



**REPORTING SUPPLEMENT TO THE ANNUAL REPORT  
AND FINANCIAL STATEMENTS 2023**

Helios Towers plc

## Introduction

This document supplements our Annual Report and Financial Statements 2023 and provides additional disclosures on our management and reporting on progress of our Sustainable Business Strategy.

**R**eporting transparently on progress and managing our material issues are an important part of our commitment to sustainable business. We are committed to continuous improvement of our approach, and we use globally recognised reporting frameworks and standards to guide the rigour of our reporting.

In this report, we provide details on our material issues, how these issues are governed and managed and how we contribute to global targets, such as the UN Sustainable Development Goals (SDGs).

Bureau Veritas has provided limited assurance on selected non-financial data, including our 2023 carbon footprint, gender diversity and population coverage. See our Assurance statement on [page 41](#).



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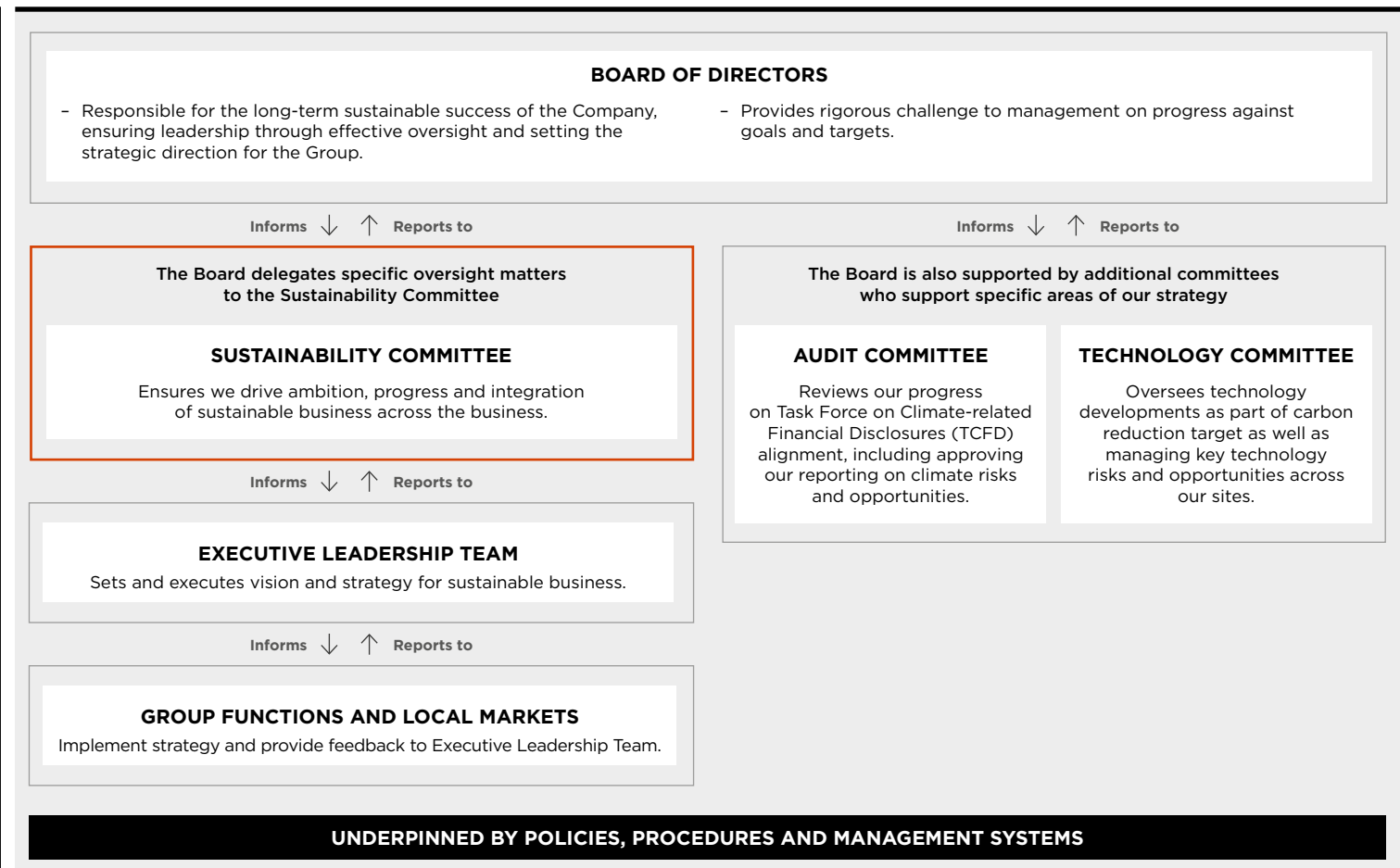
**FOR MORE INFORMATION, SEE OUR ANNUAL REPORT AND FINANCIAL STATEMENTS. →**



# 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.

To ensure the Board has sufficient oversight of our Sustainable Business Strategy and performance, a dedicated Sustainability Committee was established in 2023 to oversee all material sustainability topics based on our assessment completed in 2022. The Committee is chaired by an Independent Non-Executive Director and includes members of the Board, as well as the CEO and CFO. The Committee held meetings in July and December 2023, and terms of reference and a standing agenda were agreed. The Committee is responsible for providing sustainable business updates as part of all Board meetings. The Board met six times during 2023, and sustainable business was a standing agenda item at every meeting.



READ MORE ABOUT THE SUSTAINABILITY COMMITTEE IN OUR **ANNUAL REPORT AND FINANCIAL STATEMENTS, PAGE 96** →

**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 CEO, with close involvement and support from the CFO and the Executive Leadership Team, has the highest level of executive responsibility for sustainable business performance. Our Group Head of Sustainability reports to the CFO and works with functions across the business to support the delivery of our sustainable business priorities.

The CFO, Group Head of Sustainability and Heads of Function provide regular updates to the Sustainability Committee and Executive Leadership Team on progress against key performance indicators (KPIs) and targets, achievements, challenges and plans. They also work with Group functions and market teams to share best practice and support the effective delivery of our strategy. Key decisions made in 2023 include initiating a rebaselining process to review our carbon target and roadmap and the development of our Group-wide climate risk register.

Several teams at Group level and in our markets are responsible for implementing the Sustainable Business Strategy. As we strive to integrate sustainability across core business functions, both Group functions and OpCo teams manage our sustainability impacts (see our material issues on [page 7](#)).

**Managing our material issues**

- We identify issues that have the largest impacts on people and the environment as well as for our business.
- We ensure that engagement with our stakeholders is integrated into our approach.
- We are guided by best practice recommendations, international sustainability frameworks and peer benchmarking.
- We establish effective systems and robust policies such as the Environmental Policy, which governs the monitoring and management of the environmental impact of our operations.
- We operate a zero-tolerance policy and provide grievance mechanisms to counter unethical conduct, as well as ensuring the highest standards covering many of the material sustainability topics we focus on.
- We establish priorities, commitments, KPIs and clear targets to monitor progress and accelerate performance on our most material issues.
- We uphold a strong governance framework to support and evaluate this management approach and actions, with regular sustainable business reviews at Board level. We keep our management approach under regular review to ensure it remains relevant and effective.





# OUR SUSTAINABLE BUSINESS STRATEGY

Our five-year Sustainable Business Strategy guides how we will deliver on our purpose and mission and builds on our values of Integrity, Partnership and Excellence. Our strategy drives impact in the key areas of digital inclusion,

climate action, localised and talented teams. Responsible governance underpins the strategy and ensures we achieve our objectives and deliver impact.

## OUR STRATEGY

### Overview

Delivering the best customer service, including power uptime, network roll out speed, attractive pricing, capital efficiency and reduced carbon footprint enabled through our infrastructure-sharing model.

Investing in our people and partners, providing local employment, creating a culture of safety and embedding business excellence and Lean Six Sigma principles for more efficient and effective operations.

Disciplined approach to capital allocation and focus on efficiency drives the sustainable growth of our business, enabling mobile connectivity with fewer emissions and delivering value for all stakeholders.

## OUR 2026 TARGETS

### Strategic KPIs and 2026 targets

**Downtime per tower per week**  
<30 seconds

**New site/colocation roll out**  
90 days | 24 hours

**Population coverage**  
164m

**Employees trained in Lean Six Sigma**  
70%

**Female employees**  
30%

**Local employees**  
>95%

**Tenancy ratio**  
2.2x

**Rural sites**  
6,000

**Carbon reduction per tenant<sup>1</sup>**  
46%

Digital inclusion



Climate action



Local, diverse, talented teams



Responsible governance



**Customer Service Excellence**

**People and Business Excellence**

**Sustainable Value Creation**

**UNDERPINNED BY OUR VALUES**

### INTEGRITY

Striving to do the right thing

### PARTNERSHIP

Based on mutual respect and benefit

### EXCELLENCE

Our goal is to be the best we can be

<sup>1</sup> 2030 target reflects Scope 1 and 2 emissions and covers the five markets where we were operational in our 2020 baseline year.



