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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 2019.

Our business and structure

The HT Group is an independent telecommunications network roll-out and communication tower group owning and managing circa 7,000 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 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 and the Republic of South Africa (the "**Jurisdictions**").

Helios Towers plc is the parent company of the HT Group and is incorporated in England and Wales as a public company. 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 2019, the HT Group employs 407 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 approach 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 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 Management team. 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.

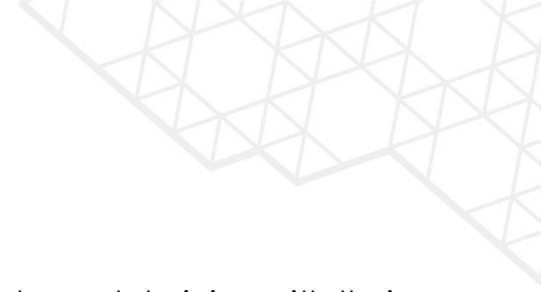
We have a confidential and anonymous 24/7 reporting helpline to encourage those who might have concerns of i) breaches of the law, ii) breaches of our Codes of Conduct or other policies, or iii) any other wrongdoing, to come forward and report such concerns with confidence and without fear of retaliatory action.

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 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 induction training upon commencing employment and periodic reminders and refresher training thereafter. 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 provide face-to-face 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.

Monitoring and audit

During 2019, we conducted visits to group regional offices and supplier premises in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana and the United Republic of Tanzania. These included visits to our fuel, security and project services providers in several office locations in each jurisdiction. Meetings were held with third party representatives and training provided. We also visited a sample of tower sites at each location and met with individual security guards where they were present.

We also conducted several supplier performance reviews and audits in each jurisdiction during 2019 and obtained certification from all high and medium risk third parties that they comply with the requirements of our Third Party Code of Conduct.

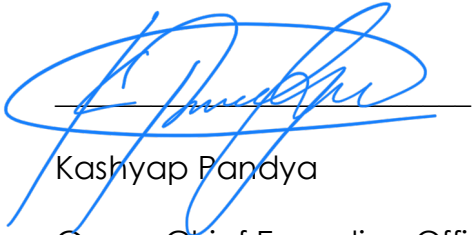
Effectiveness

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. In addition to the actions detailed above, 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 chain; and,
- assessing the need for and execution of a third party audit to assess compliance with Third party Code of Conduct requirements.



Kashyap Pandya

Group Chief Executive Officer

Helios Towers plc

Date approved: 8 April 2020