



Driving the growth of mobile communications across Africa and the Middle East

Sustainable
Business
Impact Report
2021





We play a pivotal role in enabling mobile connectivity and contributing to social and economic development in our markets. I am proud that, in 2021, we continued to drive value for our stakeholders and contribute to the UN SDGs.

Sir Samuel Jonah KBE, OSG
Chair



Welcome

Helios Towers in 2021

Employees

550

(2020: 441)

Sites

9,560

(2020: 7,356)

Tenancy ratio

1.96x

(2020: 2.13x)

Adjusted EBITDA margin

54%

(2020: 55%)

Markets

7

(2020: 5)

Tenancies

18,776

(2020: 15,656)

Revenue

\$449m

(2020: \$414m)

Contracted revenues

\$3.9bn

(2020: \$2.8bn)

This is our second **Sustainable Business Impact Report¹**. It sits alongside our **Annual Report and Financial Statements** to form part of our 2021 reporting suite.



¹ Our Sustainable Business Impact Report covers all Helios Towers plc operations during the 2021 calendar year. Performance data is for our operating companies in seven markets (Tanzania, Democratic Republic of Congo, Ghana, South Africa, Congo Brazzaville, Senegal and Madagascar) and for Group operations. Exceptions or exclusions are noted as relevant in the text.

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We are a leading independent telecoms tower infrastructure company serving major mobile network operators (MNOs) in seven high-growth markets. We play a pivotal role in enabling mobile connectivity and contributing to social and economic development.

Our principal business is building, acquiring and operating telecommunications towers that can accommodate and power the needs of multiple tenants. With minimal fixed line availability and rapidly growing populations, Africa and the Middle East both have an acute need for mobile communications. This translates to significant opportunities for Helios Towers to continue working with MNOs to improve and further develop mobile networks, which have been life-changing for individuals and communities in the markets where we operate.

Our Values



Integrity



Partnership

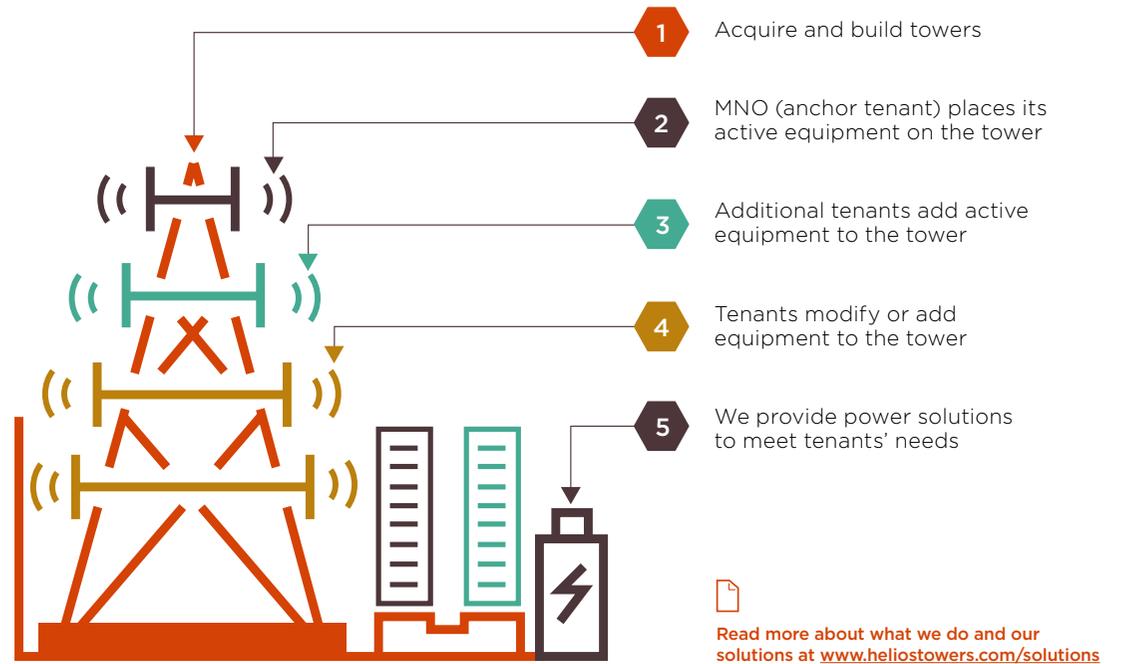


Excellence

Our mission is to drive the growth of mobile communications across Africa and the Middle East

A sustainable business model

We offer a comprehensive infrastructure solution that includes site selection and preparation, maintenance, security, power management and hosting of active equipment such as antennae. Our core business of tower sharing is inherently sustainable, helping us create economic value and high-quality local employment, minimising wasteful duplication and reducing environmental impact.



Our customers include



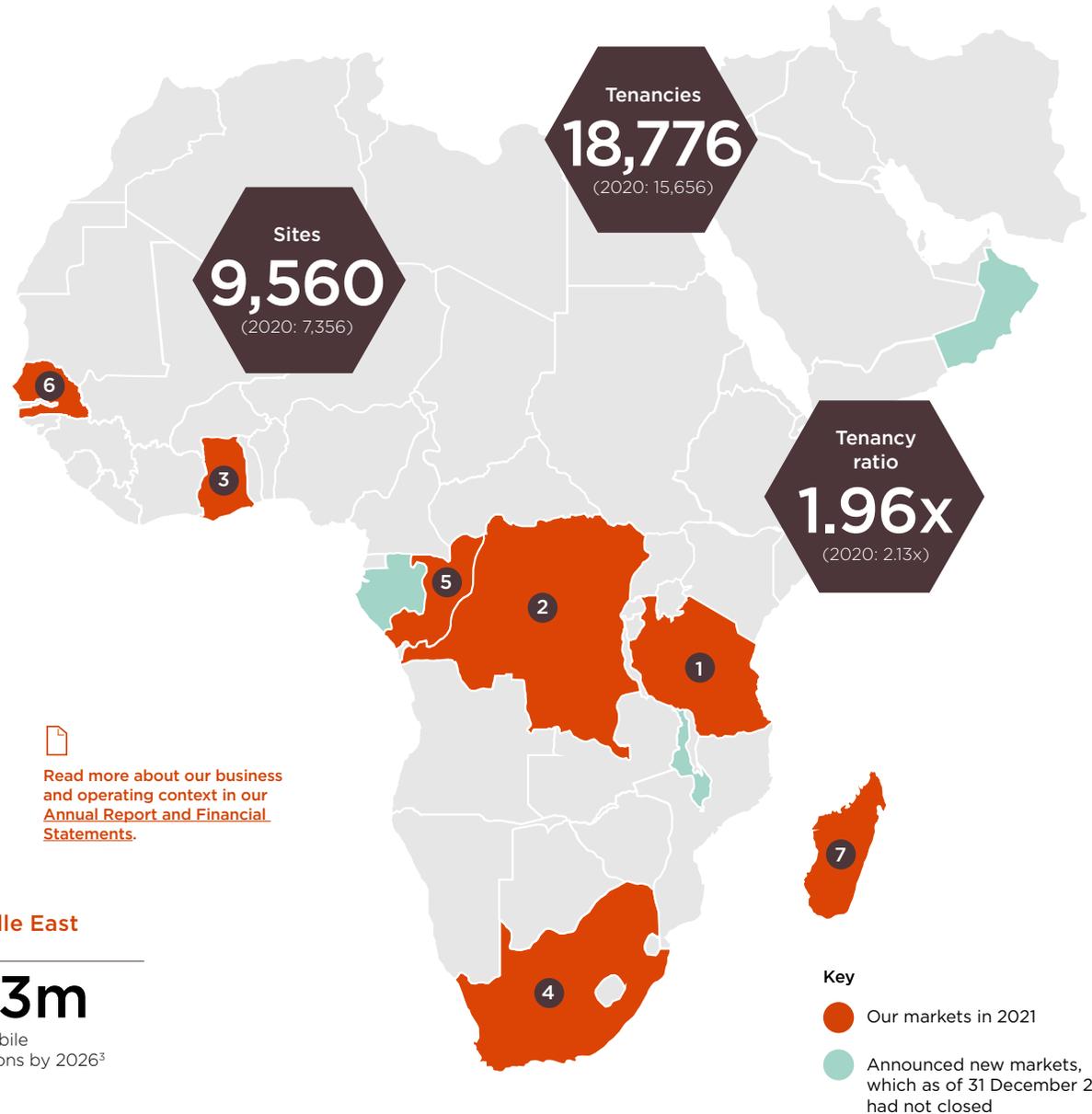
About us

Our business landscape

In 2021 we were operational in seven high-growth markets. Through signed acquisition agreements, we expect to extend our presence into three new markets, making us the most diversified towerco in Africa and the Middle East.

Our markets are some of the fastest growing in the world, driven by young and growing populations and low mobile penetration.

	SITES	TENANCIES	TENANCY RATIO
1 Tanzania	4,005	9,012	2.25x
2 DRC	2,062	4,701	2.28x
3 Ghana	1,040	2,041	1.96x
4 South Africa	272	464	1.71x
5 Congo B	459	661	1.44x
6 Senegal	1,232	1,303	1.06x
7 Madagascar	490	594	1.21x



Read more about our business and operating context in our [Annual Report and Financial Statements](#).

The growing mobile economy in Africa and the Middle East

+41m
more people by 2026²

67%
of Africa's population is below the age of 30²

+63m
more mobile connections by 2026³

2 United Nations World Population Prospects, June 2019.
 3 Analysys Mason report, February 2022.

Significant business growth

With new acquisitions announced in 2021, we will be expanding into more regions that have an acute need for mobile communications.

Only 51% of the 1.6 billion population in Africa and the Middle East is connected to mobile, compared to 87% in Europe and 85% in the US⁴. By expanding our infrastructure, we are addressing the digital divide and helping people to access life-enhancing services that contribute to the achievement of the UN Sustainable Development Goals (SDGs).

Through signed acquisition agreements announced during the year, alongside the closing of Free Senegal's tower portfolio first announced in 2020, we exceeded our previously stated 2025 ambition of operating 12,000+ towers across 8+ markets, well ahead of plan.

We closed the acquisition in Madagascar in November 2021 and we anticipate the acquisitions in Oman, Malawi and Gabon to close in 2022⁵.

	POPULATION ⁶	MOBILE PENETRATION ⁷ (2021)	MOBILE CONNECTIONS CAGR ⁷ (2021-26)
1 Malawi	20m	34%	6%
2 Gabon	2m	63%	1%
3 Oman	5m	71%	4%



- Key**
- New markets where we signed acquisition agreements in 2021
 - Our markets in 2021
 - ★ Sole or leading independent towerco

4 United Nations World Population Prospects, June 2019; GSMA database, accessed January 2022.
 5 Subject to obtaining a passive infrastructure licence in each jurisdiction and other customary closing conditions.
 6 United Nations World Population Prospects, June 2019.
 7 GSMA database, accessed January 2022. Mobile connections CAGR data: Analysys Mason report, February 2022.

Through our infrastructure-sharing business model we work to create sustainable impact for all our stakeholders. We are helping to reduce the environmental footprint of telecommunications infrastructure, while driving positive social change by providing jobs and opportunities for local people and developing skills in our partner network.

Here are a few examples of our impact.

Our people

Local employment and equal opportunity to advance.

97%

of employees in our operating companies are local.

Our partners and suppliers

Business growth, skill-building and development of industry standards.

72%

of spend used with local suppliers.

Our customers

Full suite of tower-related space, power and operational services.

99.99%

of power uptime achieved.

Our communities

Social and economic development supported by mobile telecoms.

>139m

people under the coverage footprint of our sites.

Our investors

Sustainable return on investment and value creation.

54%

Adjusted EBITDA margin.

Our environment

Carbon reduction and operational efficiencies.

7%

reduction in carbon emissions per tenant⁸.

Our impact



⁸ Reflects Scope 1 and 2 emissions for our five operational markets as of 2020, against a 2020 baseline.

A transformational year

Q

Helios Towers' mission is to drive the growth of mobile communications across Africa and the Middle East. How have you continued to deliver on this in 2021?

A

Kash: 2021 has been a transformational year for Helios Towers. We are extremely pleased to have commenced operations in Senegal and Madagascar, successfully integrating both portfolios and building a strong team in each market. Through new acquisitions announced in 2021, we have outperformed our previously stated 2025 ambition of operating over 12,000 towers across more than eight markets, well ahead of plan.

Tom: Our planned acquisitions will establish Helios Towers as the most geographically diverse tower company across Africa and the Middle East, and almost double the size of our tower portfolio. Alongside these material acquisitions, we were equally pleased with the value created for our stakeholders in our established markets. We had one of our best ever years of organic tenancy additions, reflecting the exciting structural growth opportunity in each of our markets. We achieved record power uptime for customers in 2021, in markets where grid infrastructure is frequently not available or consistent. And while our principal business lies in driving the growth of mobile communications across Africa and the Middle East, we are proud that in 2021 we set out our commitment to minimise our carbon emissions in the years to come.

Q

How have you progressed your Sustainable Business Strategy since launching it a year ago?

A

Tom: I am delighted at the progress we have made over the last year in putting our Sustainable Business Strategy into action. We delivered on multiple fronts; through the portfolio expansion, as well as delivering exceptional power uptime for our customers; achieving our 2025 ambition of less than one minute downtime per tower per week for four months of the year. In November 2021, we launched our Carbon Reduction Roadmap with an intensity-reduction target and set an ambition to reach net zero carbon emissions by 2040. We also announced 'Project 100' – our pledge

to invest US\$100 million across 2022-2030 in cleaner, greener solutions to reduce carbon. This is a substantial investment and we are excited about the opportunities to further expand our utilisation of renewable power.

Kash: We always strive to conduct our business in a way that is respectful and protective of the rights of all our stakeholders and this past year was no exception. We carried out a human rights risk assessment and launched our Human Rights Policy to reaffirm our commitment in this area. We also signed up to the UN Global Compact, highlighting our commitment to aligning our business with universal sustainability principles.

Q

How has the business continued to adapt to the ongoing pressures of Covid-19?

A

Kash: In 2020 and continuing through 2021, the Covid-19 pandemic created significant challenges for people in our markets and globally – including global supply chain disruptions and labour shortages. Our people were at the heart of our resilience and agility throughout the pandemic. I am immensely proud of each and every colleague who came together and worked diligently to capture the opportunities present. Their spirit of collaboration and commitment to problem-solving enabled us to continually adapt and deliver the exceptional service our customers know and trust.

Tom: Equally, the wellbeing of our people is paramount. While some people enjoy remote working, others can feel quite disconnected and isolated. Keeping that in mind, we launched our new Helios Towers Wellbeing Program, a third-party confidential service that our people can access for expert help, counselling and wellbeing resources.

Q

Tom, as you step into the CEO role what are your plans for 2022 and beyond?

A

Tom: Through the signed acquisitions we achieved our business growth target of operating in 8+ markets and 12,000+ towers, well ahead of schedule. So in 2021, the senior leadership mapped out a revised strategy and set of targets, drawing on feedback from our stakeholders. We look forward to unveiling this in detail during 2022.

Our focus will be very much to continue to deliver exceptional customer service and to enable the growth of mobile communications as an engine of sustainable development in our markets. Climate action, diversity and inclusion, community engagement and working with our contracted partners on sustainability initiatives will continue to be priority areas for us in 2022. In the coming years, we will also advance our carbon reduction and carbon innovation programmes and look forward to working more closely with our stakeholders to help us all collectively transition to a sustainable future.



For a more detailed Q&A with our CEO and CEO-Designate, see pages 10-14 of our [Annual Report and Financial Statements](#).



Kash Pandya, CEO (left)
and Tom Greenwood,
CEO-Designate (right)

Sustainable Business Strategy

Our business strategy reflects the value we create for all our stakeholders.

Through sustainable business growth, we enable mobile connectivity, contributing to social and economic development in the countries where we operate - with reduced overall environmental impact.

2021 highlights



- **Expanding into new markets** resulting in close to 9,560 sites across seven markets.
- **Engaging with our communities** to support education and skills development.
- **Continuing to support our MNO customers and regulators** to expand and improve access to mobile networks.



- **Upskilling our maintenance partners** through ongoing safety training.
- **Identifying key human rights risks in our supply chain** and developing a survey to assess and engage our suppliers on sustainability in 2022.
- **Providing our people with global mobility and career-progression opportunities** to help launch new markets. This helps to ensure that our culture is embedded in all our markets as we grow.



- **Delivering record power uptime performance**, and in four months of the year, achieved our 2025 target of less than one-minute downtime per tower per week.
- **Increasing tenancy ratio of 0.02x in our established markets**, with Group tenancy ratio of 1.96x at year-end.
- **Setting a carbon intensity reduction target of 46% reduction per tenant** and integrating climate impact in our business processes.



Our strategy reflects the issues that matter most to our stakeholders and where we can have the greatest impact.

To determine these issues, we conducted our first materiality assessment in 2020. This included benchmarking, reviewing reporting frameworks and standards, a materiality survey in line with the GRI-recommended approach, and interviews and workshops with both internal and external stakeholders.

We will review our materiality assessment in 2022, in line with best practice guidelines, to assess any shifts in priorities and identify the most important issues that impact the business and our stakeholders.

Commitment to transparency and collective action



We signed up to the UN Global Compact in 2021.

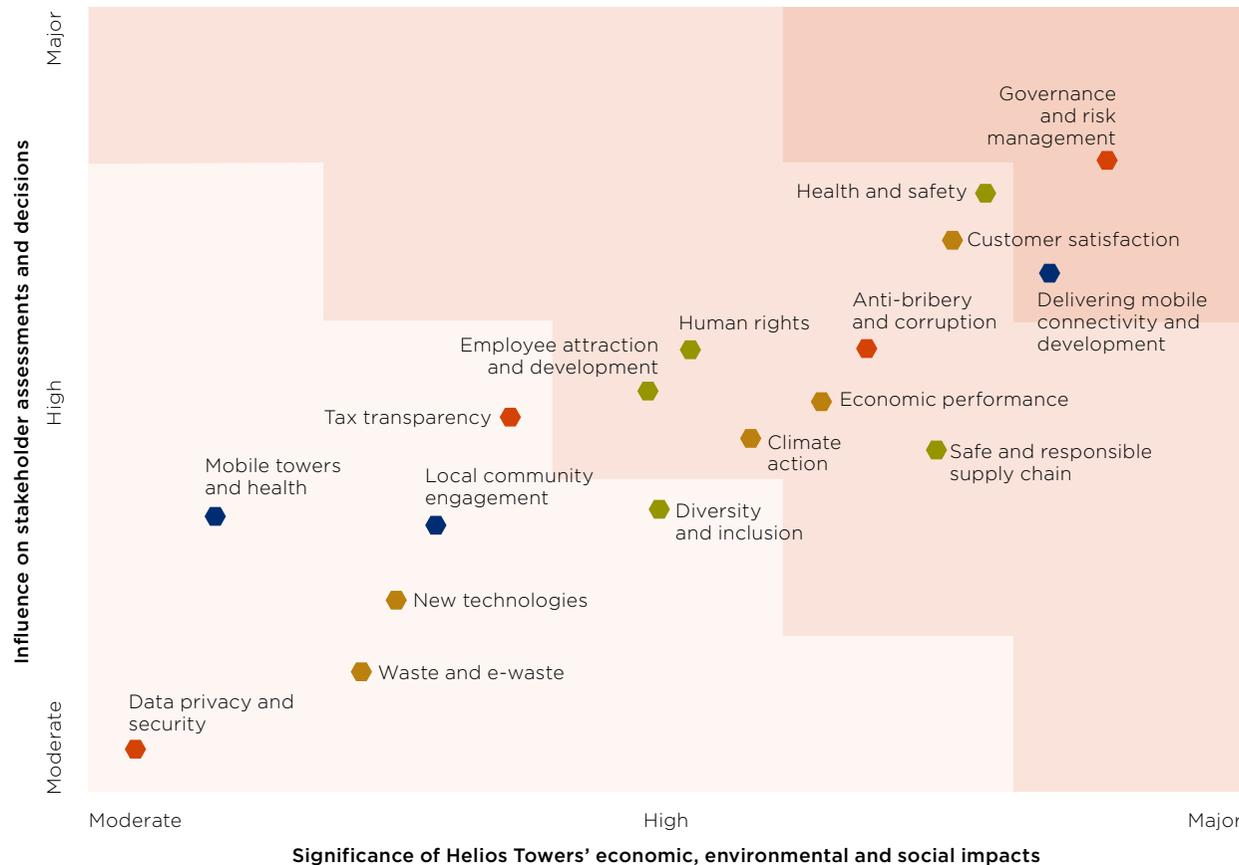


B- score in our first response to the CDP climate questionnaire.



Gold rating for sustainability by independent platform EcoVadis (2020: Silver rating).

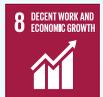
Materiality matrix



- ◆ Network access and sustainable development
- ◆ Business excellence and efficiency
- ◆ Empowered people and partnerships
- ◆ Governance

Materiality

The mobile industry uniquely contributes to all 17 SDGs⁹. Through our Sustainable Business Strategy, we support several SDGs and make the greatest positive contribution to SDGs 8 and 9.