## 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	2023 PERFORMANCE	2026 TARGET	HOW WE CREATE IMPACT
<b>Customer service excellence</b>	Downtime per tower per week (minutes)	1:49	<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.
	Population coverage (millions)	144m	164m	
<b>People and business excellence</b>	% employees trained in Lean Six Sigma	53%	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, maintenance of low-carbon solutions and maximising power uptime.
	% female employees	28%	30%	
	% local employees	96%	>95%	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.
	Five ISO accreditations maintained		100%	
<b>Sustainable value creation</b>	Tenancy ratio	1.91x	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.
	Rural sites	5,817	6,000	
	Carbon emissions per tenant (tCO <sub>2</sub> e)	12.01*	(2030 target) 46% reduction per tenant from 2020 baseline	

\* Reflects Scope 1 and 2 emissions and covers the five markets where we were operational in our 2020 baseline year.

# OUR MATERIAL ISSUES

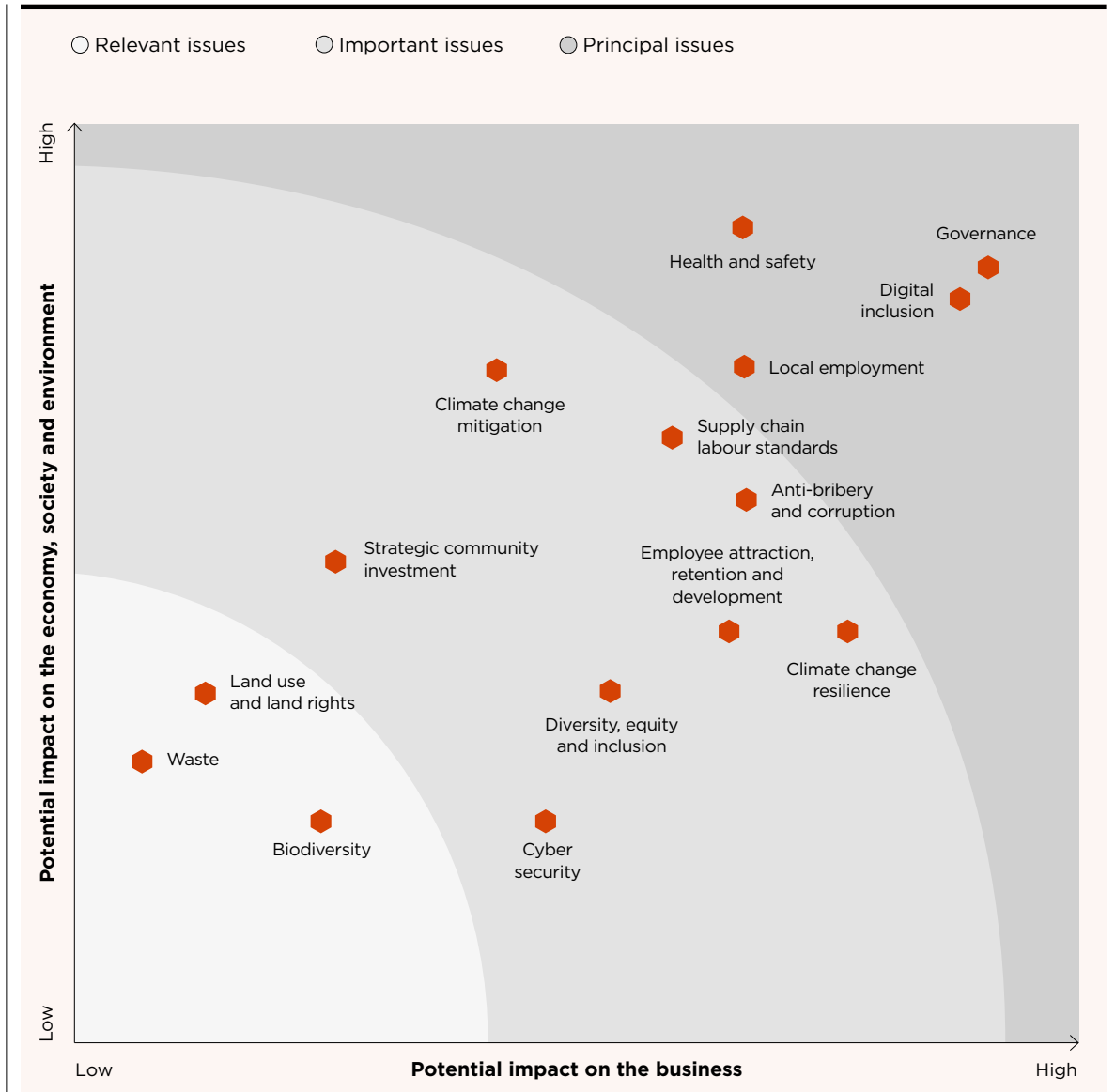
In 2022, we reviewed our material issues taking a double materiality approach aligned to the Global Reporting Initiative (GRI) Standards as well as the EU Corporate Sustainability Reporting Directive (CSRD).

**W**e review our material issues every two years to ensure we are identifying any shifts in priorities and topics most relevant to our stakeholders.

Our process involved industry benchmarking and reviewing reporting frameworks and standards, as well as interviews and workshops with both internal and external stakeholders. The result was a list of both actual and potential negative and positive impacts on the economy, environment and people, which were then evaluated for 'impact materiality' based on criteria including scale, scope, remediability and likelihood of impact. We then reviewed financial materiality of the same issues, based on the compliance, reputational, financial, operational, strategic and people risks they could represent for our business.

We will be aligning our financial materiality approach to the final CSRD guidance and will undertake a full double materiality assessment in 2024.

We classify issues within three areas: relevant issues, important issues and principal issues. Our principal and important issues are covered in detail in our discussion of impact areas in the Annual Report and Financial Statements and are considered to have a high to substantial impact on our financial value creation and wider society. Our relevant issues are lower in materiality, but still have relevance for our operations. For information on our relevant issues, please see the following pages in this reporting supplement.



OUR MATERIAL ISSUES CONTINUED

## RELEVANT ISSUES

We monitor and manage relevant impacts 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.**

We are committed to minimising the impacts of our activities on biological diversity, habitats and natural ecosystems across our asset lifecycle. Our impact on biodiversity is considered limited because our sites cover on average an area of 10m<sup>2</sup>, 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 reducing carbon, waste, spills and any discharges to water. Where we need to decommission sites, we look to minimise waste and restore the land.

Last year, we planted over 1,000 trees across Congo Brazzaville and South Africa to support local biodiversity and environmental conservation initiatives. In 2024, we will be exploring opportunities to participate in more reforestation and environmental programmes in our markets.



### 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 2024, we will implement measures to improve our returns from site process and continue to standardise our data-collection processes to report more detailed waste disclosures.

A returns from site process is currently being developed during 2024. The aim of this process is to ensure that all countries are receiving the materials identified for return in a timely manner. The new process will help to assess the percentage of materials that are returned from site that can be repaired and so extend the life of the asset.

### WAREHOUSE REFURBISHMENTS COMPLETED IN 2023

Gensets

**39%**

2022: 32%

Batteries

**10%**

2022: 10%

Rectifiers

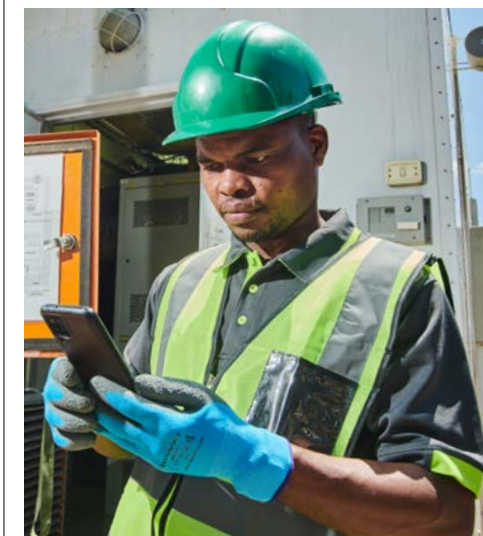
**29%**

2022: 11%

Rectifier modules

**74%**

2022: 15%





## OUR MATERIAL ISSUES 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 impact on land use and rights is considered limited for the same reasons as our impact on biodiversity.

Our Site Acquisition Policy provides a framework for identifying, leasing/purchasing and permitting of land suitable for the construction of a new tower. We align approach to consultation with potentially affected groups and relevant stakeholders to 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 roll out 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, 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 that there is no perceived or potential adverse impact on Indigenous Peoples.

In compliance with our Anti-Bribery Policy, we never offer any form of inducement to secure a permit, lease or access to a site.

**Note 1:** Water impacts have been assessed as not being material 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.

**Note 2:** 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.



# OUR CONTRIBUTION TO THE UN SDGs

We have assessed how our management of material issues contributes to the realisation of the UN SDGs.

