



**Sustainable Business  
Addendum**  
Annual Report  
and Financial  
Statements 2024



This document supplements our Annual Report and Financial Statements 2024 and provides additional disclosures on progress towards our Sustainable Business Strategy.



Tower site in Tanzania.

**Managing our material issues and reporting transparently on progress is an important part of our commitment to sustainable business. We actively track emerging Environmental, Social and Governance (ESG) regulations and use global best practice reporting frameworks and standards to guide the rigour of our reporting and inform our approach.**

Bureau Veritas has provided limited assurance on selected non-financial data, including our 2024 carbon footprint, gender diversity and population coverage. See our Assurance statement on [page 40](#).

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**OUR APPROACH TO SUSTAINABLE BUSINESS**

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# Governance and management of sustainable business

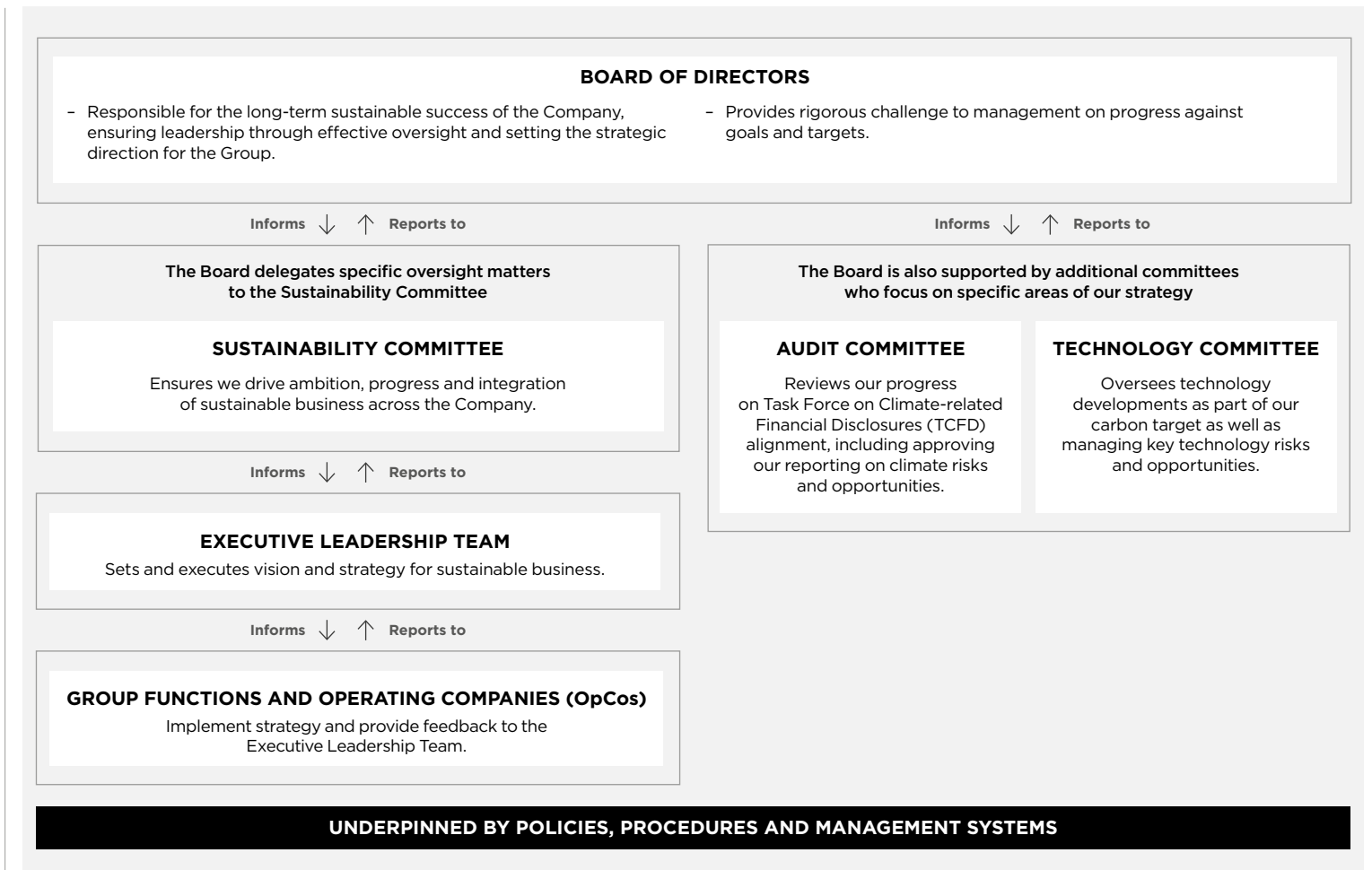
Our Board of Directors oversees all aspects of our Sustainable Business Strategy and has the ultimate responsibility and accountability for determining overall strategy and prioritisation of key focus areas.

The Board is responsible for promoting the long-term success of the Company in line with its Sustainable Business Strategy.

The Sustainability Committee assists the Board in overseeing the implementation of the Sustainable Business Strategy, monitoring the Group's engagement with stakeholders and providing oversight of best practice and regulatory developments in corporate sustainability.

The Sustainability Committee held meetings in July and December 2024. The Committee is responsible for providing sustainable business updates as part of all Board meetings. The Board met six times during 2024, and sustainable business was a standing agenda item at each meeting.

**➔ READ MORE**  
ABOUT THE SUSTAINABILITY COMMITTEE IN OUR ANNUAL REPORT AND FINANCIAL STATEMENTS, PAGE 83



Our approach

**GOVERNANCE AND MANAGEMENT  
OF SUSTAINABLE BUSINESS CONTINUED**

We also have robust management structures in place to ensure we successfully implement our Sustainable Business Strategy and support teams in our markets. The Chief Executive Officer (CEO), with close involvement and support from the Chief Financial Officer (CFO) and the Executive Leadership Team (ELT), has the highest level of executive responsibility for sustainable business performance. Our Group Head of Sustainability and Communications reports to the CFO and works with functions across the business to share best practice and support the effective delivery of our strategy.

The CFO, Group Head of Sustainability and Heads of Function provide regular updates to the Board and the Sustainability Committee on progress against key performance indicators (KPIs) and targets, achievements, challenges and plans.

At the market level, our Regional CEOs and Operating Company (OpCo) Managing Directors have frontline responsibility, supported by Group teams. The markets are also supported by Executive Committee members representing global functions. In this way, our Sustainable Business Strategy is embedded across the organisation.

**Managing our material issues**

We are guided by best practice recommendations, international sustainability frameworks and peer benchmarking in our materiality assessment. Our establishment of effective systems and robust policies such as our Environmental Policy and Human Rights Policy govern the monitoring and management of the environmental and social impact of our operations.

We operate a zero-tolerance policy towards any form of bribery and corruption and provide grievance mechanisms to counter any instances of unethical conduct, as well as ensuring the highest standards covering many of our material sustainability topics.

We have established KPIs and targets to accelerate performance and monitor progress on our most material issues.

Our governance framework supports and evaluates this management approach and actions, with regular sustainable business reviews at Board level. As we strive to integrate sustainability across core business functions, both Group functions and OpCo teams manage our sustainability impacts. We keep our management approach under regular review to ensure it remains relevant and effective.







Helios Towers' colleagues at the Executive Leadership Team Conference in 2024.

# How we create impact

Our strategy pillars enable us to deliver exceptional customer service through our business excellence platform and create sustainable value for our people, partners, environment, customers, communities and investors.

The impact we create through our strategy - driving digital inclusion, reducing our environmental impact through climate action and building local, diverse, talented teams - enables the business to deliver financial value creation over the long term, underpinned by responsible governance.

Strategy pillar	Strategic KPIs	2024 performance	2026 target	How we create impact	Our impact
<b>Customer service excellence</b>	Downtime per tower per week (minutes)	1 minute 16 seconds	<30 seconds	Delivering quality infrastructure and enabling reliable connectivity through world-class levels of power uptime help to drive digital inclusion in our markets. Having local, diverse, talented teams is the foundation for our customer service.	 <b>Digital inclusion</b>
	Population coverage (millions)	151m	164m		
<b>People and business excellence</b>	% employees trained in Lean Six Sigma	58%	70%	Our local, diverse, talented teams are the foundation for delivering customer service excellence. Successful collaboration with our partners is essential for the construction and maintenance of our assets and low-carbon solutions in order to maximise power uptime.	 <b>Climate action</b>
	% female employees	29%	30%		
	% local employees	95%	95-100%	Our governance structures help us and our partners to deliver on our strategy, manage our performance and conduct business in an ethical and transparent manner.	 <b>Local, diverse, talented teams</b>
	Five ISO accreditations maintained	100%	100%		
<b>Sustainable value creation</b>	Tenancy ratio	2.05x	2.2x	Expanding our portfolio efficiently and enabling faster expansion of mobile connectivity help to tackle the digital divide by providing universal access to mobile in our markets, thereby promoting social and economic development.  Through our infrastructure-sharing model, as well as our Carbon Reduction Roadmap, we are taking climate action and reducing industry emissions.	 <b>Responsible governance</b>
	Rural sites	6,008	6,000		
	Carbon emissions per tenant (tCO <sub>2</sub> e)	12.72	(2030 target) 36% reduction per tenant from 2020 baseline		

# Our contribution to the SDGs

The UN Sustainable Development Goals (SDGs) represent a more sustainable future for all, with African countries committed to implementing the SDG-aligned African Union Agenda 2063.

Mobile connectivity has an instrumental role to play in achieving the SDGs across our regions, from eradicating extreme poverty to ensuring financial inclusion and supporting a just climate transition. Through enabling mobile connectivity and contributing to social and economic development in our markets, we contribute to all 17 SDGs. Our greatest positive contribution is to SDGs 8 and 9, reflecting our business impact and the needs of the communities we serve across Africa and the Middle East.



## SDG 8: Decent Work and Economic Growth

We champion local employment in safe and secure work environments; respect human rights; promote ethical business practices; invest in training and development; and contribute to local economies through fair tax payments. By enabling connectivity, we also help ensure people under our site coverage have reliable access to the services they need to establish independent businesses, driving entrepreneurship and innovation essential for economic growth. Our work aligns with most SDG 8 targets:

- 8.2** Drive technological innovation
- 8.3** Promote decent job creation
- 8.5** Achieve productive employment and decent work
- 8.6** Reduce youth employment
- 8.7** Protect human rights
- 8.8** Promote safe working environment
- 8.10** Strengthen capacity for digital financial inclusion



## SDG 9: Industry, Innovation and Infrastructure

We provide resilient, quality infrastructure that supports wider, more reliable access to the services and benefits of mobile connectivity. By expanding our network and building vital infrastructure for some of the most remote communities in the world, we support the objectives of SDG 9 with a particular focus on five specific targets:

- 9.1** Develop sustainable infrastructure
- 9.3** Increase access to financial services
- 9.4** Increase resource-use efficiency
- 9.a** Facilitate resilient infrastructure development in Africa
- 9.c** Increase access to ICT



# Our double materiality assessment

In 2024, we undertook a double materiality assessment (DMA) to identify the areas where our business model has the greatest impact on society and the environment, and which impacts are most important to our business success.

Although our priorities may not change greatly from year to year, we evaluate each topic to inform strategic decision-making. Since 2022, we have applied the double materiality methodology to our approach, taking into consideration the Corporate Sustainability Reporting Directive of the European Union (CSRD) and its European Sustainability Reporting Standards (ESRS), reflecting the latest global best practice in reporting and transparency.

Overseen by the Sustainability Committee, we update our materiality assessment every two years. Conducting a DMA has provided us with deeper insights into the risks and opportunities associated with sustainability, in turn fostering enhanced transparency, accountability and long-term value creation for both the business and society.

In addition, it enables us to ensure that our objectives, policies and action plans are in alignment with our critical issues from a dual perspective:

- **Impact materiality:** Identifying the most severe and likely negative impacts as well as the most significant positive impacts the Company has on people or the environment throughout its value chain.
- **Financial materiality:** Identifying sustainability issues that trigger, or could reasonably be expected to trigger, material financial effects on the Company.

## OUR 2024 DMA CONSISTED OF FIVE KEY STEPS:

### 1. Context analysis

We analysed our operating context and value chain to gain insight into which sustainability topics should be assessed for materiality as well as guiding the assessment of the severity, positive impact and financial effects of those topics. Our process involved review of policies, procedures and financial reporting in addition to workshops with both internal and external stakeholders.

### 2. Stakeholder engagement

Consultation of stakeholders involved a review of feedback from ongoing stakeholder engagement activities, such as information from employee surveys, supplier assessments and direct feedback during other supplier engagement, environmental and human rights risk analyses, investor engagement and community consultations, as well as interviews with internal and external stakeholders.

### 3. Identification of sustainability topics and impacts, risks and opportunities (IROs)

The mandatory topics listed in ESRS 1 AR 16 (which provides a list of sustainability matters that may be relevant in the context of an entity's business activities and value chain) informed the identification of sustainability topics. However, to consider sector-specific matters, the context analysis introduced additional topics outside of the ESRS while excluding others. The assessment itself considered 32 sustainability topics.

### 4. Assessment of impacts and financial effects

The severity of impacts, risks and opportunities and the scale of their financial effects were assessed in the short and medium term (0-3 years and identified as either actual or potential). Dynamic materiality (impacts and effects in the long term, 3+ years) and likelihood of the IROs identified were also considered.

### 5. Review and validation

The final list of topics was reviewed and validated by our CFO and the Sustainability Committee.

