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Helios Towers: Modern Slavery and Human-Trafficking Statement

Introduction

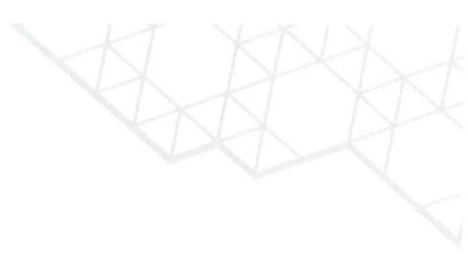
This statement is made and published in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "**Act**"). It outlines the steps taken by Helios Towers plc and its subsidiaries (together, "**we**", "**our**" or the "**HT Group**") to prevent modern slavery and human-trafficking for the financial year ending 31 December 2023.

Our business, structure, and supply chain

The HT Group is an independent telecommunications network rollout and communication tower group owning and managing circa 14,097 towers in Africa and Oman. The HT Group provides passive infrastructure services, including options to lease space on existing towers through co-location or through "build-to-suit", whereby a tower is constructed for a customer to their specifications, in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana, the United Republic of Tanzania, the Republic of South Africa, the Republic of Senegal, Republic of Madagascar, Malawi and Oman (the "**Jurisdictions**").

Helios Towers plc ("**HT plc**") is a public company incorporated in England and is the parent company of the HT Group. Through HT plc, the HT Group conducts business under its individual operating companies in the Jurisdictions, each of which is a separately constituted and regulated legal entity.

The HT Group's customers include a wide range of wireless operating companies across the 2G, 3G, 4G and 5G technology platforms. As of 31 December 2023, the HT Group employs 725 direct employees in permanent, fixed-term, and temporary



contract positions. We also support the employment of over 11,500 partners and contractors.

The HT Group's supply chain includes procurement services, which manage the provision of goods and services. Typically, the HT Group procures generators, rectifiers, solar and hybrid power units, telecom towers, fuel, and other related products. In terms of services, the HT Group invests in site and tower maintenance as well as civil construction, tower strengthening, and security arrangements. The HT Group maintains a central supply chain function to manage the tendering processes and negotiations with key suppliers, with support teams in each of the Jurisdictions.


- We spend approximately USD 364 million through work with over 1,170 suppliers worldwide to meet the needs of customers and our business;
- 81% of our spend is on local suppliers.

Our principles and values

Modern Slavery is a serious crime that violates fundamental human rights by holding individuals in slavery or servitude, requiring people to perform forced or compulsory labour, and the human-trafficking of people for exploitation.

We have a zero-tolerance approach to slavery and human-trafficking, and we are committed to ensuring that no slavery or human-trafficking is taking place within our supply chain or in any part of our business. We expect all those connected to our supplier networks, involved in procurement for the HT Group, and/ or any other part of our business, to comply with this approach.

The HT Group is committed to acting ethically and with integrity. We conduct our business relationships in such a manner by developing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place. We work to the highest professional standards and seek to comply with all laws, regulations, and rules applicable to our business. We take our corporate and social responsibilities seriously, and we expect the same high standards from those with whom we conduct business.



We are committed to fair employment practices, and we regularly review and ensure competitive wages and benefits for our employees, in addition, we hold our suppliers accountable to our third-party code of conduct, which includes the requirement to pay their employees promptly and at a rate that meets or exceeds the local minimum wage.

In our recruitment process, we conduct onboarding checks, including identity and right-to-work verifications and reference checks. We also perform education and professional qualification checks where applicable. These checks help identify potential red flags for modern slavery and any issues found are promptly addressed by our recruitment team.


We maintain an employee wellness program, offering resources and support to address well-being issues and emphasising the importance of employee health in our organisational culture.

We expect all third parties with whom we conduct business to respect and promote universal human rights principles as set out in the United Nations Universal Declaration of Human Rights, and the conventions of the International Labour Organisation's declaration on Fundamental Principles and Rights at Work, and other applicable laws prohibiting slavery and human trafficking. Helios Towers is also a signatory of the UN Global Compact. We have a stand-alone [Human Rights Policy](#).