Through enabling mobile connectivity and contributing to social and economic development in our markets, we contribute to all 17 UN SDGs. In addition, we support several SDGs and their targets through our Sustainable Business Strategy. 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 and labour standards; promote ethical business practices; invest in training and development and contribute to local economies through 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 the entrepreneurship and innovation that is essential for economic growth. Our work aligns with most targets under SDG 8:

### Key SDG targets

- 8.2 Drive technological innovation
- 8.3 Promote decent job creation
- 8.5 Productive employment and decent work
- 8.6 Youth employment
- 8.7 Protect human rights
- 8.8 Promote safe working environment
- 8.10 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:

### Key SDG 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

### WE ALSO CONTRIBUTE TO THE FOLLOWING SDGs:



**No Poverty, Quality Education and Gender Equality**



**Good Health and Well-Being**



**Affordable and Clean Energy, Climate Action and Life on Land**



**Responsible Consumption and Production**



**Peace, Justice and Strong Institutions**



**Partnerships for the Goals**

OUR CONTRIBUTION TO THE UN SDGs CONTINUED

## IMPACT AREA: DIGITAL INCLUSION

By growing our business and increasing access to mobile connectivity, we are promoting digital inclusion across Africa and the Middle East. The towers we build and manage are helping to connect individuals and communities to a range of life-enhancing services in areas such as education, healthcare and employment – in some cases, for the very first time.

Impact key



Customers



Communities, economies and the environment



Our people and partners

MATERIAL ISSUE	DEFINITION	WHO IS IMPACTED	TARGETS AND REPORT LOCATION	SDG TARGETS
<b>Digital inclusion</b>	Supporting greater digital inclusion by increasing and improving mobile coverage (including reliability and speed of rollout).		<p><b>Targets</b></p> <ul style="list-style-type: none"> <li>- 30-second downtime per tower per week</li> <li>- Tenancy ratio 2.2x by 2026</li> <li>- 6,000 rural towers</li> </ul> <p><b>KPIs</b></p> <p>Population footprint coverage under our tower footprint</p> <p><b>Annual Report</b> pages 22-23</p>	<b>1.4</b> By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance. <b>9.1</b> Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all. <b>9.a</b> Facilitate sustainable and resilient infrastructure development in developing countries through enhanced financial, technological and technical support to African countries, least developed countries, landlocked developing countries and small island developing States. <b>9.4</b> By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities. <b>9.c</b> Significantly increase access to information and communications technology and strive to provide universal and affordable access to the Internet in least developed countries by 2020.
<b>Strategic community investment</b>	Supporting local communities through education, digital inclusion and access to cleaner power and amenities.		<p><b>KPIs</b></p> <p>KPIs are tailored to each project. Examples include: number of students benefitting from ICT equipment, number of people using our solar-powered stations to charge their phones.</p> <p><b>Annual Report</b> page 24</p>	<b>4.4</b> By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship. <b>4.5</b> By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations. <b>5.b</b> Enhance the use of enabling technology, in particular information and communications technology, to promote the empowerment of women. <b>7.2</b> By 2030, increase substantially the share of renewable energy in the global energy mix. <b>8.3</b> Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services. <b>17.17</b> Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.



OUR CONTRIBUTION TO THE UN SDGs CONTINUED

IMPACT AREA: CLIMATE ACTION

We strive to lower our carbon emissions across our portfolio and enable a more sustainable expansion of mobile connectivity. We deploy cleaner technologies where possible and focus on minimising our diesel consumption, which reduces our footprint as well as our operating costs.

Impact key



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Our people and partners

MATERIAL ISSUE	DEFINITION	WHO IS IMPACTED	TARGETS AND REPORT LOCATION	SDG TARGETS
<b>Climate change mitigation</b>	Contribution to tackle climate change by reducing GHG emissions generated as a result of business activities.		<b>Target</b> 46% reduction in carbon emissions per tenant by 2030 <b>Annual Report</b> pages 26-27	<b>7.2</b> By 2030, increase substantially the share of renewable energy in the global energy mix. <b>7.3</b> By 2030, double the global rate of improvement in energy efficiency. <b>13.3</b> Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.
<b>Climate change resilience</b>	Ensuring resilience of business operations to the impacts of climate change to ensure robust service to customers and end users.		<b>Target</b> 30-second downtime per tower per week <b>Annual Report</b> TCFD disclosures pages 57-62	<b>13.1</b> Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries.
<b>Biodiversity</b>	Impacts of business activities on biological diversity, habitats and natural ecosystems.		See our controls and process in place to manage impacts on <a href="#">page 8</a>	<b>15.2</b> By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.
<b>Waste</b>	Responsibly managing the impact of waste generated through our operations.		See our controls and process in place to manage impacts on <a href="#">page 8</a>	<b>12.5</b> By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

OUR CONTRIBUTION TO THE UN SDGs CONTINUED

IMPACT AREA: **LOCAL, DIVERSE, TALENTED TEAMS**

Our success is built on the talent and diversity of our teams, and a working environment that is inclusive. We focus on promoting local talent and developing an engaged workforce both for our people and for our partners, providing them with the tools they need. Successful collaboration with our partners is essential for the construction and maintenance of our assets and maximising power uptime.

Impact key



Customers



Communities, economies and the environment



Our people and partners

MATERIAL ISSUE	DEFINITION	WHO IS IMPACTED	TARGETS AND REPORT LOCATION	SDG TARGETS
<b>Local employment</b>	Providing employment opportunities to local employees and contractor employees.		<b>KPI</b> % local employees <b>Annual Report</b> pages 30, 33	 <b>8.3</b> Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services. <b>8.5</b> By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value. <b>8.6</b> By 2020, substantially reduce the proportion of youth not in employment, education or training.
<b>Diversity, equity and inclusion</b>	Ensure equitable opportunities for all, and foster a diverse and inclusive workplace.		<b>Target</b> 30% female employees by 2026 <b>Annual Report</b> pages 30, 31	 <b>5.5</b> Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life. <b>5.5.2</b> Proportion of women in managerial positions.
<b>Employee attraction, retention and development</b>	Supporting the development, engagement and skills of employees.		<b>Target</b> 70% of employees trained in Lean Six Sigma by 2026 <b>Annual Report</b> pages 30-33	 <b>5.5</b> Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life. <b>8.2</b> Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors.  <b>8.3</b> Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.

OUR CONTRIBUTION TO THE UN SDGs CONTINUED

IMPACT AREA: RESPONSIBLE GOVERNANCE

Responsible governance underpins our Sustainable Business Strategy and guides how we work, as well as the positive impact we create for our stakeholders. Our Board of Directors is engaged to oversee the direction of our Company, and our governance controls ensure that we effectively manage our material impacts while acting safely, ethically and with integrity for the benefit of all our stakeholders.

Impact key










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Our people and partners

MATERIAL ISSUE	DEFINITION	WHO IS IMPACTED	TARGETS AND REPORT LOCATION	SDG TARGETS
<b>Health and safety</b>	Impacts on the health and safety of employees and contractors, and the prevention and mitigation of work-related incidents and injuries.	  	<p><b>Target</b> Maintenance partners certified to ISO 45001 and achieve 100% in the Helios Towers SHEQ assessment by the end of 2025</p> <p><b>KPIs</b></p> <ul style="list-style-type: none"> <li>- Near miss reporting rate</li> <li>- Road traffic accident frequency rate</li> <li>- Lost-time incident frequency rate</li> <li>- Total recordable case frequency rate</li> </ul> <p><b>Annual Report</b> pages 34-36</p>	 <p><b>3.6</b> By 2020, halve the number of global deaths and injuries from road traffic accidents.</p>
<b>Supply chain labour standards</b>	Impacts to the labour rights of contractors and workers in the wider supply chain of products and services.	 	<p>Continued engagement with our partners on our Third Party Code of Conduct and labour standards</p> <p><b>Annual Report</b> pages 37-38</p> <p><b>KPIs</b></p> <ul style="list-style-type: none"> <li>% local procurement</li> <li>% of suppliers who have signed our Third Party Code of Conduct</li> </ul>	 <p><b>8.2</b> Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors.</p> <p><b>8.7</b> Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.</p> <p><b>8.8</b> Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.</p> <p><b>8.10</b> Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.</p>



OUR CONTRIBUTION TO THE UN SDGs CONTINUED

IMPACT AREA: RESPONSIBLE GOVERNANCE

Impact key



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Communities, economies and the environment



Our people and partners

MATERIAL ISSUE	DEFINITION	WHO IS IMPACTED	TARGETS AND REPORT LOCATION	SDG TARGETS
<b>Anti-bribery and corruption</b>	Impacts on society and communities resulting from bribery and corruption.		<p><b>Target</b> Maintain our ISO certifications including our ISO 37001 anti-bribery certification</p> <p><b>Annual Report</b> pages 36-37</p> <p><b>KPI</b> Number of third party organisations completing code of conduct training</p>	<p><b>16.5</b> Substantially reduce corruption and bribery in all their forms.</p>
<b>Land use and land rights</b>	Impact on local communities' ability to use - and derive rightful benefit from - sites where Helios Towers operates, including in relation to customary land rights, Indigenous Peoples and for cultural heritage purposes.		See our controls and process in place to manage impacts on <a href="#">page 9</a>	<p><b>15.5</b> Take urgent and significant action to reduce degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.</p>
<b>Data privacy and cyber security</b>	Breaches of employees' and other individuals' privacy through disproportionate collection and/or unauthorised access to personal data.		See our controls and process in place in the <b>Annual Report</b> page 38	

## 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 sustainable business 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 2023 our scores improved compared to 2022.

