

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

Legal content (Law 11/2018)	Materiality	Equivalent GRI indicator (2021 version if not stated otherwise)	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
<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	Material	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, 11-13 28007 Madrid</li> <li>Location of operations: 1. CELLNEX - Bring the world closer through telecom connectivity / 1.2. Connectivity solutions / European Ambition</li> </ul>	30-34
		2-6	<ul style="list-style-type: none"> <li>Activities: 1. CELLNEX - Bring the world closer through telecom connectivity / 1.2. Connectivity solutions</li> <li>Value chain: 6. VALUE CHAIN - Extending our commitment to the value chain</li> <li>Business relationships:                             <ul style="list-style-type: none"> <li>1. CELLNEX - Bring the world closer through telecom connectivity / 1.3 Our commitment / Stakeholders</li> <li>2. GOVERNANCE - Showing what we are, acting with integrity / 2.5 Business perspectives</li> <li>2. GOVERNANCE - Showing what we are, acting with integrity / 2.6 Investors relations</li> </ul> </li> </ul>	21-62; 78-87; 143; 144-152; 253-267
		2-7	3. PEOPLE - Boosting our talent, being diverse and inclusive / 3.1 People Strategy Annex 6. KPI Tables	155; 321-322
		2-22	Interview with the Chair and the CEO 2. GOVERNANCE - Showing what we are, acting with integrity / 2.1 Corporate Governance	5-7; 90-105
		1-3	7. Basis for the preparation of the Report / 7.2 Reporting scope This report has been prepared with reference to the GRI Standards.	270
Reporting framework used	Material			
Materiality	Material	3-1 3-2	1. CELLNEX - Bring the world closer through telecom connectivity / 1.3 Our commitment / Double materiality analysis	66-67
<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	1. CELLNEX - Bring the world closer through telecom connectivity / 1.3 Our commitment 2. GOVERNANCE - Showing what we are, acting with integrity 2.1 Corporate Governance 2.2 Global Management System 3. PEOPLE - Boosting our talent, being diverse and inclusive 3.2 Culture - Empowering our People / Equity, Diversity, and Inclusion 3.5 Social Dialogue 3.6 Safety and well-being at our core 4. SOCIETY - Being a facilitator of social progress / 4.4 Commitment to Human Rights 5. ENVIRONMENT - Growing with a long-term sustainable environmental approach 5.1 Environmental strategy and positioning 5.2 Monitoring and management of the main environmental risks, opportunities, and impacts 5.4 Resource conservation 5.5 Carbon footprint and Climate Change 6. VALUE CHAIN - Extending our commitment to the value chain 6.1 Customers 6.2 Suppliers	63-87; 90-105; 106-112; 165-171; 186-188; 189-197; 220; 223-226; 227-230; 233-238; 239-245; 255-261; 262-267

Legal content (Law 11/2018)	Materiality	Equivalent GRI indicator (2021 version if not stated otherwise)	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
<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 - Bring the world closer through telecom connectivity / 1.3 Our commitment 2. GOVERNANCE - Showing what we are, acting with integrity / 2.3 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	63-87; 113-117; 220; 227-230; 275-297
<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. CELLNEX - Bring the world closer through telecom connectivity / 1.2 Connectivity solutions / Regulatory context / Exposure to electromagnetic fields 2. GOVERNANCE - Showing what we are, acting with integrity / 2.2 Global Management System 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	60-62; 106-112; 227-230; 275-297
Resources dedicated to the prevention of environmental risks.	Material	2-23	2. GOVERNANCE - Showing what we are, acting with integrity / 2.2 Global Management System 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.	106-112; 227-230; 275-297
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 System 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, amounting to €20Mn.	106-112; 227-230; 275-297
<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	3-3 305-5 (2016)	While it is a non-material topic and reporting is not mandatory, 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 Resource conservation 5.5 Carbon footprint and Climate Change 6. VALUE CHAIN - Extending our commitment to the value chain / 6.1 Customers 7. Basis for the preparation of the Report / 7.3 Carbon footprint: Scope and calculation methodology for CO <sub>2</sub> emissions	227-230; 233-238; 239-245; 255; 271-272

