



**Vodafone Supplier Policy – A9
Sanctions & Trade Controls**



Scope

All Vodafone Procurement Company procurement agreements with Suppliers.

Policy

1. Introduction

Vodafone is committed to complying with all host nation laws and regulations applicable to the exporting/importing of Suppliers' products and technologies. Vodafone maintains a global internal compliance programme that is dependent upon the continued cooperation of its Suppliers. This collaborative effort will ensure that compliance of the export/import laws and regulations of the host nations are properly applied by Vodafone and Suppliers.

In this Supplier Policy, references to:

- (i) "Trade Control Laws" are all applicable export and import control laws and regulations;
- (ii) "Sanctions" are all economic, trade and financial sanctions laws, regulations, embargoes or restrictive measures of any Relevant States;
- (iii) "Supplier" shall, include the relevant contracting entity and all other Supplier Group Companies which are involved in the provision of the goods and services to Vodafone. For the avoidance of doubt, where relevant, it shall also include all officers and employees of Supplier; and
- (iv) "Vodafone" shall include the relevant contracting entity and all other Vodafone Group Companies that benefit from the goods and services being provided.

2. Compliance

Supplier shall, in connection with Vodafone's procurement activities with Supplier:

- (i) comply with all Trade Control Laws and Sanctions;
- (ii) not do anything which may cause Vodafone to breach Trade Control Laws or Sanctions;
- (iii) keep Vodafone apprised at all times of such information as Vodafone may need in order to comply with Trade Control Laws and Sanctions, including details and copies of applicable restrictions and export classification numbers, export licences or equivalent documentation, exemptions or exception and conditions relating to export, transfer or use, and provide Vodafone with such assistance as Vodafone may reasonably request in this respect; and
- (iv) keep Vodafone apprised at all times (as soon as reasonably practicable in the given circumstances) of all relevant information on:
 - a) any changes in circumstances relevant to Supplier's compliance with Trade Control Laws and Sanctions;
 - b) actual or potential breaches of Supplier's obligations in relation to Trade Control and Sanctions;
 - c) loss, suspension or invalidation of any relevant licence, authorisation, approval or export control privileges, including by being placed on a restricted party list; or
 - d) it becoming aware that any relevant authority has initiated or will initiate any investigation or proceedings against Supplier relating to an actual or potential breach of any Trade Control Laws or Sanctions.