**Disclaimers:** FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirms that Helios Towers 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 GRI. We have prepared the information in this report with reference to GRI 2021 Standards for our material impacts.

**Abbreviations**

**AR:** Annual Report and Financial Statements 2023  
**RS:** Reporting Supplement to Annual Report and Financial Statements 2023

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: 10th Floor 5 Merchant Square West London W2 1AS  <b>AR</b> > What we do p3 <b>AR</b> > Notes to the Financial Statements > 1. Statement of compliance and presentation of financial statements p136
2-2	<b>Entities included in the organization's sustainability reporting</b>	The scope of our integrated 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 p136 <b>AR</b> > Notes to the Financial Statements > Investments p169
2-3	<b>Reporting period, frequency and contact point</b>	Date of reporting period for the AR: 1 January 2023 - 31 December 2023.  Date of publication: 14 March 2024  Frequency: We report every year in line with our financial reporting.  Point of contact for any queries regarding the report: <a href="mailto:investorrelations@heliostowers.com">investorrelations@heliostowers.com</a> .
2-4	<b>Restatements of information</b>	<b>AR</b> > Emissions and energy p28
2-5	<b>External assurance</b>	<b>AR</b> > Independent auditor's report to the members of Helios Towers plc p125-131 <b>RS</b> > Assurance statement p41

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 11,500 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 p3 <b>AR</b> > How we do it p4 <b>AR</b> > Group CEO's statement p15-18 <b>AR</b> > Responsible supply chain p37-38
2-7	<b>Employees</b>	See <a href="#">page 35</a> 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. As a result of expansion into Malawi and Oman during 2022, the number of employees has increased.



**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 11,500 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 p51-56 <b>AR</b> > Governance Report p72-123 <b>AR</b> > Nomination Committee Report p89-91 <b>AR</b> > Sustainability Committee Report p94 <b>RS</b> > Governance and management of sustainable business p3 <u>Division of Responsibilities between Chair, Chief Executive Officer and Senior Independent Director</u>
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 p89-91  <u>Governance</u>  The terms of reference of all <u>Board Committees</u> are available on our <u>website</u>
2-11	<b>Chair of the highest governance body</b>	<b>AR</b> > Governance Report > Board leadership and Company purpose p79-81 <b>AR</b> > Governance Report > Division of responsibilities p87

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.  In 2023, we established a Sustainability Committee as a committee of the Board. The Committee is chaired by an Independent Non-Executive Director to align to 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. Further strategy updates and review of our impacts will be overseen and monitored by the Sustainability Committee.  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 materiality assessment, which includes an analysis of our social and environmental impacts. During 2023, the Sustainability Committee was briefed on our strategic sustainable business initiatives, performance on metrics and targets, regulatory landscape, and deep-dives on material topics. The Committee also has oversight of the risks and opportunities associated with climate change. Additional detail regarding the Board and Sustainability Committee's role and our governance of climate change can be found in our Task Force on Climate-related Financial Disclosures (TCFD) section.  <b>AR</b> > TCFD p57-62
2-13	<b>Delegation of responsibility for managing impacts</b>	<b>AR</b> > Risk management p51-52 <b>RS</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 newly established Sustainability Committee. Furthermore, the Board reviews the risk management process and receives updates on the results of the materiality assessment.
2-15	<b>Conflicts of interest</b>	<b>AR</b> > Governance Report > Division of responsibilities p87-88
2-16	<b>Communication of critical concerns</b>	All Group employees and third parties have access to a confidential whistleblowing hotline; EthicsPoint®. The Board, through the Audit Committee, has oversight of all incidents reported and logged on EthicsPoint®. All concerns raised are brought to the attention of and discussed with the Audit Committee at its regular meetings. In 2023, 48 concerns were communicated to the Audit Committee.  <b>AR</b> > Strategic Report > Responsible governance p34-38 <b>AR</b> > Section 172(1) p82-83

**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. As sustainable business is our way of doing business, the Board's knowledge and skills are kept updated through engagement on sustainable business topics delivered by the Executive Leadership Team and other subject-matter experts across the business.</p> <p>In 2023, we established a Sustainability Committee as a committee of the Board. The Committee is chaired by an Independent Non-Executive Director to align to 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 2023, the Committee met twice, and included material topics with guest presenters (subject-matter experts) to provide knowledge sharing as part of the agenda.</p> <p>In accordance with the UK Corporate Governance Code, we conducted an external evaluation of the Board and its Committees in 2022 to review effectiveness of the Board. It was recognised that the skills and knowledge of the Board are broad in range and operate effectively together. The Board includes members with both direct and indirect experience of ESG.</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 disclosure on our sustainable business priorities and impacts.</p> <p><b>AR</b> &gt; Governance Report &gt; Nomination Committee Report p89-90</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 Code and did so during 2022, following two years of internal evaluations in 2020 and 2021. 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>The actions taken are detailed further as part of our Nomination Committee Report p89</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, 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. In 2023, the Remuneration Committee introduced an 'Impact scorecard' to the long-term incentive plan (LTIP) award to supplement the existing financial metrics. The Impact scorecard includes three equally weighted metrics that align with the KPIs and targets set out in our Sustainable Business Strategy.</p> <p><b>AR</b> &gt; Governance Report &gt; Directors' Remuneration Report p102-119</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>Remuneration Committee - <a href="https://www.heliostowers.com/investors/corporate-governance/">https://www.heliostowers.com/investors/corporate-governance/</a></p> <p><b>AR</b> &gt; Governance Report &gt; Directors' Remuneration Report p102-119 <b>AR</b> &gt; Governance Report &gt; Directors' Remuneration Policy p103</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.</p> <p>With fewer than 250 UK employees, Helios Towers is not required at this stage to report or disclose our ratio of CEO to median employee pay. However, we provide our <a href="#">gender pay gap information</a> 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>	<p><b>AR</b> &gt; Group CEO statement p15-18</p>



**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; Governance and ethics p72  <b>AR</b> &gt; Non-financial information statement p50  <a href="#">Helios Towers: Our value and approach</a>  <a href="#">Human Rights Policy</a>  <a href="#">Code of Conduct</a>  <a href="#">Third Party Code of Conduct</a>  <a href="#">Modern Slavery and Human-Trafficking Statement</a>  <a href="#">Environmental Policy</a>  <a href="#">Health and Safety Policy</a>  <a href="#">Quality Policy</a>  <a href="#">Tax Strategy</a>  <a href="#">Supply Chain Statement</a>  <a href="#">Strategic Community Investment</a></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. Likewise, all third-party suppliers receive training on the Group's Third Party Code of Conduct.</p> <p><b>RS</b> &gt; Governance and Management of Sustainable Business p3  <b>AR</b> &gt; Non-financial information statement p50  <b>AR</b> &gt; Risk management &gt; Governance structure p51</p>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
2-25	<b>Processes to remediate negative impacts</b>	<p>We are committed to a strong 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, and if desired anonymous, hotline: EthicsPoint®. The Group's General Counsel and Company Secretary, the Group HR Director as well as the Group Head of Compliance receive the details of all incidents reported via the hotline. The Audit Committee has oversight of all cases that are logged on EthicsPoint®. 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. 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; Governance and compliance p36  <b>AR</b> &gt; Health and safety p34-35  <a href="#">Code of Conduct: Raising a Concern</a> 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 whistleblowing hotline, EthicsPoint®. The Board, through the Audit Committee, has oversight of all incidents reported and logged on EthicsPoint®. 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; Governance and compliance p36  <a href="#">Code of Conduct</a></p>
2-27	<b>Compliance with laws and regulations</b>	<p>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>- GSMA (Global System for Mobile Communications Association); and</li> <li>- UN Global Compact.</li> </ul> <p>Among the multistakeholder principles and initiatives we have endorsed and align with, some 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 p84-85  <b>AR</b> &gt; Advancing labour and human rights p37-38  <b>RS</b> &gt; Our material issues p7</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 DRC, with employee representatives present in Senegal, Congo Brazzaville and Madagascar. Senegal and Congo Brazzaville have collective bargaining agreements at the national level. In addition, DRC, Congo Brazzaville and Madagascar have established an approved 'Reglement interieur' (rules and regulations document) negotiated with employee representatives.</p>
<b>GRI 3: Material Topics 2021</b>		
3-1	<b>Process to determine material topics</b>	<p><b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10</p>
3-2	<b>List of material topics</b>	<p><b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10</p>
3-3	<b>Management of material topics</b>	<p>See all relevant disclosures below, by each material topic.</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3  <b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10</p>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<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 Reporting Supplement 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 p21  <b>AR</b> &gt; Market and operating review p39-46  <b>AR</b> &gt; Group CFO's statement p47-49  <b>AR</b> &gt; Section 172 Statement &gt; Stakeholder engagement p84-85  <b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10</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 11,500 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; Market and operating review p39-46  <b>AR</b> &gt; Our impact p7  <b>AR</b> &gt; Our value creation p5</p>
201-2	<b>Financial implications and other risks and opportunities due to climate change</b>	<p><b>AR</b> &gt; TCFD disclosures p57-62</p>
201-3	<b>Defined benefit plan obligations and other retirement plans</b>	<p><b>AR</b> &gt; Financial statements &gt; Retirement benefit costs p142</p>