Legal content (Law 11/2018)	Materiality	Equivalent GRI indicator (2021 version if not stated otherwise)	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
<b>Circular economy and waste prevention and management</b>				
Circular economy; Waste: Prevention, recycling, reuse, other forms of recovery and waste disposal.	Not material	3-3 306-2 (2020)	While it is a non-material topic and reporting is not mandatory, information is disclosed in: 5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.4 Resource conservation / Responsible and circular resource management Annex 6. KPI Tables	237-238; 339
Actions to fight food waste	Not material	-	As this is a non-material topic, reporting this information is not applicable.	-
<b>Sustainable use of resources</b>				
Water consumption and water supply according to local limitations	Not material	303-1 (2018) 303-3 (2018) 303-5 (2018)	While it is a non-material topic and reporting is not mandatory, information is disclosed in: 5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.4 Resource conservation / Responsible and circular resource management Annex 6. KPI Tables	237-238; 336
Consumption of raw materials and the measures adopted to improve the efficiency of their use.	Not material	-	As this is a non-material topic, reporting this information is not applicable.	-
Consumption, direct and indirect, of energy,	Material	3-3 302-1 (2016)	5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.4 Resource conservation / Energy management Annex 6. KPI Tables	233-236; 333-335
Measures taken to improve energy efficiency.	Material	3-3 302-4 (2016)	5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.4 Resource conservation / Energy management Annex 6. KPI Tables	233-236; 333-335
Use of renewable energies	Material	3-3 302-1 (2016)	5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.4 Resource conservation / Energy management Annex 6. KPI Tables	233-236; 333-335
<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 and calculation methodology for CO <sub>2</sub> emissions Annex 6. KPI Tables	239-245; 271-272; 337-338
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	227-230; 239-245
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	239-245
<b>Biodiversity</b>				
The measures taken to preserve or restore biodiversity.	Not material	3-3	While it is a non-material topic and reporting is not mandatory, information is disclosed in: 5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.6 Nature and biodiversity	246-252
Impacts caused by activities or operations in protected areas.	Not material	304-1 (2016) 304-2 (2016)	While it is a non-material topic and reporting is not mandatory, information is disclosed in: 5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.6 Nature and biodiversity	246-252
<b>Social and personnel issues</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	155; 319-325

Legal content (Law 11/2018)	Materiality	Equivalent GRI indicator (2021 version if not stated otherwise)	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
Total number and distribution of work contract modalities.	Material	2-7	Annex 6. KPI Tables	321-322
Annual average of permanent, temporary and part-time contracts by sex, age and professional category	Material	2-7 405-1 (2016)	Annex 6. KPI Tables The annual average of contracts by type exhibits no seasonality throughout the year, therefore, the breakdown of the workforce by contract type is disclosed at the end of the reporting year.	319-322
Number of dismissals by sex, age and professional classification.	Material	401-1 (2016)	Annex 6. KPI Tables	325
The average remunerations and their evolution disaggregated by sex, age and professional classification or equal value.	Material	405-2 (2016)	Annex 6. KPI Tables	326-327
Salary gap, the remuneration of equal or average positions in the company	Material	3-3 405-2 (2016)	Annex 6. KPI Tables	326
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. Annex 10. Annual Report on the Remuneration of Directors / 4. Remuneration in 2023	326-327
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	189-190
Employees with disabilities	Material	405-1 (2016)	Cellnex had 35 employees with different abilities in 2023, 26 in 2022.	-
<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	189-197
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	189-197; 331
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	189-197
<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	189-197
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	189-197; 331
<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 / 3.5 Social dialogue	186-188
Percentage of employees covered by collective agreement by country.	Material	2-30	3. PEOPLE - Boosting our talent, being diverse and inclusive / 3.5 Social dialogue Annex 6. KPI Tables	186-188; 322
Balance of collective agreements, particularly in the field of health and safety at work.	Material	403-4 (2018)	3. PEOPLE - Boosting our talent, being diverse and inclusive / 3.5 Social dialogue Annex 6. KPI Tables	186-188; 322
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 / 3.5 Social dialogue	186-188

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<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 Cellnex: A place to grow / Growing Talent / Talent Academy Annex 6. KPI Tables	182-183; 329-330
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 Growth - Training hours Annex 6. KPI Tables	182-183; 329-330
<b>Accessibility</b>				
Universal accessibility for people with disabilities	Material	3-3	3. PEOPLE - Boosting our talent, being diverse and inclusive / 3.1 People strategy	155
<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 / 3.2 Culture: Empowering our People / Equity, Diversity, and Inclusion	165-171
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 / 3.2 Culture: Empowering our People / Equity, Diversity, and Inclusion	165-171
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 / 3.2 Culture: Empowering our People / Equity, Diversity, and Inclusion	165-171
<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 / 2.1.3 Ethics and Compliance 4. SOCIETY - Being a facilitator of social progress / 4.4 Commitment to Human Rights	101-105; 220
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	220
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 / 3.5 Social dialogue 4. SOCIETY - Being a facilitator of social progress / 4.4 Commitment to Human Rights	186-188; 220
<b>Corruption and bribery</b>				
Measures taken to prevent corruption and bribery.	Material	3-3 2-23 2-24 205-2 (2016) 205-3 (2016)	2. GOVERNANCE - Showing what we are, acting with integrity / 2.1 Corporate Governance / Ethics and Compliance	101-105
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	101-105
Contributions to foundations and non-profit entities.	Material	413-1 (2016)	In 2023, the total amount of donations was €1,179,816 (€3,430,905 in 2022). The total contribution to sponsorship activities or events by Cellnex Telecom was €315,392 euros (€265,342 in 2022) and the total contribution to associations of which Cellnex is a member was €666,804.42 (€722,693 in 2022).	-
<b>Society</b>				
<b>The company's commitments 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 - Bring the world closer through telecom connectivity 1.2 Connectivity solutions / Innovation 1.3 Our commitment / Our commitment to the Sustainable Development Goals (SDG) 4. SOCIETY - Being a facilitator of social progress	51-59; 74-86; 198-220