**OUR DOUBLE MATERIALITY ASSESSMENT CONTINUED**

**The DMA identified the following topics as material for Helios Towers, from the perspective of our impact and potential effects on our financial performance:**

-  Digital inclusion
-  Energy
-  Climate change mitigation
-  Health and safety
-  Security-related impacts
-  Working conditions in the supply chain
-  Local employment
-  Ethical business conduct
-  Equal treatment and opportunities for all

The topics in the assessment are considered priority areas and are covered in detail in our discussion of impact areas in the 2024 Annual Report and Financial Statements. These topics are fundamental to our responsibility as a corporate citizen and have high to substantial impact on our financial value creation and on wider society.

The materiality assessment also derived other sustainability topics that are relevant for our operations, and we remain committed to developing our long-term business strategy in these areas. We monitor and manage our impacts in these areas to ensure we are fulfilling our responsibilities to our stakeholders.

**Other important topics that we continue to monitor include:**

- Working conditions for our own people
- Anti-corruption and bribery
- Climate change adaptation
- Strategic community investment
- Training and skills development
- Biodiversity
- Cyber security
- Land-related impacts
- Water
- Waste
- Pollution
- Tax

 **READ MORE**  
ABOUT OTHER TOPICS ON PAGES 11-14

**KEY IMPLICATIONS FOR STRATEGY**

**Our DMA has validated our current approach while providing valuable insights to improve our processes and deliver further impact for our stakeholders.**

We aim to follow best practice and work to ensure we prioritise the key topics we have an impact on, and that have an impact on us. Our strategy, related targets and KPIs will continue to evolve and be informed by the results of our materiality assessment. It will also serve as a key foundation for our alignment with reporting disclosures such as IFRS S1 in the years to come.

Health and safety, digital inclusion, ethical business conduct and climate change

mitigation remain top priorities from an impact perspective, as in our previous materiality assessment. These topics are also seen as highly important through a financial lens due to the reputational and regulatory risks attached to them. The CSRD-aligned materiality assessment also brought to the fore the topics of 'energy', i.e. cleaner energy sources as a critical element of our climate strategy, as well as the topics of 'security-related impacts', i.e. safe interactions between our security partners and local communities. Local employment, providing equal treatment and opportunities for our employees, and fair working conditions to our supply chain partners remain highly relevant to our organisation's success.






Working at heights training.

















OUR DOUBLE MATERIALITY ASSESSMENT CONTINUED

Materiality assessment: Table of impacts

**Materiality level**

-  Low
-  Medium
-  High

Material topic	Description of materiality	Impacted stakeholders	Impact materiality	Financial materiality	Targets and KPIs	Relevant SDG targets
<b>Digital inclusion</b>	Population coverage within the Helios Towers tower footprint was 151 million in 2024 and expected to grow. Digital inclusion brings significant economic and social benefits and is directly linked to our financial value creation.	<ul style="list-style-type: none"> <li>Customers</li> <li>Communities, economies and the environment</li> </ul>			<p><b>Target</b></p> <p>30-second downtime per tower per week</p> <p>Tenancy ratio 2.2x by 2026</p> <p>6,000 rural towers</p> <p><b>KPI</b></p> <p>Population footprint coverage under our tower footprint</p> <p><a href="#">Annual Report pages 13-15</a></p>	 <b>1.4</b>   <b>9.1</b> <b>9.4</b> <b>9.a</b> <b>9.c</b>
<b>Energy</b>	Optimising our energy consumption is the key driver for reducing our environmental impact. We remain reliant on fossil fuels for site power in many site locations, due to poor availability of grid power and renewable energy infrastructure. We are leveraging renewables and battery technologies to reduce both fuel and grid consumption.	<ul style="list-style-type: none"> <li>Customers</li> <li>Communities, economies and the environment</li> </ul>			<p>We do not currently have a target or KPI for energy efficiency. However, our activities to reduce our Scope 1 and 2 GHG emissions prioritise driving energy efficiency across our sites, making use of more efficient and cleaner power solutions.</p>	 <b>7.2</b> <b>7.3</b>
<b>Climate change mitigation</b>	There are greenhouse gas (GHG) emissions resulting from our operations and supply chain. We focus on reducing these through connecting to the grid as well as deploying hybrid and solar solutions where appropriate. Furthermore, mobile networks, connectivity and Internet of Things (IoT) solutions enable customers and society to decarbonise.	<ul style="list-style-type: none"> <li>Customers</li> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<p><b>Target</b></p> <p>36% reduction in carbon emissions per tenant by 2030, against a 2020 baseline</p> <p><a href="#">Annual Report pages 16-19</a></p> <p><a href="#">TCFD statement pages 44-50</a></p>	 <b>7.2</b> <b>7.3</b>   <b>13.3</b>
<b>Health and safety</b>	Health and safety impacts can be absolute and irremediable. As our priority material topic, we strive to ensure a safe working environment, invest in preventative measures and minimise injuries to employees, contractors and workers in the supply chain.	<ul style="list-style-type: none"> <li>Customers</li> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<p><b>Target</b></p> <p>Maintenance partners certified to ISO 45001</p> <p><b>KPIs</b></p> <p>Near miss reporting rate</p> <p>Road traffic accident frequency rate</p> <p>Lost-time incident frequency rate</p> <p>Total recordable case frequency rate</p> <p><a href="#">Annual Report pages 22-23</a></p>	 <b>3.6</b>

OUR DOUBLE MATERIALITY ASSESSMENT CONTINUED

Material topic	Description of materiality	Impacted stakeholders	Impact materiality	Financial materiality	Targets and KPIs	Relevant SDG targets
<b>Security-related impacts</b>	Several Helios Towers sites are guarded. While guards are not armed, incidents have taken place between guards and communities, making this an important issue of focus.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			Annual Report page 23	 <b>16.1</b>
<b>Working conditions in the supply chain</b>	Our services and ways of working impact the rights and wellbeing of workers in our supply chain, many of whom are manual and low-skilled workers. Violations of labour rights in our value chain can have severe impacts on individuals, impact the trust in the business as well as our reputation with stakeholders. We continue to engage with our partners on our Third Party Code of Conduct and labour standards.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<b>KPIs</b> % spend on local suppliers % of suppliers who have signed our Third Party Code of Conduct Annual Report pages 24-25	 <b>8.2</b> <b>8.7</b> <b>8.8</b>
<b>Local employment</b>	Providing employment opportunities to local staff in both our own operations and contractor operations has generated thousands of local jobs. 95% of our direct employees are local and 81% of our spend is with local suppliers.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<b>KPI</b> % local employees Annual Report pages 20-21	 <b>8.3</b> <b>8.5</b> <b>8.6</b>  <b>9.2</b>
<b>Ethical business conduct</b>	Impacts from unethical business conduct can be broad, affecting employees and their wellbeing, and suppliers and the value chain, as well as impacting public financing. There can be financial effects from non-compliance and poor risk management, and awareness can be significant on our operations.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<b>KPI</b> Number of third-party organisations completing Code of Conduct training Annual Report pages 24-25	 <b>16.3</b> <b>16.6</b>
<b>Equal treatment and opportunities for all</b>	Impacts from discrimination can be severe for individuals when they are disadvantaged in areas such as opportunities for education, training, employment or career development. We work to ensure equitable opportunities for all and foster a diverse and inclusive workplace. We have programmes in place to improve gender diversity across our operations.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<b>Target</b> 30% female employees by 2026 Annual Report pages 20-21	 <b>5.2</b> <b>5.5.2</b>  <b>10.3</b>

OUR DOUBLE MATERIALITY ASSESSMENT CONTINUED

Material topic	Description of materiality	Impacted stakeholders	Impact materiality	Financial materiality	Targets and KPIs	Relevant SDG targets
<b>OTHER TOPICS</b>						
<b>Anti-bribery and corruption</b>	While there is high inherent risk of corruption in many of our markets, our day-to-day operations do not involve or depend on interactions with government officials. We have a robust anti-corruption programme in place, as well as local champions supporting teams.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			<b>Target</b> Maintain our ISO certifications, including our ISO 37001 anti-bribery certification <a href="#">Annual Report pages 24–25</a>	 <b>16.5</b>
<b>Cyber security</b>	Helios Towers does not hold consumer data and operates an ISO 27001-aligned cyber security management system. As operations become increasingly digitised, the topic may rise in materiality.	<ul style="list-style-type: none"> <li>Our people and partners</li> <li>Communities, economies and the environment</li> </ul>			<a href="#">Annual Report page 25</a>	 <b>16.5</b>
<b>Climate change adaptation</b>	Helios Towers has experienced climate impacts related to droughts, high winds and floods. While the near-term impacts have been isolated and related costs minimal, this is an area where materiality is likely to evolve in the longer term.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>			<a href="#">TCFD statement pages 44–50</a>	 <b>13.1</b>
<b>Training and skills</b>	We deliver field-based training to our maintenance and build partners to promote efficient and safe operations across our network.	<ul style="list-style-type: none"> <li>Our people and partners</li> </ul>			<b>Target</b> 70% of employees trained in Lean Six Sigma by 2026 <a href="#">Annual Report page 21</a>	 <b>5.5</b>   <b>8.2</b> <b>8.3</b>
<b>Strategic community investment</b>	We develop charitable activities that benefit local communities and relate to Helios Towers' core business as a connectivity enabler. Individual positive impacts from these activities can be significant, but the scale of the total impact remains low.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>			<b>KPIs</b> KPIs are tailored to each project. Examples include: the number of students benefitting from ICT equipment, and the number of people using our solar-powered stations to charge their phones. <a href="#">Annual Report page 15</a>	 <b>4.4</b> <b>4.5</b>   <b>5.b</b>   <b>7.2</b>   <b>8.3</b>   <b>17.17</b>

OUR DOUBLE MATERIALITY ASSESSMENT CONTINUED

Material topic	Description of materiality	Impacted stakeholders	Impact materiality	Financial materiality	Targets and KPIs	Relevant SDG targets
<b>Biodiversity</b>	Our potential impacts on biodiversity relate to the construction, operation and decommissioning of our sites. However, typical sites occupy a small area of 10 x 10 metres and the majority are located in urban environments.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>			See more on page 13	<b>15.2</b>
<b>Pollution</b>	Air pollution and spills in our operations from vehicles and generators on site are minimal and contained. Our teams monitor and mitigate any potential impacts on natural resources and wildlife, as well as the subsequent impact on surrounding communities during our business operations.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>				<b>3.9</b> <b>12.4</b>
<b>Working conditions for our own people</b>	Helios Towers has a small direct workforce (758 employees at the end of 2024). Our processes maintain respect of labour rights of employees – fair wages, working time, and respecting employees' right to join or not join unions, freely associate and collectively bargain.	<ul style="list-style-type: none"> <li>Our people and partners</li> </ul>			Annual Report pages 20–21	<b>8.8</b>
<b>Waste</b>	The most significant waste from Helios Towers operations is metal (iron, steel), which has a high recycling rate. Other waste streams are not significant and handled by approved suppliers and recyclers in-country, including hazardous waste recyclers.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> <li>Our people and partners</li> </ul>			See more on page 13	<b>12.5</b>
<b>Tax</b>	Helios Towers' tax strategy states a zero tolerance for tax evasion and a reasonable approach to tax compliance.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>			Helios Towers Tax Strategy	
<b>Land-related impacts</b>	Land disputes in site acquisition are rare. Before developing any new site, we carefully consider the impacts on the surrounding communities. We respond to all public concerns and offer opportunities to meet and discuss these at council tribunal processes and other forums involving all stakeholders.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>			See more on page 14	<b>15.5</b>
<b>Water</b>	Water impacts have been assessed as low in materiality to our business and supply chain activities in terms of operational, regulatory or market risks. Any water-related weather conditions such as flooding or droughts are covered under our assessment of climate risks.	<ul style="list-style-type: none"> <li>Communities, economies and the environment</li> </ul>				<b>6.4</b>

## Other topics

There are a number of issues that are lower in materiality but still have relevance for our operations. We monitor and manage our impacts in these areas to ensure we are fulfilling our responsibilities to our stakeholders.

### BIODIVERSITY

**Our potential impacts on biodiversity relate to the construction, operation and decommissioning of our sites.**

Our impact on biodiversity is considered limited because our sites cover on average an area of 10m x 10m, with the majority in urban areas. As part of our site planning process, we assess whether potential new sites are located in sensitive ecosystems or those with high biodiversity significance. Our Site Acquisition Policy includes our commitment to biodiversity:

*It is Helios Towers' policy to make its best efforts to protect and conserve biodiversity. Any material impact on biodiversity when constructing and operating a site must be identified and mitigation implemented to avoid or minimise any negative impact. Restoration of an ecosystem may be necessary after the construction or decommissioning of a site. It is Helios Towers' policy to avoid constructing sites in any areas of critical habitats and/or legally protected and internationally recognised areas.*

To build and operate a site, we must obtain an environmental permit from the national environment agency. This requires an independent environmental assessment of any actual or potential impact on habitats and species from the construction and maintenance of our towers. During operations, we focus our efforts on reducing any negative impact on nature by cutting carbon, waste, spills and any discharges to water. Where we need to decommission sites, we look to minimise waste and restore the land.

### WASTE

**Our ultimate aim is to avoid waste. Where waste is unavoidable, our first priority is to reuse materials, and if this is not possible, to recycle through certified partners, re-sell or gift them safely and responsibly.**

Our warehousing teams follow a central asset disposal procedure, managed by our Supply Chain and Finance teams. Our key waste streams include tower materials, generators, batteries and rectifiers. Any equipment or materials that cannot be repaired or reused on site are returned to our warehouses. We look to repair or refurbish generators, batteries and rectifiers to extract full value from and expand the lifespan of our equipment. This avoids waste and saves costs. When this is no longer possible, we use a certified and approved recycling partner that safely recovers valuable metals and materials.