**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
201-4	<b>Financial assistance received from government</b>	The business did not require or receive financial assistance from any government during 2023.
<b>Market Presence</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<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><b>AR</b> &gt; Our strategic KPIs p21</p> <p><b>AR</b> &gt; Market and operating review p39-46</p> <p><b>AR</b> &gt; Group CFO's statement p47-49</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p>
<b>GRI 202: Market Presence</b>		
202-1	<b>Ratios of standard entry level wage by gender compared to local minimum wage</b>	<p>In the UK, we continue to pay all our employees above the London Living Wage. Our UK staff constitutes around 22% 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: <a href="#">Diversity and Inclusion</a></p> <p>Significant locations are defined as our countries of operation.</p> <p><a href="#">Third Party Code of Conduct</a></p>
202-2	<b>Proportion of senior management hired from the local community</b>	<p>70% of senior management in our OpCos were hired from the local community in 2023.</p> <p>Here, senior management is defined as Managing Directors and Heads of Department.</p> <p>Local is defined as operating market country.</p> <p>Significant locations are defined as our countries of operation.</p>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>Indirect Economic Impacts</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p>As a business operating in markets across Africa and the Middle East, we have many indirect economic impacts on the communities we operate in. 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).</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><b>AR</b> &gt; Driving digital inclusion p22-24</p> <p><a href="#">Human Rights Policy</a></p> <p><a href="#">Strategic Community Investment</a></p>
<b>GRI 203: Indirect Economic Impacts 2016</b>		
203-1	<b>Infrastructure investments and services supported</b>	<p><b>AR</b> &gt; Group CEO statement p15-19</p> <p><b>AR</b> &gt; Tackling the connectivity and infrastructure divide p22</p> <p><b>AR</b> &gt; Strategic community investment p24</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p>
203-2	<b>Significant indirect economic impacts</b>	<p><b>AR</b> &gt; Tackling the connectivity and infrastructure divide p22</p> <p><b>AR</b> &gt; Strategic community investment p24</p>
<b>Anti-Corruption</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<p><b>AR</b> &gt; Anti-bribery and corruption p37</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><a href="#">Code of Conduct</a> p7, 16</p> <p><a href="#">Modern Slavery and Human-Trafficking Statement</a></p> <p><a href="#">Third Party Code of Conduct</a></p>



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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**GRI 205: Anti-Corruption 2016**

<b>205-1</b>	<b>Operations assessed for risks related to corruption</b>	<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-party suppliers with relevant risk assessments and due diligence. Our due diligence also incorporates screening against sanctions and enforcement lists and adverse media.</p> <p>By the end of 2022, a Group-wide fraud risk assessment was completed, and individual OpCo fraud risk assessments are currently in process. Individual third-party activities are assessed via the Third Party Engagement and Due Diligence Policy risk assessment. This links with our Group Risk Register and individual OpCo risk registers.</p> <p><b>AR</b> &gt; Anti-bribery and corruption p37</p>
<b>205-2</b>	<b>Communication and training about anti-corruption policies and procedures</b>	<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. 37 suppliers completed this in 2023.</p> <p>Colleagues in higher-risk functions take a periodic refresher course. All employees receive the Group's Code of Conduct and Integrity policies upon joining and all third-party suppliers receive the Group's Third Party Code of Conduct training.</p>
<b>205-3</b>	<b>Confirmed incidents of corruption and actions taken</b>	<p>No public allegations of corruption were made against Helios Towers in 2023. There were zero confirmed incidents in which employees were dismissed or disciplined for corruption.</p>

**Anti-Competitive Behavior**

**GRI 3: Material Topics 2021**

<b>3-3</b>	<b>Management of material topics</b>	<p><b>AR</b> &gt; Compliance monitoring and evaluation p36</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><a href="#">Code of Conduct</a> p7, 8, 16</p>
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DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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**GRI 206: Anti-Competitive Behavior**

<b>206-1</b>	<b>Legal actions for anti-competitive behavior, anti-trust, and monopoly practices</b>	<p>No legal actions were pending or completed during the reporting period.</p>
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**Tax**

**GRI 3: Material Topics 2021**

<b>3-3</b>	<b>Management of material topics</b>	<p><b>AR</b> &gt; Principal risks and uncertainties p55</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><a href="#">Group Tax Strategy</a></p>
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**GRI 207: Tax**

<b>207-1</b>	<b>Approach to tax</b>	<p>The Board discusses, reviews and approves the 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. 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 p72-123</p> <p><a href="#">Group Tax Strategy</a></p>
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**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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><u>Group Tax Strategy</u>  <b>AR</b> &gt; Governance Report p72-123  <b>AR</b> &gt; Financial Statements &gt; Independent auditor's report to the members of Helios Towers plc p125-132</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.</p> <p>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><u>Group Tax Strategy</u></p>

**Energy**

**GRI 3: Material Topics 2021**

3-3	<b>Management of material topics</b>	<p><b>AR</b> &gt; Reducing our environmental impact p25  <b>AR</b> &gt; TCFD disclosures p57-62  <b>RS</b> &gt; Governance and management of sustainable business p3  <b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10  <u>Environmental Policy statement</u></p>
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DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 302: Energy 2016</b>		
302-1	<b>Energy consumption within the organization</b>	<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 in petrol vehicles is also collected.</p> <p>None of our fuel consumption is currently from renewable sources. We used 764,125,020 kWh of total fuel (diesel and petrol). We consumed 354,537,461 kWh total electricity.</p> <p>We did not have heating, cooling or steam consumption. No electricity, heating, cooling or steam was sold.</p> <p>Our total energy consumption was 1,118,662,481 kWh. Energy consumption has been calculated in line with the GHG Protocol. We used Department for Business, Energy &amp; Industrial Strategy (BEIS) UK conversion factors, 2023.</p>
302-2	<b>Energy consumption outside of the organization</b>	<p>During 2023, we consumed 18,097,326 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. We used BEIS UK conversion factors 2023 as the source of conversion factors.</p> <p><b>AR</b> &gt; Emissions and energy p28</p>
302-3	<b>Energy intensity</b>	<p>Energy intensity per tower: 84,779 kWh/tower</p> <p>Energy consumption is in kWh.</p> <p>Energy included are fuel (diesel and petrol) and electricity.</p> <p>Energy consumption is for within the organisation only.</p> <p><b>AR</b> &gt; Emissions and energy p28</p>
302-4	<b>Reduction of energy consumption</b>	<p><b>AR</b> &gt; Energy efficiency p28  <b>AR</b> &gt; Carbon reduction initiatives p26-27</p>
302-5	<b>Reductions in energy requirements of products and services</b>	<p>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.</p>



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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**Biodiversity**

**GRI 3: Material Topics 2021**

<b>3-3</b>	<b>Management of material topics</b>	<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 then 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 <a href="#">page 8</a> of this Reporting Supplement.</p> <p><b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10  <a href="#">Environmental Policy statement</a></p>
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**GRI 304: Biodiversity 2016**

<b>304-1</b>	<b>Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</b>	<b>RS</b> > Biodiversity p8
<b>304-2</b>	<b>Significant impacts of activities, products and services on biodiversity</b>	<b>RS</b> > Biodiversity p8
<b>304-3</b>	<b>Habitats protected or restored</b>	We do not currently track habitats protected or restored. <b>RS</b> > Biodiversity p8

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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<b>304-4</b>	<b>IUCN Red List species and national conservation list species with habitats in areas affected by operations</b>	We have had no escalations on site locations during 2023. In instances that the cases concern IUCN Red List species, these are escalated internally to relevant functions to determine the risk level and appropriate action.
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**Emissions**

**GRI 3: Material Topics 2021**

<b>3-3</b>	<b>Management of material topics</b>	<p><b>AR</b> &gt; Reducing environmental impact p25  <b>AR</b> &gt; TCFD disclosures p57-62  <b>RS</b> &gt; Governance and management of sustainable business p3  <b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10  <a href="#">Environmental Policy statement</a>  <a href="#">Basis of reporting</a></p>
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**GRI 305: Emissions 2016**

<b>305-1</b>	<b>Direct (Scope 1) GHG emissions</b>	<b>AR</b> > Emissions and energy p28-29
<b>305-2</b>	<b>Energy indirect (Scope 2) GHG emissions</b>	<p><b>AR</b> &gt; Emissions and energy p28-29</p> <p>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.</p>
<b>305-3</b>	<b>Other indirect (Scope 3) GHG emissions</b>	<b>AR</b> > Emissions and energy p28-29
<b>305-4</b>	<b>GHG emissions intensity</b>	<b>AR</b> > Emissions and energy p28-29
<b>305-5</b>	<b>Reduction of GHG emissions</b>	<p><b>AR</b> &gt; Emissions and energy p28-29  <b>RS</b> &gt; Scope 3 emissions p34</p>
<b>305-6</b>	<b>Emissions of ozone-depleting substances (ODS)</b>	We do not have significant emissions of ozone-depleting substances.