Our policies

The Helios Towers [Code of Conduct](#), applies to all employees in all of our Jurisdictions and emphasises working with our communities to create sustainable growth that benefits all. In addition to our [Code of Conduct](#), we have in place various procurement, supply chain and HR policies and procedures to manage, mitigate and minimise the risk of occurrence of any modern slavery and human trafficking. Our key policies in this respect are our:

- Integrity Policy (incorporating a section on Anti-Slavery);
- Business Terms and Conditions (in English and French);

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- [Third Party Code of Conduct](#);
 - Third Party Engagement and Due Diligence Policy;
 - [Human Rights Policy](#);
 - Recruitment Policy;
 - Diversity, Equality, and Inclusion Policy.

Our Business Terms and Conditions include the right to terminate a relationship with third parties in instances of non-compliance with the Modern Slavery Act 2015. The HT Group is committed to a periodic review and update of its policies, procedures, and guidelines.

The policies and procedures referred to above are approved, adopted, and implemented under the oversight of the HT Group's Board and Executive Management teams. This enables the functional areas and procedural requirements to be combined to help identify and mitigate the risk of slavery and human-trafficking occurring.

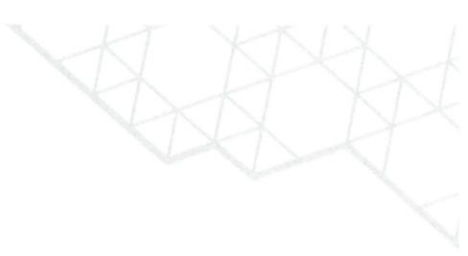
EthicsPoint

The [EthicsPoint helpline](#) is a confidential and anonymous 24/7 reporting helpline to encourage those who might have concerns of: i) breaches of the law, ii) breaches of our Codes of Conduct or other policies, or iii) any other wrongdoing, to come forward and report such concerns with confidence and without fear of retaliatory action. This includes concerns regarding slavery and human trafficking.

We also use a mobile web-intake version of the EthicsPoint helpline to make it easier for anyone to raise a concern, in a more simplified manner, via mobile phone.

Due diligence

Our most significant risk regarding slavery and human-trafficking is in our supply chain and procurement processes. We apply a risk-based approach and methodology to evaluate each third party prior to engagement and on an ongoing basis thereafter.



Third parties identified as medium and high risk are subject to enhanced due diligence, which includes, but is not limited to:

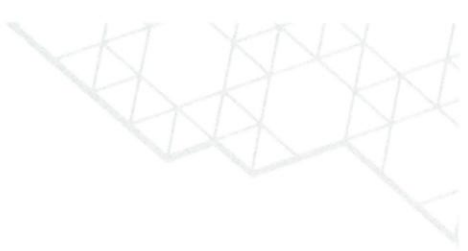
- Subscribing to our Third-Party Code of Conduct;
- Screening against sanctions and enforcement lists and adverse media using our third-party screening platform;
- Diligence questionnaires;
- Additional legal and financial document review;
- Third-Party Code of Conduct training;
- Annual Third-Party Code of Conduct certification; and;
- Regular due diligence refresh.

In 2023, we completed a human rights due diligence review of our Oman operations to identify opportunities to strengthen our current approach relating to the implementation of our policies. We have since reviewed the new Omani labour law requirements and will look to adapt current processes, such as our year-end partner evaluations and site feedback mechanisms.

Training

We arrange for all our employees to be provided with an appropriate level of training, including induction training upon commencing employment and periodic reminders and refresher training thereafter. In addition to the initial training provided to new joiners, an e-learning course on Protecting Human Rights is also assigned to all new joiners. These training sessions cover how our employees should identify and report concerns including breaches of the law, breaches of our Codes of Conduct and other policies, and any other wrongdoing.