An internal committee convened by the Head of Supply Chain reviews all materials and equipment returned at quarterly intervals and agrees how to reuse or recycle if these cannot be refurbished. Our Safety, Health, Environment and Quality (SHEQ) department assesses and approves any scrap dealers who buy our waste, as well as companies certified for recycling, which is particularly important for disposal of hazardous materials such as batteries and chemical waste. During 2021, we initiated refurbishment of our batteries, which has formed part of our asset disposal procedure. In 2025, we will continue to standardise our data collection processes to report more detailed waste disclosures.

A returns from site process is currently being developed, in conjunction with an overall system upgrade. The aim of this process is to ensure that all OpCos are receiving materials identified for return in a timely manner. The new process will help to assess the percentage of materials returned from site that can be repaired and so extend the life of the asset.

### REFURBISHMENTS COMPLETED IN 2024

#### Generator sets refurbished

**22%**  
2023: 32%

#### Batteries refurbished

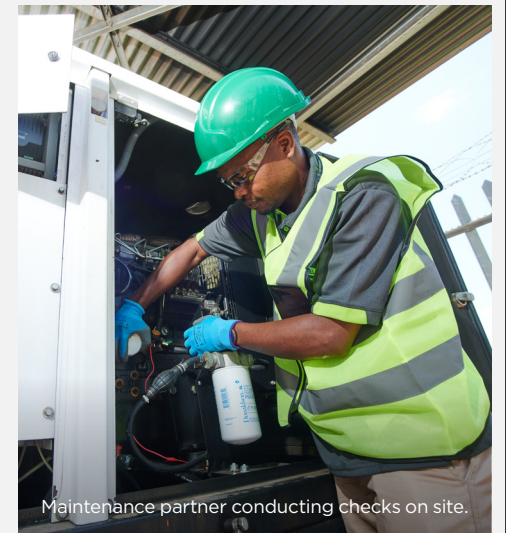
**16%**  
2023: 10%

#### Rectifiers refurbished

**26%**  
2023: 29%

#### Rectifier modules refurbished

**46%**  
2023: 74%



Maintenance partner conducting checks on site.

OTHER TOPICS CONTINUED

LAND USE AND LAND RIGHTS

**Before developing any new site, we carefully consider the impacts on the surrounding communities.**

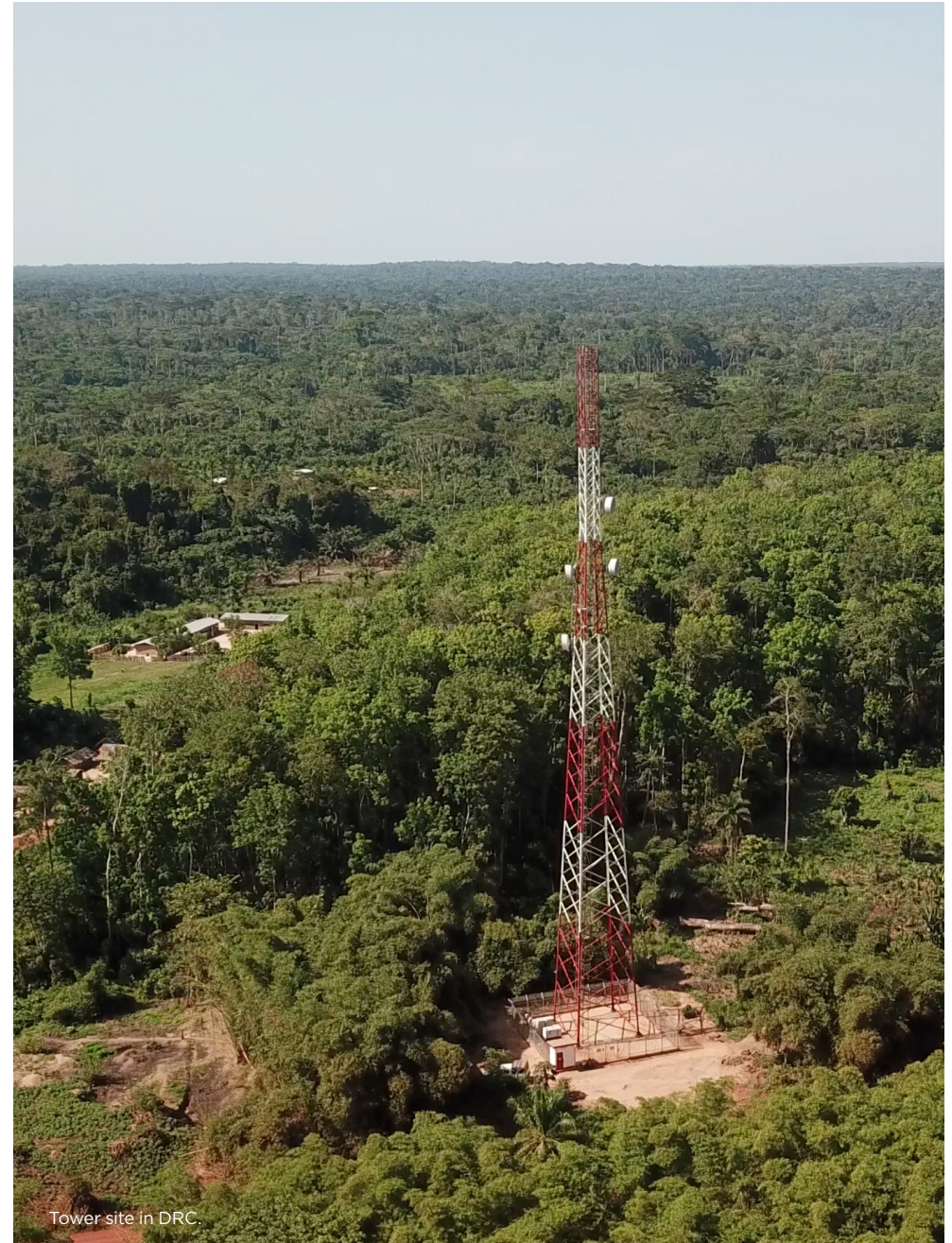
Following our well-established public consultation and community engagement practices, we respond to all public concerns and offer opportunities to meet and discuss these at council tribunal processes and other forums involving all stakeholders.

Our Site Acquisition Policy provides a framework for identifying, leasing, purchasing and permitting of land suitable for the construction of a new tower. We consult meaningfully with potentially affected groups and relevant stakeholders, in accordance with Article 32 of the UN Declaration on the Rights of Indigenous Peoples, and Principle 18 (b) of the UN Guiding Principles on Business and Human Rights. The Principle states that businesses must “involve meaningful consultation with potentially affected groups and other relevant stakeholders, as appropriate to the size of the business enterprise and the nature and context of the operation”.

We also look to design sites to have as minimal a visual impact as possible on the communities in which they are located. This can include taking advantage of existing natural screening — for example, positioning a tower within woods or behind tall trees, having camouflaged monopoles or providing additional planting or screening.

As part of our site planning process, we check that no involuntary resettlement of any individual is required to acquire this location, that the location will not adversely impact any site of cultural heritage and there is no perceived or potential adverse impact on Indigenous Peoples. In compliance with our Anti-Bribery Policy, we do not offer any form of inducement to secure a permit, a lease or access to a site. During a site search, an Environmental and Social Impact Assessment is conducted to determine whether the site affects Indigenous settlements, in consultation with key stakeholders of the community and including authorised government officials. In cases where Indigenous Peoples could be affected by our development activities, we will engage with these communities and work closely with their representative institutions to ensure their contributions are considered before any construction begins.

**Note:** As a telecommunications infrastructure provider, we do not buy tin, tungsten, tantalum or gold as metals (or ore), manufacture or contract to manufacture products containing these metals and have limited possibilities to impact the conflict minerals ecosystem through our supply chain. We conducted a human rights impact assessment in 2021 and assessed the materiality of conflict minerals for our business. We acknowledge that metals such as tin, tungsten, tantalum and gold may be present in some of our purchased electronic goods. However, we are a small purchaser of these goods compared with other organisations. We are focusing our efforts on using our influence to improve supply chain practices and, therefore, are working more closely with local partners who build, maintain and secure our sites on improving labour standards.



Tower site in DRC.

# External recognition

Throughout the year, we are rated by ESG and investment research ratings agencies, and we submit information to sustainability indices as part of our external disclosures and transparency.

This enables us to benchmark our performance against the wider business community and is an important way for us to understand how our approach measures up to current standards, best practice and expectations. We are pleased that our management of, and progress on, material issues continues to be recognised externally and that in 2024 we maintained or improved scores in all indices compared to 2023.

**Disclaimers:** FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirms that Helios Towers plc has been independently assessed according to the FTSE4Good criteria, and has satisfied the requirements to become a constituent of the FTSE4Good Index Series. Created by the global index provider FTSE Russell, the FTSE4Good Index Series is designed to measure the performance of companies demonstrating strong Environmental, Social and Governance (ESG) practices. The FTSE4Good indices are used by a wide variety of market participants to create and assess responsible investment funds and other products.

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# GRI Index

We are committed to robust and transparent reporting of our most material issues using international sustainability reporting frameworks such as the Global Reporting Initiative (GRI). We have prepared the information in this report with reference to the GRI 2021 standards for our material impacts.

## Abbreviations

**AR:** Annual Report and Financial Statements 2024

**SB-A:** Sustainable Business Addendum 2024

Disclosure	Description	Location of Information/Response
<b>GENERAL DISCLOSURES</b>		
<b>GRI 2: General Disclosures 2021</b>		
2-1	<b>Organizational details</b>	Helios Towers plc Registered office: Level 21 8 Bishopsgate London EC2N 4BQ United Kingdom  <b>AR</b> > What we do p2 <b>AR</b> > Notes to the Financial Statements > 1. Statement of compliance and presentation of financial statements p126
2-2	<b>Entities included in the organization's sustainability reporting</b>	The scope of our Integrated Annual Report includes all operations-based entities under Helios Towers plc. <b>AR</b> > Notes to the Financial Statements > 1. Statement of compliance and presentation of financial statements p126 <b>AR</b> > Notes to the Financial Statements > Investments p158
2-3	<b>Reporting period, frequency and contact point</b>	Date of reporting period for the AR: 1 January 2024 - 31 December 2024. Date of publication: 7 April 2025 Frequency: We report every year in line with our financial reporting. Point of contact for any queries regarding the report: <a href="mailto:investorrelations@helios Towers.com">investorrelations@helios Towers.com</a>
2-4	<b>Restatements of information</b>	<b>AR</b> > Our 2024 footprint p19
2-5	<b>External assurance</b>	<b>AR</b> > Independent auditor's report to the members of Helios Towers plc p115-121 <b>SB-A</b> > Assurance statement p40

Disclosure	Description	Location of Information/Response
2-6	<b>Activities, value chain and other business relationships</b>	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 11,000 contracted partners who build, maintain and secure our sites (based on monthly, voluntary reported people hours from our partners).  Our supply chain includes procurement services, which manage the provision of goods and services. Typically, the Group procures generators, rectifiers, solar and hybrid power units, telecom towers, fuel and other related products. In terms of services, we procure site and tower maintenance as well as civil construction, tower strengthening and security arrangements. We maintain 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 over US\$400 million through work with over 1,000 suppliers worldwide to meet the needs of customers and our business; 81% of our spend is on local suppliers.  There were no material changes to the overall location of suppliers, structure of the supply chain or our relationships with suppliers during this reporting period. <b>AR</b> > What we do p2 <b>AR</b> > How we do it p3 <b>AR</b> > Group CEO's statement p9-11 <b>AR</b> > Responsible supply chain practices p24
2-7	<b>Employees</b>	See <b>page 34</b> for more details.  The methodology used to compile the data is based on head count, full-time equivalent (FTE) at the end of the reporting period. We do not have non-guaranteed hours contracts.



GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
2-8	<b>Workers who are not employees</b>	Our site operations are conducted by contracted partners (and not our direct employees). We support the employment of over 11,000 contracted partner personnel (based on monthly, voluntary reported people hours from our partners).  1. Maintenance Partners – ensure the continued integrity and power uptime of our leased towers. 2. Build Partners – build towers on greenfield sites to meet new customer requirements. 3. Security Partners – protect the integrity of assets from damage and theft.
2-9	<b>Governance structure and composition</b>	<b>AR</b> > Risk management p38 <b>AR</b> > Governance Report p61–67 <b>AR</b> > Nomination Committee Report p78–82 <b>AR</b> > Sustainability Committee Report p83 <b>SB-A</b> > Governance and management of sustainable business p3 <b><u>Division of Responsibilities between Chair, Chief Executive Officer and Senior Independent Director</u></b>
2-10	<b>Nomination and selection of the highest governance body</b>	The Nomination Committee is responsible for assisting the Board in discharging its responsibilities relating to the size, structure and composition of the Board and its Committees.  The Committee also ensures a balance of diverse skills, knowledge and experience of both the Board and senior executives and assists the Board on matters such as succession planning, conflicts of interest and independence.  For more detail: <b>AR</b> > Governance Report > Nomination Committee Report p78–82 <b><u>Corporate governance</u></b>  The terms of reference of all <b>Board Committees are available on our website</b>
2-11	<b>Chair of the highest governance body</b>	<b>AR</b> > Governance Report > Board leadership and Company purpose p68 <b>AR</b> > Governance Report > Division of responsibilities p76