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>305-7</b>	<b>Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions</b>	We do not have significant emissions of any of these gases.
<b>Waste</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	<b>RS</b> > Waste p8
<b>GRI 306: Waste 2020</b>		
<b>306-1</b>	<b>Waste generation and significant waste-related impacts</b>	<b>RS</b> > Waste p8
<b>306-2</b>	<b>Management of significant waste-related impacts</b>	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 2024. <b>RS</b> > Waste p8
<b>306-3</b>	<b>Waste generated</b>	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 2024, we will build on our data collection processes and reporting. <b>RS</b> > Waste p8
<b>306-4</b>	<b>Waste diverted from disposal</b>	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 2024, we will build on our data collection processes and reporting. <b>RS</b> > Waste p8
<b>306-5</b>	<b>Waste directed to disposal</b>	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 2024, we will build on our data collection processes and reporting. <b>RS</b> > Waste p8

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>Environmental Compliance</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	<b>AR</b> > Principal risks and uncertainties p52-57 <b>RS</b> > Governance and management of sustainable business p3 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10 <a href="#">Code of Conduct</a> p10, 16 <a href="#">Environmental Policy statement</a>
<b>GRI 307: Environmental Compliance</b>		
<b>307-1</b>	<b>Non-compliance with environmental laws and regulations</b>	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.  In Congo Brazzaville, the Environmental Agency carried out two separate audits and site inspections on our sites in 2023 and made recommendations in their audit reports (the last audit was conducted in December 2023, with the final report yet to be shared). According to the information currently available, no enforcement actions are included in the 2023 reports.
<b>Supplier Environmental Assessment</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	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 p37 <b>RS</b> > Governance and management of sustainable business p3 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10 <a href="#">Third Party Code of Conduct</a> p8 <a href="#">Environmental Policy statement</a> <a href="#">Supply Chain Management Statement</a>

**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 308: Supplier Environmental Assessment</b>		
<b>308-1</b>	<b>New suppliers that were screened using environmental criteria</b>	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.
<b>308-2</b>	<b>Negative environmental impacts in the supply chain and actions taken</b>	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.  <a href="#">Supply Chain Management Statement</a> <a href="#">Environmental Policy statement</a>
<b>Employment</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	<b>AR</b> > Engaging our people p30 <b>RS</b> > Governance and management of sustainable business p3 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10  <a href="#">Human Rights Policy</a>
<b>GRI 401: Employment</b>		
<b>401-1</b>	<b>New employee hires and employee turnover</b>	See <a href="#">page 37</a> for more details.
<b>401-2</b>	<b>Benefits provided to full-time employees that are not provided to temporary or part-time employees</b>	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.

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>401-3</b>	<b>Parental leave</b>	All employees are entitled to take parental leave.  In 2024, as part of our diversity, equity and inclusion (DEI) strategy, we will develop our data collection methodologies to report more detailed disclosures around the numbers of employees that took, and returned from, parental leave in our reporting year.
<b>Occupational Health and Safety</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	<b>AR</b> > Health and safety p34-35 <b>RS</b> > Governance and management of sustainable business p3 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10  <a href="#">Code of Conduct</a> p11, 16 <a href="#">Health and Safety Policy statement</a> <a href="#">Human Rights Policy</a>
<b>403-1</b>	<b>Occupational health and safety management system</b>	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.  Helios Towers employees are not the frontline workers on sites; site operations are conducted by contracted partners:  1. Maintenance Partners - to ensure the continued integrity and power uptime of our leased towers.  2. Build Partners - to build towers on greenfield sites to meet new customer requirements.  3. Security Partners - to protect the integrity of Helios Towers' assets from damage and theft.  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</b> > Health and safety p34-35



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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 for all personnel.</p>
403-3	<b>Occupational health services</b>	See 403-1, 403-2
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. As mentioned, 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.</p> <p>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.</p> <p><b>AR</b> &gt; Health and safety p34-35</p>
403-5	<b>Worker training on occupational health and safety</b>	<b>AR</b> > Health and safety p34-35

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
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 ICAS, 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>Initiatives are managed and coordinated locally in each market such as ‘lunch and learn sessions’ on wellbeing (sports and keeping active, mental health awareness, nutrition, etc).</p> <p><b>AR</b> &gt; Supporting colleagues’ wellbeing p31-32</p>
403-7	<b>Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</b>	<b>AR</b> > Health and safety p34-35
403-8	<b>Workers covered by an occupational health and safety management system</b>	<p>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.</p> <p>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 2023.</p>

**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>403-9</b>	<b>Work-related injuries</b>	<p>a) Helios Towers direct personnel</p> <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 23–Dec 23): 0</li> <li>v. Worked hours: 1,223,588</li> </ul> <p>b) All workers</p> <ul style="list-style-type: none"> <li>i. Occupational fatalities: 1 (partner workforce – fall from height); Road traffic accident MV fatalities: 3 (member of public); Road traffic accident MC fatalities: 1 (member of public); Workplace violence fatalities: 1 security guard (fatalities in our security workforce as a result of workplace violence)</li> <li>ii. High-potential occupational injuries: 4 with 342 days away (Lost-Time Incidents)</li> <li>iii. Recordable injuries (Jan 23–Dec 23): 14 (1 x fatality 4 x Lost-Time Incidents; 1 x restricted work cases; 8 x medical treatment injuries) Total Recordable Case Frequency Rate (Dec 23): 0.51 per one million manhours worked (12-month roll)</li> <li>iv. Driving, line of fire and working at height</li> <li>v. Worked hours: 26,381,554</li> </ul> <p>c) Hazards that pose a risk of high-consequence injury</p> <ul style="list-style-type: none"> <li>i. Hazards are determined by competent and experienced personnel during the risk-review process, and supplemented by feedback from the SHEQ governance reviews.</li> <li>ii. Driving, fall from height and line of fire have been identified as causes of injuries during the period.</li> <li>iii. Actions taken: Driving Performance Management Framework established across Helios Towers and all partners. At-risk Driving Behaviour Intervention Matrix, dashcams and In-Vehicle Monitoring Systems rolled out to Company and partner vehicles. Group-wide training on working at height, working with safety company to design a bespoke course. All partners received bespoke training for mechanical lifting and safe lifting, with their mechanical lifting equipment being reviewed and certified as fit for use. We are exploring the inclusion of manual handling of generators as part of our tower erection training, in particular with guidance on appropriate action when there is inadequate road access.</li> </ul> <p>d) Actions taken to eliminate other work-related hazards: mandating two-way vehicle dashcams in all partner contracts.</p> <p>e) Rates are calculated based on 1,000,000 hours worked (12-month roll, Jan 23–Dec 23).</p> <p>f) No workers have been excluded from this disclosure.</p>
<b>403-10</b>	<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>		
<b>3-3</b>	<b>Management of material topics</b>	<p><b>AR</b> &gt; Learning and development across our business p32–33</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><b>AR</b> &gt; Health and safety p34–35</p>
<b>GRI 404: Training and Education</b>		
<b>404-1</b>	<b>Average hours of training per year per employee</b>	<p>Average hours of training per employee in 2023 was 33. Average hours of training undertaken by employees by gender: 35.52 male, 30.14 female.</p> <p>Our data collection system does not currently provide a breakdown by employee category.</p>
<b>404-2</b>	<b>Programs for upgrading employee skills and transition assistance programs</b>	<p>We do not currently have formal transition-assistance programmes to facilitate continued employability.</p> <p>For more details see:</p> <p><b>AR</b> &gt; Learning and development across our business p32–33</p>
<b>404-3</b>	<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>		
<b>3-3</b>	<b>Management of material topics</b>	<p><b>AR</b> &gt; Developing a diverse, inclusive workforce p30–33</p> <p><b>AR</b> &gt; Other Statutory Information &gt; Anti-Discrimination Policy p121</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><a href="#">Code of Conduct</a> p9, 16</p> <p><a href="#">Diversity and Inclusion</a></p>