Decent Work and Economic Growth

We champion local employment in safe and secure work environments; protect human rights; improve responsible business practices; and invest in training and development.

Key SDG targets: 8.2 (Drive technological innovation), 8.3 (Promote decent job creation), 8.8 (Promote safe working environment).

For more examples of our contribution to SDG 8, see pages 16, 18 and 33.



Industry, Innovation and Infrastructure

We provide resilient, quality infrastructure that supports wider, more reliable access to the services and benefits of mobile connectivity.

Key SDG targets: 9.1 (Develop sustainable infrastructure), 9.4 (Increase resource-use efficiency), 9.a (Facilitate resilience infrastructure development in Africa), 9.c (Increase access to ICT).

For more examples of our contribution to SDG 9, see pages 14, 16 and 20.

We also contribute to:



Good Health and Well-being

Road safety – page 28



Quality Education and Gender Equality

Skills development and youth employment opportunities – pages 16–18, 29–31



Affordable and Clean Energy and Climate Action

Colocation and power management – pages 21–25



Responsible Consumption and Production

Waste – page 57



Peace, Justice and Strong Institutions

Zero tolerance on bribery and corruption – page 37



Partnerships for the Goals

Partnering on digital inclusion and access to energy – pages 16–17

⁹ [GSMA 2021 Mobile Industry Impact Report: Sustainable Development Goals](#).



Progress on our KPIs and targets

Network access and sustainable development

Relevant SDGs	Material topics	KPI/target	Progress	2021 progress
	Delivering mobile connectivity and development	KPI		>139m people covered within the Helios Towers tower footprint (2020: >109m).
		Targets	Expand to 12,000+ towers in 8+ markets by the end of 2025. <ul style="list-style-type: none"> Increase the number of sites in rural¹¹ and underserved regions by 1,500 by the end of 2025. 	9,560 towers in seven markets (2020: 7,356 towers in five markets). On closing the deals announced in 2021, we will have c.14,000 towers across ten markets. <ul style="list-style-type: none"> 818 additional rural towers (against a 2020 baseline of 2,471 towers).
	Local community engagement	Targets	Start bespoke community needs-based partnerships in 2021. <ul style="list-style-type: none"> Pilot phone-charging points for free community use on selected sites in 2021¹². 	Education projects and partnerships initiated. <ul style="list-style-type: none"> To improve ease of phone charging on the go, we will be trialling distribution of solar-powered charging banks to communities in Ghana in 2022.

Business excellence and efficiency

Relevant SDGs	Material topics	KPI/target	Progress	2021 progress
	Customer satisfaction and economic performance	KPI		2.15x in our five established markets 1.96x overall (2020: 2.13x)
		KPI		53.6% (2020: 54.7%)
		Target	All new towers to have an average of two tenants per tower within five years of construction ¹³ .	1.37x (2020: 1.16x)
	Climate action	Target	Achieve an average one-minute weekly downtime per tower by the end of 2025 ¹⁴ .	One minute ten seconds (2020: One minute 32 seconds)
Target		Analyse carbon footprint and climate risk across our value chain and set an emissions-reduction target in 2021.	Target set in 2021: 46% reduction in CO ₂ e per tenant by 2030	

10 We calculate the population coverage potential by calculating the people that come under the coverage footprint of each of our towers using WorldPop source data.
 11 There is no standardised definition of rural and urban. We have defined rural as milieu with population density per square kilometre of up to 1,000. These are generally greenfield sites, or small villages and towns with a series of small settlement structures.
 12 Where grid power is not readily available.
 13 This target excludes special projects and smaller, unique build-to-suit projects.
 14 The Group has five years to achieve this milestone for any new network acquisition.

Find more detailed commentary and information on performance in the corresponding report sections.

Key  Achieved  On Target

Empowered people and partnerships

Relevant SDGs	Material topics	KPI/target	Progress	2021 progress	
  	Health and safety	Target		6 out of 12 maintenance partners ¹⁶ have ISO 45001 (2020: 3 out of 10) 96.6% average MP score in SHEQ assessment (2020: 92.5%)	
	Safe and responsible supply chain	Target		Developed a sustainability survey to send to key suppliers in early 2022.	
	Employee attraction and development	KPI	Percentage of local employees in our operating companies.		97% (2020: 98%)
		KPI	Diversity of gender and ethnicity among all employees.		24% female and 76% male (2020: 23% female and 77% male) 82% ethnically diverse, 13% other, 5% not disclosed (2020: 77% ethnically diverse, 15% other, 9% not disclosed)
		KPI		Percentage of employees trained in Lean Six Sigma. 31% (2020: 37%)	

Governance

Relevant SDGs	Material topics	KPI/target	Progress	2021 progress
	Anti-bribery and corruption Health and safety	Target		We have maintained our accreditations in all four systems that cover Group-wide operations. Helios Towers successfully transferred certification to Bureau Veritas.
				<ul style="list-style-type: none"> • ISO 9001 (Quality) • ISO 14001 (Environmental Management) • ISO 45001 (Health & Safety Management) • ISO 37001 (Anti-Bribery).

 Find more detailed commentary and information on performance in the corresponding report sections.

¹⁵ New maintenance partners have three years to achieve ISO 45001 from start of contract with Helios Towers.

¹⁶ Includes two new maintenance partners in Senegal.

¹⁷ This will incorporate Group-level strategic suppliers, maintenance partners and security partners.

Network access and sustainable development

OBJECTIVE

Continued development of mobile connectivity, improving livelihoods and strengthening economies.

EXPANDING OUR INFRASTRUCTURE

Expanded to 9,560 towers in seven markets.

NEW AND IMPROVED NETWORK ACCESS

Supported MNO customers and regulators with expanding network access and improving connectivity.

SUPPORTING SKILLS AND SOCIAL MOBILITY

Launched our flagship Group internship programme 'Helios Towers School of Engineers' starting in DRC.

Tackling the digital divide

Our ambition is to expand our infrastructure in Africa and the Middle East to provide more people with access to mobile network connectivity, advancing social and economic development.

There is a major infrastructure and connectivity gap in Sub-Saharan Africa and the Middle East compared to more developed parts of the world.

Our infrastructure-sharing model enables MNOs to roll out and densify mobile coverage more quickly and cost effectively and with a lower environmental impact. In turn, this means that individuals and communities in our markets can experience the life-changing benefits of mobile more rapidly.

In 2021, we continued to bridge this gap, delivering one of our best years of organic tenancy growth, and signed agreements that, upon closing, more than double the size of our tower portfolio and the number of markets where we will support mobile operators to reliably and efficiently deliver connectivity.

There is a persistent rural-urban gap in mobile internet access, with rural populations in Sub-Saharan Africa being 60% less likely to use mobile internet than people in towns and cities¹⁸. MNOs often face economic challenges in providing infrastructure for rural coverage as base stations can cost more to build and to run, with lower revenues. To support MNOs and governments wanting to provide universal access and expand into rural areas, we provide more sustainable solutions that are more appropriate for rural coverage. These include new, upgradeable, lighter-weight tower designs with lower environmental impact and power solutions to increase potential penetration into more marginal and inaccessible rural areas that do not have access to the grid.

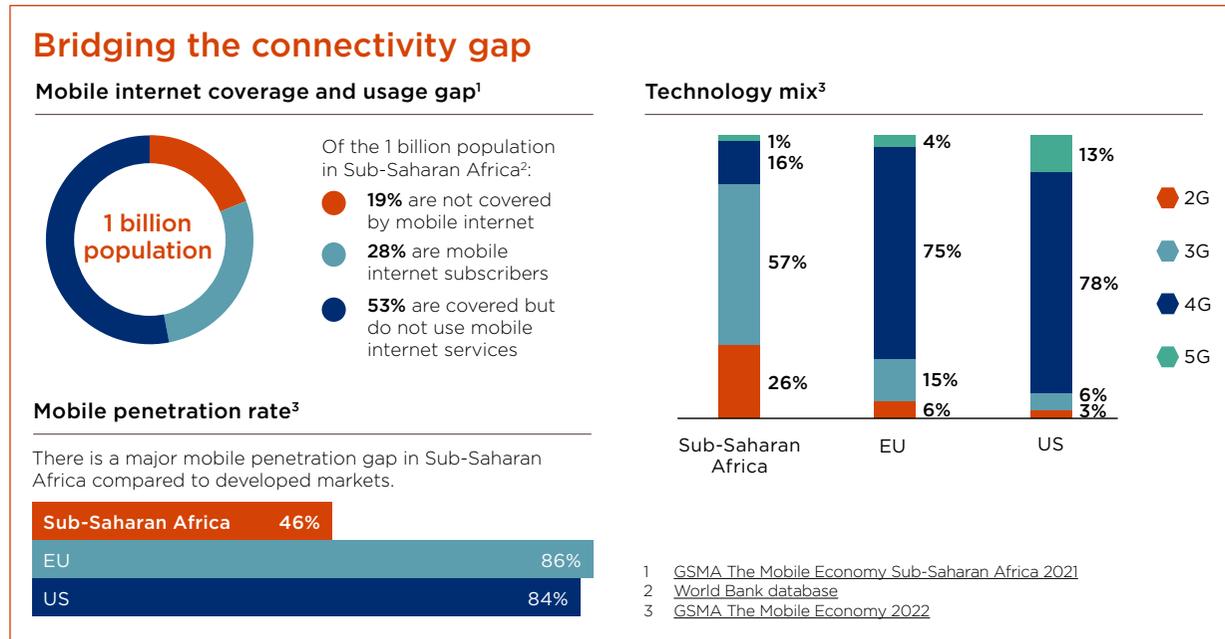
For example, enabled by our customers' access to grants from the Tanzania Government's Universal Communications Service Access Fund (UCSAF), we have built over 350 rural sites since 2015, including 52 in 2021.

Target	2021 progress
Expand to 12,000+ towers in 8+ markets by 2025.	9,560 towers across seven markets
Increase the number of sites in rural ¹⁹ and underserved regions by 1,500 by the end of 2025.	818 additional rural towers (against a 2020 baseline of 2,471 towers)

KPI	2021 progress
Population coverage within the Helios Towers tower footprint ²⁰ .	>139m

Innovative solutions to improve connectivity

In densely populated urban environments where there is poor mobile coverage and limited space for traditional tower infrastructure we look to develop innovative solutions to improve connectivity. In Kariakoo market – the biggest and busiest market in Dar es Salaam, Tanzania – we will be expanding coverage from an existing tower site nearby to equipment on two lampposts to distribute the signal to the market. We collaborated with our MNO customers to develop a futureproof solution that could accommodate multiple operators and support 2G, 3G and 4G services as well as additional spectrum bands.



¹⁸ [GSMA The State of Mobile Internet Connectivity 2021](#)

¹⁹ There is no standardised definition of rural and urban. We have defined rural as milieu with population density per square kilometre of up to 1,000. These are generally greenfield sites, or small villages and towns with a series of small settlement structures.

²⁰ We calculate the population coverage potential by calculating the people that come under the voice (2G equivalent) coverage footprint of each of our towers using Worldpop source data. Over 45 million of that population come under the data (3G, 4G) coverage footprint of our towers. The figure covers towers in our seven markets.

Senegal, the economic hub of West Africa, became our sixth market of operation when we closed the acquisition of Free Senegal’s towers in May 2021. We are the first and only independent tower company in the market, which provides us with a unique opportunity to work with all three MNOs to support colocation on our existing sites and additional built-to-suit (BTS) rollout.

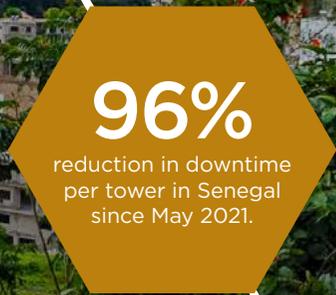
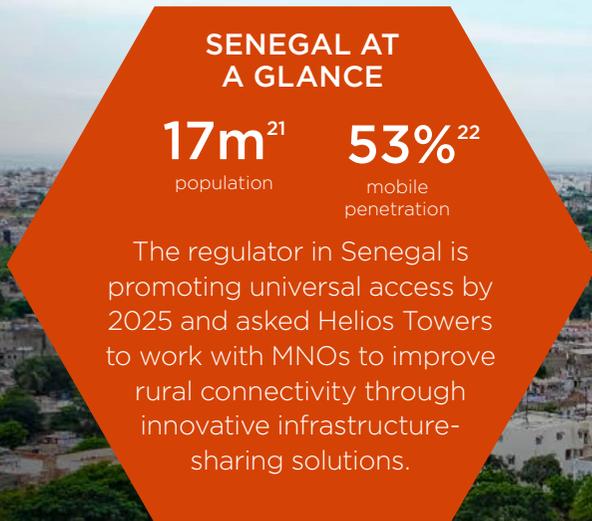


I’m proud of our achievements so far – we have improved mobile coverage in Senegal through expansion and higher power uptime while investing in essential safety training to our maintenance partners.



Karim Ndiaye
Managing Director,
HT Senegal

Setting up in Senegal



²¹ United Nations World Population Prospects, June 2019.
²² GSMA database, accessed January 2022.
²³ Those who report to the Managing Director.

Supporting our communities

Alongside addressing the major digital divide, we have a key role to play supporting people in the communities where we live and work.

As we grow our business to bridge the gap in reliable mobile connectivity, we create local employment both directly through our operations and indirectly through providing network access.

While our teams have been supporting great causes in their communities, we want to develop more focused, long-term, strategic projects and partnerships across our markets to deliver greater impact. Our approach will be to trial projects in a market and use the learnings to inform how we roll out across the Group. One such example is the internship programme which we launched in DRC, 'Helios Towers School of Engineers' – see page 18.

Target	Progress
<p>Start bespoke community needs-based partnerships in 2021.</p> <ul style="list-style-type: none"> • Pilot phone-charging points for free community use on selected sites in 2021²⁴. 	<p>Our markets have focused on education and skills-development projects. Examples can be found on the following pages.</p> <ul style="list-style-type: none"> • On reviewing phone-charging points at our sites, we prioritised exploring options to help community members charge their phones on the go. We have planned a pilot scheme offering them solar charging power banks. We will distribute these in a rural community in northern Ghana and roll out further, informed by community feedback and impact.

24 Where grid power is not readily available, we will add charging points on community-accessible sites to increase access to technology.

Our community engagement strategy

To have an even greater positive impact, our community strategy focuses on two key areas:



Education, skills and digital inclusion

Championing education and skills-development opportunities with a focus on supporting women and rural communities.



Access to power and amenities

Enabling access to electricity and mobile broadband based on local community needs.



Our ambition is to continue to focus on the two key pillars of our community strategy while also considering opportunities to support carbon reduction in our markets, for example projects which avoid carbon and contribute to a number of SDGs such as health and wellbeing or affordable and clean energy.

Education and digital inclusion

The pandemic highlighted that many schools, particularly those in rural areas across our markets, lack resources and infrastructure for ICT teaching and learning. Our teams have been working on projects to help address this digital divide.

SOUTH AFRICA

Promoting greater equality in education

In South Africa, Covid-19 exposed a huge gap in the quality of education and infrastructure between public and private schools. Many schools struggled to access learning materials throughout the pandemic and the matriculation pass rate fell by 6% (from 81.3% to 76.2%)²⁵, compared to the private school rate, which dropped by only 1% to 98%²⁶.

iSchool Africa is a non-governmental organisation (NGO) empowering South African teachers and pupils in townships and rural public schools with technology and learning practices. Working with the Department of Education and Department of Rural Development, iSchool Africa has developed a well-coordinated innovative learning syllabus using iPads.

In partnership with iSchool Africa, we will support Fred Norman Secondary School, near our towers in Johannesburg. We will fund the training of teachers and provide 20 iPads and related ICT tools, including wifi. Our people will also give talks to help guide and inform children about career options.

iSchoolAfrica
iPad Learning Programme

²⁵ <https://www.education.gov.za/2021NSCEXamReports.aspx>

²⁶ <https://www.news24.com/news24/southafrica/news/ieb-schools-get-matric-pass-rate-of-just-over-98-marking-excellent-performance-in-a-tough-year-20210219>

GHANA

Providing access to ICT

To support digital learning and inclusion, we built an ICT laboratory using recycled and refurbished cell site containers in an underserved rural community in Northern Ghana. The lab is equipped with solar panels to provide renewable electricity and we provided recycled laptops and broadband connectivity for more than 200 pupils in the first year.

In the Upper East region of Ghana, we donated classroom furniture and stationery to two selected schools that lacked basic infrastructure for teaching and learning. This will facilitate learning for over 100 students.

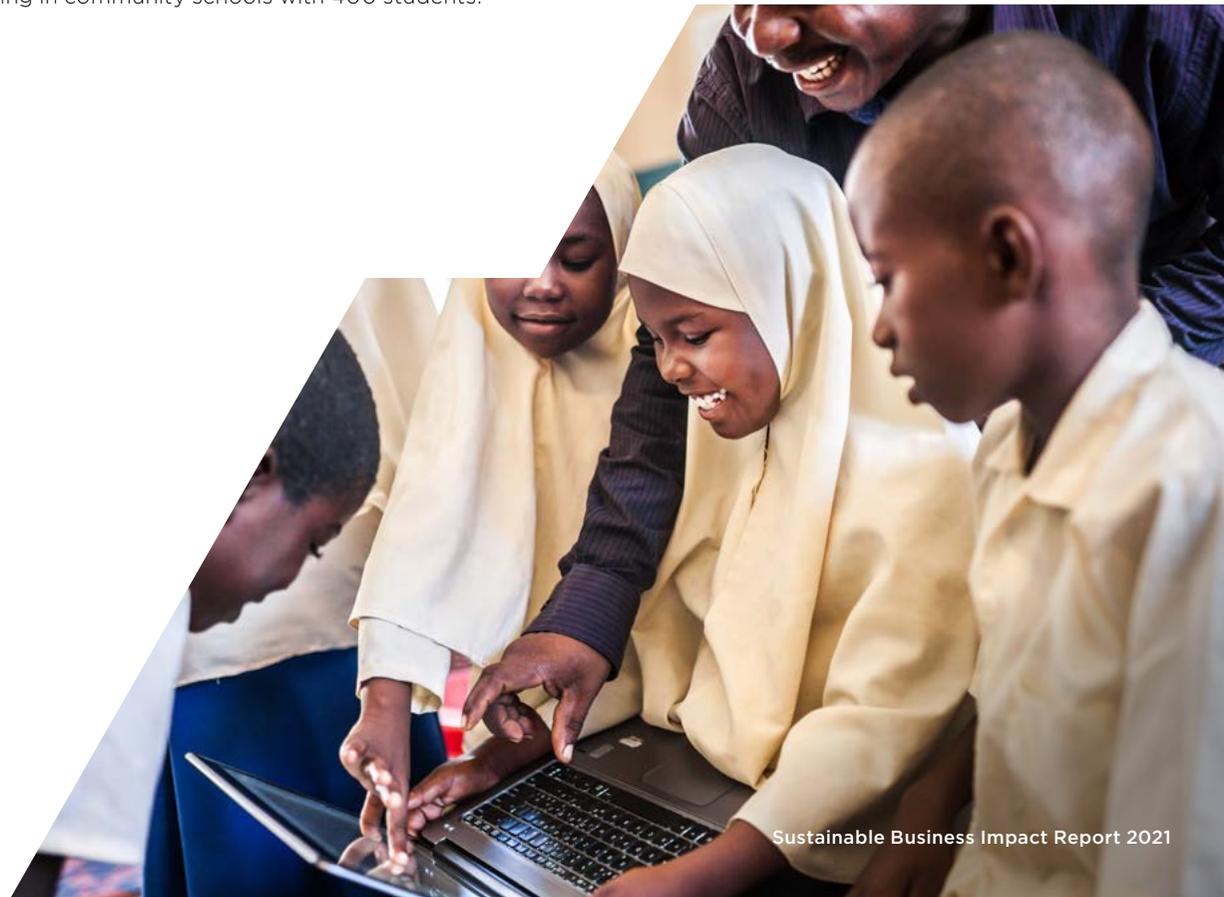
Our team in Ghana will also support science, technology, engineering and mathematics (STEM) teaching in community schools with 400 students.

TANZANIA

Championing digital inclusion in schools

As our focus on digital inclusion also aligns with many of our customers, we explore opportunities to work with them to achieve greater impact. In 2021, we started a partnership with Vodacom Foundation to equip an ICT lab for a school local to our towers.

We also donated used laptops and equipment for developing an IT lab to CAMARA, a charity supporting schools in economically deprived areas across Africa.



Flagship internship programme

DEMOCRATIC REPUBLIC OF CONGO

Helios Towers School of Engineers

Africa's youth population is rapidly growing and expected to double to over 830 million by 2050²⁷. Investing in skills development that improves employability has the potential to support increased productivity and more inclusive economic growth across the continent.