Disclosure	Description	Location of Information/Response
2-12	<b>Role of the highest governance body in overseeing the management of impacts</b>	The Board of Directors approves any updates to Helios Towers' Sustainable Business Strategy and targets that cover our economic, environmental and social impacts. Strategy updates and review of our impacts are overseen and monitored by the Sustainability Committee.  The Sustainability Committee is chaired by an Independent Non-Executive Director to align with corporate governance best practice and ensure we drive ambition and integration of the strategy across the business. The Committee ensures that the business is making socially and environmentally responsible decisions and monitors progress while proactively preparing for compliance with evolving regulations. Updates on our Sustainable Business Strategy are discussed at every Board meeting through our Sustainability Committee members and Executive Leadership Team. Our Group Head of Sustainability provides regular briefings to the Board and the Audit Committee, including on any updates to our double materiality assessment, which includes an analysis of our social and environmental impacts.  During 2024, the Sustainability Committee oversaw progress on, and reporting of, Sustainable Business Strategy KPIs, reviewed sustainability-related regulatory updates, monitored compliance with TCFD and CFD disclosures, and approved the double materiality assessment.  Additional detail regarding the Board and Sustainability Committee's role and our governance of climate change can be found in the Task Force on Climate-related Financial Disclosures (TCFD) section of our Integrated Annual Report. <b>AR</b> > TCFD disclosures p44–50 <b>AR</b> > Sustainability Committee Report p83
2-13	<b>Delegation of responsibility for managing impacts</b>	<b>AR</b> > Risk management p38 <b>SB-A</b> > Governance and management of sustainable business p3
2-14	<b>Role of the highest governance body in sustainability reporting</b>	Our Annual Report and Financial Statements is approved by the Board Audit Committee, and signed off by our Group CEO and CFO. The Board regularly reviews our performance against our sustainable business targets, and the strategy is monitored by our Sustainability Committee. Furthermore, the Board reviews the risk management process and receives updates on the results of the double materiality assessment.
2-15	<b>Conflicts of interest</b>	<b>AR</b> > Governance Report > Division of responsibilities p76
2-16	<b>Communication of critical concerns</b>	All Group employees and third parties have access to a confidential reporting line. The Board, through the Audit Committee, has oversight of all incidents reported and logged. All concerns raised are brought to the attention of and discussed with the Audit Committee at its regular meetings. In 2024, 32 concerns were communicated to the Audit Committee.  <b>AR</b> > Reporting concerns p25 <b>AR</b> > Governance Report > Audit Committee Report p89

## GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
2-17	<b>Collective knowledge of the highest governance body</b>	<p>The Board has strong knowledge and experience of sustainable business and sustainable development. The Board's knowledge and skills are kept updated through engagement on sustainable business topics delivered by the Sustainability Committee, Executive Leadership Team and other subject matter experts across the business.</p> <p>The Sustainability Committee is chaired by an Independent Non-Executive Director to align with corporate governance best practice and ensure we drive ambition and integration of the strategy across the business. The Committee ensures that the business is making socially and environmentally responsible decisions and monitors progress while proactively preparing for compliance with evolving regulations. In 2024, the Committee met twice, and the sessions included deep dives on material topics with guest presenters (subject matter experts) to provide knowledge sharing as part of the agenda. During 2024, the Board completed training on sustainability reporting, transition planning and related corporate governance implications. The Board includes members with both direct and indirect experience of ESG.</p> <p>In accordance with the UK Corporate Governance Code, the Company is required to carry out Board evaluations on a three-year cycle to review the effectiveness of the Board and its Committees. The last external evaluation of the Board and its Committees was conducted in 2022. An internal evaluation was completed in 2024, as part of the current three-year cycle. It was acknowledged that the Board and its Committees remain effective and work well and that the skills and knowledge of the Board continue to be broad in range and operate effectively together.</p> <p>The Audit Committee reviews management's assessment of our principal risks, including risks associated with our economic and sustainability performance. This improves Directors' experience of risks associated with climate change and other sustainability topics too. The Audit Committee of the Board is also responsible for reviewing our Integrated Annual Report, which contains important contextual and performance disclosures on our sustainable business priorities and impacts.</p> <p><b>AR &gt; Governance Report &gt; Nomination Committee Report p78-82</b></p>
2-18	<b>Evaluation of the performance of the highest governance body</b>	<p>The Company is required to carry out an external Board evaluation every three years under the UK Corporate Governance Code, and we are now in our second cycle of a new three-year cycle of Board evaluations, with our second internal Board evaluation having been conducted in 2024.</p> <p>The evaluation process provides an opportunity for the Board and its Committees to gain meaningful insight into their performance, composition and how well members worked together during the year. The Chair acts on the results of the Board evaluation, shares these with the Board for discussion, and works with the Company Secretary to ensure any strengths are recognised. Any focus or action areas are also considered and implemented during the next financial year.</p> <p><b>AR &gt; Governance Report &gt; Nomination Committee Report p78-82</b></p>

Disclosure	Description	Location of Information/Response
2-19	<b>Remuneration policies</b>	<p>The annual bonus for the Executive Directors is based on Adjusted EBITDA, portfolio free cash flow, 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.</p> <p>Introduced in 2023, our 'impact scorecard' is included as part of the Long-Term Incentive Plan (LTIP) award to supplement financial metrics. The Impact scorecard includes three equally weighted metrics that align with the KPIs and targets set out in our Sustainable Business Strategy. The current impact scorecard metrics are emissions per tenant, female staff and population coverage.</p> <p><b>AR &gt; Governance Report &gt; Directors' Remuneration Report p91</b></p>
2-20	<b>Process to determine remuneration</b>	<p>The Director's Remuneration Report includes:</p> <ul style="list-style-type: none"> <li>- a summary of the of the Directors' Remuneration Policy;</li> <li>- details on independent remuneration consultants; and</li> <li>- details of shareholder voting on remuneration items.</li> </ul> <p><b>Remuneration Committee</b></p> <p><b>AR &gt; Governance Report &gt; Directors' Remuneration Report p91</b> <b>AR &gt; Governance Report &gt; Summary of the Directors' Remuneration Policy p95</b></p>
2-21	<b>Annual total compensation ratio</b>	<p>We are committed to paying our employees fair and appropriate compensation. We do not currently disclose annual total compensation ratios. With fewer than 250 UK employees, Helios Towers is not required to report or disclose our ratio of CEO to median employee pay. However, we provide our <b>gender pay gap information</b> in the interest of transparency.</p> <p>We regularly review our pay rates throughout the business and will keep our approach to disclosing a UK and/or Group-wide pay ratio, and/or gender pay gap information, under review over the coming years.</p>
2-22	<b>Statement on sustainable development strategy</b>	<b>AR &gt; Group CEO statement p9-11</b>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
2-23	<b>Policy commitments</b>	<p>Our policies are critical to achieving our Sustainable Business Strategy and targets. Where applicable, we base our policies and standards on international norms and recognised initiatives, and ensure these are approved and signed by the Group CEO. This includes International Labour Organization (ILO) Conventions and the UN Guiding Principles on Business and Human Rights. All employees receive the Group's Code of Conduct and Integrity Policy upon joining. Likewise, all third-party suppliers receive training on the Group's Third Party Code of Conduct.</p> <p><b>AR</b> &gt; Ethical business conduct p24  <b>AR</b> &gt; Non-financial information statement p37</p> <p><b>Helios Towers: Our values</b>  <b>Human Rights Policy</b>  <b>Code of Conduct</b>  <b>Third Party Code of Conduct</b>  <b>Modern Slavery Statement</b>  <b>Environmental Policy</b>  <b>Health and Safety Policy</b>  <b>Quality Policy</b>  <b>Group Tax Strategy</b>  <b>Supply Chain Management Statement</b>  <b>Strategic Community Investment</b></p>
2-24	<b>Embedding policy commitments</b>	<p>Our governance structures and policies help us to deliver on our Sustainable Business Strategy, manage our performance and ultimately support the value we create for all of our stakeholders. All employees receive the Group's Code of Conduct and Integrity Policy upon joining. Those assessed as high- and medium-risk third parties receive training on the Group's Third Party Code of Conduct.</p> <p><b>AR</b> &gt; Non-financial information statement p37  <b>AR</b> &gt; Risk management p38  <b>SB-A</b> &gt; Governance and Management of Sustainable Business p3</p>

Disclosure	Description	Location of Information/Response
2-25	<b>Processes to remediate negative impacts</b>	<p>We maintain a robust compliance culture and ensure any negative impacts are remediated in line with Group principles, through internal reporting and external audits. Employees, suppliers and stakeholders are encouraged to report practices or actions believed to be inappropriate or illegal. All complaints are investigated with impartiality, prohibiting retaliation. Anyone can raise concerns about actual or potential non-compliance through our confidential reporting line. The Group's General Counsel and Company Secretary, the Group Director – People, Organisation and Development, as well as the Group Head of Compliance receive the details of all incidents reported via the hotline.</p> <p>The Audit Committee has oversight of all cases that are logged on the confidential reporting line. All whistleblower reports are investigated in line with the Group's policies, which include its non-retaliation provisions. Appropriate disciplinary and remediation actions are identified and effected, as necessary.</p> <p>A simplified mobile web-intake portal is also available for the reporting of any potential concerns.</p> <p>Similarly, in the area of health and safety, we have a strong reporting culture. Increased reporting has continued to guide SHEQ initiatives across the Group to reduce negative impacts, such as working at height and driving.</p> <p><b>AR</b> &gt; Reporting concerns p25  <b>AR</b> &gt; Safety p22-23  <b>Code of Conduct:</b> Raising a Concern p16</p>
2-26	<b>Mechanisms for seeking advice and raising concerns</b>	<p>All Group employees and third parties have access to a confidential reporting line. The Board, through the Audit Committee, has oversight of all incidents reported and logged on our confidential reporting line. All concerns raised are brought to the attention of and discussed with the Audit Committee at its regular meetings.</p> <p><b>AR</b> &gt; Reporting concerns p25  <b>Code of Conduct</b></p>
2-27	<b>Compliance with laws and regulations</b>	<p>Other than as previously disclosed, the Group has not been subject to any significant instances of non-compliance with laws and regulations during the reporting period. The Group has in place policies and procedures, including reporting and incident-response mechanisms, to respond to any such incidents or concerns raised.</p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
2-28	<b>Membership associations</b>	<p>Key memberships:</p> <ul style="list-style-type: none"> <li>- TowerXchange;</li> <li>- Global System for Mobile Communications Association (GSMA);</li> <li>- UN Global Compact; and</li> <li>- British Quality Foundation.</li> </ul> <p>The multi-stakeholder principles and initiatives we have endorsed and align with include:</p> <ul style="list-style-type: none"> <li>- UN Guiding Principles on Business and Human Rights;</li> <li>- UN Sustainable Development Goals;</li> <li>- UN Women’s Empowerment Principles; and</li> <li>- CFO Principles on Integrated SDG Investments and Finance.</li> </ul>
2-29	<b>Approach to stakeholder engagement</b>	<p>We make stakeholder engagement a priority and part of what we do across our operations. Examples include: engaging with communities during the new-site consultation process and as part of strategic community investment with local schools; 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.</p> <p>To understand how the Board engages with our stakeholders, see:</p> <p><b>AR</b> &gt; Section 172 Statement &gt; Stakeholder engagement p73-74</p> <p><b>AR</b> &gt; Advancing labour and human rights p24</p> <p><b>SB-A</b> &gt; Our double materiality assessment p8</p> <p><b>Strategic Community Investment</b></p>
2-30	<b>Collective bargaining agreements</b>	<p>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 the Democratic Republic of the Congo (DRC), with employee representatives present in Senegal, Congo Brazzaville and Madagascar.</p> <p>Senegal and Congo Brazzaville have collective bargaining agreements at the national level. During 2024, the agreement was negotiated with the relevant unions and approved by the Labour Administration, effective since September 2024. In addition, DRC, Congo Brazzaville and Madagascar and Senegal have established an approved ‘Reglement interieur’ (rules and regulations document) negotiated with employee representatives.</p>

Disclosure	Description	Location of Information/Response
<b>GRI 3: Material Topics 2021</b>		
3-1	<b>Process to determine material topics</b>	<b>SB-A</b> > Our double materiality assessment p7-8
3-2	<b>List of material topics</b>	<b>SB-A</b> > Our double materiality assessment p8
3-3	<b>Management of material topics</b>	<p>See all relevant disclosures below, by each material topic.</p> <p><b>SB-A</b> &gt; Governance and management of sustainable business p3</p> <p><b>SB-A</b> &gt; Our contribution to the UN SDGs p6</p> <p><b>SB-A</b> &gt; Our double materiality assessment p8</p>
<b>MATERIAL ISSUES</b>		
<b>Economic Performance</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>We ensure our business practices – both within our business and across our supply chain – do not have a negative impact but foster positive impacts on people and the environment. Our relationships with suppliers, investors, governments, employees and local communities have direct economic and social impacts. Our Integrated Annual Report explains how we manage financial performance and includes financial and non-financial KPIs. Our section on material impacts in this Addendum outlines our focus on reducing risks and mitigating any potential negative impacts that our business activities might have on the realisation of the SDGs.</p> <p><b>AR</b> &gt; Our strategic KPIs p12</p> <p><b>AR</b> &gt; Market and operating review p26-33</p> <p><b>AR</b> &gt; Section 172 Statement &gt; Stakeholder engagement p73-74</p> <p><b>SB-A</b> &gt; Our double materiality assessment p8</p> <p><b>SB-A</b> &gt; Our contribution to the UN SDGs p8</p>
<b>GRI 201: Economic Performance 2016</b>		
201-1	<b>Direct economic value generated and distributed</b>	<p>By creating job opportunities (we support over 11,000 jobs through direct and indirect employment), paying taxes and procuring from local suppliers, we make a significant positive contribution to both our host communities and their regional and national economies in Africa and the Middle East. Due to the multiplier effect, our total economic contribution extends far beyond the direct value we add.</p> <p><b>AR</b> &gt; Our value creation journey p4</p> <p><b>AR</b> &gt; Market and operating review p26-33</p> <p><b>AR</b> &gt; Impact report p13-25</p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
201-2	Financial implications and other risks and opportunities due to climate change	AR > TCFD disclosures p44-50 AR > Principal risks and uncertainties p38-43
201-3	Defined benefit plan obligations and other retirement plans	AR > Financial statements > Retirement benefit costs p132
201-4	Financial assistance received from government	The business did not require or receive financial assistance from any government during 2024.