We also offer face-to-face and remote training to employees and third parties on modern slavery and protecting human rights, as well as training on our Third-Party Code of Conduct to high and medium-risk third parties. We encourage our suppliers to undertake such training with their staff and we offer to share our training materials



and assist with training if requested. We continue to ensure that employees and our third parties are actively informed of the risks of modern slavery and how to identify them.

In 2023, to increase awareness and to reinforce shared responsibility in eradicating human-trafficking and modern slavery we hosted a supply chain forum in Ghana, one of our markets and re-emphasised:

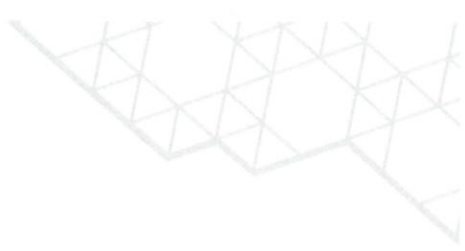
- our commitment to combatting human-trafficking and modern slavery;
- key indicators that may suggest potential human-trafficking and modern slavery situations;
- the need for our partners and employees to remain vigilant and to promptly report any suspicions;
- the need to explore collaborative ideas with the aim of further mitigating the risk of human-trafficking and modern slavery.

Monitoring and audit

Modern slavery risk has increased due to the lingering effects of the Covid-19 pandemic, ongoing war and other conflict situations and economic challenges. Helios Towers is aware of such risks and continues to actively assess and manage its response in respect of potential health and safety concerns, the treatment and payment of workers in its supply chain and access to grievance mechanisms.

During 2023, Group compliance conducted on-site visits and visits to supplier premises in the majority of our jurisdictions and met with individuals present, providing services to Helios Towers. Group compliance will continue these visits during 2024.

Further, we conducted several supplier performance reviews during 2023, and as of 31 December 2023, we obtained certification from approximately 73 % of high and medium risk third parties that they comply with the requirements of our Third-Party



Code of Conduct. We continue to follow up on any outstanding third-party certifications during 2024.


Effectiveness

We assess any instances of non-compliance as they arise, on a case-by-case basis, and take action, as required. We will only conduct business with those third parties who fully comply with the requirements of this statement or those who are taking demonstrable steps towards full compliance. Any instances of non-compliance are reported to HT Group's senior management. The Group's senior management ensures all instances of non-compliance are investigated and that any identified remedial actions are communicated and implemented promptly.

Next steps

We understand that we must continue to review our internal policies, procedures, and processes and identify risks, opportunities, and further steps that can be taken to improve our position regarding slavery and human-trafficking. In addition to the ongoing actions detailed above, specific measures that we aim to undertake in 2024 include:

- The launch of a cross functional Human Rights Working Group in 2024 to manage this risk holistically across all key functions and the Jurisdictions;
- Ongoing review of our Human Rights policy (and related policies) and procurement procedures to ensure they align with best practices;
- Continuing to risk assess our third parties and review supplier responses to questionnaires to identify potential risks, and strengthen supplier engagement concerning modern slavery and human-trafficking;
- Continuing employee and third-party awareness campaigns on promoting a speak-up culture and reporting of actual or potential breaches of our Code of Conduct and Third-Party Code of Conduct;
- Holding additional supplier/business partner forums in other Jurisdictions to

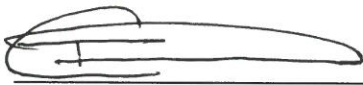


strengthen further knowledge and understanding among our key suppliers and increase capability and competency in mitigating this risk;

- Developing additional metrics to measure the effectiveness of compliance with our policies and best practices;
- Completing registration on the UK Government Modern Slavery register.

We are committed to the prevention of modern slavery, and we will continue to align ourselves with applicable laws and regulations to this effect.

The Board of Helios Towers plc has reviewed and approved this Modern Slavery and Human-Trafficking Statement. It has been signed on its behalf by the Helios Towers plc CEO.



Helios Towers plc

Tom Greenwood

Group Chief Executive Officer

Date approved: 6 March 2024