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 405: Diversity and Equal Opportunity 2016</b>		
405-1	<b>Diversity of governance bodies and employees</b>	For a breakdown of employees by gender see: <a href="#">GRI 405-1 p35</a> For a breakdown of governance bodies by gender and ethnicity see: <b>AR</b> > Governance Report > Board diversity at a glance p92-93 <b>AR</b> > Developing a diverse, inclusive workforce p30-33
405-2	<b>Ratio of basic salary and remuneration of women to men</b>	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. <a href="#">Diversity and inclusion</a>
<b>Non-Discrimination</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<b>AR</b> > Governance and compliance p36 <b>AR</b> > Developing a diverse, inclusive workforce p30-33 <b>AR</b> > Other Statutory Information > Anti-Discrimination Policy p121 <b>RS</b> > Governance and management of sustainable business p3 <a href="#">Code of Conduct</a> p9: Respect our people, p16 Raising a concern
<b>GRI 406: Non-Discrimination 2016</b>		
406-1	<b>Incidents of discrimination and corrective actions taken</b>	No concerns were raised during the reporting period.
<b>Freedom of Association and Collective Bargaining</b>		
<b>GRI 3: Material Topics 2021</b>		
3-3	<b>Management of material topics</b>	<b>AR</b> > Stakeholder engagement > Workforce p84 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10 <b>RS</b> > Governance and management of sustainable business p3 <a href="#">Third Party Code of Conduct</a> <a href="#">Human Rights Policy</a>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 407: Freedom of Association and Collective Bargaining</b>		
407-1	<b>Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk</b>	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.  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	<b>Management of material topics</b>	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 p37-38 <b>RS</b> > Governance and management of sustainable business p3 <b>RS</b> > Our material issues p7 <b>RS</b> > Our contribution to the UN SDGs p10 <a href="#">Code of Conduct</a> p16 <a href="#">Modern Slavery and Human-Trafficking Statement</a> <a href="#">Third Party Code of Conduct</a> <a href="#">Human Rights Policy</a>



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 408: Child Labor</b>		
<b>408-1</b>	<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 whistleblowing service, EthicsPoint®.</p> <p>As well as periodic supplier performance reviews and health and safety assessments, our compliance monitoring in 2023 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 p37-38  <a href="#">Modern Slavery and Human-Trafficking Statement</a>  <a href="#">Third Party Code of Conduct</a>  <a href="#">Human Rights Policy</a></p>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>Forced or Compulsory Labor</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<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; Governance Report &gt; Anti-discrimination Policy p121  <b>AR</b> &gt; Advancing labour and human rights p37-38  <b>RS</b> &gt; Governance and management of sustainable business p3  <b>RS</b> &gt; Our material issues p7  <b>RS</b> &gt; Our contribution to the UN SDGs p10  <a href="#">Code of Conduct</a> p16  <a href="#">Modern Slavery and Human-Trafficking Statement</a>  <a href="#">Third Party Code of Conduct</a></p>

**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>GRI 409: Forced or Compulsory Labor</b>		
<b>409-1</b>	<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 service, EthicsPoint®, 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.</p> <p>As well as periodic supplier performance reviews and health and safety assessments, our compliance monitoring in 2023 included visits to third-party premises, meetings with key staff and visits to Helios Towers' sites.</p> <p>During 2023, we also piloted a workers' rights survey in Ghana and discussed results with suppliers as part of a Supplier Forum event. The survey is 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 2024.</p> <p><b>AR</b> &gt; Advancing labour and human rights p37-38 <a href="#">Human Rights Policy</a> <a href="#">Modern Slavery and Human-Trafficking Statement</a></p>

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
<b>Local Communities</b>		
<b>GRI 3: Material Topics 2021</b>		
<b>3-3</b>	<b>Management of material topics</b>	<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 will seek to be 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>RS</b> &gt; Our material issues p7 <b>RS</b> &gt; Our contribution to the UN SDGs p10 <b>RS</b> &gt; Women's Empowerment Principles Index p40 <b>RS</b> &gt; Land use and land rights p9 <b>AR</b> &gt; Strategic community investment p24 <a href="#">Human Rights Policy</a> <a href="#">Code of Conduct</a></p>
<b>GRI 413: Local Communities 2016</b>		
<b>413-1</b>	<b>Operations with local community engagement, impact assessments, and development programs</b>	<p>We recognise the importance of community engagement, throughout our planning and construction phases, and ensure that we respond to local needs.</p> <p>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 never 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 aim to roll out sites to have as minimal a visual impact as possible on the communities in which they are located.</li> <li>- We undertake environmental assessments into any potential impact on habitats and species.</li> </ul> <p><b>AR</b> &gt; Strategic community investment p24</p>



**GRI INDEX CONTINUED**

DISCLOSURE	DESCRIPTION	LOCATION OF INFORMATION/RESPONSE
413-2	<b>Operations with significant actual and potential negative impacts on local communities</b>	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.
<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>RS</b> &gt; Governance and management of sustainable business p3</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><a href="#">Third Party Code of Conduct</a></p> <p><a href="#">Code of Conduct</a> 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</p> <p><b>AR</b> &gt; Responsible supply chain p37</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 two years, we have strengthened management and oversight of interactions with public officials. With several new markets becoming operational during 2022, and many interactions with public officials envisaged as part of the licensing, regulatory and market-launch activities, providing more detailed advice and support was a key compliance requirement. Enhanced guidelines and best practices were communicated to our teams across 2023.</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><a href="#">Third Party Code of Conduct</a></p> <p><a href="#">Code of Conduct</a> p16</p>
<b>GRI 415: Public Policy</b>		
415-1	<b>Political contributions</b>	The Company made no donations to any political party or other political organisation during the year.
<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>RS</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.</p> <p>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>During 2022, we launched a site community signage initiative for members of the local community. This site signage highlights any key risks on entering a site without permission. 98% of our sites have completed installation as of 2023.</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; Cybersecurity and data privacy p38</p> <p><b>RS</b> &gt; Our material issues p7</p> <p><b>RS</b> &gt; Our contribution to the UN SDGs p10</p> <p><b>RS</b> &gt; Governance and management of sustainable business p3</p> <p><u>Code of Conduct</u> p12, 16</p> <p><u>Third Party Code of Conduct</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>The Group has not identified any substantiated complaints during the reporting period. We have policies and procedures in place 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	464	59	523
Female	173	29	202

	CORPORATE	CONGO BRAZZAVILLE	DRC	GHANA	MADAGASCAR	MALAWI	OMAN	SOUTH AFRICA	SENEGAL	TANZANIA
<b>Total number of employees by region</b>	172	44	141	56	43	33	42	35	55	104
Male	120	35	122	45	27	23	28	17	38	68
Female	52	9	19	11	16	10	14	18	17	36

	CORPORATE	CONGO BRAZZAVILLE	DRC	GHANA	MADAGASCAR	MALAWI	OMAN	SOUTH AFRICA	SENEGAL	TANZANIA
<b>Total number of employees by region</b>	172	44	141	56	43	33	42	35	55	104
Permanent	157	42	115	49	36	33	38	31	45	91
Temporary	15	2	26	7	7	0	4	4	10	13

## GRI INDEX CONTINUED

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

SCOPE 3 CATEGORY	EVALUATION	% OF SCOPE 3
<b>Category 1: Purchased goods and services</b>	Relevant, calculated	9%
<b>Category 2: Capital goods</b>	Relevant, calculated	11%
<b>Category 3: Fuel- and energy-related activities (not included in Scope 1 or Scope 2)</b>	Relevant, calculated	64%
<b>Category 4: Upstream transport and distribution</b>	Relevant, calculated	1%
<b>Category 5: Waste generated in operations</b>	Relevant, not yet calculated	0% This category will be accounted for in due course.
<b>Category 6: Business travel</b>	Relevant, calculated	5%
<b>Category 7: Employee commuting</b>	Relevant, calculated	0%
<b>Category 8: Upstream leased assets</b>	Not relevant, explanation provided	0% We do not have any leased assets and hence this category has been excluded.
<b>Category 9: Downstream transportation &amp; distribution</b>	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.
<b>Category 10: Processing of sold products</b>	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.
<b>Category 11: Use of sold products</b>	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.
<b>Category 12: End-of-life treatment of sold products</b>	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.
<b>Category 13: Downstream leased assets</b>	Relevant, calculated	10%
<b>Category 14: Franchises</b>	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.
<b>Category 15: Investments</b>	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**

<b>EMPLOYEES HIRED AND TURNOVER BY AGE (PERMANENT EMPLOYEES ONLY)</b>	<b>UNDER 30</b>	<b>30-50</b>	<b>OVER 50</b>	<b>TOTAL</b>
Number (and rate <sup>1</sup> ) of new employee hires during the reporting period	18 (17%)	80 (76%)	7 (7%)	105 (18%)
Number (and rate <sup>1</sup> ) of employee turnover during the reporting period	4 (6%)	52 (84%)	6 (10%)	62 (11%)

<b>EMPLOYEES HIRED AND TURNOVER BY GENDER (PERMANENT EMPLOYEES ONLY)</b>	<b>FEMALE</b>	<b>MALE</b>	<b>TOTAL</b>
Number (and rate) of new employee hires during the reporting period	32 (30%)	73 (70%)	105 (18%)
Number (and rate) of employee turnover during the reporting period	19 (31%)	43 (69%)	62 (11%)

<b>EMPLOYEES HIRED AND TURNOVER BY REGION (PERMANENT EMPLOYEES ONLY)</b>	<b>CORPORATE</b>	<b>TANZANIA</b>	<b>DRC</b>	<b>CONGO BRAZZAVILLE</b>	<b>GHANA</b>	<b>SOUTH AFRICA</b>	<b>SENEGAL</b>	<b>MADAGASCAR</b>	<b>MALAWI</b>	<b>OMAN</b>
Number (and rate*) of new employee hires during the reporting period	28 (27%)	5 (5%)	22 (21%)	5 (5%)	5 (5%)	4 (4%)	6 (6%)	12 (11%)	6 (6%)	12 (11%)
Number (and rate*) of employee turnover during the reporting period	17 (27%)	2 (3%)	14 (23%)	2 (3%)	2 (3%)	6 (10%)	2 (3%)	4 (6%)	4 (6%)	9 (15%)

\* Compared to total average permanent employees in 2023.