Market Presence

GRI 3: Material Topics 2021

3-3	Management of material topics	<p>Our principal business is building, acquiring and operating telecommunications towers that can accommodate and power the needs of multiple tenants. We operate in nine markets across Africa and the Middle East and have leading positions in seven as an independent towerco. Each of our markets is accountable for its own performance and for driving growth.</p> <p>We assess performance against our strategy using relevant KPIs.</p> <p>AR &gt; Our strategic KPIs p12 AR &gt; Market and operating review p26-33 SB-A &gt; Our contribution to the UN SDGs p6 SB-A &gt; Our double materiality assessment p8</p>
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GRI 202: Market Presence

202-1	Ratios of standard entry level wage by gender compared to local minimum wage	<p>In the UK, we continue to pay all our employees above the London living wage. Our UK staff constitutes around 17% of our overall workforce. For our African and Middle East markets, we work with an external HR consultancy, which provides salary benchmarking for all markets to ensure our pay practices are in line with market practice.</p> <p>We voluntarily disclose further information by gender on a Group-wide basis: <b>Diversity and Inclusion</b></p> <p>Significant locations are defined as our countries of operation.</p> <p><b>Third Party Code of Conduct</b></p>
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Disclosure	Description	Location of Information/Response
202-2	Proportion of senior management hired from the local community	<p>79% of senior management in our OpCos were hired from the local community in 2024.</p> <p>Here, senior management is defined as Managing Directors and Heads of Department.</p> <p>Local is defined as the operating market country.</p> <p>Significant locations are defined as our countries of operation.</p>

Indirect Economic Impacts

GRI 3: Material Topics 2021

3-3	Management of material topics	<p>As a business advancing mobile connectivity in markets across Africa and the Middle East, we have many indirect economic impacts. Our role in enabling greater digital connectivity and inclusion has a significant impact on people's lives, enabling access to a wide range of life-enhancing services (education, health, financial services), particularly for some of the most vulnerable communities in the countries where we operate.</p> <p>We support local economies and extend network coverage to reach rural locations, helping to connect the unconnected and promoting socio-economic development.</p> <p><b>OpCo rural sites (%)</b></p> <table border="1"> <tbody> <tr> <td>Tanzania</td> <td>45</td> <td>Congo B</td> <td>33</td> <td>Madagascar</td> <td>65</td> </tr> <tr> <td>DRC</td> <td>25</td> <td>South Africa</td> <td>26</td> <td>Malawi</td> <td>67</td> </tr> <tr> <td>Ghana</td> <td>30</td> <td>Senegal</td> <td>29</td> <td>Oman</td> <td>59</td> </tr> </tbody> </table> <p>Alongside the growth of the business supporting greater digital inclusion, we are also developing strategic, long-term projects and partnerships to support communities local to our towers.</p> <p>AR &gt; Digital inclusion p13 AR &gt; Strategic community investment p15 SB-A &gt; Our contribution to the UN SDGs p6 SB-A &gt; Our double materiality assessment p8</p> <p><b>Human Rights Policy</b></p>	Tanzania	45	Congo B	33	Madagascar	65	DRC	25	South Africa	26	Malawi	67	Ghana	30	Senegal	29	Oman	59
Tanzania	45	Congo B	33	Madagascar	65															
DRC	25	South Africa	26	Malawi	67															
Ghana	30	Senegal	29	Oman	59															

GRI 203: Indirect Economic Impacts 2016

203-1	Infrastructure investments and services supported	<p>AR &gt; Group CEO statement p9-11 AR &gt; Digital inclusion p13 AR &gt; Strategic community investment p15 SB-A &gt; Our contribution to the UN SDGs p6</p>
203-2	Significant indirect economic impacts	<p>AR &gt; Digital inclusion p13 AR &gt; Strategic community investment p15</p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>Anti-Corruption</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<p>AR &gt; Anti-bribery and corruption p25</p> <p>SB-A &gt; Governance and management of sustainable business p3</p> <p>SB-A &gt; Our contribution to the UN SDGs p6</p> <p>SB-A &gt; Our double materiality assessment p8</p> <p><b>Code of Conduct</b></p> <p><b>Modern Slavery Statement</b></p> <p><b>Third Party Code of Conduct</b></p>
<b>GRI 205: Anti-Corruption 2016</b>		
205-1	Operations assessed for risks related to corruption	<p>100% of markets are assessed for risks relating to corruption before we enter the market.</p> <p>We recognise the heightened risks of bribery and corruption in our markets and therefore assess all new third parties with relevant risk assessments and due diligence. Our due diligence also incorporates screening against sanctions and enforcement lists and adverse media.</p> <p>Group and individual OpCo fraud risk assessments are conducted annually. This links with our Group Risk Register and individual OpCo risk registers. A standalone anti-bribery and corruption risk assessment is also conducted annually to supplement Group and OpCo risk register reviews.</p> <p>AR &gt; Anti-bribery and corruption p25</p>
205-2	Communication and training about anti-corruption policies and procedures	<p>It is mandatory for all new employees to complete initial compliance training, which includes information on anti-bribery and corruption. 100% of new starters also receive a link to an online Global Anti-Bribery and Corruption training module on our learning management system. As part of supplier onboarding, we request our partners complete a mandatory module on Anti-Bribery and Corruption. 97% of new suppliers completed this in 2024.</p> <p>Colleagues in higher-risk functions are also provided periodic refreshers. All employees receive the Group's Code of Conduct and Integrity Policy upon joining and high- and medium-risk third parties receive the Group's Third Party Code of Conduct training.</p>
205-3	Confirmed incidents of corruption and actions taken	<p>No public allegations of corruption were made against Helios Towers in 2024. There were zero confirmed incidents in which employees were dismissed or disciplined for corruption.</p>

Disclosure	Description	Location of Information/Response
<b>Anti-Competitive Behavior</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<p>AR &gt; Ethical business conduct p24</p> <p>SB-A &gt; Governance and management of sustainable business p3</p> <p>SB-A &gt; Our contribution to the UN SDGs p6</p> <p>SB-A &gt; Our double materiality assessment p8</p> <p><b>Code of Conduct</b> p7, 8, 16</p>
<b>GRI 206: Anti-Competitive Behavior</b>		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No legal actions were pending or completed during the reporting period.
<b>Tax</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<p>AR &gt; Principal risks and uncertainties p42</p> <p>SB-A &gt; Governance and management of sustainable business p3</p> <p>SB-A &gt; Our contribution to the UN SDGs p6</p> <p>SB-A &gt; Our double materiality assessment p8</p> <p><b>Group Tax Strategy</b></p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 207: Tax 2020</b>		
207-1	<b>Approach to tax</b>	<p>The Board discusses, reviews and approves the Group Tax Strategy annually.</p> <p>We are committed to being a transparent and honest corporate citizen in relation to tax. We engage openly and constructively with tax authorities and governmental organisations to ensure that we pay the fair amount of tax where levied by local law and disclose tax matters as required.</p> <p>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.</p> <p>Our Group Tax Strategy published online outlines our tax principles and ethos. We take a zero-tolerance approach to tax evasion, and maintain robust processes and controls 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.</p> <p><b>AR</b> &gt; Governance Report p87 <b>Group Tax Strategy</b></p>
207-2	<b>Tax governance, control, and risk management</b>	<p>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. There is a formal process for raising concerns confidentially within the organisation and concerns raised are taken seriously. Through a system of internal auditing, the controls are tested on a regular basis and evidence is maintained.</p> <p><b>Group Tax Strategy</b> <b>AR</b> &gt; Governance Report p87 <b>AR</b> &gt; Independent auditor's report to the members of Helios Towers plc p115-121</p>
207-3	<b>Stakeholder engagement and management of concerns related to tax</b>	<p>The Group adopts an open relationship with tax authorities in all jurisdictions in which we operate. We are 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.</p> <p>Employee responsibility is central to ensuring best practice, and our employee onboarding training includes anti-facilitation of tax evasion and compliance, which is followed by regular refreshers. The Investor Relations team at Helios Towers collates 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.</p> <p><b>Group Tax Strategy</b></p>

Disclosure	Description	Location of Information/Response
<b>Energy</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p><b>AR</b> &gt; Tackling energy challenges in our regions p17 <b>AR</b> &gt; TCFD disclosures p44-50 <b>SB-A</b> &gt; Governance and management of sustainable business p3 <b>SB-A</b> &gt; Our contribution to the UN SDGs p6 <b>SB-A</b> &gt; Our double materiality assessment p8 <b>Environmental Policy</b></p>
<b>GRI 302: Energy 2016</b>		
302-1	<b>Energy consumption within the organization</b>	<p>We used 819,125,195 kWh of total fuel (diesel and petrol) and consumed 423,951,922 kWh total electricity in 2024. None of our fuel consumption is currently from renewable sources.</p> <p>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 from vehicles is also collected.</p> <p>We did not have heating, cooling or steam consumption. No electricity, heating, cooling or steam was sold. Our total energy consumption was 1,243,077,118 kWh. Energy consumption has been calculated in line with the GHG Protocol. DEFRA conversion factors are used for the UK, and IEA factors are used for Africa and the Middle East electricity.</p>
302-2	<b>Energy consumption outside of the organization</b>	<p>During 2024, we consumed 12,357,190 kWh outside of the organisation. This consumption occurred as part of Scope 3 category 13, downstream leased assets. Downstream leased assets account for the grid usage and any diesel consumption from towers in South Africa and Oman as the power on these towers are not managed by Helios Towers. Energy consumption has been calculated in line with the GHG Protocol. DEFRA conversion factors are used for the UK, and IEA factors are used for Africa and the Middle East electricity.</p> <p><b>AR</b> &gt; Emissions and energy p19</p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
302-3	Energy intensity	Energy intensity per tower: 90,377 kWh/tower Energy consumption is in kWh. Energy included are fuel (diesel and petrol) and electricity. Energy consumption is for within the organisation only. <b>AR</b> > Emissions and energy p19
302-4	Reduction of energy consumption	<b>AR</b> > Energy efficiency p28 <b>AR</b> > Carbon reduction initiatives p26-27
302-5	Reductions in energy requirements of products and services	Helios Towers does not produce any physical products (final or intermediate) that require energy. As such, reductions in energy requirements for these are deemed not relevant for reporting.

**Biodiversity**

GRI 101: Material Topics 2024

3-3	Management of material topics	<p>It is Helios Towers' policy to make its best efforts to protect and conserve biodiversity. Any material impact on biodiversity when constructing and operating a site must be identified and mitigation implemented to avoid or minimise any negative impact. Restoration of an ecosystem may be necessary after the construction or decommissioning of a site. It is our policy to avoid constructing sites in any areas of critical habitats and/or legally protected and internationally recognised areas. If there are no viable alternatives, construction may be permitted subject to there being a robust and appropriately designed biodiversity monitoring and evaluation programme approved by the Group Head of Property.</p> <p>Many of our sites are surrounded by valuable ecosystems that not only support a wide range of plant and animal species but can be vital to the livelihoods of local people. We take responsibility for the impact our business has on these ecosystems and the wider environment. In a number of our markets, environmental impact assessments are a requirement to obtain environmental permits. For more information about how we manage biodiversity around our sites, see <b>page 13</b> of this Addendum.</p> <p><b>SB-A</b> &gt; Our contribution to the UN SDGs p6 <b>SB-A</b> &gt; Our double materiality assessment p8 <b>Environmental Policy</b></p>
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Disclosure	Description	Location of Information/Response
<b>GRI 101: Biodiversity 2024</b>		
101-1	Policies to halt and reverse biodiversity loss	We are conducting a biodiversity scoping exercise in 2025 and will report on progress next year.
101-2	Management of biodiversity impacts	
101-3	Access and benefit-sharing	N/A
101-4	Identification of biodiversity impacts	We are conducting a biodiversity scoping exercise in 2025 and will report on progress next year.
101-5	Locations with biodiversity impacts	
101-6	Direct drivers of biodiversity loss	
101-7	Changes to the state of biodiversity	
101-8	Ecosystem services	

**Emissions**

GRI 3: Material Topics 2021

3-3	Management of material topics	<p><b>AR</b> &gt; Climate action p16-18 <b>AR</b> &gt; TCFD disclosures p44-50 <b>SB-A</b> &gt; Governance and management of sustainable business p3 <b>SB-A</b> &gt; Our contribution to the UN SDGs p6 <b>SB-A</b> &gt; Our double materiality assessment p8 <b>Environmental Policy</b> <b>Basis of reporting</b></p>
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GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 305: Emissions 2016</b>		
305-1	Direct (Scope 1) GHG emissions	AR > Emissions and energy p19
305-2	Energy indirect (Scope 2) GHG emissions	We are unable to access residual factors for many of the countries we operate in to enable us to report market-based emissions. The only location where we could source a residual factor is the UK, which makes up 0.01% of our total emissions. Therefore, we deem that this is immaterial to our reporting compared to our operations in Africa and the Middle East. AR > Emissions and energy p19
305-3	Other indirect (Scope 3) GHG emissions	AR > Emissions and energy p19
305-4	GHG emissions intensity	AR > Emissions and energy p19
305-5	Reduction of GHG emissions	AR > Emissions and energy p19 SB-A > Scope 3 emissions p35
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.