To address the need to prepare young people for work and invest in developing their problem-solving and critical-thinking skills, we have developed a flagship internship programme, 'Helios Towers School of Engineers', to offer final-year engineering students and recent graduates hands-on work experience across business functions. Not only will this help develop future leaders, but it will also create a pipeline of new talent for our business as well as for our maintenance partners. It also provides opportunities for our own people to get involved in mentoring and coaching the interns.

We started the programme in DRC in 2021, and set up a cross-functional team to engage with universities and run assessments with students.

One of the integral members of our project team is Alexandre Bagula, who did an internship with us in 2014. He pursued a career in telecoms infrastructure and joined our DRC team in 2019 as Project Manager in charge of structural improvement projects such as maintenance of towers.

In 2022, we will finalise the assessment process and have our first cohort of ten interns join our team. We will review learnings and feedback from the launch in DRC and plan to expand the programme to our other markets in 2022.



My internship was so valuable for my CV and helped me get a full-time job in the industry. I believe this will be the biggest impact of 'School of Engineers' – helping interns to be competitive in the job market. They will also learn soft skills that are not always taught at university.

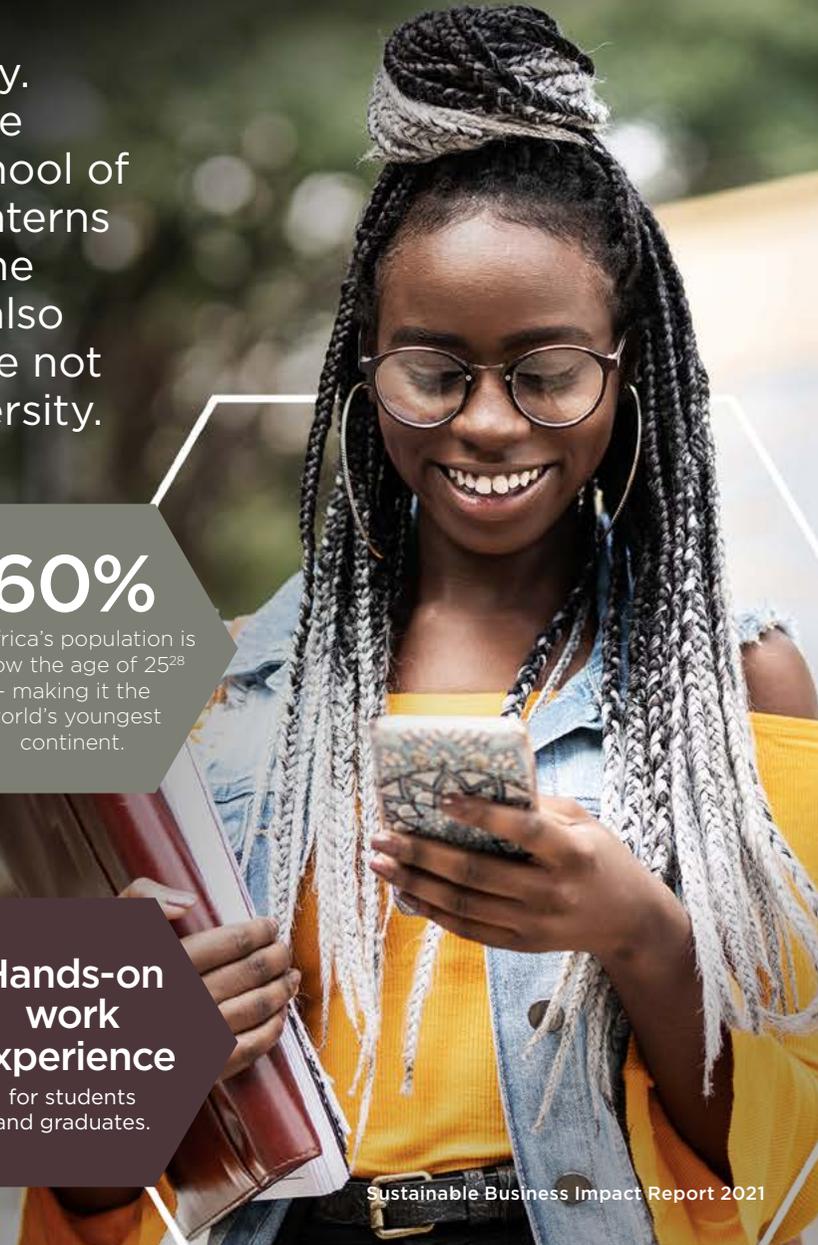


Alexandre Bagula
Project Manager, DRC

Pipeline of talent
for our business and our industry.

60%
of Africa's population is below the age of 25²⁸ – making it the world's youngest continent.

Hands-on work experience
for students and graduates.



²⁷ Jobs for Youth in Africa.

²⁸ Africa's first challenge: the youth bulge stuck in 'waithood', 2019, Mo Ibrahim Foundation.

Business excellence and efficiency



Quality, efficient infrastructure solutions

As the trusted partner for MNOs, we are committed to expanding and delivering exceptional service, while using our resources as efficiently as possible through our colocation model.

Operating a mobile tower in Africa is very different to the rest of the world. While in the US and EU 100% of the population has access to power, in Sub-Saharan Africa that figure is just 47%²⁹. Having the processes, people and systems to power towers reliably and efficiently over long distances is critical to our purpose and our ability to deliver excellent customer service.

Tenancy ratio

In 2021, we maintained our track record of strong Adjusted EBITDA growth and continued expansion through high-quality acquisitions.

We delivered one of our best years of organic tenancy growth and signed agreements that, upon closing, effectively doubled the size of our tower portfolio and the number of markets where we better enable mobile connectivity.

Through the addition of two new attractive site portfolios in Senegal and Madagascar, our Group Adjusted EBITDA margin and tenancy ratio decreased. This provides an enlarged base from which we can continue to drive growth and compounding returns, and, in fact, within our five established markets our tenancy ratio continued to climb and reached 2.15x at the end of the year.

²⁹ World Bank Global Electrification database

³⁰ This target excludes special projects and smaller, unique build-to-suit projects.

³¹ The Group has five years to achieve this milestone for any new network acquisition. 2021 performance does not include Madagascar.

Tenancy ratio

2021	1.96x
2020	2.13x
2019	2.09x

Adjusted EBITDA margin (%)

2021	53.6
2020	54.7
2019	52.9

Target

All new towers to have an average of two tenants per tower, within five years of construction³⁰.

Progress

Average tenancy ratio for sites built in 2020.

2021	1.37x
2020	1.16x

Driving uptime and service continuity

Our key role is to maintain reliable and continuous power and service, even in the most remote locations or challenging conditions.

The ability to reliably power MNOs' equipment is our true differentiator, and the key KPI of our service levels to customers is power uptime. In 2021, we delivered

record power uptime of 99.99%, meaning that our customers, and as importantly their end-users, enjoyed continuous network service.

As we pursue even better uptime, we look at the inverse: the measure of downtime in minutes and seconds. In four months of the year, we achieved our 2025 target of less than one-minute downtime per tower per week. In some of our markets, we have exceeded the target, for example in Tanzania, we have seen 23 seconds downtime and in Ghana 15 seconds.

Target

Achieve an average one-minute weekly downtime per tower by the end of 2025³¹.

Progress

2021	1 minute 10 seconds
2020	1 minute 32 seconds
2019	1 minute 42 seconds

99.99%
record power uptime



Reducing environmental impact

Our long-term ambition is to become a net zero carbon emissions business by 2040. Through our Carbon Reduction Roadmap, we are committed to reducing our footprint and supporting our customers to meet their reduction targets.

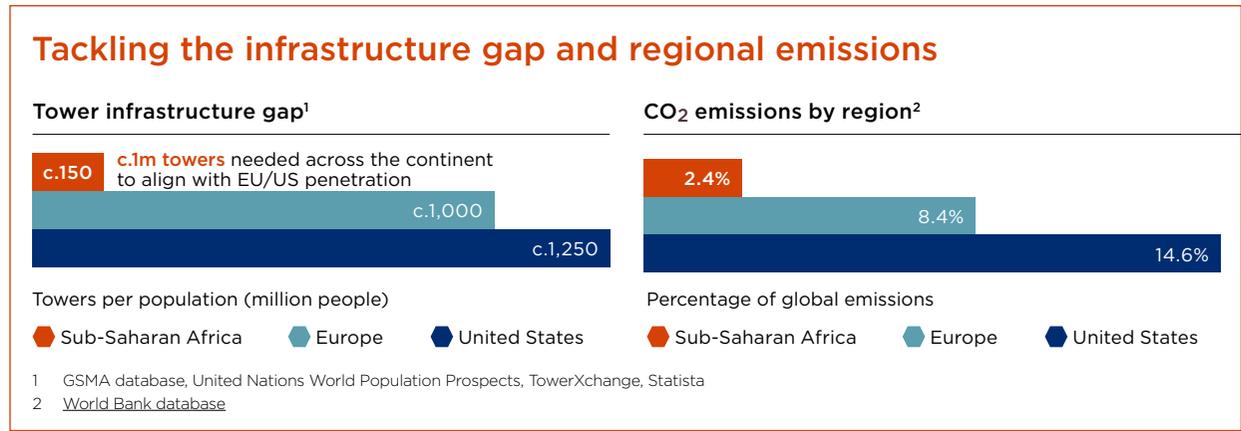
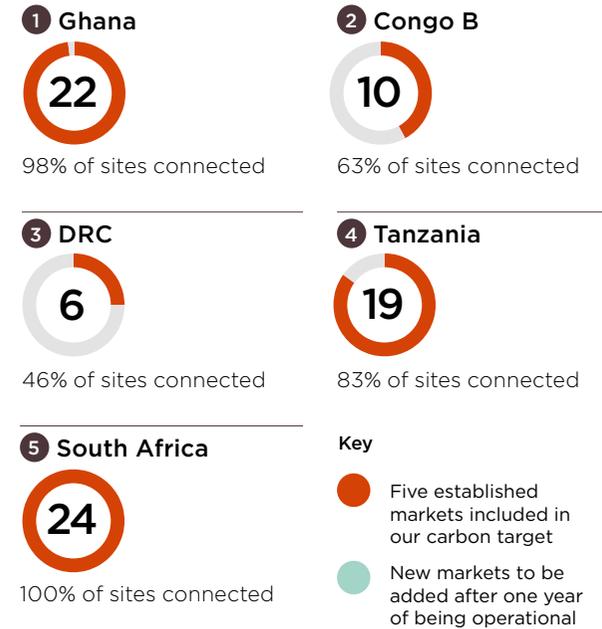
We believe we must continue to expand to enable mobile connectivity for millions more people. Decoupling this business growth from emissions is, however, a major challenge in our markets.

We are closing a vast mobile infrastructure gap as Sub-Saharan Africa has a very low number of towers per million people when compared to developed markets such as Europe and the US – we would need to build one million towers to get close to those levels.

While Sub-Saharan Africa is home to more than one billion people, it contributes 2.4% of total global CO₂ emissions and it is a region with some of the world's lowest electrification rates.

A reliable supply of grid electricity is not guaranteed in most of our markets – with a significant variance from six hours a day in DRC to 24 hours in South Africa. Our key role is to maintain reliable power and network service, even in the most remote locations or challenging conditions. This map shows the average grid hours in our five established markets (within the scope of our carbon target). Our efforts to decarbonise in the future will be impacted by grid connections in our markets becoming more reliable and greener.

Average grid hours per day in our markets³²



³² Our target covers Tanzania, DRC, Ghana, South Africa and Congo Brazzaville – the five markets where we were operational for the full year of 2020.

Our target and ambition

In 2021, we launched our Carbon Reduction Roadmap and established our first greenhouse gas (GHG) emissions intensity reduction target, initially focusing on Scope 1 and 2 emissions, where we can make the most material impact. It translates to maintaining absolute emissions at 2020 levels, despite significant and required growth in mobile infrastructure.

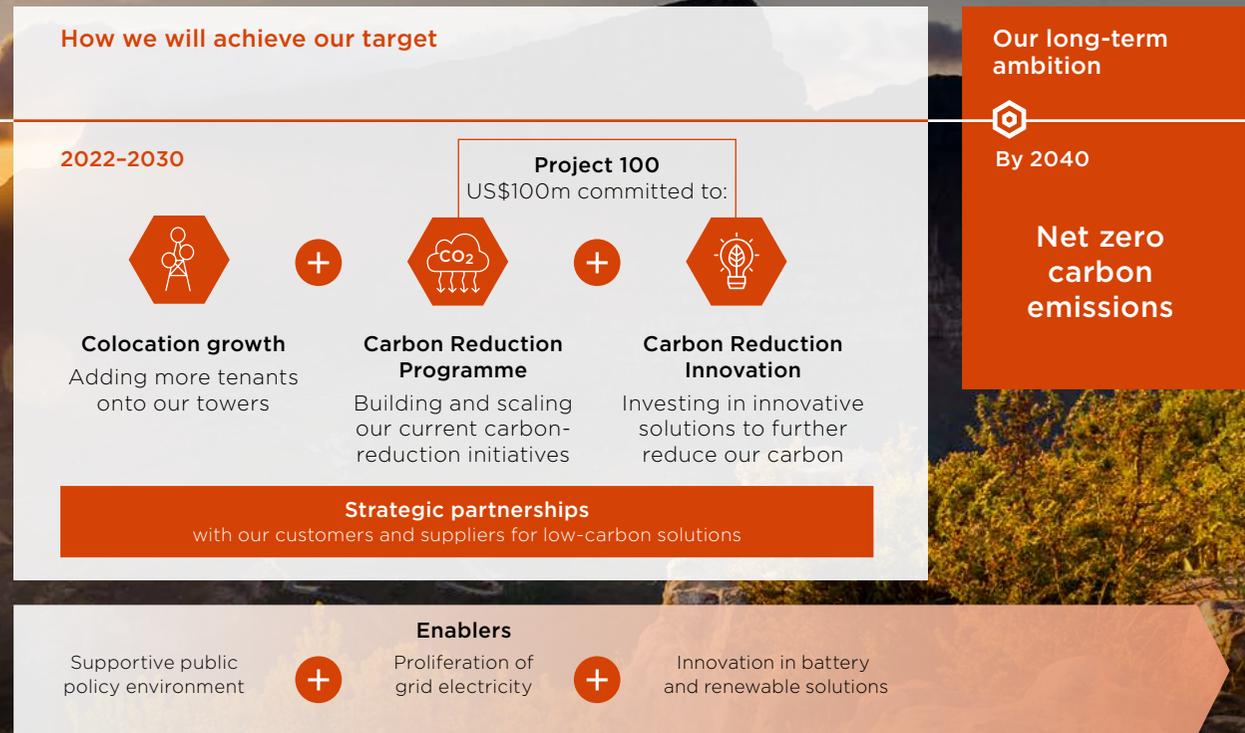
As many areas we serve have non-existent, limited or unreliable access to mains electricity, we currently rely on generators to guarantee power for our customers' equipment on most of our sites. Our roadmap builds on our strategy since 2015 to reduce reliance on generators, connect to the grid and use hybrid and solar solutions wherever possible.

To achieve our long-term ambition of becoming a net zero carbon emissions business by 2040, we will look to engage with our customers and suppliers on their reduction strategies and targets and explore offsetting projects that support underserved tower communities. We will also assess options to decarbonise the electricity we consume and encourage more renewable energy production in our markets.

Our actionable plan of activity from 2022-2030 is based on three key elements: colocation growth, our Carbon Reduction Programme and our Carbon Reduction Innovation. More detail on each element is provided on the following pages.

Project 100: US\$100 million investment in carbon reduction and innovation

Project 100 is our pledge to invest US\$100 million in cleaner, greener solutions to reduce carbon between 2022-2030. This includes planned spend on our Carbon Reduction Programme as well as investment in Carbon Reduction Innovation, which you can read about on page 24.



³³ Our target covers Tanzania, DRC, Ghana, South Africa and Congo Brazzaville – the five markets where we were operational for the full year of 2020.

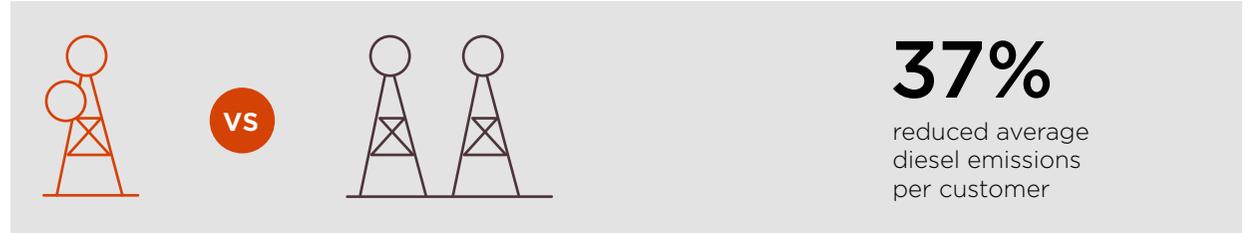


Our sustainable colocation model

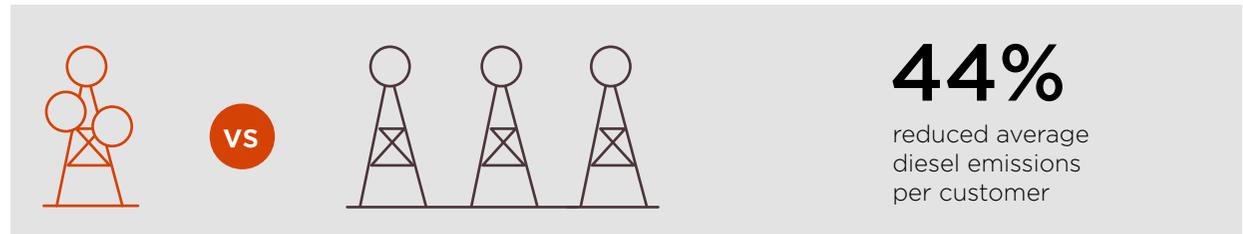
Our strategy to increase colocation on our towers enables us to reduce the environmental impact of powering mobile connectivity compared to the traditional operator-owned model. Only one generator or power supply is needed to cater for multiple tenants, minimising maintenance visits and saving thousands of kilometres driven each month. By reducing emissions from our towers, we are helping our customers to reduce their indirect emissions.

The more tenants per tower, the lower emissions per tenant.

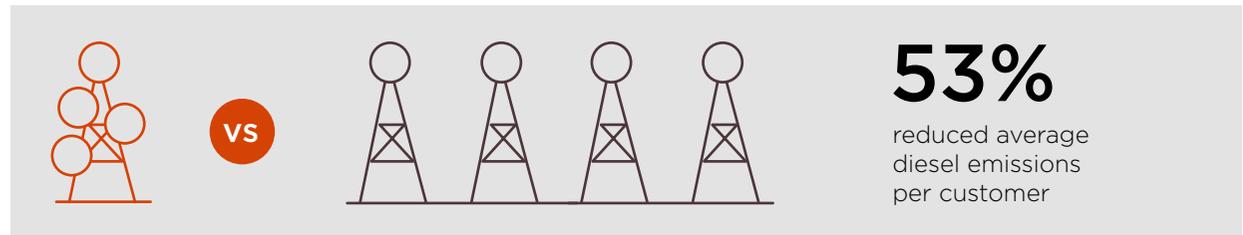
Two tenants



Three tenants



Four tenants



Average diesel emissions reductions have been calculated from diesel consumption figures for the whole Group, comparing consumption on towers with 1, 2, 3 and 4 tenants.

- Key**
- Colocation
 - Single-tenant site

Project 100: \$100 million investment



Carbon Reduction Programme

Through our Carbon Reduction Programme, we're reducing reliance on diesel and using more efficient, cleaner solutions.

Each site is unique, so our performance engineering team continually reviews the most environmentally friendly and cost-effective solutions on a targeted basis. The team identifies alternative energy sources depending on site-design requirements, commercial and technical feasibility and power needs.

Our successful pilot of a new remote monitoring system (RMS) is driving significant improvements across the Group. Regardless of how remote a site may be, the RMS is our eyes and ears for site performance in real time and can support us to optimise site power and efficiency. In turn, this allows us to reduce our fuel consumption and emissions, through optimising performance, while also keeping track of site load and performance with our customers.

Carbon Reduction Programme focus areas include:



Optimising grid utilisation

A reliable supply of grid electricity is not guaranteed in most of our markets. There's a huge variance from six hours a day in DRC to 24 hours in South Africa (see page 21). Our key role is to maintain reliable power and network service, even in the most remote locations or challenging conditions. Millions of people and many areas we serve have no power, or have a supply that runs for just a few hours each day. We are continually working on improving usage of the grid and energy efficiency at our sites in markets where grid quality is unstable. Our site performance analysis team reviews data logged from rectifiers, generators and grid meters every five minutes, which helps us to configure the best power solution to meet site needs.



Hybrid solutions

At off-grid and limited-grid tower sites, we use hybrid solutions. Where grid quality is more reliable and outages are short, we will install sufficient long-life lithium-ion batteries to bridge outage gaps reducing generator run-time.

