

Helios Towers

Basis of reporting and recalculation policy

Section	Change
All (03/24)	Summarised for external publication.
Population coverage, category 13 (02/25)	Added notes on: DRC population distribution data and Oman scope split.
GHG emissions reporting boundaries (03/25)	Addition of description of Congo B/Dubai benchmark methodology.
All (03/25)	Summarised for external publication.
All (03/26)	<p>Updated references to Oman scope split based on 2024 rebaseline.</p> <p>Department for Business, Energy & Industrial Strategy (BEIS) references replaced with the Department for Energy Security and Net Zero (DESNZ).</p> <p>Replaced years listed for 'UK Government GHG Conversion Factors for Company Reporting' with 'annual'.</p> <p>Summarised for external publication.</p>

Background

The reporting boundaries and methodologies outlined here relate to the non-financial data set out in our Annual Report and Financial Accounts and Sustainable Business Addendum. Non-financial information is often referred to as environmental, social and governance (ESG) information, and we use globally recognised reporting frameworks, such as GRI, to guide our reporting as well as to maintain the rigour of our disclosures.

Through our reporting, we aim to provide comprehensive and comparable disclosures for a broad range of stakeholders. As well as publishing our Annual Report and Accounts at financial year-end and updating information on our website, we submit sustainability performance and data to various ESG ratings and investor questionnaires throughout the year.

The three targets and initiatives referenced in this document include the following datapoints:

Gender diversity	% of male and female employees in total workforce
Population coverage	Estimated potential population that falls within the network coverage footprint of our towers
Greenhouse gas emissions (GHGs)	Scope 1, 2 and 3 (category 3) emissions

GHG emissions (Scopes 1 and 2), gender diversity and population coverage currently comprise the targets included as part of our long-term incentive plan impact scorecard.

Reporting period and frequency

Helios Towers' reporting period runs from 1 January to 31 December, with the above metrics tracked quarterly and reported annually.

For GHGs, we calculate emissions on a half-yearly basis, with the first half-year footprint calculation completed in September. Our annual footprint is calculated between January and February.

Gender diversity

All employee files are maintained on a human resources information system. As with all profiles, gender is a data field that can be updated on the system, alongside temporary and fixed-term employees.

Population coverage

Population coverage is an estimate of the potential population that falls within the network coverage areas of our sites.

Methodology

We use ArcGIS Pro 3.1.0 to run this process. It incorporates population data from WorldPop's 2020 estimate, which has a resolution of 100 metres.

The methodology includes:

- A selection of all Helios Towers 'on air' sites.
- Defining the milieu for each site as 'Urban' or 'Rural' depending on their distance to polygons of cities and towns.
- A buffer is drawn around each site with a radius set according to the milieu. A geo-statistic tool then analyses the buffer overlaid on the population raster layer. The tool provides the sum of all pixel values in the footprint of the buffer.
- The figures are exported in an excel format and distributed.

Note: The population coverage in the Democratic Republic of the Congo (DRC) is likely underestimated due to significant uncertainty regarding the accuracy of population distribution data and the lack of recent census data.

Greenhouse gas emissions

Reporting boundaries

Energy and carbon performance data included in the scope of our Annual Report and Sustainable Business Addendum includes our activities in 11 countries where we had operational control in the reporting year, aligned with the operational control approach set out in the Greenhouse Gas Protocol: Corporate Accounting and Reporting Standard, Revised Edition (GHG Protocol). Our footprint includes tower operations in Tanzania, DRC, Ghana, South Africa, Congo Brazzaville, Senegal, Madagascar, Malawi and Oman, as well as administrative operations in the UK and UAE.

Where an acquisition has taken place, data collection begins from the month the deal was closed, when Helios Towers assume control of the operations within that country. For divested OpCos, their footprint is included in the Group total until the sale date, with a note specifying the period covered for the OpCo. Helios Towers can then choose to rebase with the divested OpCo and its historical emissions removed from targets and previously reported Group emissions.

We collect carbon data through internal systems and functions, including HR, Performance Engineering and Operations. Data is predominantly based on our remote monitoring systems, invoices and meter readings. Where consumption data is unavailable, such as office electricity, it is projected using benchmark energy consumption (kWh) per square footage (sq. ft). Electricity consumption for the Dubai and Congo Brazzaville offices were estimated using this approach, based on the Better Buildings Partnership Real Estate Environmental Benchmarking data.

Standards and guidance

Our reporting is prepared in accordance with the GHG Protocol and aligned with an operational control approach. As a UK-listed company, Helios Towers is required to report on its global and UK energy use and carbon emissions in accordance with the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018. Our energy and emissions data represent emissions and energy use for which Helios Towers is responsible. To calculate our emissions, we have used the main requirements of the GHG Protocol: Corporate Standard along with annual UK Government GHG Conversion Factors for Company Reporting. Any estimates included in our totals are derived from actual data that has been extrapolated to cover the full reporting periods. The principal GHGs included in all Scope calculations are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O).

We align with reporting standards based upon the principles of GHG Protocol. Where available, we make use of local environmental knowledge and use local conventions supported by the GHG Protocol and supplementary environmental reporting guidance as appropriate.

Metrics

Scope 1 emissions

These are emissions within our direct control and include those from vehicle diesel and petrol fuel consumption, tower generator diesel fuel consumption and refrigerant gas volume. Scope 1 emissions cover all stationary and mobile combustion related emissions, and fugitive emissions from Helios Towers direct operations. This covers fuel consumption from Helios Towers' company-owned and operated vehicle fleet and fuel used for tower operations, and refrigerant gas volume.

Methodology

Scope 1 fuel consumption data and supporting evidence is collected from each OpCo and aggregated by our external carbon consultancy. Additionally, each OpCo is requested to provide a commentary on any significant data changes and the reason for these. Emissions calculations for all OpCos are undertaken using fuel consumption (litres) data provided from data collection and the relevant emission factors (EFs). EFs are applied for diesel, petrol and refrigerant consumption using the Department for Energy Security and Net Zero (DESNZ) factors. EFs are updated each year. Scope 1 fuel consumption is collected in litres, and refrigerant gases are collected in kilograms. Scope 1 emissions are in tCO₂e¹.

As part of refrigerant data collection, the total yearly top-up volume is collected in kilograms for each OpCo by refrigerant gas type. This data does not currently account for office refrigerant gas top-up volumes. Review of the data is ongoing, and current estimations may be revised in the future as we improve our data collection in this area.

Self-generated renewable electricity

Helios Towers has self-generated renewable electricity sources in the form of solar PVs at a limited number of sites. As self-generated energy is Scope 1 and the consumption has no emissions associated due to being renewable in nature, the emissions from this source are treated as zero. Furthermore, as the energy is generated onsite, there is no consequence for Scope 3, Category 3 as there are no transmission and distribution losses to be accounted for. Any upstream emissions related to the purchase of the solar PVs will have been accounted for under Scope 3, Category 2: Capital Goods.

Energy consumption and emissions from this source has not been included in the calculation as there are negligible impacts to the figures overall. This will be reviewed and revised if solar PV use increases significantly in future.

¹ Carbon Dioxide equivalent (CO₂e) includes the global warming potential (GWP) of greenhouse gases such as carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O).

- Scope 1 fuel consumption is collected in litres.
- Scope 1 refrigerant gas volume is collected in kg.
- Scope 1 emissions are in tCO₂e.

Scope 2 emissions

These are emissions from our indirect operations. This covers electricity consumption from Helios Towers' electricity consumption in offices and owned towers. We report Scope 2 using a location-based method.

Methodology

Scope 2 electricity consumption is collected through a data collection template that is distributed to data owners within each OpCo. Electricity consumption in kWh is requested for offices and towers separately, by month. Each OpCo completes a data template and provides supporting evidence such as receipts and invoices. Additionally, each OpCo is requested to provide a commentary on any significant data changes and the reason for these. Data for the previous year is provided within the template for variance checks.

