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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 2022.

Our business, structure, and supply chain

The HT Group is an independent telecommunications network rollout and communication tower group owning and managing circa 13,553 towers in Africa and Oman. The HT Group provides passive infrastructure services, including options to lease space on existing towers through co-location or through "build-to-suit", whereby a tower is constructed for a customer to their specifications, in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana, the United Republic of Tanzania, the Republic of South Africa, the Republic of Senegal, Republic of Madagascar, Malawi and Oman (the "**Jurisdictions**").

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

The HT Group's customers include a wide range of wireless operating companies across the 2G, 3G, 4G and 5G technology platforms. As of 31 December 2022, the HT



Group employs 641 direct employees in permanent, fixed-term, and temporary contract positions. We also support the employment of over 11,000 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 \$300 million through work with over 2500 suppliers worldwide to meet the needs of customers and our business;
- 77% 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 principles as set out in the United Nations Universal Declaration of Human Rights, and the conventions of the International Labour Organisation's declaration on Fundamental Principles and Rights at Work, and other applicable laws prohibiting slavery and human trafficking. Helios Towers is also a signatory of the UN Global Compact.

In 2021, we worked with an external consultancy to assess our principal human rights impacts and risks and reinforced our commitment to respect human rights in our [Human Rights Policy](#).

Our policies

The Helios Towers [Code of Conduct](#), updated in 2022 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 occurrence of modern slavery and/or human trafficking. Our key policies in this respect are our:

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

We also use a mobile web-intake version of the EthicsPoint helpline to make it easier for anyone to raise a concern, in a more simplified manner, via mobile phone. In 2022, a refresher awareness campaign was conducted to reinforce 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. In addition to the initial training provided to new joiners, an e-learning course on Protecting Human Rights was rolled out to all employees in 2022. 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 modern slavery and protecting human rights and our Third Party Code of Conduct to third parties, focusing 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. We continue to ensure that employees and our third parties are actively informed of the risks of modern slavery and how to identify them.

In 2022, to raise awareness, we ran an internal communications campaign highlighting:


- Our commitment to the fight against human trafficking and modern slavery;
- How to spot the signs of potential human trafficking and modern slavery;
- How to report any suspicions of human trafficking and modern slavery.

Monitoring and audit

Modern slavery risk has increased due to the Covid-19 pandemic, the war in Ukraine and the current cost of living crisis. 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 2022, we recommenced Group compliance on-site visits in our operating country offices, supplier premises and tower sites in each of the jurisdictions and met with individuals present, providing services to Helios Towers. We intend to expand our on-site visit programme in 2023.

Further, we conducted several supplier performance reviews during 2022, and as of 31



December 2022, we obtained certification from approximately 76% of high and medium risk third parties that they comply with the requirements of our Third Party Code of Conduct. We continue to follow up any outstanding third party certifications during 2023.

Effectiveness

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

Next steps

We understand that we must continue to review our internal policies, procedures, and processes and identify risks, opportunities, and further steps that can be taken to improve our position regarding slavery and human trafficking. In addition to the ongoing actions detailed above, specific measures that we aim to undertake in 2023 include:

- Continue to review our Human Rights policy (and related policies) and procurement procedures to ensure they align with best practices;
- Continue to risk assess our third parties, review supplier questionnaires to identify risk, and strengthen supplier engagement around modern slavery and human trafficking;
- Execute a third party audit to assess compliance with Third Party Code of Conduct requirements including Modern Slavery and Human Rights;
- Continue employee and third party awareness campaigns on promoting a speak-up culture and reporting of actual or potential breaches of our code of conduct and third-party code of conduct;

- Participate in supplier and partner forums to build knowledge and understanding among our key suppliers and partners and increase capability and competency in mitigating this risk.
- Develop additional metrics to measure the effectiveness against our policies and best practices;
- Completing registration on the UK Government Modern Slavery register.

We are committed to the prevention of modern slavery and we will continue to align ourselves with 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
Tom Greenwood
Group Chief Executive Officer
Date approved: