

An aerial photograph of a large crowd of people, mostly seen from above, holding a wide variety of colorful umbrellas. The umbrellas come in many colors including red, blue, yellow, green, and purple, creating a vibrant pattern against the dark, wet pavement. A white, stylized graphic element, resembling a speech bubble or a bracket, is positioned on the left side of the image, framing the text.

Human Rights Policy Statement

Vodafone Group Plc





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Vodafone Human Rights Policy Statement

At Vodafone, we connect for a better future. We recognise that we have a significant role to play in a digital society. We believe that wherever we operate, we contribute to the wealth and development of countries, regions and local communities in a way that advances the protection and promotion of a number of fundamental human rights and freedoms and supports the full realisation of socio-economic development.

Scope

The Group Human Rights Policy sets out the minimum requirements that every single person working for and with Vodafone must comply with. This Policy applies to all Vodafone companies in which Vodafone Group hold an interest of 50.1%, or more, or management control. We expect our suppliers and business partners to uphold the same standards, as enshrined in our Code of Ethical Purchasing.

Our Commitment

We seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We aim to ensure that we are not, directly or indirectly, in any way complicit in human rights abuses.

Policy Alignment

Our Group Human Rights Policy is informed by the following international instruments:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Social, Economic and Cultural Rights
- United Nations Guiding Principles for Business and Human Rights
- United Nations Global Compact Principles
- ILO Declaration on Fundamental Principles and Rights at Work
- Global Network Initiative Principles

Our Operations, Products and Services

Right to Privacy and Freedom of Expression

Vodafone is committed to process personal data honestly, ethically, with integrity, and in a manner which is always consistent with applicable laws and our values. Our objective is to be open and transparent about the way we process personal data, to provide fair choices on how such data is processed, to manage personal data responsibly and to offer secure services to our customers and employees.

We respect and seek to protect our customers' lawful rights to hold and express opinions and share information and ideas without interference.

Law enforcement authorities sometimes require licensed operators to comply with requests to provide information on individual users' data or limit selected services in their networks. These requests often serve a legitimate need to protect the public, investigate criminal activity, safeguard the economy or protect critical national infrastructure.

We aim to balance our responsibility to respect our customers' right to privacy and freedom of expression with our obligations to comply with the law in each of the countries in which we operate. We assist authorities only under certain carefully prescribed circumstances

and may seek to challenge demands that appear to us to be overly broad, insufficiently targeted or disproportionate in nature. We process all assistance requests using a robust governance framework defined in our Group Law Enforcement Assistance Policy.

If faced with requests to restrict services or block content, we do not block access to services or content beyond measures that are:

- specified in a lawful demand from an agency or authority;
- undertaken under the Internet Watch Foundation or equivalent schemes that are designed to prevent access to illegal online child abuse material;
- defined and implemented by the customer directly through parental controls software or other user-defined filters, with simple and transparent opt-in and opt-out mechanisms; or
- undertaken to protect the integrity of our customers' data, manage traffic or prevent network degradation, for example blocking spam or malware or taking action to prevent denial of service hacker attacks.



Human Rights by Design

We believe it is critical to ensure that the new technologies we create and employ fully respect the privacy and security of customers. We seek to minimise the risk of any inadvertent or adverse human rights impact associated with the development of our products and services, including new technologies such as Artificial Intelligence and Internet of Things.

We engage with industry peers and other relevant experts (e.g. academics and civil society) in the development of emerging technologies in a way that enables users to fully exercise and enjoy their individual rights and freedoms.

Rights of the Child

We recognise that children can be a particularly vulnerable group in today's digital world. We are committed to upholding the rights of the child at all stages of our business operations and seek to support children and their parents to become responsible digital citizens. We will continue to provide knowledge, tools, controls and resources to help our customers keep pace with the rapid advances in technology, devices, apps and the ways this technology is used.

We are a founding signatory of the GSMA Mobile Alliance Against Child Sexual Abuse Content, which commits to the removal of such content or, where this is not possible, the disruption of the sharing of or access to this material.



Our Employees

Diversity and Inclusion

We believe that achieving greater equality of opportunity is critical to ensuring a strong corporate culture while also providing us a better understanding of the needs of our customers. We do not tolerate any form of discrimination especially related to but not limited to age, gender, disability, gender identity, sexual orientation, cultural background or belief. We base relationships with employees on respect for individuals and their human rights. We encourage our employees to challenge discriminatory behaviour, and want everyone to feel they are able to raise any concerns without fear of retaliation.

Our commitment to an Inclusion for All culture is enshrined in our global initiatives focusing on breaking the barriers around Gender, LGBT+, and Disability. The global adoption of our initiatives such as the Maternity and Parental Leave Policy, Domestic Violence and Abuse Policy and LGBT+ Friends Network, enables us to support our employees whatever their background and wherever they are.

Health and Safety

The health, safety and wellbeing of our employees is one of our most fundamental responsibilities. Everyone working for or on behalf of Vodafone must behave in a safe and responsible manner at all times.

Our commitment to safety does not differentiate between our own employees and contractors and our suppliers' employees and contractors. We expect our suppliers to be accountable for managing health and safety risks in their operations and meet our high standards as set out in the Code of Ethical Purchasing. We want everyone working for or with Vodafone to return home safe every day.

Freedom of Association, Collective Bargaining and the Employee Voice

We recognise the rights of employees to join trade unions and engage in collective bargaining in accordance with local law. We also recognise the importance of employees having a robust channel for raising matters of importance to management. In Europe, we consult with our employees through the Vodafone European Employee Consultative Council, which meets twice a year and gives employee representatives an opportunity to raise any concerns with our

executive management team. Similarly in South Africa, we consult with our employees through the National Consultative Committee. Our Senior Independent Director annually attends meetings with both the European and the South African bodies, and feeds back commentary from them to the Vodafone Board as part of our engagement with the "employee voice", in compliance with the UK Corporate Governance Code.

Slavery and Human Trafficking

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, and are committed to taking appropriate steps to ensure that everyone who works for Vodafone – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.



Our Suppliers

Ethical Purchasing

Our businesses rely on international supply chains that span multiple tiers. We work with our suppliers, partners and peers to drive responsible and ethical behaviour and high standards across our supply chain, and do our utmost to keep everyone working in our operations safe from harm.

We have robust systems and standards, based on our values, which we expect our suppliers to share. These standards set out our minimum expectations on our suppliers, and are enshrined in our Code of Ethical Purchasing.

Engaging directly with suppliers is one of the most effective ways of improving performance in our supply chains. From monitoring non-compliance to carrying out assessments and employee surveys, we work to help suppliers strengthen their own compliance and processes. We also work to encourage our suppliers to cascade our requirements to their suppliers and subcontractors.

Responsible Sourcing of Minerals

We recognise the risks associated with “conflict minerals” – the term used to describe some of the raw materials (tin, tantalum, tungsten and gold, also called 3TG metals) and cobalt used throughout the global electronics industry.

While our ability to influence the manufacturing of materials, parts, ingredients or components of electronic equipment in our supply chain remains limited, we expect our suppliers to take steps to ensure conflict minerals are not used in any of the equipment related to our supply chain. We also continue to monitor the extent of human rights risks relating to conflict minerals and cobalt within our supply chain.



Our Communities

Digital Inclusion

We believe that the opportunities of a digital future should be accessible to all. Our goal is to democratise digitalisation, making technology truly accessible to everyone, leaving no one behind. Through our technology, we contribute to the work to bridge the divides that exist and help people to enjoy and exercise their fundamental rights in full, while contributing equally and fully to society.