Emissions calculations for all OpCos are undertaken by our carbon consultancy using electricity consumption data (kWh) provided from our templates. EFs are applied for electricity consumption using the DESNZ factors and the IEA emission factors and updated each year. A hierarchy is used to determine the most accurate EF to apply to each OpCo. Where possible, a country-specific EF is sourced. Helios Towers operates primarily in Africa; therefore, the IEA EFs are most accurate. For the UK, the EF is sourced from DESNZ.

- Scope 2 electricity consumption is collected in kWh.
- Scope 2 emissions are in tCO₂e.

Scope 3 emissions

These are defined as indirect emissions from Helios Towers' value chain. Helios Towers currently captures Scope 3 emissions from the following categories:

- Category 1: Purchased goods and services
- Category 2: Capital goods
- Category 3: Fuel- and energy related activities (not included in Scope 1 or 2)
- Category 4: Upstream transport and distribution

- Category 6: Business travel
- Category 7: Employee commuting
- Category 13: Downstream leased assets

Emissions from purchased goods and services and capital goods data are currently calculated as spend-based data. Fuel and energy related activities accounts for the well-to-tank and transmission and distribution (T&D) from fuel and electricity consumption. Upstream T&D covers air, road and sea. Business travel covers emissions from air, road, rail and accommodation. Downstream leased assets accounts for the grid usage and any diesel consumption from towers in South Africa, as these are not operated by Helios Towers.

Methodology

Data is collected from each OpCo for each category, excluding downstream leased assets which covers South Africa only. Air business travel data is included within the data collection template and is requested from each OpCo. All other data is provided by Helios Towers and our carbon consultants calculate associated emissions.

Intensity calculations

Scope 1 and 2 intensity calculations are undertaken by our carbon consultants, based on tower and tenant data provided by Helios Towers. Average tower and tenant numbers over the period are used e.g. for H1 2025 the tower and tenant figures between January 2025 and July 2025 inclusive will be averaged per OpCo. Thus, the monthly averages used for towers and tenants may be presented as a decimal figure.

Intensity metrics are calculated using the total Scope 1 and 2 figures divided by average tenant or tower figures as necessary.

Exclusions

- Office backup generators

Diesel generators used in Helios Towers office locations have been excluded from the scope of the footprint. These generators would generally not be involved in direct operations of Helios Towers, and it is expected that the materiality of related emissions would likely be very low, therefore excluded as de minimis.

- Office refrigerant usage

Refrigerants data collection does not currently account for office refrigerant usage. This is estimated to be less than 1% of Helios Towers' overall footprint and is therefore excluded.

Recalculation policy

This policy is drafted in line with the reporting principles and GHG reporting standards from the GHG Protocol.

Helios Towers uses 2020 as the base year for the carbon footprint and emissions recalculation policy. To accurately track progress towards the carbon reduction targets, Helios Towers will adjust the base year emissions inventory and most recent year to account for significant changes described below. A significant change is described as an increase/ decrease in emissions of greater than 5% from any source. Helios Towers may also choose to recalculate the baseline for changes by less than 5%, particularly when structural changes occur.

Structural changes

Structural changes include acquisitions, divestures or mergers of businesses or facilities that existed during the base year (currently 2020). An example of this is a new portfolio acquisition.

Methodology changes:

These changes include any updates to:

1. Update in emissions factors from DEFRA, the International Energy Authority, CEDA, or any other relevant dataset.
2. Improved data access.
3. Updated calculation methods or guidance from the GHG Protocol.

Other changes:

In addition to structural and methodology changes, Helios Towers will recalculate emissions for the following:

1. Discovery of a significant error or cumulative errors.
2. Change in our organisational boundary e.g. if Helios Towers changes from using an operational control approach to calculate our emissions to a financial control approach.
3. Changes in operational boundary e.g. the inclusion of an additional type of Scope 3 emissions category such as emissions associated with waste generated from operations.

Adjusting the baseline

At the end of each financial year, Helios Towers will:

1. Update our emission factors and how these may affect the baseline if the significance threshold described above is met.
2. Identify any changes described above that have occurred in the reporting period which may require us to recalculate our base year and most recent year.
3. For 2020 and any future rebaselining, we will publicly restate our baseline, and any recalculated years, when we report the latest carbon footprint for the previous financial year. This will be accompanied by an explanation of why the rebaselining has occurred.