Waste

GRI 3: Material Topics 2021

3-3	Management of material topics	SB-A > Waste p13
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Disclosure	Description	Location of Information/Response
<b>GRI 306: Waste 2020</b>		
306-1	Waste generation and significant waste-related impacts	SB-A > Waste p13
306-2	Management of significant waste-related impacts	All operational waste is tracked in line with our waste and asset disposal procedures. In general, waste is returned to our warehouse and an internal committee agrees the best method of disposal for each item at quarterly intervals. This can include refurbishing, recycling through certified partners, gifting (depending on the nature of the item) and selling materials at auction where the local government specifies which companies can participate. We continue to standardise our data collection to improve our waste disclosures into 2025. SB-A > Waste p13
306-3	Waste generated	We do not collect waste data according to this criteria. In our markets, we either reuse, refurbish or sell materials that we can no longer use to scrap dealers. In 2025, we will build on our data collection processes and reporting. SB-A > Waste p13
306-4	Waste diverted from disposal	
306-5	Waste directed to disposal	

Environmental Compliance

GRI 3: Material Topics 2021

3-3	Management of material topics	SB-A > Governance and management of sustainable business p3 SB-A > Our contribution to the UN SDGs p6 SB-A > Our double materiality assessment p8 Code of Conduct p10 Environmental Policy
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GRI 307: Environmental Compliance

307-1	Non-compliance with environmental laws and regulations	The Group has not been subject to any significant instances of non-compliance with environmental laws and regulations during the reporting period. The Group has in place policies and procedures including reporting and incident-response mechanisms to respond to any such incidents or concerns raised.
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GRI INDEX CONTINUED

**Disclosure Description Location of Information/Response**  
**Supplier Environmental Assessment**

**GRI 3: Material Topics 2021**

3-3	Management of material topics	All high- and medium-risk suppliers are required to sign the Third Party Code of Conduct, which stipulates standards of conduct for environmental protection. We also request evidence of environmental policies and certification. No suppliers were identified as having significant actual or potential negative environmental impacts. <b>AR</b> > Responsible supply chain practices p24 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Third Party Code of Conduct</b> p8 <b>Environmental Policy</b> <b>Supply Chain Management Statement</b>
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**GRI 308: Supplier Environmental Assessment**

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 certification. 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. Suppliers are screened and audited against sustainability criteria, including environmental criteria. For example, they are requested to provide evidence of environmental policies and certifications. <b>Supply Chain Management Statement</b> <b>Environmental Policy</b>

**Employment**

**GRI 3: Material Topics 2021**

3-3	Management of material topics	<b>AR</b> > Engaging our people p21 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Human Rights Policy</b>
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**Disclosure Description Location of Information/Response**  
**GRI 401: Employment**

401-1	New employee hires and employee turnover	See <b>page 36</b> for more details.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Benefits provided to employees vary across the countries where we do business, based on in-country guidelines and market practice. However, we do not make any differentiation in relation to access to benefits between full-time and part-time employees. We do not disclose a list of benefits across all operating companies. Benefit packages are provided based on in-country guidelines and best practices.
401-3	Parental leave	All employees are entitled to take parental leave across the Group.

**Occupational Health and Safety**

**GRI 3: Material Topics 2021**

3-3	Management of material topics	<b>AR</b> > Safety p22-23 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Code of Conduct</b> p11, 16 <b>Health and Safety Policy</b> <b>Human Rights Policy</b>
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GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 403: Occupational Health and Safety 2018</b>		
403-1	<b>Occupational health and safety management system</b>	<p>Helios Towers operates in multiple markets, including the UK and across Africa and the Middle East. We are guided by our management system, which complies with the international ISO 45001 health and safety standard. Each market has its own legislative requirements for health and safety, which are considered in a set of legal registers applicable to each market.</p> <p>Helios Towers employees are not the frontline workers on site; site operations are conducted by contracted partners:</p> <ol style="list-style-type: none"> <li>1. Maintenance Partners – to ensure the continued integrity and power uptime of our leased towers.</li> <li>2. Build Partners – to build towers on greenfield sites to meet new customer requirements.</li> <li>3. Security Partners – to protect the integrity of Helios Towers' assets from damage and theft.</li> </ol> <p>All these contracted partner personnel fall under Helios Towers' safe system of work and are reported on as part of our oversight and governance framework. <b>AR &gt; Safety p22-23</b></p>
403-2	<b>Hazard identification, risk assessment, and incident investigation</b>	<p>Helios Towers employees do not work on site and as such have a comparatively low exposure to occupational health risks.</p> <p>In line with the risk assessment for our employees, we mitigate risks with initiatives such as Display Screen Equipment training. All Helios Towers colleagues have access to medical care where required.</p> <p>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 assessment for all personnel.</p> <p>As part of our ongoing efforts to enhance safety measures and streamline risk reporting processes, we launched a new SHEQ ServiceNow reporting system in June 2024. Providing an improved user interface and reporting capability, the reporting system has been designed to make it easier for both colleagues and partners to report incidents and near misses.</p> <p>This system strengthens our existing safety strategy and reaffirms our unwavering commitment to health and safety across all aspects of our operations.</p>
403-3	<b>Occupational health services</b>	See 403-1, 403-2

Disclosure	Description	Location of Information/Response
403-4	<b>Worker participation, consultation, and communication on occupational health and safety</b>	<p>The intent of this requirement is understood to ensure that those undertaking risk-based activities are involved with how they are managed. Helios Towers does not directly employ frontline operational workers as per the intent of this requirement; however, we have included our most junior members of staff as 'worker representatives' in all SHEQ reviews and consultation, including management reviews, risk reviews and strategy workshops. Our contracted partners are required to have a plan to achieve ISO 45001 within six months of contract commencement and to have achieved certification within 18 months. 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. <b>AR &gt; Safety p22-23</b></p>
403-5	<b>Worker training on occupational health and safety</b>	<b>AR &gt; Safety p22-23</b>
403-6	<b>Promotion of worker health</b>	<p>To support our colleagues in balancing any personal and work-related challenges that they may be facing, our Group-wide employee assistance programme, provided by Lyra Health, gives colleagues and their family a range of free and confidential services, including access to professional counselling sessions.</p> <p>Company-funded private healthcare is available for all employees. The opportunity to cover immediate family members is also provided, either funded by the Company or, in certain markets, at a favourable rate.</p> <p>Wellbeing and health were key areas of focus that emerged from our Employee Engagement Survey, and our teams often conduct localised initiatives throughout the year. Initiatives are coordinated locally in each market, such as 'lunch and learn sessions' on wellbeing covering subjects such as sports and keeping active, mental health awareness, nutrition, etc.</p>
403-7	<b>Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</b>	<b>AR &gt; Safety p22-23</b>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
403-8	<b>Workers covered by an occupational health and safety management system</b>	100% of employees and contracted partner personnel are covered by an occupational health and safety system that has been internally audited. No workers are excluded.  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. We have a KPI ensuring that all maintenance partners are certified with ISO 45001 within 18 months of joining Helios Towers, with 16 out of 17 maintenance partners certified in 2024.
403-9	<b>Work-related injuries</b>	<ul style="list-style-type: none"> <li>a) Helios Towers direct personnel                             <ul style="list-style-type: none"> <li>i. Occupational fatalities: 0</li> <li>ii. High-potential occupational injuries: 0</li> <li>iii. Recordable injuries (Jan 24-Dec 24): 0</li> <li>v. Worked hours: 1,165,431</li> </ul> </li> <li>b) Contracted maintenance, build and security partners                             <ul style="list-style-type: none"> <li>i. Occupational fatalities: 1 (casual labour - hit by electric pole); road traffic accident motor vehicle fatalities: 4 (members of public); road traffic accident motorcycle fatalities: 0 workplace violence fatalities: 1 security guard (fatalities in our security workforce as a result of workplace violence)</li> <li>ii. High-potential occupational injuries: 7 with 357 days away (Lost-Time Incidents)</li> <li>iii. Recordable injuries (Jan 24-Dec 24): 16 (1 x occupational fatality, 7 x Lost-Time Incidents; 2 x restricted work cases; 6 x medical treatment injuries); Total Recordable Case Frequency Rate (Dec 24): 0.59 per 1 million people hours worked (12-month roll)</li> <li>iv. Driving, line of fire and working at height</li> <li>v. Worked hours: 27,017,136 12-month roll</li> </ul> </li> <li>c) Hazards that pose a risk of high-consequence injury <b>AR</b> &gt; Safety p22-23</li> <li>d) Actions taken to eliminate other work-related hazards: mandating two-way vehicle dashcams in all partner contracts.</li> <li>e) Rates are calculated based on 1,000,000 hours worked (12-month roll, Jan 24-Dec 24).</li> <li>f) No workers have been excluded from this disclosure.</li> </ul>
403-10	<b>Work-related ill health</b>	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
<b>Training and Education</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<b>AR</b> > Learning and development p21 <b>AR</b> > Safety p22-23 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8
<b>GRI 404: Training and Education</b>		
404-1	<b>Average hours of training per year per employee</b>	Total learning needs in 2024: Total: 3,023 hours (956 male, 426 female). Our data collection system does not currently provide a breakdown by employee category or average hours.
404-2	<b>Programs for upgrading employee skills and transition assistance programs</b>	We do not currently have formal transition-assistance programmes to facilitate continued employability. For more details see: <b>AR</b> > Learning and development p21
404-3	<b>Percentage of employees receiving regular performance and career development reviews</b>	100% of permanent employees receive regular performance and career-development reviews.
<b>Diversity and Equal Opportunity</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<b>AR</b> > Our local, diverse workforce p20 <b>AR</b> > Other Statutory Information > Anti-Harassment and Anti-Discrimination p11 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Code of Conduct</b> p9, 16 <b>Diversity and Inclusion</b>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 405: Diversity and Equal Opportunity 2016</b>		
405-1	Diversity of governance bodies and employees	For a breakdown of employees by gender see: <b>GRI 405-1 p36</b> For a breakdown of governance bodies by gender and ethnicity see: <b>AR</b> > Our local, diverse workforce p20 <b>AR</b> > Governance Report > Board diversity at a glance p81
405-2	Ratio of basic salary and remuneration of women to men	We report on the difference between the average earnings of male and female colleagues across the workforce. We currently do not provide a comparative salary ratio by employee category or by market. <b>Diversity and inclusion</b>
<b>Non-Discrimination</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<b>AR</b> > Our local, diverse workforce p20 <b>AR</b> > Reporting concerns p25 <b>AR</b> > Other Statutory Information > Anti-Harassment and Anti-Discrimination p111 <b>SB-A</b> > Governance and management of sustainable business p3 <b>Code of Conduct</b> p9: Respect our people, p16 Raising a concern
<b>GRI 406: Non-Discrimination 2016</b>		
406-1	Incidents of discrimination and corrective actions taken	One concern on harassment and discrimination was raised. It was not substantiated following our internal investigation and grievance process.
<b>Freedom of Association and Collective Bargaining</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<b>AR</b> > Stakeholder engagement > Workforce p73 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Third Party Code of Conduct</b> <b>Human Rights Policy</b>

Disclosure	Description	Location of Information/Response
<b>GRI 407: Freedom of Association and Collective Bargaining</b>		
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, with employee representatives present in Senegal, Congo Brazzaville and Madagascar. Senegal and Congo Brazzaville have collective bargaining agreements at the national level. During 2024, the agreement was negotiated with the relevant unions and approved by the Labour Administration, effective since September 2024. In addition, DRC, Congo Brazzaville and Madagascar and Senegal have established an approved 'Reglement interieur' (rules and regulations document) negotiated with employee representatives. Our Third Party Code of Conduct clearly states that the third party must respect the right of workers to freely create or join a labour union of their choice, without suffering any kind of discrimination, intimidation or harassment, in accordance with local law.
<b>Child Labor</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	All employees receive initial compliance training that also covers modern slavery compliance expectations. All our employees receive substantial training, including induction training upon commencing employment and periodic 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, focusing on high- and medium-risk third parties. We encourage our suppliers to undertake such training with their staff, share training materials and assist with delivery if requested. <b>AR</b> > Advancing labour and human rights p24 <b>SB-A</b> > Governance and management of sustainable business p3 <b>SB-A</b> > Our contribution to the UN SDGs p6 <b>SB-A</b> > Our double materiality assessment p8 <b>Code of Conduct</b> p16 <b>Modern Slavery Statement</b> <b>Third Party Code of Conduct</b> <b>Human Rights Policy</b>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 408: Child Labor</b>		
408-1	<b>Operations and suppliers at significant risk for incidents of child labor</b>	<p>We do not tolerate forced, bonded or compulsory labour, human trafficking, child labour and other kinds of slavery and servitude within our own operations or within our supply chain.</p> <p>Child labour is considered a risk in all our 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.</p> <p>We reinforce our commitment to protecting and respecting human rights in our Human Rights Policy. All high-risk suppliers have been trained in our Third Party Code of Conduct, which includes a review of labour rights and standards and our expectations.</p> <p>We have regular training and discussions with our third parties and contractors to sensitise teams to human rights risks and signs to look for. We ask that any violations on site or operations are reported to our dedicated confidential reporting line. As well as periodic supplier performance reviews and health and safety assessments, our compliance monitoring in 2024 included visits to third-party premises, meetings with key staff and visits to Helios Towers sites.</p> <p><b>AR</b> &gt; Advancing labour and human rights p24</p> <p><b>Modern Slavery Statement</b></p> <p><b>Third Party Code of Conduct</b></p> <p><b>Human Rights Policy</b></p>

