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Helios Towers: Modern Slavery and Human-Trafficking Statement

Introduction

This statement is made and published in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "**Act**"). It outlines the steps taken by Helios Towers plc and its subsidiaries (together, "**we**", "**our**" or the "**HT Group**") to prevent modern slavery and human-trafficking for the financial year ending 31 December 2021.

Our business, structure, and supply chain

The HT Group is an independent telecommunications network rollout and communication tower group owning and managing circa 8700 towers in Africa. The HT Group provides passive infrastructure services, including options to rent space on existing towers through co-location or through "build-to-suit", whereby a tower is constructed for a customer to their specifications, in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana, the United Republic of Tanzania, the Republic of South Africa, the Republic of Senegal, and the Republic of Madagascar (the "**Jurisdictions**").

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

The HT Group's customers include a wide range of wireless operating companies across the 2G, 3G, and 4G technology platforms. As of 31 December 2021, the HT



Group employs 560 direct employees in permanent, fixed-term, and temporary contract positions. We also support the employment of approximately 9,000 partners and contractors.

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

- We spend approximately **\$320 million** through work with over **1000** suppliers worldwide to meet the needs of customers and our business;
- **72%** of our spend is on local suppliers

Our principles and values

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

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

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



We expect all third parties with whom we conduct business to respect and promote universal human rights as stated in the United Nations Universal Declaration of Human Rights, and to abide by the conventions of the International Labour Organisation, UNICEF, and other applicable laws prohibiting slavery and human trafficking.

In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks. We also developed a dedicated Human Rights Policy detailing these impacts and our approach to managing them. [Human Rights Policy](#).

Our policies

The Helios Towers [Code of Conduct](#), updated in 2020, applies to all employees in all of our Jurisdictions and emphasises working with our communities to create sustainable growth that benefits all. In addition to our [Code of Conduct](#), we have integrated various procurement, supply chain and HR policies and procedures to manage, mitigate and minimise the risk of any modern slavery and human trafficking occurring. Our key policies in this respect are our:

- Integrity Policy (incorporating a section on Anti-Slavery);
- Business Terms and Conditions (in English and French);
- [Third Party Code of Conduct](#);
- Third Party Engagement and Due Diligence Policy; and
- [Human Rights Policy](#).

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

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

EthicsPoint

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

In 2020, we launched a mobile web-intake version of the EthicsPoint helpline to make it easier for anyone to raise a concern, in a more simplified manner, via their mobile phones. In 2021, an awareness campaign was launched to provide details to third parties and their employees.

Due diligence

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

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

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

Training

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

Monitoring and audit

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

During 2021, our compliance function conducted limited on-site visits to regional offices, supplier premises, and tower sites in each of the jurisdictions. However, operational teams continued to conduct such visits and meet with individuals providing services to Helios Towers. We expect to resume on-site visits with the relaxation of Covid-19 restrictions in 2021 and will consider the engagement of external reviews, if these are not possible.

Further, we conducted several supplier performance reviews and audits in each jurisdiction during 2021, and as of 31 December 2021, we obtained certification from approximately 91% of high and medium risk third parties that they comply with the requirements of our Third Party Code of Conduct. We will continue to follow up any outstanding third party certifications in the course of 2022.

Effectiveness

We assess any instances of non-compliance as they arise, on a case-by-case basis, and take action as required. We will only conduct business with those third parties who

fully comply with the requirements of this statement or those who are taking demonstrable steps towards full compliance. Any instances of non-compliance are reported to HT Group's senior management.

Next steps

We understand that we must continue to review our internal policies, procedures, and processes and identify risks, opportunities, and further steps that can be taken to improve our position regarding slavery and human trafficking. In addition to the ongoing actions detailed above, specific measures that we aim to undertake in 2022 include:

- a review of existing policies, procedures, and terms of business (including contractual warranties, indemnity provisions, and rights to terminate) for the procurement of goods and services;
- a review of supply chain, diligence and contractual processes to consider any amendments necessary to reduce the risk of slavery and human-trafficking in our supply chain; and,
- assessing the need for and execution of a third party audit to assess compliance with Third Party Code of Conduct requirements.
- A review of our recruitment agent policy to include a Modern Slavery declaration (which encompasses slavery, forced and compulsory labour, and human trafficking).
- Completing registration on the UK Government Modern Slavery register.

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

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



Helios Towers plc
Kashyap Pandya
Group Chief Executive Officer
Date approved: 9 March 2022