Legal content (Law 11/2018)	Materiality	Equivalent GRI indicator (2021 version if not stated otherwise)	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
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 - Bring the world closer through telecom connectivity / 1.3 Our commitment / Stakeholders 2. GOVERNANCE - Showing what we are, acting with integrity / 2.6 Investor relations 4. SOCIETY - Being a facilitator of social progress	78-87; 144-152; 198-220
Association or sponsorship actions.	Material	2-28	1. CELLNEX - Bring the world closer through telecom connectivity / 1.3 Our commitment / Stakeholders In 2023, the total amount of donations was €1,179,816 (€3,430,905 in 2022). The total contribution to sponsorship activities or events by Cellnex Telecom was €315,392 (€265,342 in 2022) and the total contribution to associations of which Cellnex is a member was €666,804.42 (€722,693 in 2022). In 2023, the contribution to Tallon Boury & Associés amounted to €77,000 (€66,000 in 2022), the contribution to Mayer Brown to €3,500 (€21,000 in 2022), the contribution to Brunswick to €521,224.43 (€532,468 in 2022), and the contribution to Hill+Knowlton Strategies to €61,000 (€45,082 in 2022).	78-87
<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 2-6 308-1 (2016) 308-2 (2016) 414-1 (2016) 414-2 (2016)	1. CELLNEX - Bring the world closer through 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 throughout the value chain 6. VALUE CHAIN - Extending our commitment to the value chain / 6.2 Suppliers / Supplier evaluation, selection, and monitoring	68-73; 245; 266-267
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 throughout 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	245; 266-267; 332
<b>Consumers</b>				
Measures for the health and safety of consumers.	Material	3-3 416-1 (2016)	2. GOVERNANCE - Showing what we are, acting with integrity / 2.2 Global Management System / 2.2.2 Information security	111-112
Claims systems, complaints received and resolution of them.	Material	3-3 418-1 (2016)	2. GOVERNANCE - Showing what we are, acting with integrity / 2.2 Global Management System / 2.2.2 Information security 6. VALUE CHAIN - Extending our commitment to the value chain / 6.1 Customers / Our customer-centric approach	111-112; 255
<b>Tax information</b>				
Benefits obtained country by country	Material	3-3 207-4 (2019)	2. GOVERNANCE - Showing what we are, acting with integrity / 2.4 Financial information This information is provided in detail in the Consolidated Annual Accounts.	136-140
Taxes paid on benefits	Material	3-3 207-1 (2019) 207-4 (2019)	2. GOVERNANCE - Showing what we are, acting with integrity / 2.4 Financial information This information is provided in detail in the Consolidated Annual Accounts.	136-140
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	2023 Integrated Annual Report section and/or direct response	2023 Integrated Annual Report page number
Proportion of eligible and aligned, eligible non-aligned and non-eligible economic activities in relation to the volume of business, calculated according to the criteria of section 1.1.1. of Annex I of Delegated Regulation 2021/2178 and its subsequent amendments.	Material		5. ENVIRONMENT - Growing with a long-term sustainable environmental approach / 5.3 EU Taxonomy Annex 7. EU Taxonomy	231-232; 340-364
Proportion of eligible and aligned, eligible non-aligned and non-eligible economic activities in relation to investments in fixed assets (CapEx), calculated according to the criteria of section 1.1.2. of Annex I of Delegated Regulation 2021/2178 and its subsequent modifications.	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	231-232; 340-364
Proportion of eligible and aligned, eligible non-aligned and non-eligible economic activities in relation to operating expenses (OpEx), calculated according to the criteria of section 1.1.3. of Annex I of Delegated Regulation 2021/2178 and its subsequent modifications.	Not material		As this is a non-material topic, reporting this information is not applicable.	-
Breakdown of qualitative contextual information for the correct interpretation of the previously detailed indicators, as detailed in section 1.2. of Annex I of Delegated Regulation 2021/2178 and its subsequent modifications.	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	231-232; 340-364