**Forced or Compulsory Labor**

**GRI 3: Material Topics 2021**

3-3	<b>Management of material topics</b>	<p>All employees receive initial compliance training that also covers modern slavery compliance expectations. All our employees receive substantial training, including induction training upon commencing employment and periodic refresher training thereafter.</p> <p>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, focusing on high- and medium-risk third parties. We encourage our suppliers to undertake such training with their staff, share training materials and assist with delivery if requested.</p> <p><b>AR</b> &gt; Advancing labour and human rights p24</p> <p><b>AR</b> &gt; Other Statutory Information &gt; Anti-Harassment and Anti-Discrimination p11</p> <p><b>SB-A</b> &gt; Governance and management of sustainable business p3</p> <p><b>SB-A</b> &gt; Our contribution to the UN SDGs p6</p> <p><b>SB-A</b> &gt; Our double materiality assessment p8</p> <p><b>Code of Conduct</b> p16</p> <p><b>Modern Slavery Statement</b></p> <p><b>Third Party Code of Conduct</b></p>
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Disclosure	Description	Location of Information/Response
<b>GRI 409: Forced or Compulsory Labor</b>		
409-1	<b>Operations and suppliers at significant risk for incidents of forced or compulsory labor</b>	<p>We do not tolerate forced, bonded or compulsory labour, human trafficking, child labour and other kinds of slavery and servitude within our own operations or within our supply chain.</p> <p>Forced or compulsory labour is considered a risk in all our 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. We reinforce our commitment to protecting and respecting human rights in our Human Rights Policy.</p> <p>All high-risk suppliers are trained in our Third Party Code of Conduct, which includes a review of labour rights and standards and our expectations. We promote our dedicated whistleblowing and confidential reporting line as a channel for reporting any violations on site or operations. We raise awareness throughout the year with supplier sessions and wider forums to discuss risks and signs to look out for. As well as periodic supplier performance reviews and health and safety assessments, our compliance monitoring in 2024 included visits to third-party premises, meetings with key staff and visits to Helios Towers sites.</p> <p>During 2024, we initiated a review of our Group-wide partner evaluation process, including working conditions checks. This will be used as part of site visits to spot-check measures in place around rest days, payments and fair treatment for any employee that is engaged to work as part of Helios Towers, in addition to ongoing monitoring conducted by our Supply Chain, Operations and SHEQ teams. This will be reviewed as part of a Group-wide supplier evaluation process update in 2025.</p> <p><b>AR</b> &gt; Advancing labour and human rights p24</p> <p><b>Human Rights Policy</b></p> <p><b>Modern Slavery Statement</b></p>

**Security Practices**

3-3	<b>Management of material topics</b>	<p>During 2024, we appointed a Group Head of Security and developed a Group Security Policy and strategy. We define security solutions according to the risk profile of our sites, integrating technology such as motion sensors, CCTV, alarms, electronic access locks and guards, in addition to site monitoring tools with our Remote Monitoring System (RMS) and fuel alarms. An external audit will be carried out during 2025.</p>
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**GRI 410: Security Practices 2016**

410-1	<b>Security personnel trained in human rights policies or procedures</b>	<p>The security of our teams, partners and assets is paramount. A number of our sites are guarded and we work to minimise any risks relating to interactions between guards and local communities. We follow best practice guidance with regard to safety on site. Guards may also be recruited locally, helping to empower the community.</p>
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GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>Rights of indigenous Peoples</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	SB-A > Land use and land rights p14
<b>GRI 411: Rights of Indigenous Peoples 2016</b>		
411-1	Incidents of violations involving rights of indigenous peoples	SB-A > Land use and land rights p14
<b>Local communities</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	Management of material topics	<p>We engage with communities prior to construction of sites, and ensure that any grievances from affected communities are responded to and managed appropriately. Mechanisms are in place to ensure that affected persons or communities can easily lodge grievances, and all grievances lodged will be recorded and resolved in a transparent and traceable manner.</p> <p>Furthermore, we contribute to community-based organisations and initiatives through investments of time, funds and services. Our approach is to focus on long-term strategic projects and partnerships that align with our community investment strategy and our corporate values of Integrity, Partnership and Excellence. Read more about our approach in <a href="#">Strategic Community Investment</a>.</p> <p><b>AR</b> &gt; Strategic community investment p15  <b>SB-A</b> &gt; Our contribution to the UN SDGs p6  <b>SB-A</b> &gt; Our double materiality assessment p8  <b>SB-A</b> &gt; Land use and land rights p14  <b>SB-A</b> &gt; Women’s Empowerment Principles Index p39</p> <p><a href="#">Human Rights Policy</a>  <a href="#">Code of Conduct</a></p>

Disclosure	Description	Location of Information/Response
<b>GRI 413: Local Communities 2016</b>		
413-1	Operations with local community engagement, impact assessments, and development programs	<p>We recognise the importance of community engagement throughout our planning and construction phases, and ensure that we respond to local needs. Before developing any new site, we carefully consider the impacts on our communities through the following measures:</p> <ul style="list-style-type: none"> <li>- We consult with landowners, community leaders and municipal authorities through public consultation and community engagement. 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.</li> <li>- In compliance with our Anti-Bribery Policy, we do not offer any form of inducement to secure a permit, a lease or access to a site.</li> <li>- In response to public concerns, we offer opportunities to discuss these at council tribunal processes and other forums.</li> <li>- We undertake environmental assessments into any potential impact on habitats and species.</li> </ul> <p>Mobile network is required for frontline workers and local services as they assist communities in disaster-relief situations. We work with our customers to protect equipment as far as possible and ensure the safety of our staff and contractors by reducing any non-critical site work until it is safe to work. We ensure our assets are inspected in advance of severe weather situations where possible and backed up.</p> <p><b>AR</b> &gt; Strategic community investment p15</p>
413-2	Operations with significant actual and potential negative impacts on local communities	<p>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 consult with landowners, community leaders and municipal authorities through public consultation and community engagement. We develop bespoke solutions in conjunction with mobile network operators for areas where there are infrastructure challenges, such as rooftops, outdoor distributed antenna systems and dual-purpose street furniture, such as lampposts and bus shelters.</p>

GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>Supplier Social Assessment</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>We engage closely with our suppliers and contracted partners to drive responsible and ethical practices, doing our utmost to keep everyone working across our value chain safe from harm. 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 principles concerning fundamental rights set out in the ILO's Declaration on Fundamental Principles and Rights at Work.</p> <p><b>SB-A</b> &gt; Governance and management of sustainable business p3  <b>SB-A</b> &gt; Our contribution to the UN SDGs p6  <b>SB-A</b> &gt; Our double materiality assessment p8  <b>Third Party Code of Conduct Code of Conduct</b> p16</p>
<b>GRI 414: Supplier Social Assessment</b>		
414-1	<b>New suppliers that were screened using social criteria</b>	<p>Social criteria form part of the due diligence third-party questionnaires we use with all new suppliers and we work closely with partners to ensure this is integrated as part of our regular conversations. We require all our suppliers to agree to our Third Party Code of Conduct.</p> <p>All new third-party supplier risk assessments and due diligence are completed via our third-party risk management platform, which also incorporates screening against sanctions and enforcement lists and adverse media. As well as strengthening our due diligence, the platform is enabling improved Group oversight and an audit trail.</p>
414-2	<b>Negative social impacts in the supply chain and actions taken</b>	<p>See GRI 414-1.  <b>AR</b> &gt; Responsible supply chain practices p24</p>

Disclosure	Description	Location of Information/Response
<b>Public Policy</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>Our Integrity Policy sets out the requirements, rules and responsibilities that all Company employees must comply with in respect of the following: bribery and corruption, gifts and hospitality, sponsorship and donations, engagement with public officials, lobbying and advocacy activities.</p> <p>Over the last few years, we have strengthened management and oversight of interactions with public officials as part of the licensing, regulatory and market-launch activities. Enhanced guidelines and best practices were communicated to our teams across 2024.</p> <p><b>SB-A</b> &gt; Governance and management of sustainable business p3  <b>SB-A</b> &gt; Our contribution to the UN SDGs p6  <b>SB-A</b> &gt; Our double materiality assessment p8  <b>Third Party Code of Conduct Code of Conduct</b> p16</p>
<b>GRI 415: Public Policy</b>		
415-1	<b>Political contributions</b>	<p>The Company made no donations to any political party or other political organisation during the year.</p>
<b>Customer Health and Safety</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>We are committed to ensuring that our activities pose no risks to the health and safety of our colleagues, contracted partners and communities in which we operate. We follow regulations and processes. We work with government regulatory agencies and designated international bodies to ensure set standards are met and gain all required governmental permits for building, airspace safety, non-ionising radiation protection and the environment.</p> <p><b>SB-A</b> &gt; Governance and management of sustainable business p3</p>



GRI INDEX CONTINUED

Disclosure	Description	Location of Information/Response
<b>GRI 416: Customer Health and Safety 2016</b>		
416-1	<b>Assessment of the health and safety impacts of product and service categories</b>	<p>All our towers are assessed using stringent health and safety criteria. 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.</p> <p>We have a site community signage initiative for members of the local community across all sites. This site signage highlights any key risks on entering a site without permission.</p> <p>To ensure the integrity and safety of our sites, we conduct routine structural integrity audits and analyses throughout the year.</p>
416-2	<b>Incidents of non-compliance concerning the health and safety impacts of products and services</b>	<p>We have had no regulatory health and safety enforcement action brought against us in any of the markets in which we operate.</p>
<b>Customer Privacy</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p><b>AR</b> &gt; Cyber security and data privacy p25  <b>SB-A</b> &gt; Governance and management of sustainable business p3  <b>SB-A</b> &gt; Our contribution to the UN SDGs p6  <b>SB-A</b> &gt; Our double materiality assessment p8  <u><b>Code of Conduct</b></u> p12, 16  <u><b>Third Party Code of Conduct</b></u> p5, 10</p>
<b>GRI 418: Customer Privacy 2016</b>		
418-1	<b>Substantiated complaints concerning breaches of customer privacy and losses of customer data</b>	<p>We do not have direct access to end consumers or their data. In our normal business operations, we process certain personal data such as employee compensation details, performance management and other categories of personally identifiable information.</p> <p>During the reporting period, the Group has not identified any substantiated complaints. We maintain robust policies and procedures, including reporting and incident-response mechanisms, to address any concerns that may arise. Our commitment to data protection is reinforced through proactive monitoring, strong security controls and regular audits.</p>

Disclosure	Description	Location of Information/Response
<b>Socioeconomic Compliance</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>Sustainable business is a Board-level commitment. Our Board members are responsible for overseeing all activities relating to our Sustainable Business Strategy. 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 the material sustainability topics we focus on.</p> <p>For more on Governance:  <u><b>Corporate governance</b></u>  <b>AR</b> &gt; Ethical business conduct p24-25  <b>SB-A</b> &gt; Governance and management of sustainable business p3  <u><b>Code of Conduct</b></u>  <u><b>Third Party Code of Conduct</b></u></p>
<b>GRI 419: Socioeconomic Compliance</b>		
419-1	<b>Non-compliance with laws and regulations in the social and economic area</b>	<p>The Group has not identified any substantiated non-compliance with laws in the social and economic area during the reporting period.</p> <p>We have in place policies and procedures, including reporting and incident-response mechanisms, to respond to any such incidents or concerns raised.</p>

GRI INDEX CONTINUED

GRI 2-7: Employees

Total number of employees by gender	Permanent	Temporary	Total
Male	452	86	538
Female	189	31	220

	Corporate	Congo Brazzaville	DRC	Ghana	Madagascar	Malawi	Oman	South Africa	Senegal	Tanzania
Total number of employees by region	186	49	144	45	43	39	58	31	55	108
Male	129	37	121	35	29	24	38	15	37	73
Female	57	12	23	10	14	15	20	16	18	35

	Corporate	Congo Brazzaville	DRC	Ghana	Madagascar	Malawi	Oman	South Africa	Senegal	Tanzania
Total number of employees by region	186	49	144	45	43	39	58	31	55	108
Permanent	154	46	120	42	35	35	43	29	48	89
Temporary	32	3	24	3	8	4	15	2	7	19

## GRI INDEX CONTINUED

## GRI 305-3: Other Indirect (Scope 3) GHG emissions

Scope 3 category	Evaluation	% of Scope 3
Category 1: Purchased goods and services	Relevant, calculated	10%
Category 2: Capital goods	Relevant, calculated	9%
Category 3: Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	Relevant, calculated	64%
Category 4: Upstream transport and distribution	Relevant, calculated	2%
Category 5: Waste generated in operations	Relevant, not yet calculated	0% This category will be accounted for in due course.
Category 6: Business travel	Relevant, calculated	2%
Category 7: Employee commuting	Relevant, calculated	0%
Category 8: Upstream leased assets	Not relevant, explanation provided	0% We do not have any leased assets and hence this category has been excluded.
Category 9: Downstream transportation & distribution	Not relevant, explanation provided	0% Most of our transportation takes place upstream, as most of our customers put equipment on our towers directly and therefore this category is not relevant.
Category 10: Processing of sold products	Not relevant, explanation provided	0% We do not produce any physical products (final or intermediate) that would undergo processing. As such, this category is not relevant for emissions reporting.
Category 11: Use of sold products	Not relevant, explanation provided	0% We do not produce any physical products (final or intermediate) that require energy, fuel or refrigerant usage. As such, this category is not relevant for emissions reporting.
Category 12: End-of-life treatment of sold products	Not relevant, explanation provided	0% We do not produce any physical products (final or intermediate) that require end-of-life treatment. As such, this category is not relevant for emissions reporting.
Category 13: Downstream leased assets	Relevant, calculated	11%
Category 14: Franchises	Not relevant, explanation provided	0% We do not own or operate any franchises, and as such does not require calculating emissions related to this category.
Category 15: Investments	Not relevant, explanation provided	0% We do not have any investments for which emissions would need to be accounted. As such, this category is not relevant for emissions reporting.