Anti-Bribery and Corruption

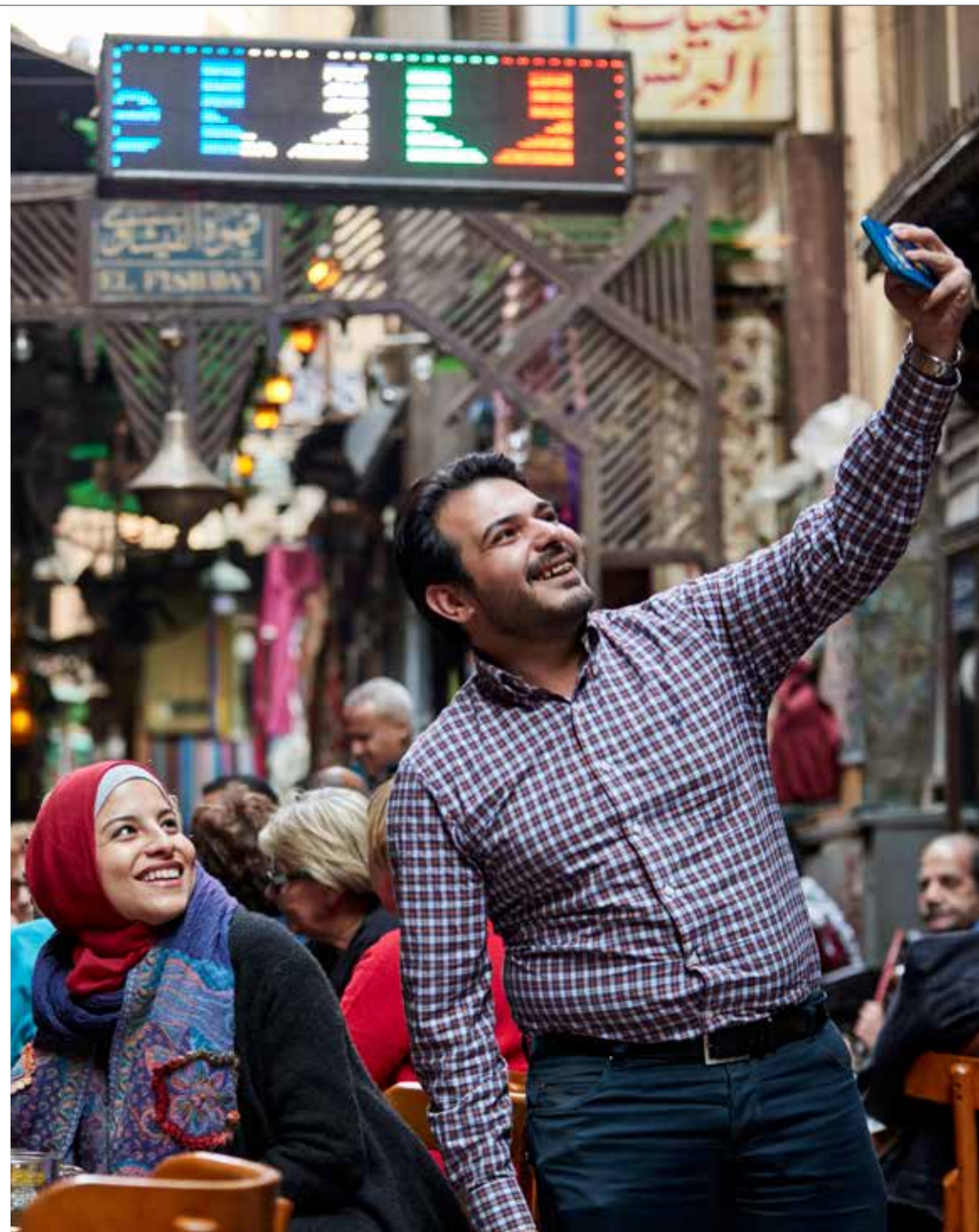
Corruption and bribery can have a significant negative impact on the enjoyment of human rights. We act with honesty, integrity and fairness in our dealings both internally and externally. We do not tolerate any form of bribery, including improper offers of payments or gifts to or from employees. We avoid any contracts that might lead to, or suggest, a conflict of interest between personal activities and the business. We neither give nor accept hospitality or gifts that might appear to incur an obligation. We monitor implementation of our anti-bribery policy and take action to investigate when issues are raised.

Community Consultation and Land Rights

Communications networks are infrastructure intensive and where relevant, we remain committed to transparent consultation and active engagement with landowners, community leaders and municipal authorities. This engagement is undertaken in compliance with our anti-bribery policy that makes it clear that we never offer any form of inducement to secure a permit, lease or access to a site.

Civil Society

We recognise the important role of civil society advocacy. We value constructive dialogue with civil society, including with human rights defenders, to advance the respect for human rights and will seek to engage where relevant and appropriate for both parties.



Controls and Governance

Human Rights Due Diligence

Our human rights due diligence approach is aligned with the United Nations Guiding Principles on Business and Human Rights. This includes policy controls, impact assessments, mitigation and monitoring, tracking our performance, employee training and stakeholder communication.

We assess the actual and the potential positive and adverse human rights impacts when:

- developing new products/services/technologies or making substantial changes to existing offers;
- entering new markets or in anticipation of changes in our existing operating environments;
- considering new partnerships/acquisitions; and
- engaging with our suppliers.

Ensuring Access to Remedy

We encourage everyone to report any grievances as soon as possible. Our employees can do this through a confidential third-party hotline Speak Up, accessible in their local language online or by telephone. Speak Up operates under a non-retaliatory policy, meaning that everyone who raises a concern in good faith is treated fairly, with no negative consequence for their employment with Vodafone. Our customers can report grievances through a dedicated complaints line and Privacy Query Form.

We believe that transparency is a key component to providing remedy. We continue to disclose information on our efforts to respect human rights and to provide remedy, and remain active in the overall stakeholder dialogue.

Roles and Responsibility

The Group Human Rights Policy is owned by the Group External Affairs Director.

We have an established Human Rights team that works closely with relevant stakeholders across Group and across our local markets. The Group External Affairs Director, who sits on the Group Executive Committee, is the executive level sponsor on human rights issues at Vodafone.

This Policy Statement is signed by the Vodafone Group Plc Executive Committee and Group CEO.

12 December 2019.

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