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Helios Towers: Modern Slavery and Human-Trafficking Statement

Introduction

This statement is made by Helios Towers plc and its subsidiaries (together, "**we**", "**our**" or the "**HT Group**") pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "**Act**") and constitutes the HT Group's modern slavery and human-trafficking statement for the financial year ending 31 December 2018.

Our business and structure

The HT Group is an independent telecommunications network roll-out and communication tower group owning and managing over 6,500 towers in Africa. 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 to customer specifications, to its customers in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana and the United Republic of Tanzania (the "**Jurisdictions**").

Helios Towers plc is the parent company of the HT Group and is a publicly listed company registered in the United Kingdom. Through its parent company, 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 company operators across the 2G, 3G and 4G technology platforms. As at 31 December 2018, the HT Group employs 352 direct employees in permanent, fixed-term, and temporary contract positions.



The HT Group's supply chain includes the procurement and provision of goods and services. Typically, the HT Group procures generators, rectifiers, solar and hybrid power units, telecom towers and fuel. 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.

Our principles and values

Holding individuals in slavery or servitude, requiring persons to perform forced or compulsory labour, and the human-trafficking of persons for exploitation, are crimes and violations of fundamental human rights.

We have a zero tolerance policy to slavery and human-trafficking, and are committed to ensuring that no slavery or human-trafficking is taking place in 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, or any other part of our business, to comply with these values.

We are committed to acting ethically and with integrity in conducting our business relationships, and to 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 very seriously, for our reputation is paramount to our standing, and we expect the same high standards from those we conduct business with. We treat our staff well and we are an employer of choice.

Our policies

We seek to identify and mitigate the risk of slavery and human-trafficking occurring through implementing a range of integrated policies and procedures, to mitigate and minimise the risk and limit the conditions for these activities occurring. In addition to our Procurement, Supply Chain and HR policies, these include the following policies and procedures:

- Code of Business Conduct;

- Integrity Policy (incorporating a section on Anti-Slavery);
- Business Terms and Conditions;
- Third Party Code of Conduct; and
- Third Party Engagement and Due Diligence Policy.

The policies and procedures referred to above are approved, adopted and implemented under the oversight of the HT Group's Board and Executive Committee. This enables the functional areas and procedural requirements to be combined to help identify and mitigate the risk of slavery and human-trafficking occurring. Our business terms include the right to terminate a relationship with third parties in instances of non-compliance with contractual requirements, or in contravention of our Codes of Conduct and other relevant policies. The HT Group is committed to a periodic review and update of its policies, procedures and guidelines.

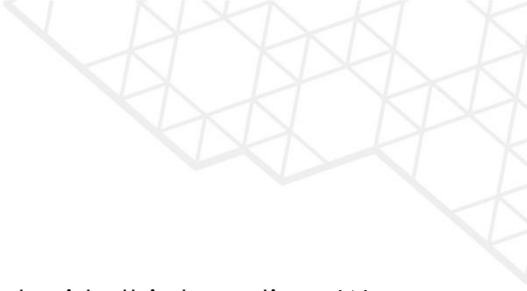
In order to encourage those with genuine concerns of wrongdoing, breaches of the law, our Codes of Conduct or policies to raise their concerns, we have established and operate a confidential and anonymous 24/7 reporting helpline enabling anyone, including third parties, to report such concerns or breaches that they may have, in confidence and without fear of retaliatory action.

Due diligence

Our third party engagement and diligence processes apply a risk-based approach and methodology to evaluate each third party prior to engagement and on an ongoing basis thereafter. We include appropriate terms in our contractual documentation, standard terms and conditions, and both our Code of Business Conduct and Third Party Code of Conduct set out our commitments against slavery and human-trafficking.

Training

We arrange for all our employees to be provided with an appropriate level of training, including an induction training upon commencing employment and periodic reminders and refresher trainings thereafter. These training sessions cover how our employees should identify and report concerns of wrongdoing and breaches of the law, our Codes of Conduct or policies. We also provide in-person training on our Third



Party Code of Conduct to third parties, focussing on high risk third parties. We encourage our suppliers to undertake such training with their staff. We share our training materials if requested.

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 who fully comply with this statement or who are taking demonstrable steps towards compliance. Instances of any non-compliance are to be reported to the HT Group's senior management.

Next steps

We continue to review our internal processes to understand what further steps can be taken to improve our position regarding slavery and human-trafficking. Specific measures that we undertake include:

- reviewing existing policies, procedures, and terms of business (including contractual warranties, indemnity provisions and rights to terminate) for the procurement of goods and services;
- reviewing contractual processes to consider what amendments are required to reduce the risk of slavery and human-trafficking in our supply service chain;
- obtaining annual certification from suppliers that they comply with the requirements of our Third Party Code of Conduct;
- conducting supplier performance reviews and audits as well as selected Third Party Compliance reviews, which include questions related to awareness of and compliance with modern slavery requirements; and
- providing training and training materials to our employees and high risk third party employees to ensure they know how to identify or prevent instances of slavery and human-trafficking.



Kash Pandya

Group Chief Executive Officer

Helios Towers plc

Approved on: 27 February 2019

Updated on: 18 October 2019