

Helios Towers plc: Group Tax Strategy

Our vision for tax

Our vision is to be the leading tower company in Africa and the Middle East, whilst complying with all relevant tax rules and requirements in all jurisdictions in which we operate. Helios Towers takes its responsibility to pay tax seriously and adopts a fair and reasonable approach to tax compliance obligations. Helios Towers is committed to a high standard of tax operations consistent with FTSE 250 groups. We will achieve our vision by adhering to the tax principles set out within this tax strategy which applies to the Helios Group ("Helios Towers plc and its subsidiaries").

Our tax principles

1. Effective tax governance and tax risk management Governance

- The Board's Audit Committee approves the Group's tax strategy. The Audit Committee has implemented criteria to assess authority levels in relation to tax decisions, including when issues should be escalated to the Group CFO or to the Audit Committee. In addition, four times a year a summary of the current key Group tax issues will be presented to the Audit Committee, including our strategy to mitigate tax risk.
- The Head of Tax and Treasury, based in the UK as part of Group Finance, has the overall tax responsibility including the monitoring, managing and where appropriate the escalation of tax risk. Support is also provided by the Assistant Group Tax Manager in the UK, as well as local tax specialists in each of the largest operating markets.
- The Head of Tax and Treasury works closely with the local Finance Directors, the Group Finance Director, Group Finance Operations Director and the Group Financial Controller to prepare the Group's consolidated tax position.
- Each of the local jurisdictions have their own Finance Directors responsible for the day to day management of local taxes, utilising local external advisors on a regular basis to assist in preparing tax returns and, where relevant, to obtain support with complex tax advisory matters.
- External specialist advice is actively sought on significant or more complex matters involving the Group.
- The Group operates a zero-tolerance approach to tax evasion, and maintains robust prevention procedures to prevent the facilitation of tax evasion by employees and third parties providing services for or on their behalf. Following a review of Group policies and procedures by an external specialist advisor, the Group anti-tax evasion policy has been refreshed and is continually monitored alongside the codes of conduct and regular training on best practice. All employees must annually attest compliance with the Group's Code of Conduct.

2. Attitude to tax planning

- In the context of decision making for transactions and day to day business processes, we explore the potential tax consequences in order to assess risk and to support our commercial and economic activity. Our taxation approach includes the following guiding principles:
 - Respect, understanding and compliance with law and regulations consistent with our Code of Conduct.
 - Consistency with the values and ethics of the company.
 - Balancing stakeholder interests and optimising our exposure to tax risks relating to local and cross-border transactions.
 - Conducting intragroup transactions on an arm's length basis to comply with applicable transfer pricing principles.
- The Group tax function works closely with the wider business including commercial, finance, legal and operations teams to provide pro-active support on significant transactions and ad hoc advice in relation to decision making.
- Our policy is not to enter into transactions with a tax planning motive. The Group avoids participation in structuring which may have artificial, aggressive or contrived features. The level of tolerable tax risk is considered by the Group CFO and the Board to be low.
- The Group Tax function regularly reviews the Group's key internal tax controls and collaborates with the Group Finance function (including Internal Audit), risk and compliance teams.
- As a result of the COVID pandemic, the Group has focused its tax processes to ensure that responsibilities are appropriately discharged in reference to tax filings and payments. The Group acknowledges the high importance of discharging its taxpayer obligations and providing a positive impact in the local economies where we operate.

3. Effective stakeholder management – including tax authorities

- We seek to maintain an open and constructive relationship approach with tax authorities, disclosing all relevant facts in all countries we operate in. We keep an informed and cordial relationship via ongoing dialogue, including follow-up of any outstanding issues, engagement or new regulations with the relevant tax office.
- Where the application of a tax law is unclear we pro-actively engage with tax authorities to seek clarity on the interpretation of the legislation.
- Where advice from the external tax advisor is to challenge a tax authority's position and the company's position should be upheld, this will be escalated to the Group Head of Tax & Treasury and the Group CFO. An assessment of appealing the tax judgement will be made, supported by external local tax advice.
- Upfront payments are not made in advance of any investigation.

4. Management Reporting

- Review of current or expected tax exposures in each jurisdiction is part of the month end reviews, which are attended by the Group CFO.
- On a monthly basis, a tracker of current tax issues is prepared for each jurisdiction

in which the Group operates by a local Finance Director including tax claims, weighted tax risk and provision taken, and strategy to mitigate. The Group Tax Function conducts monthly discussions with each local Finance Director on the status of tax provisions, assessments and uncertain tax provisions.

- A new tax risk or a change in a tax risk where management have assessed the risk to be more than USD 0.25 million will be disclosed in the monthly management report.
- Any relevant tax exposure is reported to the Board in the monthly board pack discussing Monthly Management Accounts.

This tax strategy has been approved by the Board of Helios Towers Plc on 8 December 2022 and is published in compliance with Finance Act 2016, Schedule 19, Paragraph 16(2) and Paragraph 25(1). This tax strategy applies to the Helios Group in respect of the financial year ending 31 December 2023.