>70%

sites will have hybrid and solar solutions by 2026 (31% in 2021)



Using solar solutions

We use solar solutions wherever possible at off-grid and limited-grid tower sites, depending on factors such as location, space and site performance needs. For example, powering a two-tenant site would require the space equivalent to a tennis court. Solar solutions are optimal at single-tenant, rural, off-grid sites.



Connecting to the grid

We always try to connect off-grid sites to grid supply. For example, in DRC, we have worked with private electricity-generation companies to connect sites that were previously off grid.

76%

of our sites are connected to the grid



Carbon Reduction Innovation

Through Project 100, we're committed to investing in carbon-reduction innovation to help us achieve our 2030 target. Potential solutions we will explore include:



Hydrogen fuel cells



Alternative fuels



New technologies e.g. super capacitors



Large-scale solar farms



Wind technology



Mini-grid community projects

Powering a two-tenant site with solar would require the space equivalent to a tennis court.



Our emissions and energy usage

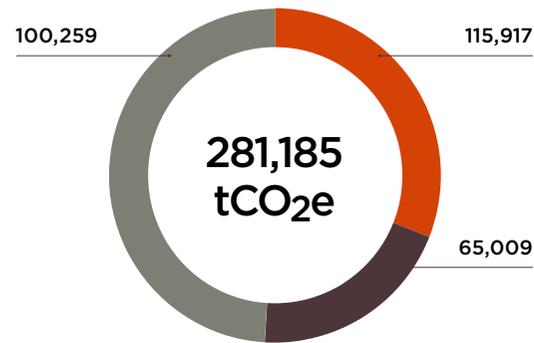
2021 energy and emissions

Tracking our energy consumption and the associated emissions is important for actioning our carbon-reduction strategy. We have monitored and reported our global Scope 1, 2 and 3 emissions over the last three years. Our overall footprint has increased as a result of business growth, including our expansion into Senegal. In line with our strategy to reduce reliance on diesel and connect more towers to grid electricity, our Scope 1 emissions are reducing and our Scope 2 emissions are increasing. Our Scope 3 emissions have increased due largely to an increase in the well-to-tank emission factor for Africa³⁴.

However, on an intensity basis, emissions per tenant are reducing. Against our 2030 target of 46% reduction in CO₂e per tenant, we have seen a 7% decrease in our five established markets.

Target	2021 progress
Analyse carbon footprint and climate risk across our value chain and set an emissions reduction target in 2021.	We analysed our carbon footprint as reported here; we conducted an initial assessment of climate-related risks and opportunities in 2021 and have set a carbon-reduction target and roadmap to decarbonisation.

Our 2021 footprint (tCO₂e)



Scope 1
includes generator diesel and vehicle petrol/diesel



Scope 2
includes tower grid electricity and office electricity³⁴



Scope 3
includes well-to-tank and transport and distribution, business travel, freight, purchased goods and services and emissions from towers in markets where the tenant pays for the fuel

Total emissions (Scope 1 and 2) per tower and per tenant (tCO₂e)

Based on the five markets included in our 2030 target³⁵.

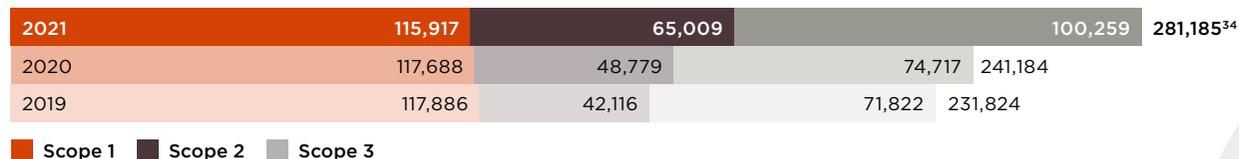
	2019	2020	2021
Tower	23.44	23.43	22.41
Tenant	11.45	11.17	10.43

Energy use for 2021 (kWh)

	2021
Tower grid electricity	205,243,949
Office grid electricity	574,528
Vehicle diesel	4,876,208
Vehicle petrol	1,653,334
Generator diesel	454,141,934
Total	666,489,953

Total emissions per year (tCO₂e)

Scope 1, 2 and 3 emissions



³⁴ Our 2021 footprint includes our operations in Tanzania, DRC, Ghana, South Africa, Congo Brazzaville and Senegal. Scope 3 emissions have increased due to UK Government enhancements in GHG accounting methodology for the UK well-to-tank emission factor, upon which Africa's emission factors are estimated.

³⁵ Our target covers Tanzania, DRC, Ghana, South Africa and Congo Brazzaville – the five markets where we were operational for the full year of 2020. Per tower and per tenant data is calculated based on a monthly average of towers and tenants across the year.

TCFD

Our reporting on the Task Force on Climate-related Financial Disclosures is included in our [Annual Report](#) pages 32-33 and in our [Appendix](#).

7%

reduction per tenant against our 2030 target of 46% reduction.

Empowered people and partnerships

OBJECTIVE
Building a network for shared success, with safety as a priority for all.

KEEPING OUR PEOPLE AND PARTNERS SAFE

130% increase in near miss reporting rate.

CREATING VALUE LOCALLY

97% local employees in operating companies.
72% of spend with local suppliers.

INVESTING IN DEVELOPING OUR PEOPLE

31% of employees trained in Lean Six Sigma.

Safety as a priority for all

Keeping people safe is critical to our work as a responsible employer and business partner. Health and safety is the first item we address in every Board meeting, and we strive to align with the highest international standards.

We champion everyone – our colleagues and our contracted partners – to engage positively with our programme for health and safety.

Our approach to Safety, Health, Environment and Quality (SHEQ) combines adherence to international safety standards with a culture of robust management and improvement. Through our safety framework, we aim to mitigate our greatest areas of risk, such as driving and working at height, and offset the comparatively low levels of regulation and enforcement in our markets.

In 2021, we made considerable progress developing our SHEQ management system. We upgraded our certification from OHSAS 18001 to ISO 45001, extending to all our established operating companies. We also aim to certify Senegal to the ISO standards in early 2022.

When we enter a new market, establishing robust SHEQ systems is the priority, and this year our SHEQ team was involved in three new markets: Malawi, Madagascar and Oman. We appointed local SHEQ managers to induct all new maintenance partners with plans set out to ensure they align with our standards for health and safety.

Developing an open reporting culture

Our reporting culture has continued to evolve. We have improved near-miss and low-severity incident reporting so we are able to identify systemic trends and areas for improvement to offset the hazards and behaviours that could potentially cause further incidents in the future.

Our investigation of major incidents has continued to act as a strong catalyst for driving SHEQ initiatives across the Group, including sweeping reforms to our lifting and working-at-height protocols. For example, when the reporting of low-severity incidents showed a pattern of operational personnel manually handling mechanically suspended and supported loads, we mandated the use of tag lines for all suspended loads and conducted a 'line of fire' campaign across the Group. All our partners have received bespoke training for mechanical lifting and safe lifting, with all their mechanical lifting equipment being reviewed and certified fit for use.

130%

increase in near miss reporting rate since 2020

Covid-19

The pandemic has continued to dominate our health programme in 2021, with all business continuity protocols remaining in place. While there were several instances of Helios Towers and partner personnel requiring hospitalisation from the virus, we were fortunate not to record any fatalities.

Group-wide business continuity planning reviews have continued throughout the year on a weekly basis. We also established an employee assistance programme to support our colleagues in balancing any personal and work-related challenges that they may be facing. Read more on page 31.



Operating under a common safety culture with our partners

We are committed to collaborating with our contracted partners, creating a shared safety culture and improving standards across the industry. This includes helping them achieve ISO 45001 certification, the international standard for occupational health and safety management systems.

To help support the communication of our SHEQ values across our markets and to our contracted partners, we published the Helios Towers Life Saving Rules and Standards, which aim to help prevent major incidents from occurring.

Based on our 'One Team, One Business' ethos, we monitor and report on the safety and performance of our contracted partners as our own. Our safety governance requires detailed monthly assessments from every operating company and partner. We measure the levels of SHEQ compliance our partners' management systems are able to achieve and the effectiveness of their operational controls using our quantitative benchmarking tool. This consists of assessing 127 SHEQ criteria. Partners under-performing and over-performing are recognised during monthly SHEQ governance reviews at both Group and operating company levels. As a result, there has been considerable progress towards our target of all maintenance partners achieving full compliance by 2025.

However, and with deep regret, we recorded four fatal incidents from our contracted partners. Three were unavoidable road traffic accidents, with the fourth being an occupational drop-from-height incident that occurred during tower construction. The investigation into the latter incident has led to significant reforms being implemented across the Helios Towers management system for controlling outsourced tower construction activities.

³⁶ In 2021, we had 12 maintenance partners. New maintenance partners have 18 months to achieve ISO 45001 from the start of their contract with Helios Towers. The OHSAS 18001 certification has been replaced by ISO 45001 in 2021.

³⁷ All occupational incident frequency rates are the number of incidents per million worked hours on a 12-month roll. Road traffic rates are per 1,000km. For Helios Towers specific data, see GRI indicator 403-9.

Target	2021 progress
All maintenance partners to achieve ISO 45001 certification and 100% in the Helios Towers SHEQ assessment by the end of 2025 ³⁶ .	Six (out of twelve) maintenance partners with ISO 45001 certification (2020: three out of ten). 96.6% average score achieved by maintenance partners in the Helios Towers SHEQ assessment (2020: 92.5%).

Road safety

Driving is the greatest physical risk to both Helios Towers' and our partners' workforces. We strive to mitigate accident risk through:

- **defensive driving training;**
- **in-vehicle monitoring system (IVMS) performance management of driving behaviours** technology rolled out in all our vehicles to profile behaviours and statistically identify drivers who are at risk of causing, or being unable to avoid, an accident. As a result of learning from our improved reporting, we are mandating two-way vehicle dash cams in all new partner contracts; and
- **proactive intervention** on poor performance such as road traffic incidents and speeding, and limiting number of miles driven per month.

We have developed an intervention framework to ensure that all fleet managers take the appropriate response to any real-time driving violations and that the SHEQ team is involved for recurring 'at-risk' driving behaviours. This has maintained the vast majority of drivers at well below the threshold limit of five at-risk behaviours per 1,000km driven, and where driving performance has remained consistently within this limit, we have continued to see no significant road traffic accidents throughout the year.

Safety performance (combined contracted partners and Helios Towers) ³⁷

Lost-time incident frequency rate

2021	0.24
2020	0.20
2019	0.23

Total recordable case frequency rate

2021	0.66
2020	1.12
2019	0.32

Road traffic accident frequency rate

2021	2.44
2020	2.67
2019	2.63

Promoting a safety culture for all

In 2021, we developed a powerful educational video, 'Safety Culture at Helios Towers', to educate our people – and our maintenance partners – on our safety management and culture, with a focus on our key risks of driving, electricity and working at height. One of the key messages is that safety is everyone's responsibility.



Valuing our people

The way we create an open and inclusive environment for our colleagues, the way we collaborate with our customers, partners and suppliers, and the way we enact our values are key to how we define our culture.

It is why we focus on developing a welcoming workplace that fosters an engaged workforce and maximises the positive impact our business can have in our markets.

Building an inclusive business

We strive to create a diverse, inclusive and collaborative work environment in which all our colleagues are equally supported to embody our corporate values of Integrity, Partnership and Excellence.

We acknowledge that building a gender-diverse workforce is a challenge in the sector and in the markets we operate in, as well as in relation to the personal security of female workers in operational and field roles. To promote women's advancement within the organisation, we implemented the following initiatives in 2021:

- **Virtual talk with senior female leaders:** an experience-sharing open forum on topics, including the challenges faced by women in senior leadership positions, the impact of the pandemic on women's careers and work-life balance.
- **Virtual workshop on 'Women's Leadership in Covid-19':** this workshop explored the challenges faced by women during uncertain times and how to empower each other.



For more information on our approach to diversity and inclusion and gender pay see the [Diversity and inclusion](#) page on our website.



For more on our Board composition, see our [Annual Report and Financial Statements](#).

In 2022, we will be looking to develop a leadership and mentoring programme for women to build a pipeline of female leaders for senior executive positions.

We are also committed to bridging the gender gap in our industry through outreach and education. In Tanzania, our team gave inspiring talks to girls on careers in STEM at two schools - one of which was a special needs school. Through our 'School of Engineers' programme, we will encourage gender diversity in our intake of interns.



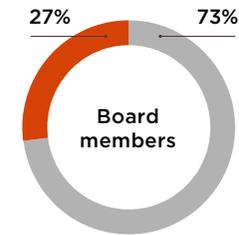
We're committed to nurturing diverse minds, inclusive culture and teamwork that not only drives business excellence, but also delivers the sustainable solutions that are vital to contributing to a better planet and society.



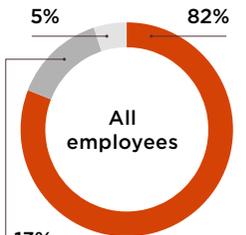
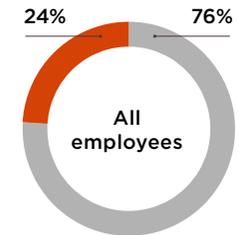
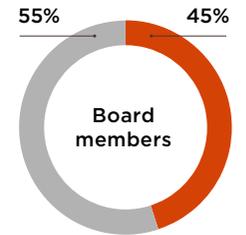
Nick Summers,
Director of Property and SHEQ

Diversity of gender and ethnicity

Diversity by gender



Diversity by ethnicity



Key ● Male ● Female

Key ● Ethnically diverse ● Other ● Not disclosed



Promoting a culture of growth and wellbeing

Our people are at the heart of our progress as a business – and living our Sustainable Business Strategy. We provide them with the tools and support to grow, creating a motivating and productive work environment. We are also committed to building a local workforce in our operating companies.

We transformed our human resources organisational structure in 2021 to support our growth into new markets and created a Group Head of Human Resources role to oversee talent development and build a pipeline of future leaders.

This year we had 97% local employees in our operating companies – a slight reduction largely due to a number of our colleagues being redeployed to help launch new markets. This is a key part of our approach for offering our people development opportunities and ensuring that our culture is embedded in all our markets as we grow.

Enhancing learning and development

We want every colleague to reach their full potential and enjoy a long, fulfilling career with us. Investing in their learning and engaging them as we transform how we work is key to our success, particularly in new markets. The purpose of our learning and development programme is to upskill our colleagues and deliver field-based training programmes to promote operational excellence.

In 2021, we launched our new Learning Management System, which provides our workforce and maintenance partners with access to more than 4,000 learning modules covering:

- business skills;
- productivity and collaboration;
- compliance;
- health, safety and environment;
- technology and development; and
- field-based preventative maintenance.



See the impact on our [maintenance partners](#) on page 34.

Promoting from within

We believe that employing local people for local markets, and developing skills in our existing colleagues and promoting from within rather than looking outside of the group, is both commercially and socially beneficial. Below are just two examples.



Eugenia Boafo, a Ghanaian citizen, joined Helios Towers Ghana in 2010 as the Head of Human Resources. As the first employee in Ghana she was instrumental in setting up the business there. Additionally, she took on responsibility as Head of SHEQ and led Ghana to achieve our first ISO 9001 in 2017. Due to her years of experience in the business and expertise across functions, she was promoted to Regional Compliance Manager in September 2021.



Ramsey Koola was appointed Managing Director of Helios Towers Oman in July 2021 and is leading the integration and operational teams in this new market, bringing knowledge and alignment from his previous position as MD for Helios Towers Tanzania. There he was instrumental in growing the business and delivering on our strategic plan in Tanzania.

10%

of our people promoted internally

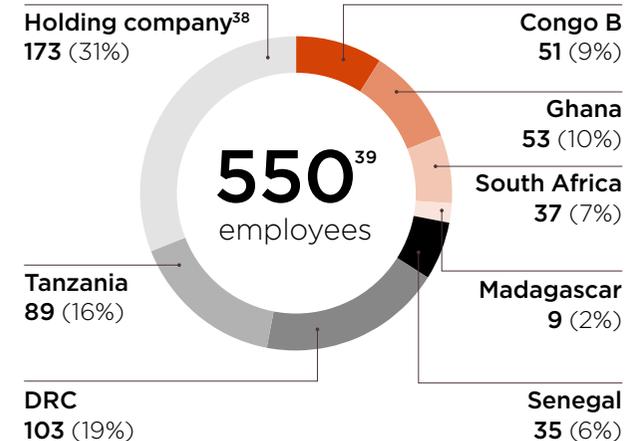
Leadership development programme

To help build a pipeline of future leaders, we will be launching a bespoke leadership development programme in 2022 designed and run by the prestigious Cranfield Management School, starting with 50 of our team members.

Percentage of local employees in our operating companies

2021	97%
2020	98%
2019	97%

Our people by region



³⁸ This includes employees in markets acquired, but not closed by the end of 2021.

³⁹ Includes permanent, fixed-term and temporary employees.

Wellbeing

Helping our people to stay safe, engaged and mentally healthy is a priority for us.

In 2021, Sally Ashford, our Non-Executive Board Director for workforce engagement, led 'voice of the employee' sessions with colleagues in markets across the Group to help the Board understand their experiences working for the Company, the challenges they face, and what changes they wanted to see going forward. Themes emerged around recognition and reward, training and wellbeing, particularly during Covid-19. We report concerns raised to the Board and strive to demonstrate that we make positive changes in direct response to these sessions.

To support our colleagues in balancing any personal and work-related challenges that they may be facing, we have launched the Helios Towers Wellbeing Program, which provides colleagues and their family with a range of free and confidential services, including access to professional counselling sessions.

Reward and recognition

We have undertaken a salary benchmarking project with an external HR consultancy, to ensure that we remain competitive as we grow our business.

Our Board is committed to creating an inclusive culture that promotes our 'One Team, One Business' vision in all our countries. We want all our colleagues to share in the success of the Group and in 2021, we launched the Helios Towers SharingPlan in recognition of our people's continued dedication to driving business growth and performance excellence. Through the plan, which requires no financial investment or risk, every participating colleague receives an equal allocation of virtual shares that track the value of Helios Towers plc shares. The Helios Towers SharingPlan enables all colleagues to have a vested interest in the growth of the Company. For the first year, colleagues will receive two awards: a 2021 award and a Covid-19 'Thank you' award to recognise them for their effort, commitment and adaptability to support the business throughout the pandemic.

Said Hassan
Operations,
Tanzania

SOUTH AFRICA/TANZANIA

Meet our Sustainable Business Champions

Engaging colleagues with our sustainable business priorities is integral to our future success. In 2021, we initiated the Sustainable Business Champion Award. Each quarter, one of our colleagues is recognised and rewarded with US\$1,000 for showing their dedication and commitment to helping us become a more sustainable business.

Our first winner was Ntombikayise Nkosi from Helios Towers South Africa, who helped set up a local sustainability committee, developed a sustainable business report for the South Africa operations and drove community partnerships.

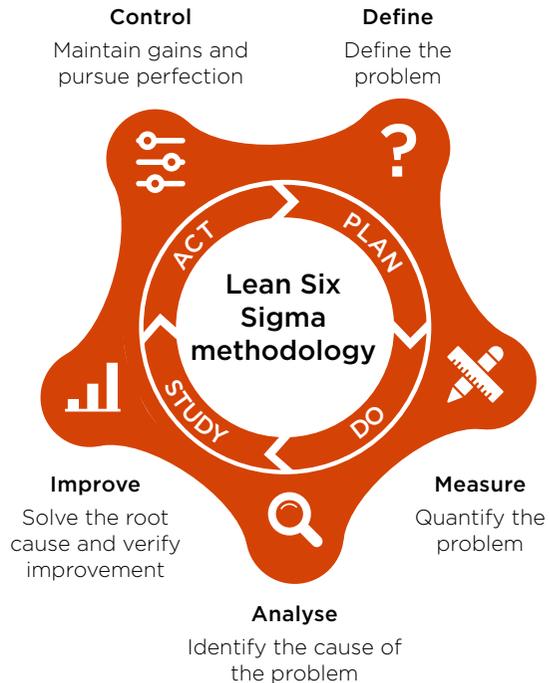
Said Hassan from Helios Towers Tanzania was the second winner. Said drove initiatives, such as grid restoration and hybrid installations, in 1,229 sites in Tanzania, which resulted in a 51% reduction in diesel fuel usage compared to 2020, avoiding 2,000 tonnes of carbon.

Ntombikayise Nkosi
Human Resources,
South Africa

Lean Six Sigma driving business excellence

Since 2016, implementation of Lean Six Sigma processes has been transformational in improving customer service, transparency, operational excellence and business resilience.

Lean Six Sigma is a renowned approach that helps businesses increase productivity, reduce inefficiencies and improve the quality of output.



Driving our business excellence

Applying Lean Six Sigma principles over the last five years has enabled our teams to ask why we are doing a particular activity, whether it needs to be done, and if it is an efficient and sustainable way of delivering a solution to our customers. Asking these questions has allowed us to localise our organisation and empower our teams.

