)	Section of the Integrated Annual Report 2022 and/or direct response	Page number of the Integrated Annual Report 2022
<b>Equality</b>				
Measures taken to promote equal treatment and opportunities between men and women.	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.5 Diversity and inclusion	152-157
Equality plans, measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and the universal accessibility of people with disabilities.	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.5 Diversity and inclusion	152-157
The policy against all types of discrimination and, where appropriate, management of diversity	Material	3-3	3. People - Boosting our talent, being diverse and inclusive / 3.5 Diversity and inclusion	152-157
<b>Human rights</b>				
Application of due diligence procedures in human rights. Prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuse	Material	3-3 2-23 2-24	2. Governance - Showing what we are, acting with integrity / 2.1 Corporate Governance / Ethics and Compliance 4. Society - Being a facilitator of social progress / 4.4 Commitment to Human Rights	89-92; 185
Complaints about cases of violation of human rights.	Material	406-1 (2016)	4. Society - Being a facilitator of social progress / 4.4 Commitment to Human Rights	185
Promotion and compliance with the provisions of the fundamental Conventions of the International Labor Organisation related to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the elimination of forced or compulsory labor and the effective abolition of child labor.	Material	3-3 406-1 (2016) 407-1 (2016) 408-1 (2016) 409-1 (2016)	3. People - Boosting our talent, being diverse and inclusive / 3.4 Driving Efficiency and performance / Social dialogue 4. Society - Being a facilitator of social progress / 4.4 Commitment to Human Rights	150-151; 185
<b>Anti-corruption and anti-bribery</b>				
Measures taken to prevent corruption and bribery.	Material	3-3 2-23 2-24 205-2 (2016)	2. Governance - Showing what we are, acting with integrity / 2.1 Corporate Governance / Ethics and Compliance	89-92
Measures to combat money laundering.	Material	205-3 (2016)	2. Governance - Showing what we are, acting with integrity / 2.1 Corporate Governance / Ethics and Compliance	89-92
Contributions to foundations and non-profit entities.	Material	413-1 (2016)	In 2022, the total amount of donations was €3,430,905 (€2,692,660 in 2021) the total contribution to sponsorship activities or events by Cellnex Telecom was €265,342 euros (€217,296 in 2021), the total contribution to associations of which Cellnex is a member was €722,693 (€799,523 in 2021)	-
<b>Society</b>				
<b>Commitments of the company to sustainable development</b>				
The impact of society's activity on employment and local development. The impact of the company's activity on local populations and the territory.	Material	3-3 203-1 (2016) 413-1 (2016)	1. Cellnex: Driving sustainable telecom connectivity 1.2 Connectivity solutions 1.3 Our commitment / Our commitment to the Sustainable Development Goals (SDG) 4. Society - Being a facilitator of social progress	15-52; 64-67; 164-185
The relationships maintained with the actors of the local communities and the modalities of dialogue with them	Material	2-29 413-1 (2016)	1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment / Stakeholders 2. Governance - Showing what we are, acting with integrity / 2.5 Investor Relations 4. Society - Being a facilitator of social progress	68-77; 125-133; 164-185
The association or sponsorship actions.	Material	2-28	1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment / Stakeholder In 2022, the total contribution to sponsorship activities or events by Cellnex Telecom was €265,342 (€217,296 in 2021), the total contribution to associations of which Cellnex is a member was €722,693 (€799,523 in 2021). The contribution to Tallon Boury & Associés has been €66,000 in 2022 (€55,134.79 in 2021), to Mayer Brown €21,000 (€21,000 in 2021), and to Brunswick €532,468 (€112,000 in 2021) to Hill+Knowlton Strategies €45,082 (€94,816 in 2021).	68-77

Information requested by Law 11/2018	Materiality	Equivalent GRI disclosure (2021 version if not stated otherwise)	Section of the Integrated Annual Report 2022 and/or direct response	Page number of the Integrated Annual Report 2022
<b>Subcontracting and suppliers</b>				
The inclusion in the procurement policy of social issues, gender equality and environmental issues. Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	Material	3-3 2-13 308-1 (2016) 308-2 (2016) 414-1 (2016) 414-2 (2016)	1. Cellnex: Driving sustainable telecom connectivity / 1.3 Our commitment / ESG Master Plan 5. Environment - Growing with a long-term sustainable environmental approach / 5.5 Carbon footprint and climate change / Carbon management along the value chain 6. Value chain - Extending our commitment to the value chain / 6.2 Suppliers / Supplier evaluation, selection and monitoring	59-63; 208; 228-229
Supervision systems and audits and their results.	Material	3-3	5. Environment - Growing with a long-term sustainable environmental approach / 5.5 Carbon footprint and climate change / Carbon management along the value chain 6. Value chain - Extending our commitment to the value chain / 6.2 Suppliers / Supplier evaluation, selection and monitoring Annex 6. KPI Tables	208; 228-229; 292
<b>Consumers</b>				
Measures for the health and safety of consumers.	Material	3-3 416-1 (2016)	6. Value chain - Extending our commitment to the value chain / 6.1 Customers / Security of the information	222-223
Claims systems, complaints received and resolution of them.	Material	3-3 418-1 (2016)	6. Value chain - Extending our commitment to the value chain / 6.1 Customers Our customer-centric approach Security of the information	217; 222-223
<b>Tax information</b>				
Benefits obtained country by country	Material	3-3 207-4 (2019)	2. Governance - Showing what we are, acting with integrity / 2.3 Financial information / Responsible tax policy and values of Cellnex This information is provided in detail in Consolidated Financial Statements / Note 18 and Note 23	118-121
Taxes paid on benefits	Material	3-3 207-1 (2019) 207-4 (2019)	2. Governance - Showing what we are, acting with integrity / 2.3 Financial information / Responsible tax policy and values of Cellnex	118-121
Public subsidies received.	Material	201-4 (2021)	No significant financial assistance has been received from the government.	-

Information requested by Regulation (EU) 2020/852 on Taxonomy	Materiality	Used references	Section of the Integrated Annual Report 2022 and/or direct response	Page number of the Integrated Annual Report 2022
The proportion of Taxonomy -eligible and aligned; eligible and not aligned; and non-eligible- economic activities in the total turnover	Material		5. Environment - Growing with a long-term sustainable environmental approach / 5.3 EU taxonomy Annex 7. EU taxonomy	196-197; 300-318
The proportion of Taxonomy -eligible and aligned; eligible and not aligned; and non-eligible- economic activities in the total investments in fixed assets (CapEx)	Material	Regulation (EU) 2020/852 on Taxonomy Commission Delegated Regulation (EU) 2021/2178 supplementing Regulation (EU) 2020/852 on Taxonomy	5. Environment - Growing with a long-term sustainable environmental approach / 5.3 EU taxonomy Annex 7. EU taxonomy	196-197; 300-318
The proportion of Taxonomy -eligible and aligned; eligible and not aligned; and non-eligible- economic activities in the operating expenses (OpEx)	Not material		As it is a non-material topic, it is not applicable to report this information.	-
Breakdown of qualitative information for the indicators described above understanding	Material	Commission Delegated Regulation (EU) 2021/2178 supplementing Regulation (EU) 2020/852 on Taxonomy - Annex 1.2	5. Environment - Growing with a long-term sustainable environmental approach / 5.3 EU taxonomy Annex 7. EU taxonomy	196-197; 300-318