



## Modern Slavery Statement

### Introduction

This statement is made and published in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "**Act**"). It outlines the steps taken by Helios Towers plc and its subsidiaries (together, "**we**", "**our**" or the "**HT Group**") to prevent modern slavery and human trafficking for the financial year ended 31 December 2024.

### Our business, structure, and supply chain

We are a leading independent telecommunications infrastructure company, with over 14,000 towers in nine markets across Africa and the Middle East. We build, acquire, lease-up and operate telecommunications towers that can accommodate and power the needs of multiple tenants. Our tenants are blue-chip Mobile Network Operators (MNOs) and we serve them across nine high-growth markets. We operate in the Democratic Republic of Congo, the Republic of Congo, the Republic of Ghana, the United Republic of Tanzania, the Republic of South Africa, the Republic of Senegal, Republic of Madagascar, Malawi and Oman (the "**Jurisdictions**").

We offer a high-quality and comprehensive passive infrastructure solution that includes site selection and preparation, maintenance, security, power management and hosting of active equipment such as antennae. Our focus on building and acquiring sites with high lease-up potential, and providing best-in-class customer service, supports the sustainable expansion of mobile connectivity. MNOs can roll out and densify mobile coverage faster, more reliably, more cost effectively and with a lower environmental impact. We are proud of our role in advancing access to mobile communications in our markets, which in turn contributes to social and economic development.

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

As of 31 December 2024, the HT Group employed 758 direct employees in permanent, fixed-term and temporary positions.

Helios Towers works with suppliers around the world to meet the needs of our business and customers, with a strong focus on local sourcing wherever possible. Our product procurement typically comprises telecom towers, generators, rectifiers, batteries, solar power units and fuel. We engage local contractors as partners in services such as site maintenance, civil construction, power management and security provision. We spend over USD 400 million through work with over 1,200 suppliers worldwide to meet the needs of customers and our business. 81% of our spend is with local suppliers.<sup>1</sup>

We work closely with our suppliers and contractors to promote responsible and ethical behaviour, doing our utmost to keep everyone working in our operations safe from harm and treated fairly. We support an indirect workforce of more than 11,000<sup>2</sup> people who build, maintain and secure our sites.

The HT Group maintains a central supply chain function to manage the tendering processes and negotiations with key suppliers, with support teams in each of the Jurisdictions.

### **Our principles and values**

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

As set out in our [Human Rights Policy](#), the HT Group is committed to respecting human rights following the principles of internationally recognised human rights as expressed in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We also expect all third parties with whom we conduct business to respect and promote universal human rights principles expressed in these declarations. Helios Towers is also a signatory of the UN Global Compact.

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

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<sup>1</sup> Suppliers operating in the country where products and services are delivered.

<sup>2</sup> This is based on monthly, voluntarily reported people hours from our partners.

social responsibilities seriously, and we expect the same high standards from those with whom we conduct business.

We are committed to fair employment practices, and we regularly review and ensure competitive wages and benefits for our employees, in addition, we hold our suppliers accountable to our [Third Party Code of Conduct](#), which includes the requirement to pay their employees promptly and at a rate that meets or exceeds the local minimum wage.

In our recruitment process, we conduct onboarding checks, including identity and right-to-work verifications and reference checks. We also perform education and professional qualification checks where applicable. These checks help identify potential red flags for modern slavery and any issues found are promptly addressed by our recruitment team.

We maintain an employee wellness program, offering resources and support to address well-being issues and emphasising the importance of employee health and wellbeing in our organisational culture.

### **Our policies**

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

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

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

The policies and procedures referred to above are approved, adopted, and implemented under the oversight of the HT Group's Board and Executive

Management teams. This enables the functional areas and procedural requirements to be combined to help identify and mitigate the risk of slavery and human trafficking occurring.

### **Confidential Reporting Line**

In 2024, we introduced a new, more user-friendly confidential reporting line available to all employees and partners, should they wish to raise concerns about actual or potential non-compliance, confidentially and anonymously if desired. The service is available in multiple languages designed to encourage those who might have concerns of i) breaches of the law, ii) breaches of our Codes of Conduct or other policies, or iii) any other wrongdoing, to come forward and report such concerns with confidence and without fear of retaliatory action. This includes concerns regarding slavery and human trafficking.

### **Due diligence and risk assessment**

Our most significant risks regarding slavery and human trafficking are in our supply chain. We apply a risk-based approach and methodology to evaluate each third party prior to engagement and on an ongoing basis thereafter. We use Freedom House Global Freedom in the World reports and Walk Free Global Slavery Index to understand human rights and modern slavery risk in our Jurisdictions.

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

- Screening against sanctions and enforcement lists and adverse media using our third-party screening platform;
- Additional due diligence questionnaires to understand more details of the supplier's policies and practices;
- Additional financial document review;
- Annual Third Party Code of Conduct certification;
- Regular due diligence refresh.

### **Training**

We arrange for all employees to be provided with an appropriate level of training, including induction training upon commencing employment and periodic reminders and refresher training thereafter. In addition to the induction training, new joiners must also complete the Protecting Human Rights e-learning course.

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 offer face-to-face and remote training to employees and third parties on modern slavery and protecting human rights, as well as training on our Third Party Code of Conduct to high and medium-risk third parties. We encourage our suppliers to undertake such training with their staff and we offer to share our training materials and assist with training if requested. We continue to ensure that employees and our third parties are actively informed of the risks of modern slavery and how to identify them.

In 2024, we held supply chain forums in Malawi and Madagascar where we discussed with our partners:

- our Third Party Code of Conduct and our commitment to combatting human trafficking and modern slavery;
- signs and indicators that may suggest potential human trafficking and modern slavery situations;
- the need for our partners and employees to remain vigilant and to promptly report any suspicions;
- the need to collaborate to mitigate the risk of human trafficking and modern slavery.

### **Monitoring and audit**

Helios Towers is aware of such risks and continues to actively assess and manage its response in respect of potential health and safety concerns, the treatment and payment of workers in its supply chain and access to grievance mechanisms.

During 2024, Group compliance conducted on-site visits and visits to supplier premises in the majority of our Jurisdictions and met with individuals present, providing services to Helios Towers. Group compliance will continue these visits during 2025.

Further, we conducted several supplier performance reviews during 2024, and as of 31 December 2024, we obtained certification from 79% of high and medium risk third parties that they comply with the requirements of our Third Party Code of Conduct. We will continue to follow up on any outstanding third-party certifications during 2025.

## Effectiveness

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

## Next steps

We understand that we must continue to review our internal policies, procedures and processes, and identify risks, opportunities and further steps that can be taken to improve our position regarding slavery and human trafficking.

In addition to the ongoing actions detailed above, specific measures that we aim to undertake in 2025 include:

- Ongoing review of our Human Rights Policy (and related policies) and procurement procedures to ensure they align with best practices;
- Continuing to risk assess our third parties and review supplier responses to questionnaires to identify potential risks, and strengthen supplier engagement concerning modern slavery and human trafficking;
- Developing additional human rights due diligence processes to be included in supplier onboarding, partner evaluations and onsite feedback mechanisms;
- Continuing employee and third-party awareness campaigns on promoting a speak-up culture and reporting of actual or potential breaches of our Code of Conduct and Third Party Code of Conduct;
- Holding additional supplier/business partner forums in other Jurisdictions to strengthen further knowledge and understanding among our key suppliers and increase capability and competency in mitigating this risk;
- Developing additional metrics to measure the effectiveness of compliance with our policies and best practices;
- Completing registration on the UK Government Modern Slavery register.

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

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

Tom Greenwood  
Group Chief Executive Officer  
07 March 2025