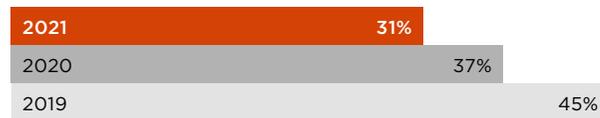
We encourage and support senior managers and those in middle management to get certified within 12 months of joining the company.

Since implementing Lean Six Sigma principles in 2016, our uptime has improved by 87%.

We believe that our success is contingent on the business excellence of our maintenance and security partners. We also invest in Lean Six Sigma training for our partners to embed the philosophy through their businesses, ensuring we are looking at end-to-end solutions, which not only drives reliability up but also brings costs down.

31% of our employees have an orange or black belt. The percentage has reduced in 2021 due to an increase in the number of employees.

Percentage of employees trained in Lean Six Sigma



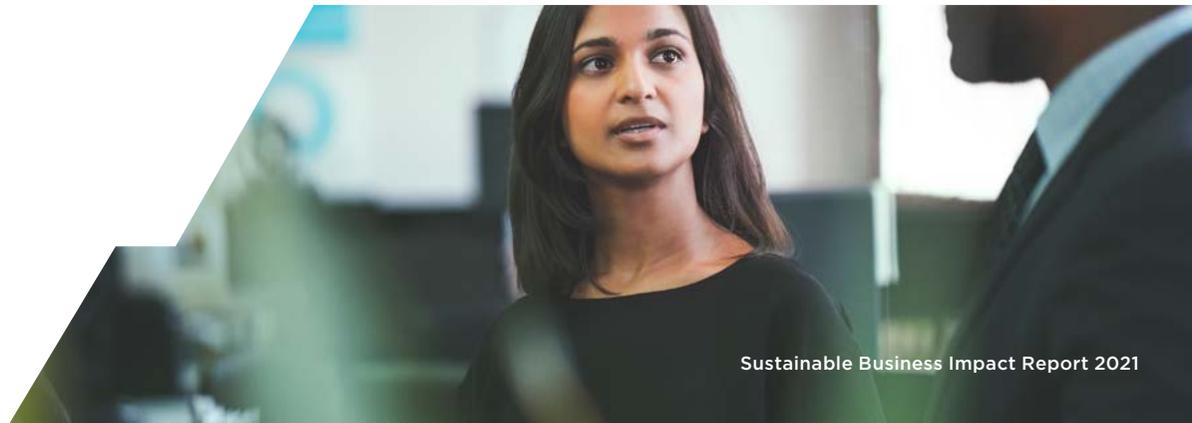
Lean Six Sigma is the backbone of business excellence at Helios Towers. Putting in place a structured approach to problem-solving empowers colleagues in our markets to drive operational performance across the board.



Allan Fairbairn
Director of Operations and Technology

Lean Six Sigma improvements

87%
improvement in power uptime since 2016



Safe and responsible supply chain

We work with our suppliers, contracted partners and peers to drive responsible and ethical behaviour, doing our utmost to keep everyone working in our operations safe from harm.

Helios Towers works with suppliers around the world to meet the needs of our business and customers. By doing so, we support the employment of over 9,700 contracted partners who build, maintain and secure our sites.

Key products and services we procure

Products	Services
 Generators	 Site and tower maintenance
 Rectifiers	 Civil construction
 Solar and hybrid power units	 Power management
 Telecoms towers	 Security
 Fuel	

72%

of spend used with local suppliers⁴⁰

⁴⁰ Local is in-country. This figure does not include Madagascar.

⁴¹ This will incorporate Group-level strategic suppliers, maintenance partners and security partners.

Advancing human rights

Our work advancing mobile connectivity can positively promote a number of fundamental human rights and freedoms by enabling access to life-enhancing services, education and healthcare.

In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks, identifying gaps and mitigating actions. Our human rights impacts are predominantly in the area of labour rights (including health and safety) for third-party and contractor employees and for workers in our wider supply chain of purchased goods. We reinforced our commitment in our first [Human Rights Policy](#).

Labour rights and standards in the supply chain

We expect all our third parties to respect and promote universal human rights as defined in the United Nations Universal Declaration of Human Rights, and to abide by the conventions of the International Labour Organization and UNICEF, and other applicable laws prohibiting slavery and human trafficking.

We do not tolerate forced, bonded or compulsory labour, human trafficking, child labour or other kinds of slavery and servitude within our own operations or within our supply chain.

Our [Modern Slavery and Human-Trafficking Statement](#) provides an overview of the measures we take to address the risk of modern slavery in our business and our supply chain. All partners are required to adhere to the Helios Towers [Third Party Code of Conduct](#) principles, which outline our policy around human rights, including workers' rights.

Third Party Code of Conduct and due diligence

It is important to us that our suppliers uphold our high ethical and environmental standards. We therefore expect all our suppliers to adhere to our [Code of Conduct](#) and [Third Party Code of Conduct](#).

For both new and existing suppliers, we check that they meet our health, safety and ethical rules. Safety compliance is a critical priority, and we work closely with our partners to advance practices and performance. In 2021, our team in Tanzania introduced new equipment and training to improve the safety process of the tower build. We will continue this work in other markets in 2022. For more information on engagement on safety, see page 28.

Our compliance monitoring also includes visits to third-party premises, meeting with key people and visits to Helios Towers sites. Due to Covid-19, in 2021 we continued to carry out our due diligence processes through virtual supplier assessments, and reinforced with local teams the importance of being vigilant to compliance issues and the need to escalate accordingly.

Our third-party risk management platform

During 2021, we launched an integrated third-party risk management platform, on which we now complete all new third-party supplier risk assessments and due diligence, landlord screening and any other required business-development activities. It also incorporates screening against sanctions and enforcement lists and adverse media. As well as strengthening our due diligence, the platform will enable improved Group oversight and an audit trail.

Target	2021 progress
Assess all key suppliers ⁴¹ against sustainability criteria by the end of 2022.	In 2021, we developed a sustainability survey to send to our key suppliers in 2022.

Driving standards and investing in developing our partners

We believe in close collaboration with our contractors with a 'One Team, One Business' ethos. This includes sharing offices with our maintenance partners and embedding business excellence and Lean Six Sigma principles into their own practices.

Investing in skills development of our maintenance partners by providing sustained training support to help develop the knowledge and capability of their field teams is critical to us meeting power uptime targets. Our dedicated Learning and Development Team undertakes skills gap assessments and delivers fit-for-purpose, field-based training programmes to enhance operational excellence and capability.

Providing access to training in 2022 enabled many of our maintenance partners to transform their traditional approach to preventive maintenance and improve practices to align with international standards. This also benefits their businesses as a whole and contributes to a more skilled local workforce.



The training has helped field engineers to refresh and acquire new skills and improve the quality of their work. We really appreciate the ability to access and download the modules for our own learning.

Jean Olivier Fanevaniaina
Manager, AFRO Engineering Ltd,
Madagascar



The training helps to create uniformity of knowledge so every asset is maintained to the same standard across the network. Improvements have been seen on troubleshooting skills and simplifying maintenance tasks - which will hopefully improve the lifespan of equipment and assets too.

Abiud Kahema
Manager, Operations at Northern Engineering Works,
Tanzania



Our governance structures and policies help us to deliver on our strategy, manage our performance and ultimately support the value we create for all of our stakeholders.

Governance and ethics

Our management approach to sustainable business

We are committed to conducting our business to the highest ethical and responsible standards and remain focused on continually improving our approach.

We have developed a sustainable business strategy very much rooted in our business model, corporate purpose and values. This provides the basis for further integrating sustainability into the core of the company and its culture.

The strategy is built on three pillars, all underpinned by strong governance and corporate culture:

- Network access and sustainable development
- Business excellence and efficiency
- Empowered people and partnerships

Helios Towers manages the sustainability topics within each strategic pillar by:

- Identifying those matters most material to our business and stakeholders and ensuring that engagement with our stakeholders is embedded into every level of our approach. Read more about materiality on page 9.
- Identifying the boundary of each material issue aligned with the GRI definition of where the impacts occur for each material topic, and our involvement with the impacts.

- Being guided by best practice recommendations, international sustainability frameworks (including GRI and SASB) and peer benchmarking.
- Establishing effective systems and robust policies, having a zero-tolerance policy, and supporting grievance mechanisms to counter unethical conduct and ensure the highest standards covering many of the material sustainability topics we focus on. See examples of our policies and read about our grievance mechanisms on page 33.
- Establishing priorities, commitments, KPIs and clear targets to monitor progress and accelerate performance on our most material issues. See details in the relevant sections of this Sustainable Business Impact Report.
- Ensuring our material issues, KPIs and targets are reflected and captured in our Group Risk Register.
- Ensuring a strong governance framework to support and evaluate this management approach and actions, with regular quarterly sustainable business reviews at Board level and bonus schemes linked to maintaining all of our ISO certifications. Read more about our governance on page 37.

We will keep our management approach under regular review to ensure it remains relevant and effective.

 [Learn more about our corporate governance and how we manage risk in our Annual Report and Financial Statements.](#)

Sustainable business governance

Sustainable business is a Board-level commitment. Our Board members are responsible for overseeing all activities relating to our sustainable business strategy.



The CFO, Director of Property and SHEQ, and the Group Head of Sustainability provide regular updates to the Board on progress against targets, achievements, challenges and plans. They also work with the Group functions and local markets to share best practice and support the effective delivery of our strategy.



The combination of strong governance and ethical business practices underpins the way we work and sets the foundation for our Sustainable Business Strategy.

Anti-bribery and corruption

We do not tolerate any form of bribery and corruption, and expect all of our colleagues and our contracted partners to uphold our standards, as set out in our [Code of Conduct](#), our internal Integrity Policy and our [Third Party Code of Conduct](#).

Due to the elevated risk of bribery and corruption, and the nature of our work interacting with third parties, including government officials to obtain construction and operational permits, we have robust policies and procedures in place. Our systems to ensure compliance with all relevant laws and regulations include:

- compliance programme monitoring conducted in each of our operating companies at least twice a year;
- compliance training for all new starters, including an online anti-bribery training module. Colleagues in higher-risk functions take a periodic refresher course;
- a reporting hotline. Anyone can raise concerns about actual or potential non-compliance through our confidential, and if desired, anonymous, hotline, EthicsPoint®. The Group's General Counsel and Company Secretary and the Group Head of Compliance receive the details of all incidents reported via the hotline. The Audit Committee has oversight of all cases that are logged on EthicsPoint®; and

- investigation into all whistleblower reports in line with the Group's policies, which include its non-retaliation provisions. Appropriate disciplinary and remediation actions are identified and effected, as necessary. A simplified mobile web-intake portal is also available for the reporting of any potential concerns.

In 2021, our ISO 37001 accreditation for our anti-bribery measures was recertified. Maintaining these ISO certifications forms part of the performance measures for our bonus scheme.

An external consultancy, GoodCorporation, conducted an 'adequate procedures' review on management of risks related to anti-bribery and corruption, fraud and third-party management. As part of their assessment, they also reviewed anti-facilitation of tax evasion. Overall, they placed Helios Towers just outside the top quartile and found no high-risk areas. As part of the report review, GoodCorporation also conducted in-depth remote fieldwork covering our Tanzania, DRC and Congo Brazzaville markets. Required actions and recommended improvements are now being remediated.



For more information on our corporate governance and Board of Directors, see our [Annual Report and Financial Statements](#).

Compliance and oversight

Compliance team structure

During 2021, the compliance function was restructured to accommodate the expansion of our operations. The function now comprises part of the legal team, with the Group Head of Compliance reporting to the Group General Counsel and Company Secretary. Consistent with the wider Group regionalisation strategy, we appointed a new Regional Compliance Manager for our Anglophone markets and in early 2022 completed recruitment for the same role for Francophone markets.

Strengthening management and oversight of interactions with public officials

With several new markets either closed or announced during 2021, and many interactions with public officials envisaged as part of the licensing, regulatory and market-launch activities, providing more detailed advice and support was a key compliance requirement. Enhanced guidelines and best practices were introduced and communicated in 2021.



Community consultation

Before developing any new site, we carefully consider the impacts on our communities:



We consult with landowners, community leaders and municipal authorities through public consultation and community engagement⁴².



In compliance with our anti-bribery policy, we never offer any form of inducement to secure a permit, a lease or access to a site.



In response to public concerns, we offer opportunities to discuss these at council tribunal processes and other forums.



We aim to design sites to have as minimal a visual impact as possible on the communities in which they are located.



We undertake environmental assessments into any potential impact on habitats and species.

Mobile towers and health

We are committed to ensuring that our activities pose no risks to the health and safety of the communities in which we operate and to our colleagues and contracted partners. We follow regulations and processes as follows:



We gain all required permits for building, airspace safety, non-ionising radiation protection and the environment.



We work with government regulatory agencies and designated international bodies to ensure set standards are met.

Helios Towers does not own or operate any spectrum or radio equipment.

The International Commission on Non-Ionizing Radiation Protection (ICNIRP), an independent advisory body working in collaboration with the World Health Organization (WHO), has confirmed that there is no evidence to convince experts that mobiles or base stations carry any risk to human health when operating within these international safety guideline limits.



For more information on mobile towers and health, see [Sustainable Business page on our website](#).

⁴² We consult meaningfully with potentially affected groups and relevant stakeholders in accordance with Principle 18 (b) of the UN Guiding Principles on Business and Human Rights.

Tax transparency

We are committed to complying with all applicable tax legislation in all jurisdictions in which we operate. Helios Towers takes its responsibility to pay tax seriously, adopts a fair and transparent approach to tax compliance obligations and utilises trusted professional external advisors in every market of operation.

Helios Towers operates to a high standard consistent with FTSE 250 companies, in pursuit of generating sustainable shareholder value. Our [Group Tax Strategy](#) published online outlines our tax principles. We take a zero-tolerance approach to tax evasion, and maintain robust procedures to prevent the facilitation of tax evasion by employees and third parties.

Following a review of Group policies and procedures by an external specialist advisor, we refreshed the Group Anti-Tax Evasion Policy, which we continually monitor alongside the codes of conduct.

Employee responsibility is central to ensuring best practice, and our employee on-boarding training includes anti-facilitation of tax evasion and compliance, which is followed by regular refreshers.

We strive to engage openly and constructively with tax authorities and governmental organisations. The payment of taxes, levies and other charges forms part of our corporate and social responsibility.

As a result of the Covid-19 pandemic, we have refined our tax processes to ensure that we play our part in fulfilling our taxpayer obligations and having a positive impact in the local economies where we operate.



Further information around our approach to tax transparency is contained in our [Annual Report and Financial Statements](#).

Data privacy and cybersecurity

Maintaining the security and integrity of our systems is paramount to the business and its stakeholders. Our incident management and response processes align with the Information Technology Infrastructure Library (ITIL®) framework of identification, containment, eradication, recovery and lessons learned.

We focus our cybersecurity strategy on prevention and recoverability through:

- comprehensive measures based on industry best practice and [National Cyber Security Centre guidance](#);
- regular operational assessments and testing validated by external third-party security partners; and
- regular staff training and education as a key element of risk reduction.

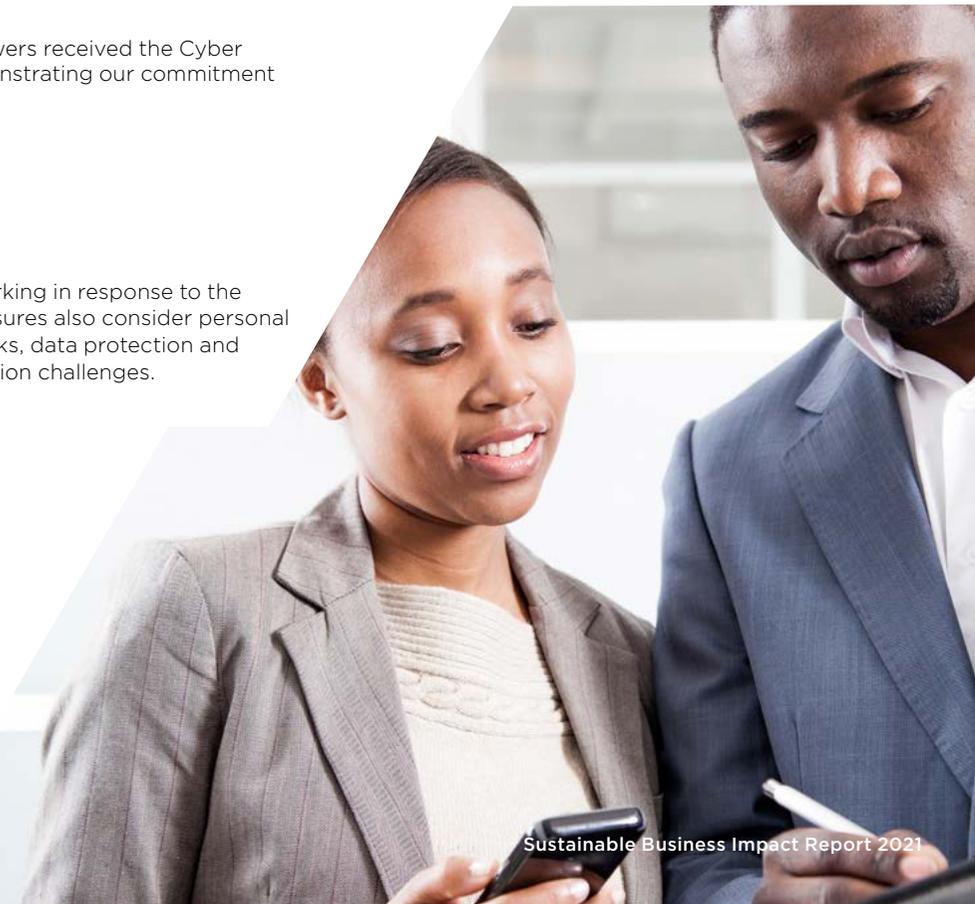
In December 2021, Helios Towers received the Cyber Essentials certification, demonstrating our commitment to cybersecurity.



Due to continued remote working in response to the Covid-19 pandemic, our measures also consider personal computing home network risks, data protection and remote-user identity verification challenges.

At Helios Towers, we do not have direct access to end consumers or their data. However, in our normal business operations, we need to process certain personal data such as employee compensation details, performance management and other categories of personally identifiable information.

We comply with the General Data Protection Regulation and any equivalent legislation in other jurisdictions. This governs the type of information we store, how we use it, how long we keep it and the steps we take to ensure its security.



- 41 Stakeholder material issue mapping
- 43 Global Reporting Initiative (GRI) Index
- 75 Sustainable Accounting Standards Board (SASB) Index
- 78 UN Global Compact Index
- 81 Task Force on Climate-related Financial Disclosures (TCFD)



Appendix

Stakeholder material issue mapping



Partners and suppliers



Employees



Customers



Communities



Shareholders



Environment



Governments and regulators

Network access and sustainable development

Material issue	Stakeholders who influence the issue	Stakeholders impacted by the issue
Delivering mobile connectivity and development	<ul style="list-style-type: none"> Employees Partners and suppliers 	<ul style="list-style-type: none"> Customers Communities
Human rights	<ul style="list-style-type: none"> Partners and suppliers Employees 	<ul style="list-style-type: none"> Partners and suppliers Employees Communities
Local community engagement	<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> Communities
Mobile towers and health	<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> Communities

Business excellence and efficiency

Material issue	Stakeholders who influence the issue	Stakeholders impacted by the issue
Customer satisfaction	<ul style="list-style-type: none"> Partners and suppliers Employees 	<ul style="list-style-type: none"> Customers
Economic performance	<ul style="list-style-type: none"> Employees Shareholders Partners and suppliers 	<ul style="list-style-type: none"> Employees Shareholders Communities
Climate action	<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> HT operations and employees Environment Communities
Data privacy and security	<ul style="list-style-type: none"> Employees 	<ul style="list-style-type: none"> Employees
New technologies	<ul style="list-style-type: none"> Employees Customers Shareholders 	<ul style="list-style-type: none"> Customers Communities Shareholders
Waste and e-waste	<ul style="list-style-type: none"> Partners and suppliers Employees 	<ul style="list-style-type: none"> Environment

Stakeholder material issue mapping

Continued

Empowered people and partnerships

Material issue	Stakeholders who influence the issue	Stakeholders impacted by the issue
Health and safety	 Partners and suppliers  Employees	 Partners and suppliers  Employees  Communities
Safe and responsible supply chain	 Partners and suppliers  Employees	 Partners and suppliers  Employees
Employee attraction and development	 Employees	 Employees  Customers  Communities
Diversity and inclusion	 Employees	 Partners and suppliers  Employees  Communities

Governance and culture

Material issue	Stakeholders who influence the issue	Stakeholders impacted by the issue
Governance and risk management	 Partners and suppliers  Employees	 Partners and suppliers  Employees  Shareholders
Anti-bribery and corruption	 Partners and suppliers  Employees	 Partners and suppliers  Employees  Shareholders  Governments and regulators
Tax transparency	 Employees	 Employees  Shareholders  Governments and regulators

Global Reporting Initiative (GRI) Index

We are committed to robust and transparent reporting of our most material issues using international sustainability reporting frameworks such as GRI. This report is in accordance with the 2016 GRI Standards: Core option for our material impacts.