## GRI INDEX CONTINUED

## GRI 401-1: New employee hires and employee turnover

Employees hired and turnover by age (permanent employees only)	Under 30	30-50	Over 50	Total
Number (and rate <sup>1</sup> ) of new employee hires during the reporting period	18 (23%)	58 (73%)	4 (5%)	80 (13%)
Number (and rate <sup>1</sup> ) of employee turnover during the reporting period	5 (7%)	57 (79%)	10 (14%)	72 (11%)

Employees hired and turnover by gender (permanent employees only)	Female	Male	Total
Number (and rate <sup>1</sup> ) of new employee hires during the reporting period	27 (34%)	53 (66%)	80 (13%)
Number (and rate <sup>1</sup> ) of employee turnover during the reporting period	16 (22%)	56 (78%)	72 (11%)

Employees hired and turnover by region (OpCo)	Holding company	Tanzania	DRC	Congo Brazzaville	Ghana	South Africa	Senegal	Madagascar	Malawi	Oman
Number (and rate <sup>1</sup> ) of new employee hires during the reporting period	21 (14%)	4 (5%)	16 (14%)	7 (16%)	2 (4%)	0 (0%)	6 (13%)	11 (31%)	4 (12%)	9 (5%)
Number (and rate <sup>1</sup> ) of employee turnover during the reporting period	20 (13%)	7 (8%)	9 (8%)	4 (9%)	6 (13%)	6 (20%)	5 (11%)	10 (29%)	3 (9%)	2 (5%)

## GRI 405-1: Diversity of governance bodies and employees

For more information on employees by gender and ethnicity see: GRI 2-7 SB-A: p34

For more information on governance bodies by age, gender and ethnicity see: AR: Governance Report p112

Governance body members and employees by age	Under 30	30-50	Over 50	Not disclosed
Board members	N/A	3	7	
Management <sup>2</sup>	0	81	30	
All other employees	80	454	52	

1 Compared to total average permanent employees in 2024.

2 Management includes permanent employees with line management responsibility or those in leadership positions (defined as band 1 and 2 employees).

## SASB Index

The Sustainable Accounting Standards Board (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.

Area/Standard	SASB indicator code	Requirement	2024 response
<b>SASB: Managing Systemic Risks</b>			
From the SASB Telecommunication Services standard	TC-TL-550a.1	(1) System average interruption frequency and (2) customer average interruption duration <i>Unit of measure:</i> <i>Disruptions per customer</i> <i>Hours per customer</i>	Average weekly downtime per tower: 1 minute 16 seconds <b>AR</b> > Digital Inclusion p14 Power uptime for reliable mobile connectivity.
From the SASB Telecommunication Services standard	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions <i>Discussion and analysis</i>	<b>AR</b> > Digital Inclusion p14 Power uptime for reliable mobile connectivity.
<b>SASB: Business Ethics</b>			
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 <i>Unit of measure:</i> <i>Number</i> <i>Reporting currency</i>	In Democratic Republic of the Congo (DRC), we have 2,601 sites and 6,470 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 <i>Unit of measure:</i> <i>Reporting currency</i>	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 <i>Discussion and analysis</i>	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. <b>Code of Conduct</b>

## SASB INDEX CONTINUED

Area/Standard	SASB indicator code	Requirement	2024 response
<b>SASB: Energy Management</b>			
From the SASB Telecommunication Services standard	TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable <i>Unit of measure:</i> <i>Gigajoules (GJ),</i> <i>Percentage (%)</i>	AR > Energy use p19
<b>SASB: Environmental Impacts of Project Development</b>			
From the SASB Wind Technology & Project Developers standard	IF-EN-0160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations <i>Unit of measure:</i> <i>Number</i>	SB-A > GRI 307-1 Non-compliance with environmental laws and regulations p25
From the SASB Waste Management standard	IF-EN-0160a.2	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction <i>Discussion and analysis</i>	SB-A > Other topics p13-14
<b>SASB: Workforce Health and Safety</b>			
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) 0.59 per million worked hours (12-month roll) (2.a) 0 occupational fatalities per million worked hours (12-month roll) (2.b) 0.04 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 <i>Unit of measure:</i> <i>Number</i>	Road traffic accident (RTA) total: 33 (29: motor vehicle; 4: motorcycle)
<b>SASB: Structural Integrity &amp; Safety</b>			
From the SASB Engineering & Construction Services standard	IF-EN-250a.1	Amount of defect- and safety-related rework costs <i>Unit of measure:</i> <i>Reporting currency</i>	Our primary rework costs related to defects and safety originate from our internal quality audits and planned maintenance inspections, during which we verify that all undertaken work aligns with our quality and safety standards. Currently, we do not gather or disclose detailed data on the costs associated with these activities.
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 <i>Unit of measure:</i> <i>Reporting currency</i>	There have been no monetary losses as a result of legal proceedings associated with defect- and safety-related incidents.

## Activity metrics

	Number of towers	Number of tenancies	Number of employees	Revenues (US\$m)
2024 Data	14,325	29,406	758	792

# Women’s Empowerment Principles Index

In 2020, Helios Towers signed the Women’s Empowerment Principles (WEPs) to help us advance gender equality in the workplace, marketplace and our communities. Below is a summary of our actions against the Principles.

In support of

## WOMEN’S EMPOWERMENT PRINCIPLES

Established by UN Women and the UN Global Compact Office

### 2024 activity and achievements

#### Principle 1

**Prerequisite for the signing of the charter: Establish high-level corporate leadership for gender equality**

- Promoting gender equality is part of our Sustainable Business Strategy. The Board and Group ExCo championed and monitored progress throughout the year.
- At Board level, we fully comply with the female representation target originally set by the Hampton-Alexander Review (now known as the FTSE Women Leaders Review).
- 22% women in our Executive Committee.
- 40% women on our Board of Directors.

#### Principle 2

**Treat all women and men fairly at work – respect and support human rights and non-discrimination**

- Company-wide mandatory training on diversity, equity and inclusion (DEI), with the course ‘Your Role in Workplace Diversity’. Further DEI awareness training will be launched in 2025. DEI has also been incorporated as part of our bespoke leadership programmes.
- Review of recruitment processes with a focus on gender equity (as part of talent sourcing and retention strategies).

#### Principle 3

**Ensure the health, safety and well-being of all women and men workers**

- Our wellbeing programme and employee assistance programme (supported by Lyra Health) provide colleagues and their family with a range of free and confidential services, including access to professional counselling sessions.
- We train all new team members on our Code of Conduct and Anti-Discrimination Policy, which encompasses a zero-tolerance policy towards all forms of discrimination and violence at work.

### 2024 activity and achievements

#### Principle 4

**Promote education, training and professional development for women**

- We have initiated a reciprocal mentoring programme, sponsored by our Group CEO. Male colleagues from our Executive Leadership Team (ELT) have been paired with senior female colleagues across the business, in efforts to deepen understanding of the challenges faced by female colleagues in the workplace, shift perceptions and unconscious bias where they may exist, and ultimately improve collaboration and ways of working.
- Following the successful pilot of our Women in Leadership programme last year, we intend to launch a full programme in 2025.

#### Principle 5

**Implement enterprise development, supply chain and marketing practices that empower women**

- Promoting women in STEM through our HT graduate programme, engaging with schools and universities.
- We contribute towards Broad-Based Black Economic Empowerment (B-BBEE) in South Africa (level 1), which focuses on empowerment of local businesses and youth through skills development.
- We support digital inclusion for women, which in turns supports female entrepreneurship and access to services. We cover over 75 million women in the coverage footprint of our sites.

#### Principle 6

**Promote equality through community initiatives and advocacy**

- The HT graduate programme aims to achieve a target of 50% female students.
- Community initiatives such as partnering with Camara to develop ICT labs and supporting schools and universities as part of Girls in ICT Day.

Read more on our efforts to empower women and girls through our community initiatives on page 15 of our Annual Report.

#### Principle 7

**Measure and publicly report on progress to achieve gender equality**

- We report annually to indices such as the Workplace Disclosure Initiative as well as international reporting frameworks such as the GRI on gender-related indicators to support internal decision-making and public disclosure.
- We report our gender pay gap data annually to measure our progress and review areas for improvement in achieving equal pay across the Group.

# Independent assurance report

## To: The Stakeholders of Helios Towers

### 1. Introduction and Objectives of Work

Bureau Veritas UK Limited ('Bureau Veritas') has been engaged by Helios Towers Plc ('Helios Towers') to provide limited assurance over Scope 1, Scope 2 and selected Scope 3 Greenhouse Gas emissions and Gender Diversity and Population Coverage related indicators reported in its Annual Report and Financial Statements 2024 (the 'Report') published [here](#). The objective is to provide assurance to Helios Towers and its stakeholders over the accuracy and reliability of the reported information and data.

### 2. Scope of Work

The scope of our work was limited to assurance over the following information included within the Report for the period 1st January 2024 – 31st December 2024 (the 'Selected Information'):

- Scope 1 GHG emissions - Includes tower diesel, company vehicle petrol/diesel and refrigerants (tCO<sub>2</sub>e)
- Scope 2 GHG emissions - Includes tower grid electricity and office electricity (tCO<sub>2</sub>e)
- Scope 3 GHG emissions (tCO<sub>2</sub>e) - Category 3: Fuel and Energy related activities not included in Scope 1 and Scope 2 GHG emissions. This includes:
  - Emissions generated from Well-To-Tank (WTT) and due to Transmissions and Distribution (T&D) of Petrol
  - Emissions generated from WTT and due to T&D of Diesel
  - Emissions generated from WTT and due to T&D of Electricity
- Emissions intensity: Total emissions (Scope 1 and Scope 2) per tower and per tenant
- Gender Diversity: % of male and female employees in total workforce
- Population coverage: Helios Towers' estimated potential population that falls within the network coverage footprint of towers, calculated using WorldPop source data (2G and 3G/4G modelling)

### 3. Reporting Criteria

The Selected Information needs to be read and understood together with the Helios Towers Basis of reporting and recalculation policy, as set out [here](#).

### 4. Limitations and Exclusions

Excluded from the scope of our work is assurance of information relating to:

- Activities outside the defined assurance period;
- Positional statements of a descriptive or interpretative nature, or of opinion, belief, aspiration or commitment to undertake future actions; and
- Other information included in the Report other than the Selected Information;

The following limitations should be noted:

- This limited assurance engagement relies on a risk based selected sample of sustainability data and the associated limitations that this entails.
- The reliability of the reported data is dependent on the accuracy of metering and other production measurement arrangements employed at site level, not addressed as part of this assurance.
- This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist.

### 5. Responsibilities

This preparation and presentation of the Selected Information in the Report are the sole responsibility of the management of Helios Towers. Bureau Veritas was not involved in the drafting of the Report or of the Reporting Criteria. Our responsibilities were to:

- Obtain limited assurance about whether the Selected Information has been prepared in accordance with the Reporting Criteria;
- Form an independent conclusion based on the assurance procedures performed and evidence obtained; and
- Report our conclusions to the Directors of Helios Towers

### 6. Assessment Standard

We performed our work to a limited level of assurance in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after December 15, 2015), issued by the International Auditing and Assurance Standards Board.



**INDEPENDENT LIMITED ASSURANCE REPORT CONTINUED**

**7. Summary of Work Performed**

As part of our independent assurance, our work included:

1. Conducting interviews with relevant personnel of Helios Towers;
2. Reviewing the data collection and consolidation processes used to compile Selected Information, including assessing assumptions made, and the data scope and reporting boundaries;
3. Reviewing documentary evidence provided by Helios Towers;
4. Agreeing a selection of the Selected Information to the corresponding source documentation;
5. Reviewing Helios Towers systems for quantitative data aggregation and analysis;
6. Assessing the disclosure and presentation of the Selected Information to ensure consistency with assured information;
7. Comparing the Selected Information to the prior year amounts taking into consideration changes in business activities, acquisitions and disposals;
8. Evaluating the design of internal systems, processes and controls to collect and report the Selected Information;

A 5% materiality threshold was applied to this assurance. It should be noted that the procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

**8. Conclusion**

On the basis of our methodology and the activities and limitations described above, nothing has come to our attention to indicate that the Selected Information is not fairly stated in all material respects as per the table below.

**Verified Metrics for FY2024**

Scope 1 GHG Emissions	210,603 tCO <sub>2</sub> e
Scope 2 GHG Emissions*	140,414 tCO <sub>2</sub> e
Scope 3 Category 3 GHG Emissions (Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2)	98,133 tCO <sub>2</sub> e
Emission Intensity** (Scope 1 and 2 GHG emissions from Helios Towers' markets)	25.52 tCO <sub>2</sub> e per tower 12.72 tCO <sub>2</sub> e per tenant
Gender Diversity	30% female employees in total workforce
Estimated population that falls within the network coverage footprint of each tower	151,400,224 people

\* This figure is calculated as location-based. Helios Towers do not calculate Scope 2 market-based emissions  
\*\*Includes Scope 1 and 2 for the markets included in the 2030 target

**9. Statement of Independence, Integrity and Competence**

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 190 years history. Its assurance team has extensive experience in conducting verification over environmental, social, ethical and health and safety information, systems and processes.

Bureau Veritas operates a certified<sup>1</sup> Quality Management System which complies with the requirements of ISO 9001:2015, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, quality reviews and applicable legal and regulatory requirements which we consider to be equivalent to ISQM 1 & 2<sup>2</sup>.

Bureau Veritas has implemented and applies a Code of Ethics, which meets the requirements of the International Federation of Inspections Agencies (IFIA)<sup>3</sup>, across the business to ensure that its employees maintain integrity, objectivity, professional competence and due care, confidentiality, professional behaviour and high ethical standards in their day-to-day business activities. We consider this to be equivalent to the requirements of the IESBA code<sup>4</sup>. The assurance team for this work does not have any involvement in any other Bureau Veritas projects with Helios Towers.



**Bureau Veritas UK Ltd**

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**London, 13 March 2025**

1 Certificate available on request  
2 International Standard on Quality Management 1 (Previously International Standard on Quality Control 1) & International Standard on Quality Management 2  
3 International Federation of Inspection Agencies – Compliance Code – Third Edition  
4 Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants



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