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

For more information on employees by gender and ethnicity see: GRI 2-7 AR: Developing a diverse, inclusive workforce p30-33

For more information on governance bodies by age, gender and ethnicity see: AR: Governance Report p72-123

<b>GOVERNANCE BODY MEMBERS AND EMPLOYEES BY AGE</b>	<b>UNDER 30</b>	<b>30-50</b>	<b>OVER 50</b>	<b>NOT DISCLOSED</b>
Board members	N/A	3	7	
Management <sup>2</sup>	1	88	25	
All other employees	106	451	50	4

1 Compared to total average permanent employees in 2023

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	2023 RESPONSE
<b>SASB: MANAGING SYSTEMIC RISKS</b>			
<b>From the SASB Telecommunication Services standard</b>	<b>TC-TL-550a.1</b>	(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 49 seconds <b>AR</b> > Digital Inclusion p23 Maintaining reliable power
<b>From the SASB Telecommunication Services standard</b>	<b>TC-TL-550a.2</b>	Discussion of systems to provide unimpeded service during service interruptions <i>Discussion and analysis</i>	<b>AR</b> > Digital Inclusion p23 Maintaining reliable power
<b>SASB: BUSINESS ETHICS</b>			
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-510a.1</b>	(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 Congo (DRC) we have 2,562 sites and 6,238 tenancies.
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-510a.2</b>	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.
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-510a.3</b>	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.  <u>Code of Conduct</u>



**SASB INDEX CONTINUED**

AREA/STANDARD	SASB INDICATOR CODE	REQUIREMENT	2023 RESPONSE
<b>SASB: ENERGY MANAGEMENT</b>			
<b>SASB Water Utilities &amp; Services standard</b>	<b>TC-TL-130a.1 / IF-WU-130a.1</b>	(1) Total energy consumed (2) percentage grid electricity (3) percentage renewable (4) percentage diesel	<b>AR</b> > Energy efficiency p28
<b>SASB: ENVIRONMENTAL IMPACTS OF PROJECT DEVELOPMENT</b>			
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-160a.1</b>	Number of incidents of non-compliance with environmental permits, standards, and regulations <i>Unit of measure:</i> <i>Number</i>	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.
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-160a.2</b>	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction <i>Discussion and analysis</i>	<b>RS</b> > Biodiversity, Land use and land rights p8-9
<b>SASB: WORKFORCE HEALTH AND SAFETY</b>			
<b>From the SASB Wind Technology &amp; Project Developers standard</b>	<b>RR-WT-320a.1</b>	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	(1) 0.51 per million worked hours (12-month roll) (2.a) 0 occupational fatalities per million worked hours (12-month roll) (2.b) 0.04 occupational fatalities per million worked hours (12-month roll)
<b>From the SASB Waste Management standard</b>	<b>IF-WM-320a.3</b>	Number of road accidents and incidents <i>Unit of measure:</i> <i>Number</i>	Road traffic accident (RTA) total: 45 (39: motor vehicle; 6: motorcycle)
<b>SASB: STRUCTURAL INTEGRITY &amp; SAFETY</b>			
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-250a.1</b>	Amount of defect- and safety-related rework costs <i>Unit of measurement:</i> <i>Reporting currency</i>	Our principal defect- and safety-related rework costs arise from our own quality assurance site audits, whereby we ensure that all work undertaken meets our minimum quality and safety standards. We do not currently collect data on or disclose specific breakdown of costs related to this.
<b>From the SASB Engineering &amp; Construction Services standard</b>	<b>IF-EN-250a.2</b>	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents <i>Unit of measurement:</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	2023 DATA
Number of towers:	14,097
Number of tenancies:	26,925
Number of employees:	725
Revenues 2023 (US\$m):	721



# 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

### 2023 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.
- 27% 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 DEI.
- Re-launch of internal DEI policy. Read more in our **AR** on page 31.
- In 2023, we conducted internal Group-wide town halls to raise awareness of support available during international men's and women's days.

#### PRINCIPLE 3

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

- The Helios Towers employee assistance programme (provided by ICAS) provides colleagues and their families with a range of free and confidential services, including access to professional counselling sessions.
- We carry out localised wellness initiatives throughout the year, led by each OpCo.
- We train all new team members on our Code of Conduct and Anti-Discrimination Policy, which encompasses zero-tolerance policy towards all forms of discrimination and violence at work.

### 2023 ACTIVITY AND ACHIEVEMENTS

#### PRINCIPLE 4

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

- We have initiated a mentoring circle, with three of our female Board members mentoring a cohort of 25 female leaders across the business over six months. This will inform the launch of the reciprocal mentoring programme in 2024.
- We are currently exploring additional development programmes for women in leadership.

#### PRINCIPLE 5

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

- Promoting women in STEM through our School of Engineers programme engaging with schools and universities.
- We support digital inclusion for women, which in turn supports female entrepreneurship and access to services. We cover over 72 million women in the coverage footprint of our sites.

#### PRINCIPLE 6

**Promote equality through community initiatives and advocacy**

- Helios Towers School of Engineers programme aims to achieve a target of 50% female students as part of each intake. We have been able to achieve our target of 50% women in Ghana, Senegal and South Africa, with 100% female intake achieved in South Africa through the learnership programme.
  - Community initiatives such as supporting a majority girls school in the Thiès region of Senegal with school supplies.
- Read more on our efforts to empower women and girls through our community initiatives on pages 8 and 24 of our **AR**.

#### 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 to international reporting frameworks such as 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 LIMITED ASSURANCE REPORT

## To: The Stakeholders of Helios Towers Plc

### 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 2023 (the 'Report'). 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 January 1st to December 31st 2023 (the 'Selected Information'):

- Scope 1 GHG emissions - Includes tower diesel and company vehicle petrol/diesel (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
- Emission 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 each of our towers, calculated using WorldPop source data

### 3. Reporting Criteria

The Selected Information has been prepared in accordance with the internal definitions and procedures stated in Basis of Reporting - Helios Towers V1.0 230224 ([https://www.heliostowers.com/ourimpact/reports/.](https://www.heliostowers.com/ourimpact/reports/))

### 4. Limitations and Exclusions

Excluded from the scope of our work is the verification 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
- The appropriateness of the Reporting Criteria for the Selected Information;
- Any calculation input data provided by third parties, together with any potential errors, discrepancies or gaps identified in this input data by Bureau Veritas raised during the course of the engagement;

The following limitations should be noted:

- Where data has been derived from closed software models, for example for Population Coverage, our assurance work does not include examination of the model (ie. construction and formulae) but was limited to gaining an understanding of the underlying data sources and methodology applied.
- 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 data collection and monitoring arrangements at market/site level, and it should be noted that not all the Selected Information was sampled at site level 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 Stakeholders 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:

- Conducting interviews with relevant personnel of Helios Towers;
- Reviewing the data collection and consolidation processes used to compile Selected Information, including assessing assumptions made, and the data scope and reporting boundaries;
- Reviewing documentary evidence provided by Helios Towers;
- Agreeing a selection of the Selected Information to the corresponding source documentation;
- Reviewing Helios Towers’ systems for quantitative data aggregation and analysis;
- Assessing the disclosure and presentation of the Selected Information to ensure consistency with assured information.
- Comparing the Selected Information to the prior year amounts.

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 FY2023**

Scope 1 GHG Emissions	195,151 tCO2e
Scope 2 GHG Emissions	119,191 tCO2e
Scope 3 Category 3 GHG Emissions	88,823 tCO2e
Emission Intensity* (Scope 1 and 2 GHG emissions from Helios Towers’ five established markets**)	27.00 tCO2e per tower 12.01 tCO2e per tenant
Gender Diversity	72% male workforce 28% female workforce
Estimated population that falls within the network coverage footprint of each tower	144,255,729 people

\* Includes Scope 1 and 2 for the markets included in the 2030 target.

\*\*Includes Tanzania, Democratic Republic of Congo (DRC), Ghana, Congo Brazzaville and South Africa, the markets where Helios Towers was operational in the 2020 baseline year.

**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, 06 March 2024**

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.

[heliostowers.com](https://heliostowers.com)

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