Disclosure	Description	Location of Information/Response
Organization Profile		
102-1	Name of the organization	Helios Towers plc
102-2	Activities, brands, products, and services	2021 Annual Report > Overview > Who we are > At a glance p2-3
102-3	Location of headquarters	Helios Towers plc Registered office: 10th Floor, 5 Merchant Square West, London W2 1AS
102-4	Location of operations	2021 Annual Report > Overview > Who we are > At a glance p2-3
102-5	Ownership and legal form	2021 Annual Report > Financial Statements > Notes to the Financial Statements > 1. Statement of compliance and presentation of financial statements p143 2021 Annual Report > Financial Statements > Notes to the Financial Statements > 13. Investments p162
102-6	Markets served	2021 Annual Report > Overview > Who we are > At a glance p2-3
102-7	Scale of the organization	For total number of employees, see table on the next page (102-8) Sustainable Business Impact Report 2021 > Empowered people and partnerships > Promoting a culture of growth and wellbeing p30 2021 Annual Report > Overview > Who we are > At a glance p2 2021 Annual Report > Strategic Report > Detailed financial review p71-75 2021 Annual Report > Financial Statements > Consolidated statement of financial position p140

Disclosure	Description	Location of Information/Response																																				
102-8	Information on employees and other workers	<table border="1"> <thead> <tr> <th></th> <th>Male</th> <th>Female</th> <th>Other</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Total number of employees by gender</td> <td>420</td> <td>130</td> <td>N/A</td> <td>550*</td> </tr> <tr> <td>Permanent</td> <td>363</td> <td>114</td> <td>N/A</td> <td>477</td> </tr> <tr> <td>Temporary</td> <td>57</td> <td>16</td> <td>N/A</td> <td>73</td> </tr> </tbody> </table>		Male	Female	Other	Total	Total number of employees by gender	420	130	N/A	550*	Permanent	363	114	N/A	477	Temporary	57	16	N/A	73																
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		<table border="1"> <thead> <tr> <th></th> <th>Holding Company**</th> <th>Tanzania</th> <th>Democratic Republic of Congo</th> <th>Congo Brazzaville</th> <th>Ghana</th> <th>South Africa</th> <th>Senegal</th> <th>Madagascar</th> </tr> </thead> <tbody> <tr> <td>Total number of employees by region</td> <td>173</td> <td>89</td> <td>103</td> <td>51</td> <td>53</td> <td>37</td> <td>35</td> <td>9</td> </tr> <tr> <td>Permanent</td> <td>143</td> <td>83</td> <td>81</td> <td>43</td> <td>50</td> <td>36</td> <td>34</td> <td>7</td> </tr> <tr> <td>Temporary</td> <td>30</td> <td>6</td> <td>22</td> <td>8</td> <td>3</td> <td>1</td> <td>1</td> <td>2</td> </tr> </tbody> </table>		Holding Company**	Tanzania	Democratic Republic of Congo	Congo Brazzaville	Ghana	South Africa	Senegal	Madagascar	Total number of employees by region	173	89	103	51	53	37	35	9	Permanent	143	83	81	43	50	36	34	7	Temporary	30	6	22	8	3	1	1	2
			Holding Company**	Tanzania	Democratic Republic of Congo	Congo Brazzaville	Ghana	South Africa	Senegal	Madagascar																												
		Total number of employees by region	173	89	103	51	53	37	35	9																												
		Permanent	143	83	81	43	50	36	34	7																												
		Temporary	30	6	22	8	3	1	1	2																												
* Includes permanent, fixed-term and temporary employees																																						
** Includes employees in markets acquired, but not closed by the end of 2021.																																						
102-9	Supply chain	Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33																																				
102-10	Significant changes to the organization and its supply chain	2021 Annual Report > Overview > 2021 Highlights p1 2021 Annual Report > Strategic Report > Chief Executive Officer's statement p12-13 2021 Annual Report > Strategic Report > Section 172(1) Statement > Key Strategic Decisions p52 No supplier contracts were terminated in 2021.																																				
102-11	Precautionary principle or approach	<p>While we have not formally adopted the Precautionary Principle, we systematically assess and manage environmental, safety, supply chain, operational and other risks, and take appropriate action to mitigate these and prevent any potential harm or adverse impact. This is an extract from our Third Party Code of Conduct:</p> <p><i>In line with UN's Rio de Janeiro Declaration, the Third Party should acknowledge that "in order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it." Therefore, the Third Party should strive to minimize the adverse environmental impact of its products and services during the whole product life cycle: production, transport, use and disposal or recycling.</i></p> <p><i>The Third Party shall comply with all laws and regulatory requirements relating to environmental matters at all times.</i></p>																																				

Disclosure	Description	Location of Information/Response
102-12	External initiatives	<p>Some external initiatives we support include:</p> <ul style="list-style-type: none"> • The UN Sustainable Development Goals • TCFD • UN Guiding Principles on Business and Human Rights • UN Women's Empowerment Principles • Broad Based Black Economic Empowerment (BBBEE) • UN Global Compact (UNGC) • CDP <p>UN SDGs: Sustainable Business Impact Report 2021 > Overview and strategy > Contributing to the SDGs p10 CDP: Sustainable Business Impact Report 2021 > Business excellence and efficiency p25 TCFD: 2021 Annual Report > Strategic Report > TCFD p32-33 UNGC: Sustainable Business Impact Report 2021 > Overview and strategy p10 UNGC: 2021 Annual Report > Strategic Report > Culture and Governance p38</p>
102-13	Membership of associations	<p>TowerXchange IDIA (International Digital Infrastructure Alliance) GSMA (Global System for Mobile Communications Association)</p>
Strategy		
102-14	Statement from senior decision-maker	<p>2021 Annual Report > Overview > Chair's statement p10-11 2021 Annual Report > Strategic Report > Chief Executive Officer's statement p12-13 Sustainable Business Impact Report 2021 > A transformational year p7</p>
102-15	Key impacts, risks, and opportunities	<p>Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 2021 Annual Report > Strategic Report > Risk management p60 2021 Annual Report > Overview > Why invest? p6</p>
Ethics and Integrity		
102-16	Values, principles, standards, and norms of behavior	<p>2021 Annual Report > Who we are > Inside front cover Sustainable Business Impact Report 2021 > Overview and strategy > About us p3 Our values and approach</p>
102-17	Mechanisms for advice and concerns about ethics	<p>2021 Annual Report > Strategic Report > Culture and governance p38 Sustainable Business Impact Report 2021 > Governance and ethics > Anti-bribery and corruption p37</p>

Disclosure	Description	Location of Information/Response
Governance		
102-18	Governance structure	2021 Annual Report > Strategic Report > Risk management > Governance structure p60 Governance Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36
102-19	Delegating authority	2021 Annual Report > Governance Report > Board leadership and Company purpose p86 2021 Annual Report > Strategic Report > Risk management > Governance structure p60
102-20	Executive-level responsibility for economic, environmental, and social topics	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36
102-21	Consulting stakeholders on economic, environmental, and social topics	2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 Partners webpage: 'Engaging with our stakeholders'
102-22	Composition of the highest governance body and its committees	2021 Annual Report > Governance Report p76-85 2021 Annual Report > Governance > Nomination Committee Report p94-97 Governance Division of Responsibilities between Chair, Chief Executive Officer and Senior Independent Director
102-23	Chair of the highest governance body	2021 Annual Report > Governance Report > Division of responsibilities p88-90 2021 Annual Report > Governance Report > Board leadership and Company purpose p86
102-24	Nominating and selecting the highest governance body	2021 Annual Report > Governance Report > Nomination Committee Report p94-97 2021 Annual Report > Governance Report p89
102-25	Conflicts of interest	2021 Annual Report > Governance Report > Nomination Committee Report p94
102-26	Role of highest governance body in setting purpose, values, and strategy	2021 Annual Report > Governance Report > Board leadership and Company purpose p86-87
102-27	Collective knowledge of highest governance body	Economic, environmental and social topics are integrated into the Company's Sustainable Business Strategy, for which the Board has ultimate accountability. The Board receives updates and information on ESG topics at each meeting and where relevant, external advisors have provided training and information. For example, in June 2021, the Board received a climate-related training session as part of the carbon strategy and target development process. Division of Responsibilities between Chair, Chief Executive Officer and Senior Independent Director

Disclosure	Description	Location of Information/Response
102-28	Evaluating the highest governance body's performance	2021 Annual Report > Governance Report p74 2021 Annual Report > Governance Report > Nomination Committee Report > Board evaluation p97
102-29	Identifying and managing economic, environmental, and social impacts	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement p52-53 2021 Annual Report > Strategic Report > Risk management p60
102-30	Effectiveness of risk management processes	2021 Annual Report > Strategic Report > Risk management p60 2021 Annual Report > Governance Report > Audit Committee Report p98-99 2021 Annual Report > Governance Report > Audit Committee Report > Effectiveness of internal control and risk management process p102-103
102-31	Review of economic, environmental, and social topics	2021 Annual Report > Strategic Report > Risk management p60 During quarterly discussions with executive management and functional heads of department, potential emerging risks are also discussed.
102-32	Highest governance body's role in sustainability reporting	2021 Annual Report > Strategic Report > Viability statement p66-67 The Board reviews and approves the Annual Report, which has key updates on our Sustainable Business Strategy.
102-33	Communicating critical concerns	All Group employees and third parties have access to a confidential whistleblowing hotline, EthicsPoint®. They can either make a personal call to report any concerns or log them via a website. The Company's whistleblowing policy provides that, subject to an allegation not being malicious or vexatious, there is no recrimination against any whistleblower – even if the concern is later found to be unsubstantiated.
102-34	Nature and total number of critical concerns	The Board through the Audit Committee have oversight of all incidents reported and logged on EthicsPoint®. All concerns raised are brought to the attention of and discussed with the Audit Committee at its regular meetings. All concerns raised and any whistleblower reports are investigated thoroughly using internal and external resources, where necessary, in line with Group policies. 2021 Annual Report > Governance Report > Section 172(1) Statement > Engaging with our stakeholders p56
102-35	Remuneration policies	2021 Annual Report > Governance Report > Directors' Remuneration Report p106-123 2021 Annual Report > Financial Statements > Notes to the Financial Statements p143
102-36	Process for determining remuneration	2021 Annual Report > Governance Report > Directors' Remuneration Report p106 2021 Annual Report > Governance Report > Directors' Remuneration Report p111 Remuneration Committee
102-37	Stakeholders' involvement in remuneration	2021 Annual Report > Governance Report > Directors' Remuneration Report p108

Disclosure	Description	Location of Information/Response
Stakeholder Engagement		
102-40	List of stakeholder groups	Partners webpage 'Engaging with our stakeholders' 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57
102-41	Collective bargaining agreements	We do not have any collective bargaining agreements in place with any of our employees. We recognise the rights of employees to join trade unions and engage in collective bargaining in accordance with local law. Across the Group, the only union present is in DRC. The Group is in negotiations in relation to defining and implementing a collective bargaining agreement but nothing has been agreed in 2021.
102-42	Identifying and selecting stakeholders	Partners webpage 'Engaging with our stakeholders' 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57
102-43	Approach to stakeholder engagement	2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Partners webpage 'Engaging with our stakeholders' We make stakeholder engagement a priority and part of what we do every day. It is therefore not possible to quantify the frequency of stakeholder engagement. Examples include: engaging with communities during the new-site consultation process; working with contracted partners, some of whom we share office space with, to constantly improve ethical, environmental and safety standards; engaging with employees on a regular basis through surveys, townhall meetings and other forums for two-way communication; and engaging with investors through regular events and one-on-one meetings.
102-44	Key topics and concerns raised	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Partners webpage 'Engaging with our stakeholders' 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57
Reporting Practice		
102-45	Entities included in the consolidated financial statements	2021 Annual Report > Financial Statements > Notes to the Financial Statements > 1. Statement of compliance and presentation of financial statements p143 2021 Annual Report > Financial Statements > Notes to the Financial Statements > 13. Investments p162
102-46	Defining report content and topic Boundaries	Sustainable Business Impact Report 2021 > Welcome p2
102-47	List of material topics	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
102-48	Restatements of information	No restatements.

Disclosure	Description	Location of Information/Response
102-49	Changes in reporting	There have been no significant changes in our list of material topics and topic boundaries, as compared to the previous reporting period. We will review our materiality assessment in 2022 in line with best practice guidelines to assess any shifts in priorities and identify the most important issues that impact the business and our stakeholders.
102-50	Reporting period	01/01/2021-31/12/2021
102-51	Date of most recent report	Sustainable Business Report 2020 was published on 15/03/2021
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	sustainablebusiness@heliostowers.com
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option
102-55	GRI content index	Sustainable Business Impact Report 2021 > Appendix > Global Reporting Initiative (GRI) Index p43
102-56	External assurance	We do not currently seek external assurance for the content and disclosures in the Sustainable Business Impact Report 2021, but plan to seek external assurance from 2023. For the Annual Report and Accounts see: 2021 Annual Report > Independent auditor's report to the members of Helios Towers plc p128

Disclosure	Description	Location of Information/Response
Economic		
GRI 201: Economic Performance 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 2021 Annual Report > Strategic Report > Chief Financial Officer's statement p49-51
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Overview > Why invest? p6-7 2021 Annual Report > Strategic Report > Chief Financial Officer's statement p49-51 2021 Annual Report > Strategic Report > Detailed financial review p71-75 Code of Conduct p16
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report > Audit Committee Report p98-105
201-1	Direct economic value generated and distributed	2021 Annual Report > Overview > 2021 Highlights p1 2021 Annual Report > Financial Statements > Consolidated Income Statement p138 2021 Annual Report > Financial Statement > Notes to the Financial Statements p143-146
201-2	Financial implications and other risks and opportunities due to climate change	2021 Annual Report > Strategic Report > Risk management p60 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Quality, efficient infrastructure solutions p20
201-4	Financial assistance received from government	The business did not require or receive financial assistance from government during the year.
GRI 202: Market Presence 2016		
103-1	Explanation of the material topic and its Boundaries	2021 Annual Report > Strategic Report > Operating review > Our markets and performance p40-47
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Business model p20-21 Code of Conduct
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82

Disclosure	Description	Location of Information/Response
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	<p>We use a specialist international human resources consultancy to provide benchmarking and pay band guidance to ensure we are paying market rate or above market rate. This is particularly important because in some of our markets, there is no established minimum wage.</p> <p>More information on wages broken down by pay band and gender can be found here: Diversity and Inclusion</p> <p>Significant locations are defined as our countries of operation.</p> <p>Third Party Code of Conduct</p>
202-2	Proportion of senior management hired from the local community	<p>94% of senior management in our opcos were hired from the local community in 2021.</p> <p>Here, senior management is defined as Managing Directors and Heads of Department.</p> <p>Local is defined as operating market country.</p> <p>Significant locations are defined as our countries of operation.</p>
GRI 203: Indirect Economic Impacts		
103-1	Explanation of the material topic and its Boundaries	<p>Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9</p> <p>Sustainable Business Impact Report 2021 > Overview and strategy > Our business landscape p4</p> <p>Sustainable Business Impact Report 2021 > Overview and strategy > Contributing to the SDGs p10</p> <p>Sustainable Business Impact Report 2021 > Network access and sustainable development p13</p> <p>A more sustainable Africa – How Helios Towers supports the SDGs</p>
103-2	The management approach and its components	<p>Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36</p> <p>2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57</p> <p>Sustainable Business Impact Report 2021 > Network access and sustainable development p13-17</p> <p>Code of Conduct</p>
103-3	Evaluation of the management approach	<p>Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36</p> <p>Governance</p> <p>2021 Annual Report > Governance Report p78-82</p>
203-1	Infrastructure investments and services supported	<p>2021 Annual Report > Strategic Report > Chief Executive Officer's statement p12-13</p> <p>Sustainable Business Impact Report 2021 > Network access and sustainable development p13-17</p> <p>Sustainable Business Impact Report 2021 > Business excellence and efficiency > Quality, efficient infrastructure solutions p20</p>
203-2	Significant indirect economic impacts	<p>Sustainable Business Impact Report 2021 > Network access and sustainable development p13-17</p> <p>Third Party Code of Conduct</p>

Disclosure	Description	Location of Information/Response
GRI 204: Procurement Practices 2016		
103-1	Explanation of the material topic and its Boundaries	2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct Third Party Code of Conduct Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p76-82 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
204-1	Proportion of spending on local suppliers	72% of procurement spend is used with local suppliers. Local is in-country. Significant locations of operations are our operating markets. Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
GRI 205: Anti-Corruption 2016		
103-1	Explanation of the material topic and its Boundaries	Code of Conduct p7 2021 Annual Report > Strategic Report > Culture and governance p34 Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct p7 Modern Slavery and Human-Trafficking Statement Third Party Code of Conduct 2021 Annual Report > Strategic Report > Culture and governance p34
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82

Disclosure	Description	Location of Information/Response
205-1	Operations assessed for risks related to corruption	Sustainable Business Impact Report 2021 > Governance and ethics > Anti-bribery and corruption p33 Individual third-party types and activities are assessed via the Third Party Engagement and Due Diligence Policy risk assessment. This interlinks with the Group Risk Register and individual opco risk registers.
205-2	Communication and training about anti-corruption policies and procedures	All employees are invited to initial Compliance training shortly after joining the Company. All new starters also receive a link to an online anti-bribery and corruption training module - this was previously provided by iHASCO; however, it has now been replaced by a new module on the Group's newly introduced Learning Management System (Eloomi). All employees receive the Group's Code of Conduct and Integrity policies upon joining and all third-party suppliers receive the Group's Third Party Code of Conduct . The Board receives periodic refresher training - last completed in November 2021.
GRI 206: Anti-Competitive Behavior		
103-1	Explanation of the material topic and its Boundaries	Code of Conduct p7 2021 Annual Report > Strategic Report > Culture and governance p38-39 Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct p8, 16 2021 Annual Report > Strategic Report > Culture and governance p38-39
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct p8, 16 2021 Annual Report > Strategic Report > Culture and governance p38-39
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No legal actions were pending or completed during the reporting period.
GRI 207: Tax 2019		
103-1	Explanation of the material topic and its Boundaries	Tax Strategy > Our vision for tax p1 2021 Annual Report > Strategic Report > Principal risks and uncertainties p61 Sustainable Business Impact Report 2021 > Governance and ethics > Tax transparency p39 Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Tax Strategy Code of Conduct p16 2021 Annual Report > Governance Report > Division of responsibilities p88

Disclosure	Description	Location of Information/Response
103-3	Evaluation of the management approach	2021 Annual Report > Governance Report p78-82 2021 Annual Report > Governance Report > Audit Committee Report continued > Taxation p102 Sustainable Business Impact Report 2021 > Governance and ethics > Our approach to managing sustainable business p36 Tax Strategy
207-1	Approach to tax	2021 Annual Report > Governance Report p78-82 Tax Strategy The Board discusses, reviews and approves the Tax Strategy annually. We are committed to being a transparent and honest corporate citizen in relation to tax. We engage in open communication with tax authorities and ensure that we pay the fair amount of tax where levied by local law and disclose tax matters as required. Sustainable Business Impact Report 2021 > Governance and ethics > Tax transparency p39
207-2	Tax governance, control, and risk management	Tax Strategy Sustainable Business Impact Report 2021 > Governance and ethics > Tax transparency p39 2021 Annual Report > Governance Report p78-82 2021 Annual Report > Financial Statements > Independent auditor's report to the members of Helios Towers plc p128 Tax governance is overseen by the Board, led by the CFO and regularly reviewed by the Group Head of Tax and Treasury. The organisation adopts a cautious approach to risk, seeking to maximise compliance by following robust and coherent controls for all taxes. Tax matters are a central part of the decision-making process to evaluate potential risks associated with potential projects and transactions. Through a system of internal auditing, the controls are tested on a regular basis and evidence is maintained.
207-3	Stakeholder engagement and management of concerns related to tax	Tax Strategy The Group adopts an open relationship with tax authorities in all jurisdictions in which we operate. We adopt an approach of engaging in regular communication, both on a voluntary compliance basis and in formal proceedings, to facilitate transparency on the tax impact of the Group's operations. The Investor Relations team at Helios Towers collate all feedback received from investors and analysts. Any feedback relevant to our Tax strategy is presented to the CFO and Group Head of Tax and Treasury.
207-4	Country-by-country reporting	2021 Annual Report > Governance Report > Tax strategy p90 We do not currently report tax disclosures by country. Tax Strategy

Disclosure	Description	Location of Information/Response
Environmental		
GRI 302: Energy 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21-25 Environmental policy statement
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement p55-57 Code of Conduct p10, 16 Environmental policy statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82 Environmental policy statement
302-1	Energy consumption within the organization	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage > 2021 energy and emissions p25 Energy-related data is predominantly collected for electricity and diesel consumption. Electricity data is collected for offices and towers connected to national grids and diesel data is collected for towers using generators as well as owned diesel vehicles. Petrol consumption in petrol vehicles is also collected. None of our fuel consumption is from renewable sources.
302-2	Energy consumption outside of the organization	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage > 2021 energy and emissions p25
302-3	Energy intensity	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage > 2021 energy and emissions p25 The average energy intensity per tower in 2021 was 76,712 kWh.
302-5	Reductions in energy requirements of products and services	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage > 2021 energy and emissions p24-25 Our business model is service-based rather than product-based. As such, energy requirements related to sold products are deemed immaterial.

Disclosure	Description	Location of Information/Response
GRI 305: Emissions 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement p52 2021 Annual Report > Strategic Report > Non-financial information statement p58 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21-24 Code of Conduct p10, 16 Environmental policy statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance Environmental policy statement 2021 Annual Report > Governance Report p78-82
305-1	Direct (Scope 1) GHG emissions	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
305-2	Energy indirect (Scope 2) GHG emissions	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
305-3	Other indirect (Scope 3) GHG emissions	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
305-4	GHG emissions intensity	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
305-5	Reduction of GHG emissions	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
305-6	Emissions of ozone-depleting substances (ODS)	We do not have significant emissions of ozone-depleting substances.
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	We do not have significant emissions of any of these gases. Our towers are remotely located and are unlikely to cause any significant impact.

Disclosure	Description	Location of Information/Response
GRI 306: Waste 2020		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement p52-57 2021 Annual Report > Strategic Report > Non-financial information statement p58 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21 Code of Conduct p10, 16 Environmental policy statement
103-3	Evaluation of the management approach	Environmental policy statement
306-1	Waste generation and significant waste-related impacts	Our ultimate aim is to eliminate waste. Where waste is unavoidable, our first priority is to reuse materials, and if this is not possible, to recycle them safely and responsibly. Our key waste streams include tower materials, generators, batteries and rectifiers. In general, waste is returned to our warehouse and an internal Disposal Committee agrees the best method of disposal. This can include refurbishing, recycling through certified partners and selling materials at auction where the local government specifies which companies can participate. Our Safety, Health, Environment and Quality (SHEQ) department assesses and approves all other authorised local companies that we use for disposal and recycling, which is particularly important for disposal of hazardous materials; predominantly batteries. We are committed to extracting full value from, and expanding the lifespan of, materials and often repair or refurbish batteries. When this is no longer possible, we use a certified recycling partner that safely recovers valuable metals and materials. In 2022, we will define our key waste streams and begin to standardise our data-collection processes to enable us to create a waste reduction strategy and report more detailed waste disclosures in 2023 and beyond.
306-2	Management of significant waste-related impacts	We are committed to extracting full value from, and expanding the lifespan of, materials and often repair or refurbish batteries. When this is no longer possible, we use a certified recycling partner that safely recovers valuable metals and materials. In 2021, we started to collect waste data and we will standardise our data-collection processes and report more detailed waste disclosures from 2022.
306-3	Waste generated	In 2021, we started to collect waste data and we will standardise our data-collection processes and report more detailed waste disclosures in 2023 and beyond.
306-4	Waste diverted from disposal	
306-5	Waste directed to disposal	

Disclosure	Description	Location of Information/Response
GRI 307: Environmental Compliance 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement p52-57 2021 Annual Report > Strategic Report > Non-financial information statement p58 Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21 Code of Conduct p10, 16 Environmental policy statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
307-1	Non-compliance with environmental laws and regulations	There has not been any case of non-compliance with environmental laws and regulations. The Group has in place policies and procedures including reporting and incident-response mechanisms to respond to any such incidents or concerns raised.
GRI 308: Supplier Environmental Assessment 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28
103-2	The management approach and its components	All high- and medium-risk suppliers are required to sign the Third Party Code of Conduct , which stipulates standards of conduct for environmental protection. Supply Chain Management Statement Environmental policy statement Suppliers are screened and audited against sustainability criteria, including environmental criteria. For example, they are requested to provide evidence of environmental policies and certification. Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28

Disclosure	Description	Location of Information/Response
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
308-1	New suppliers that were screened using environmental criteria	100% of our new operational suppliers and strategic materials suppliers are requested to provide their environmental policy or ISO 14001. All high- and medium-risk suppliers are required to sign the Third Party Code of Conduct . Environmental criteria form part of the due diligence third-party questionnaires.
308-2	Negative environmental impacts in the supply chain and actions taken	All high- and medium-risk suppliers are required to sign the Third Party Code of Conduct , which stipulates standards of conduct for environmental protection. Supply Chain Management Statement Environmental policy statement Suppliers are screened and audited against sustainability criteria, including environmental criteria. For example, they are requested to provide evidence of environmental policies and certification.
Social		
GRI 401: Employment 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Valuing our people p29
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82

Disclosure	Description	Location of Information/Response									
401-1	New employee hires and employee turnover	By age (permanent employees only)									
			Under 30			30-50		Over 50		Total	
		Number (and rate) of new employee hires during the reporting period	13 (12%)			82 (77%)		12 (11%)		107	
		Number (and rate) of employee turnover during the reporting period	3 (6%)			40 (83%)		5 (11%)		48	
		By gender (permanent employees only)									
			Female			Male		Total			
		Number (and rate) of new employee hires during the reporting period	33 (9%)			74 (18%)		107 (25%)			
		Number (and rate) of employee turnover during the reporting period	14 (3%)			34 (8%)		48 (12%)			
		By region (against opco) (permanent employees only)									
			Holding Company	Tanzania	DRC	Congo Brazzaville	Ghana	South Africa	Senegal	Madagascar	
		Number (and rate) of new employee hires during the reporting period	60 (54%)	4 (5%)	8 (10%)	2 (5%)	6 (12%)	9 (27%)	N/A*	N/A*	
		Number (and rate) of employee turnover during the reporting period	21 (20%)	3 (4%)	11 (14%)	2 (5%)	6 (12%)	3 (9%)	2 (8%)	0 (0%)	
		Average permanent employees - 2021									
			Holding Company	111							
			HT Tanzania	83							
			HT DRC	79							
	HT Congo Brazzaville	40									
	HT Ghana	50									
	HT South Africa	33									
	HT Senegal	25									
	HT Madagascar	4									
	Total permanent employees	425									
*Senegal and Madagascar are new markets that were not fully operational in 2021. These figures will be reported next year when we have a full year's data available.											

Disclosure	Description	Location of Information/Response
GRI 403: Occupational Health and Safety 2018		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37 Code of Conduct p11, 16 Health and Safety policy statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
403-1	Occupational health and safety management system	Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28 Helios Towers operates in multiple markets including the UK and across Africa. Each market has its own legislative requirements for H&S, which are considered in a set of legal registers applicable to each market. Their implementation and effectivity have been certified as part of Helios Towers' ISO 45001 approval by the British Standards Institution. Helios Towers does not directly engage workers for any of its front line operations. All operations are managed by a framework of contracted partners in each of our markets in the following three main functions: 1. Maintenance Partners - to ensure the continued integrity and power uptime of our leased towers. 2. Construction Partners - to build towers on greenfield sites to meet new customer requirements. 3. Security Partners - to protect the integrity of Helios Towers assets from damage and theft. All of these contracted partner personnel fall under Helios Towers' safe system of work and are reported on as part of our oversight and governance framework.

Disclosure	Description	Location of Information/Response
403-2	Hazard identification, risk assessment, and incident investigation	<p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28</p> <p>As detailed in 403-1, Helios Towers does not directly engage in front line operations. From a corporate standpoint, Helios Towers has implemented a Group-wide risk and opportunity register to ensure that the key risks and impacts to its Sustainable Business Plan are identified and effectively mitigated, including the management of its contracted partners. This is reviewed annually as a minimum, but more often should there be significant change identified such as a new market entry or global pandemic.</p> <p>All contracted partners have their H&S management system reviewed and prequalified prior to being engaged by Helios Towers. This includes their risk management procedure. Once engaged, contracted partners are expected to ensure that their risk assessments for activities undertaken on behalf of Helios Towers meet, as a minimum, the criteria defined in the Helios Towers baseline risk assessment. To ensure that this is being complied with, Helios Towers undertakes a quantitative audit of all partners bi-annually, which includes a review of their risk and impact assessments to ensure that they meet Helios Towers' minimum criteria.</p> <p>Helios Towers provides all contracted partners with a copy of their Document Management System, which includes procedures for effectively undertaking risk and impact assessments. All contracted partners are contractually obliged to ensure that both they and any subcontracted parties are familiarised with and follow Helios Towers' Document Management System while working on behalf of Helios Towers.</p> <p>Helios Towers proactively encourages the reporting of observations, near misses and incidents as part of its campaign for a 'just' reporting and learning culture. All personnel working for and on behalf of Helios Towers can access the HT reporting app from any smart device to report all H&S-related issues, including the uploading of photos. All incidents are reviewed in conjunction with the Helios Towers culpability matrix to ensure that all actions taken in response to an incident are consistent, objective and just.</p> <p>Helios Towers carries out SHEQ management and incident reviews each month, both at Group level and within our operating companies. This provides feedback from audits, incidents and systemic trends identified as part of our reporting framework. Outputs from this meeting are fed back into the Helios Towers H&S Management System to ensure that it continually evolves and improves.</p> <p>A core part of Helios Towers' H&S Management System, ensuring that workers remove themselves from any situations that they believe could cause injury or ill health, is the adoption of the IOGP Life Saving Rules, which are accompanied by our key H&S Standards. All are infographics to ensure maximum uptake in a multilingual environment, and included as part of the Helios Towers induction training.</p>

Disclosure	Description	Location of Information/Response
403-3	Occupational health services	All direct Helios Towers personnel are non-operational and as such have a comparatively low exposure to occupational health risks. Those risks that are present are considered in the baseline risk assessment, and mitigated by initiatives such as online Display Screen Equipment training. All Helios Towers personnel have access to medical care where required. For our contracted partners, we have oversight of both their health needs analysis and health surveillance as part of the Helios Towers periodic scored audit. The majority of our partners carry out an annual medical for all personnel. It should be noted that overall, Helios Towers' operations only present low to moderate health risks to those working on our behalf.
403-4	Worker participation, consultation and communication on occupational health and safety	<p>The intent of this requirement is understood to ensure that those undertaking risk-based activities are involved with how they are managed. As mentioned, Helios Towers does not directly employ front line operational workers as per the intent of this requirement; however, we have included colleague representatives in all SHEQ reviews and consultations, including management reviews, risk reviews and strategy workshops.</p> <p>All our contracted maintenance partners are required to achieve ISO 45001 certification by 2025. The requirements for worker participation to align with this GRI indicator are covered in the following requirements. (Ref ISO 45001 §0.3; 3.4; 3.5; 3.9; 5.2; 5.4; 6.2.1; 9.2.2; 9.3; 10.2; 10.3; A.5.4)</p> <p>Partner progress in ISO 45001 certification is reviewed and performance managed monthly as part of the SHEQ Scored Audit and Sustainable Business Strategy.</p> <p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28</p>
403-5	Worker training on occupational health and safety	Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28
403-6	Promotion of worker health	<p>Private healthcare is funded for every employee. The opportunity is also extended to cover immediate family members at the cost of the Company or for a beneficial rate in certain markets.</p> <p>Initiatives are managed and coordinated locally in each market. In the UK, for example, 'lunch and learn sessions' have been delivered on employee wellbeing (mental health awareness, nutrition etc). In our African markets, talks and workshops have been run on a variety of health and wellbeing-related issues.</p>
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28
403-8	Workers covered by an occupational health and safety management system	<p>100% of employees and contracted partner personnel are covered by an occupational health and safety system that has been internally audited and externally certified. No workers are excluded.</p> <p>Partners who have been included under our systems of work are internally audited by Helios Towers. The Helios Towers Scored Audit focuses on two areas: SHEQ management system controls and operational management system controls. All maintenance and security partners are covered by the scored audits, including maintenance partners who are certified under ISO 45001.</p>

Disclosure	Description	Location of Information/Response
403-9	Work-related injuries	<p>a) Helios Towers Direct Personnel</p> <ul style="list-style-type: none"> i. Occupational Fatalities – 0 ii. High Potential Occupational Injuries – 0 iii. Recordable Injuries (Jan 21-Dec 21) – 0 iv. N/A v. Worked Hours – 751,644 <p>b) All Workers</p> <ul style="list-style-type: none"> i. Occupational Fatalities – 1; Road Traffic Accidents – 6 (Jan 21-Dec 21) ii. High Potential Occupational Injuries – 4 (Lost-time Incidents) iii. Recordable Injuries (Jan 21-Dec 21) – 13 (4 Lost-time Incidents; 2 Restricted Work Cases; 7 Medical Treatment Injuries) Total Recordable Case Frequency Rate (Dec 21) 0.66 per one million hours worked (12-month roll) iv. Line of Fire Entrapment – Fatality drop from height v. Worked Hours – 21,135,646 <p>c) Hazards that pose a risk of high-consequence injury</p> <ul style="list-style-type: none"> i. Hazards are determined by competent and experienced personnel during the risk-review process, and supplemented by feedback from the SHEQ governance reviews ii. Driving (non-occupational) and personnel positioning themselves in the line of fire have been identified as causes of injuries during the period. iii. Actions taken: Driving Performance Management Framework established across Helios Towers and all partners. At-risk Driving Behaviour Intervention Matrix established. Group-wide campaign on line-of-fire hazards in the workplace and inclusion in Life Saving Rules. Working together with HT Projects to develop a setting-to-work system to provide daily oversight on all HT projects. <p>d) Actions taken to eliminate other work-related hazards: reduction in the distance driven by harmonising site activities so that multiple tasks can be carried out in the same trip.</p> <p>e) Rates are calculated based on 1,000,000 hours worked (12-month roll, Jan 21-Dec 21).</p> <p>f) No workers have been excluded from this disclosure.</p> <p>g) N/A. No extra contextual information is needed to understand the data.</p> <p>Sustainable Business Report > Empowered people and partnerships > Safety as a priority for all p27-28</p>
403-10	Work-related ill health	Occupational exposure is currently seen as a very low risk under Helios Towers' system of work. Helios Towers' work activities do not currently expose employees for prolonged periods to hazards such as noise, dust, hazardous chemicals and radiation. To date no work-related ill-health fatalities or recordable cases have been reported. Helios Towers has developed and implemented a baseline risk assessment addressing work-related hazards.

Disclosure	Description	Location of Information/Response
GRI 404: Training and Education 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Valuing our people p29-31 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Culture and governance p38-39 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37 Sustainable Business Impact Report 2021 > Governance and ethics > Anti-bribery and corruption p37 Code of Conduct p16 Health and Safety policy statement Third Party Code of Conduct
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
404-1	Average hours of training per year per employee	The average hours of training per year per employee in 2021 were 15.4. Female employees received 13 hours while male employees received 16 hours of training on average.
404-2	Programs for upgrading employee skills and transition assistance programs	2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Valuing our people p29-31 We do not have formal transition-assistance programmes to facilitate continued employability.
404-3	Percentage of employees receiving regular performance and career development reviews	100% of permanent employees receive regular performance and career-development reviews.

Disclosure	Description	Location of Information/Response																				
GRI 405: Diversity and Equal Opportunity 2016																						
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Valuing our people p29 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34-37 Partners webpage: 'Engaging with our stakeholders'																				
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p37 Code of Conduct p9, 16 2021 Annual Report > Governance Report p95																				
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82																				
405-1	Diversity of governance bodies and employees	For a breakdown of employees by gender see: response to GRI 102-8 For a breakdown of governance bodies by gender and ethnicity see: 2021 Annual Report > Governance Report p95 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Valuing our people p29 <table border="1"> <thead> <tr> <th>Governance body members and employees by age</th> <th>Under 30</th> <th>30-50</th> <th>Over 50</th> <th>Not disclosed</th> </tr> </thead> <tbody> <tr> <td>Board members</td> <td>0%</td> <td>27%</td> <td>73%</td> <td>N/A</td> </tr> <tr> <td>Management*</td> <td>2%</td> <td>85%</td> <td>13%</td> <td>N/A</td> </tr> <tr> <td>All other employees</td> <td>18%</td> <td>72%</td> <td>7%</td> <td>3%</td> </tr> </tbody> </table>	Governance body members and employees by age	Under 30	30-50	Over 50	Not disclosed	Board members	0%	27%	73%	N/A	Management*	2%	85%	13%	N/A	All other employees	18%	72%	7%	3%
Governance body members and employees by age	Under 30	30-50	Over 50	Not disclosed																		
Board members	0%	27%	73%	N/A																		
Management*	2%	85%	13%	N/A																		
All other employees	18%	72%	7%	3%																		
		*Management includes permanent employees with line management responsibility or those in leadership positions (defined as band 2 employees).																				
405-2	Ratio of basic salary and remuneration of women to men	Diversity and inclusion																				

Disclosure	Description	Location of Information/Response
GRI 406: Non-Discrimination 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 2021 Annual Report > Strategic Report > Culture and governance p34 Partners webpage: 'Engaging with our stakeholders'
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p37 Code of Conduct p9, 16 2021 Annual Report > Governance Report > Directors' Report > Anti-Discrimination Policy p126 Modern Slavery and Human-Trafficking Statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our approach to managing sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
406-1	Incidents of discrimination and corrective actions taken	One concern was raised during the reporting period. The incident reported was reviewed at Group level and investigated, as necessary. The matter has not been closed as the allegation is not fully substantiated. Follow-up actions are subject to review as part of ongoing compliance-monitoring reviews, and employee engagement and pulse surveys will be conducted periodically.
GRI 407: Freedom of Association		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Third Party Code of Conduct See point 7.10
103-2	The management approach and its components	2021 Annual Report > Governance Report > Stakeholder engagement > Workforce p92 Third Party Code of Conduct Code of Conduct p16 Human Rights Policy
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	We recognise the rights of employees to join trade unions and engage in collective bargaining in accordance with local law. Across the Group, the only union present is in DRC. In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks, identifying gaps and mitigating actions. Our human rights impacts are predominantly in the areas of labour rights (including health and safety) for HT's third-party and contractor employees and for workers in HT's wider supply chain of purchased goods. We reinforced our commitment to protecting and respecting human rights in a new policy. Human Rights Policy

Disclosure	Description	Location of Information/Response
GRI 408: Child Labor 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Culture and governance p38-39 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 Code of Conduct p9, 16 Modern Slavery and Human-Trafficking Statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82 Modern Slavery and Human-Trafficking Statement
408-1	Operations and suppliers at significant risk for incidents of child labor	Child labour is considered a risk in all operating countries given the geographies concerned. Higher-risk activities include site construction and maintenance, the provision of fuel, site security and suppliers associated with these activities. In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks, identifying gaps and mitigating actions. Our human rights impacts are predominantly in the areas of labour rights (including health and safety) for HT's third-party and contractor employees and for workers in HT's wider supply chain of purchased goods. We reinforced our commitment to protecting and respecting human rights in a new Human Rights Policy . Modern Slavery and Human-Trafficking Statement
GRI 409: Forced or Compulsory Labor 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 2021 Annual Report > Strategic Report > Culture and governance p38-39
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Culture and governance p38-39 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 Code of Conduct p9, 16 Modern Slavery and Human-Trafficking Statement Human Rights Policy

Disclosure	Description	Location of Information/Response
103-3	Evaluation of the management approach	Modern Slavery and Human-Trafficking Statement Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory Labor	Forced or compulsory labour is considered a risk in all operating countries given the geographies concerned. Higher-risk activities include site construction and maintenance, the provision of fuel, site security and suppliers associated with these activities. Modern Slavery and Human-Trafficking Statement In 2021 we worked with an external consultancy to assess our principal human rights impacts and risks, identifying gaps and mitigating actions. Our human rights impacts are predominantly in the areas of labour rights (including health and safety) for HT's third party and contractor employees and for workers in HT's wider supply chain of purchased goods. We reinforced our commitment to protecting and respecting human rights in a new policy. Human Rights Policy
GRI 410: Security Practices 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Principal risks and uncertainties p61 2021 Annual Report > Governance Report > Stakeholder engagement > Workforce p92 Code of Conduct p16 Third Party Code of Conduct
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82 2021 Annual Report > Governance Report > Stakeholder engagement > Workforce p92
410-1	Security personnel trained in human rights policies or procedures	All Helios Towers employees receive training as part of the Group's initial compliance training. Opco employees also receive training on modern slavery via a training presentation. Third-party supplier representatives providing security are provided with periodic training on the Company's Third Party Code of Conduct .

Disclosure	Description	Location of Information/Response
GRI 412: Human Rights Assessment 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 2021 Annual Report > Strategic Report > Strategic progress > Network access and sustainable development p24-27 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 Code of Conduct Modern Slavery and Human-Trafficking Statement Human Rights Policy
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
412-1	Operations that have been subject to human rights reviews or impact assessments	In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks in our operating markets, identifying gaps and mitigating actions. Our human rights impacts are predominantly in the areas of labour rights (including health and safety) for HT's contracted partners and for workers in HT's wider supply chain of purchased goods. We reinforced our commitment to protecting and respecting human rights in a new policy. Human Rights Policy
412-2	Employee training on human rights policies or procedures	All employees receive initial compliance training which also covers modern slavery compliance expectations. 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 and remote training on our Third Party Code of Conduct to third parties, focussing on 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. The total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations is currently unavailable. We plan to measure compliance training hours in the coming years.
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	The percentage of significant investment agreements and contracts that include human rights clauses is not specifically tracked; however, the majority of 'significant investment agreements' include warranties and/or obligations to comply with our Third Party Code of Conduct . Our Third Party Code of Conduct specifically requires compliance with human and workers' rights legislation. Our precedent agreements also include a specific clause on modern slavery compliance. The definition of significant investment agreements is supply or services contracts Helios Towers enters into with third parties.

Disclosure	Description	Location of Information/Response
GRI 413: Local Communities 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach p36 2021 Annual Report > Strategic Report > Section 172(1) Statement > Engaging with our stakeholders p56-57 2021 Annual Report > Strategic Report > Strategic progress > Network access and sustainable development p24-27 Code of Conduct p16 Third Party Code of Conduct Modern Slavery and Human-Trafficking Statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
413-1	Operations with local community engagement, impact assessments, and development programs	Sustainable Business Impact Report 2021 > Governance and ethics > Community consultation p38 Community consultation is an important part of the site-planning process. We will look to further measure and disclose more detailed information on types of assessments, projects and engagements undertaken for future reporting. See the Sustainable Business Impact Report 2021 > Network access and sustainable development p22-25 for some examples.
413-2	Operations with significant actual and potential negative impacts on local communities	We are committed to ensuring that our activities pose no risks to the health and safety of the communities in which we operate. Before developing any new site, we carefully consider the impacts on our communities and minimise any potential for negative impact by engaging responsibly with relevant stakeholders. We will look to further measure our impact and disclose more detailed information on types of assessments, projects and engagements undertaken for future reporting. Sustainable Business Impact Report 2021 > Governance and ethics > Community consultation p38
GRI 414: Supplier Social Assessment 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Third Party Code of Conduct
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Strategic progress > Empowered people and partnerships p34 Code of Conduct p16 Third Party Code of Conduct
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82

Disclosure	Description	Location of Information/Response
414-1	New suppliers that were screened using social criteria	<p>Social criteria form part of the due diligence third-party questionnaires we use with all new suppliers. All high- and medium-risk suppliers sign the Third Party Code of Conduct.</p> <p>During 2021, we launched a new integrated third-party risk management platform. All new third-party supplier risk assessments and due diligence are now completed via the platform, which also incorporates screening against sanctions and enforcement lists and adverse media. Existing third parties are also being migrated to the system and this will be completed in 2022. As well as strengthening our due diligence, the platform will enable improved Group oversight and an audit trail.</p> <p>We have set ourselves a target of assessing key suppliers on a range of sustainability criteria in 2022. We have also incorporated specific human rights questions in a new sustainability survey for our key suppliers. Results will inform our engagement with suppliers throughout 2022.</p> <p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33</p>
414-2	Negative social impacts in the supply chain and actions taken	See 414-1
GRI 415: Public Policy 2016		
103-1	Explanation of the material topic and its Boundaries	<p>Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9</p> <p>Third Party Code of Conduct</p> <p>Code of Conduct p16</p>
103-2	The management approach and its components	<p>Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36</p> <p>Third Party Code of Conduct</p> <p>Code of Conduct p16</p> <p>2021 Annual Report > Strategic Report > Culture and governance p38</p>
103-3	Evaluation of the management approach	<p>Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36</p> <p>Governance</p> <p>2021 Annual Report > Governance Report p78-82</p>
415-1	Political contributions	<p>2021 Annual Report > Governance Report > Directors' Report > Political contributions p126</p> <p>The Company did not make any donations to any political party or other political organisation during the year.</p>

Disclosure	Description	Location of Information/Response
GRI 416: Customer Health and Safety 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Health and Safety policy statement Web: Network access and sustainable development > Mobile towers and health
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Code of Conduct p16 Health and Safety policy statement
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
416-1	Assessment of the health and safety impacts of product and service categories	All of our towers are assessed using stringent health and safety criteria. Sustainable Business Impact Report 2021 > Governance and ethics > Mobile towers and health p38 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safety as a priority for all p27-28 Web: Network access and sustainable development > Mobile towers and health
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have had no regulatory health and safety enforcement action brought against us in any of the markets in which we operate.
GRI 418: Customer Privacy 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9 Sustainable Business Impact Report 2021 > Governance and ethics > Data privacy and cybersecurity p39
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Sustainable Business Impact Report 2021 > Governance and ethics > Data privacy and cybersecurity p39 Code of Conduct p12, 16 Third Party Code of Conduct
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 Governance 2021 Annual Report > Governance Report p78-82
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	The Group has not identified any substantiated complaints during the reporting period. We have in place policies and procedures including reporting and incident-response mechanisms to respond to any such incidents or concerns raised.

Disclosure	Description	Location of Information/Response
GRI 419: Socioeconomic Compliance 2016		
103-1	Explanation of the material topic and its Boundaries	Sustainable Business Impact Report 2021 > Overview and strategy > Materiality p9
103-2	The management approach and its components	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 2021 Annual Report > Strategic Report > Principal risks and uncertainties p61 <u>Code of Conduct</u> 2021 Annual Report > Financial Statements > Notes to the Financial Statements p143
103-3	Evaluation of the management approach	Sustainable Business Impact Report 2021 > Governance and ethics > Our management approach to sustainable business p36 <u>Governance</u> 2021 Annual Report > Governance Report p78-82
419-1	Non-compliance with laws and regulations in the social and economic area	The Group has not identified any substantiated non-compliance with laws in the social and economic area during the reporting period. We have in place policies and procedures including reporting and incident-response mechanisms to respond to any such incidents or concerns raised.

Sustainable Accounting Standards Board (SASB) Index

SASB is an ESG framework to guide the disclosure of financially material sustainability information by companies. As a company uniquely placed between the infrastructure and telecoms sectors, we have selected the following disclosures from a variety of SASB industry standards in order to accurately reflect the issues most material to Helios Towers.

	Code	Metric	Location of Information/Response
SASB: Managing Systemic Risks			
(From the SASB Telecommunication Services standard)	TC-TL-550a.1	(1) System average interruption frequency and (2) customer average interruption duration	Average weekly downtime per tower: One minute ten seconds Sustainable Business Impact Report 2021 > Business excellence and efficiency > Quality, efficient infrastructure solutions p20
(From the SASB Telecommunication Services standard)	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Quality, efficient infrastructure solutions p20
SASB: Business Ethics			
(From the SASB Engineering & Construction Services standard)	IF-EN-510a.1	(1) Number of active projects and (2) backlog in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	In Democratic Republic of Congo (DRC) we have 2,062 sites and 4,701 tenancies. In Congo Brazzaville (Congo B) we have 459 sites and 661 tenancies.
(From the SASB Engineering & Construction Services standard)	IF-EN-510a.2	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive practices	We have had no monetary losses as a result of legal proceedings of this kind.
(From the SASB Engineering & Construction Services standard)	IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behavior in the project bidding processes	Anti-bribery and corruption and anti-competitive behaviour are both covered under the Company's Code of Conduct, Integrity policy and associated policies and procedures. Expectations for third parties are included within standard terms and conditions, contractual clauses and provisions of the Third Party Code of Conduct . Code of Conduct

	Code	Metric	Location of Information/Response
SASB: Energy Management			
(From the SASB Telecommunications Services standard)	TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable and (4) percentage diesel	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Our emissions and energy usage p25
SASB: Environmental Impacts of Project Development			
(From the SASB Engineering & Construction Services standard)	IF-EN-160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations	There has not been any case of non-compliance with environmental laws and regulations. The Group has in place policies and procedures including reporting and incident-response mechanisms to respond to any such incidents or concerns raised.
(From the SASB Engineering & Construction Services standard)	IF-EN-160a.2	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction	Sustainable Business Impact Report 2021 > Governance and ethics > Community consultation p38
SASB: Workforce Health and Safety			
(From the SASB Wind Technology & Project Developers standard)	RR-WT-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	(1) 0.66 per million worked hours (12-month roll) (2.a) 0 occupational fatalities per million worked hours (12-month roll) (2.b) 1 occupational fatality per million worked hours (12-month roll)
(From the SASB Waste Management standard)	IF-WM-320a.3	Number of road accidents and incidents	40 RTAs (2021)
SASB: Affordability and Access			
(From the SASB Water Management standard/Water Utilities & Services standard)	Adapted from IF-WU-240a	Percentage of residents living in proximity to Helios Towers site towers who have regular access to mobile phone networks	Sustainable Business Impact Report 2021 > Network access and sustainable development > Tackling the digital divide p14
(From the SASB Water Management standard/Water Utilities & Services standard)	Adapted from IF-WU-240a.4	Discussion of impact of external factors on customer affordability of mobile network access, including the economic conditions of the service territory	As an infrastructure provider, we do not have influence over the affordability of network access. Sustainable Business Impact Report 2021 > Network access and sustainable development > Tackling the digital divide p14

	Code	Metric	Location of Information/Response
SASB: Structural Integrity & Safety			
(From the SASB Engineering & Construction Services standard)	IF-EN-250a.1	Amount of defect- and safety-related rework costs	Our principal defect- and safety-related rework costs arise from our own quality audits and snagging visits, whereby we ensure that all work undertaken meets our quality and safety standards. We do not currently collect data on or disclose specific breakdown of costs related to this.
(From the SASB Engineering & Construction Services standard)	IF-EN-250a.2	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents	There have been no monetary losses as a result of legal proceedings associated with defect- and safety-related incidents.

Activity metrics	Data
Number of towers	9,560
Number of tenancies	18,776
Number of employees	550
Revenues 2021 (US\$m)	449.1

UN Global Compact Index



Helios Towers joined the United Nations Global Compact (UNGC) as signatories in 2021 in commitment to the UNGC's Ten Principles. This report is our first annual Communication on Progress and the following Index highlights our activities and policies relating to each Principle.

UNGC Principle	Location
Human Rights	
1. Businesses should support and respect the protection of internationally proclaimed human rights.	<p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33</p> <p>Human Rights Policy</p> <p>Sustainable Business Impact Report 2021 > Appendix > GRI Index p43</p> <p>Third Party Code of Conduct</p> <p>Modern Slavery and Human-Trafficking Statement</p> <p>Supporting the UN Sustainable Development Goals p3</p>
2. Businesses should make sure that they are not complicit in human rights abuses.	<p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33</p> <p>Sustainable Business Impact Report 2021 > Appendix > GRI Index p43</p> <p>Human Rights Policy</p> <p>Modern Slavery and Human-Trafficking Statement</p> <p>Code of Conduct</p> <p>Third Party Code of Conduct</p> <p>Supporting the UN Sustainable Development Goals p3</p>

UNGC Principle	Location
Labour Standards	
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	<p>Sustainable Business Impact Report 2021 > Appendix > GRI Index p43</p> <p>Human Rights Policy</p> <p>Third Party Code of Conduct</p> <p>2021 Annual Report p126</p> <p>The Company's Anti-Discrimination Policy applies to all Group staff (including non-permanent workers) as well as contractors, consultants and any other workers, and adopts a zero-tolerance approach to any unlawful discrimination when a person is harassed or treated arbitrarily or differently due to a relevant protected characteristic. More details can be found in the Annual Report on page 126.</p> <p>We do not have any collective bargaining agreements in place with any of our employees. We recognise the rights of employees to join trade unions and engage in collective bargaining in accordance with local law. Across the Group, the only union present is in DRC. The Group is in negotiations in relation to defining and implementing a collective bargaining agreement but nothing was agreed in 2021.</p>
4. Businesses should uphold the elimination of all forms of forced and compulsory labour.	<p>Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33</p> <p>Sustainable Business Impact Report 2021 > Appendix > GRI Index p43</p> <p>Human Rights Policy</p> <p>Modern Slavery and Human-Trafficking Statement</p> <p>Supporting the UN Sustainable Development Goals p3</p> <p>Code of Conduct</p> <p>Third Party Code of Conduct</p>
5. Businesses should uphold the effective abolition of child labour.	<p>Sustainable Business Impact Report 2021 > Appendix > GRI Index p43</p> <p>Third Party Code of Conduct</p> <p>Human Rights Policy</p> <p>Modern Slavery and Human-Trafficking Statement</p> <p>Supporting the UN Sustainable Development Goals p3</p>

UNGC Principle	Location
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Sustainable Business Impact Report 2021 > Empowered people and partnerships > Building an inclusive business p29 Code of Conduct Third Party Code of Conduct Human Rights Policy Diversity and Inclusion Webpage 2021 Annual Report p95
Environment	
7. Businesses should support a precautionary approach to environmental challenges.	Sustainable Business Impact Report 2021 > Appendix > GRI Index p43 Third Party Code of Conduct Business excellence and efficiency Environmental policy statement
8. Businesses should undertake initiatives to promote greater environmental responsibility.	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Reducing environmental impact p21 Sustainable Business Impact Report 2021 > Empowered people and partnerships > Safe and responsible supply chain p33 Environmental policy statement
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.	Sustainable Business Impact Report 2021 > Business excellence and efficiency > Project 100: \$100 million investment > Carbon Reduction Programme p24
Anti-Corruption	
10. Businesses should work against corruption in all its forms, including extortion and bribery.	Sustainable Business Impact Report 2021 > Governance and ethics > Anti-bribery and corruption p37 Sustainable Business Impact Report 2021 > Appendix > GRI Index p43 Code of Conduct Third Party Code of Conduct Governance EthicsPoint® Helpline 2021 Annual Report p39

Task Force on Climate-related Financial Disclosures (TCFD)

Improving our climate disclosure and aligning with TCFD recommendations

Helios Towers plc has complied with the requirements of LR 9.8.6R by including climate-related financial disclosures consistent with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) with the following exceptions:

Strategy

2a: Describe the climate-related risks and opportunities the organization has identified over the short, medium and long term

- Helios Towers will be doing a robust assessment of how specific climate related risks and opportunities impact the business, across each time horizon, in the different markets in which it operates. Our focus in 2021 was on setting our carbon reduction target, which involved significant stakeholder engagement with investors, customers, and our internal teams to develop our roadmap. We will provide further disclosure on our risk assessment in the 2022 Annual Report. At the point of disclosure, it was considered that the work in progress was not sufficiently advanced to meet the requirement of the disclosure recommendation.

2b: Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning and 2c: Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2 degree or lower scenario

- As the analysis described above is not complete, we have not yet assessed the impact of climate-related risks and opportunities on our business, strategy and financial planning. We therefore have not conducted scenario analysis to assess the resilience of our business strategy in various climate scenarios. We plan to do this in 2023 on key risks identified to inform long-term strategic and financial planning and provide further disclosure in the 2023 Annual Report. At the point of disclosure, it was considered that this analysis was not sufficiently advanced to meet the requirement of the disclosure recommendation.

Risk Management

3a-b: Describe the organisation's process for identifying, assessing and managing climate-related risks and;

3c: Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organization's overall risk management

- Helios Towers is assessing the impacts of transition and physical risks as set out above, in order to develop plans for managing them and integrating them into our Business excellence and efficiency Enterprise Group Risk Management framework and is therefore unable to comply with the Risk Management disclosure recommendations. We will provide such disclosures after the risks have been assessed.

We support the aims of TCFD and are using their recommendations to guide our approach to tackling climate change. We are committed to continually improving our progress and

transparency against the four elements. We have started reporting to CDP (aligned to the TCFD) and scored a B- in our first response to the CDP climate questionnaire in 2021.

Governance

Board oversight and a robust management approach to embed climate change in decision-making at the highest level

Board oversight

The Board has ultimate accountability for Helios Towers' Sustainable Business Strategy and our Carbon Reduction Roadmap is a key part of this. Sustainable business is a priority on the agenda at every Board meeting, with members receiving an update from the Director of Property and SHEQ, on progress against targets, achievements, challenges and strategic plans. For example, throughout 2021, the Board was kept updated on our target-setting process and the challenges and opportunities for various target options. We ensure Board members are informed and knowledgeable on climate-related issues, and in June 2021 all members received training from an external carbon consultancy. This covered the latest climate science, our stakeholders' views on climate and discussion around its implication for our future business strategy, and provided a solid foundation for the Board to review and approve our ambitious carbon reduction target and net zero ambition, announced in November 2021.

A robust management approach

The CEO, with involvement and support from the CEO Designate and CFO, has the highest level of responsibility for climate and other sustainability issues. The annual bonus for the Executive Directors is based on Adjusted EBITDA, portfolio free cash flow, network performance and international standards targets. With diesel being the largest operating cost at a tower site, reducing diesel and associated emissions is directly linked to our Adjusted EBITDA and portfolio free cash flow.

The CEO-Designate and CFO also lead on our carbon reduction strategy. They were integral to the carbon target setting process and chair monthly meetings to monitor progress against that target. They guide, assess and have ultimate decision-making responsibility on climate-related issues, for example, on Project 100; investing US\$100 million in carbon reduction and innovation between 2022-30.

Supporting the Executive Directors to implement our climate strategy, our Group Head of Sustainability works with business functions such as Operations and Technology, Finance and Compliance to consider how 32 Helios Towers plc Annual Report and Financial Statements 2021 climate impacts our business strategy, risk management and operations. Our dedicated Performance Engineering function is responsible for continually reviewing the most environmentally friendly and cost-effective power solutions for our sites. As each site is unique, the team identifies alternative energy sources depending on site-design requirements, commercial and technical feasibility and power needs.

Integrating climate considerations into business planning

To support our ambition of becoming a net zero carbon emissions business by 2040, we set an intensity reduction target in November 2021 (see page 31). All operating companies' budgets and forecasts now include carbon emissions to help understand the impact of business decisions on our 2030 carbon reduction target and net zero ambition. We also created a cross-functional working group including Sustainability, Finance, Commercial, Supply Chain and Compliance to promote climate action across the business.

Next steps:

- Continue to provide updates and briefings to the Board on climate topics and strengthen their capacity to integrate climate-related issues in strategic decision-making.
- Develop a plan for how to assess climate-related issues when reviewing major capital expenditures and future acquisition strategies.

Strategy

Understanding climate risks and opportunities and integrating them into business strategy

Climate-related risks and opportunities

In 2021, we made progress towards understanding the impact of climate change on our business strategy and financial planning. An external carbon consultancy facilitated a workshop with colleagues from Operations, Finance, Sustainability and Compliance to identify the risks and opportunities that climate change poses for our business. These included:

- Physical risks such as increased frequency and severity of extreme weather events impacting our tower infrastructure and making access to sites difficult for maintenance and refuelling which could impact our revenues.

- Transition risks such as fuel availability, which could increase our costs due to a potentially higher cost of diesel.

Next steps:

- Review time horizons and financial impact of each risk.
- Develop plans to conduct scenario analysis in 2023 on key risks identified to inform long-term strategic and financial planning.

Risk management

Strengthening our climate change risk assessment and management processes

Identifying climate risks

Based on the initial climate risk assessment in 2021 (see Strategy section above), climate change has been included as a principal risk for the business – see page 65. This is due to continuing and increasing focus by regulators, investors and communities on the impacts of carbon emissions on business and society. In March 2022, the Audit Committee, which monitors the nature and extent of risk exposure against the Group's risk appetite, reviewed and approved the addition of climate change as a principal risk for the business.

Next steps:

- Assess the impacts of transition and physical risks on our business over different time horizons and develop plans for managing them.
- Embed climate-related risk and opportunity understanding into our enterprise Group risk management framework to ensure a systematic approach to managing them.

Metrics and targets

Measuring our climate impacts and setting a carbon target

Reducing our carbon footprint, and supporting our customers' reduction targets, is a key part of our Sustainable Business Strategy. We monitor and report our Scope 1, 2 and 3 emissions (see page 31 for the disclosures, along with the methodology used to calculate them). In 2021 we set out an intensity target to reduce carbon emissions per tenant by 46% (against a 2020 baseline) by 2030 and become a net zero business by 2040 (page 31). As we expand into new markets and begin to gather operational data, we will rebase our target.

Next steps:

- As part of our commitment to continually improve our scope 3 reporting, we will explore opportunities for more detailed reporting of indirect value chain emissions¹.
- Rebaseline target to include our operations in Senegal and Madagascar.
- Review and improve data collection processes to prepare for external assurance for carbon footprint in 2023.

¹ We report Scope 3 emissions for five relevant indirect emissions categories including purchased goods and services, well to tank and transmission and distribution of energy, business travel, freight, and downstream leased assets. The most material Scope 3 category is related to the emissions from the upstream activities of extracting, refining and distribution of fuels and electricity for our towers.

We welcome your feedback:

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