



**Our Code of Conduct**  
Doing What's Right



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## A message from Margherita

Our purpose is to connect for a better future and I am incredibly proud of the work we do together.

It is clear to me that Vodafone must change in order to grow, and be a best-in-class telco in Europe and Africa. We need empowered and agile markets focused on our customers, and we need to take out complexity to simplify how we operate. However, what will not change is our commitment to our Purpose and adherence to our Code of Conduct. Please make sure you read and understand it.

Everyone has a voice. If you have concerns, our Speak Up process is available to you.

At Vodafone we are committed to do what's right.

Thank you,

**Margherita Della Valle**  
**Chief Executive Officer**



## Why we have a Code of Conduct

Doing what's right means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work.

Our Code of Conduct sets out what we expect from every single person working for and with Vodafone. It also underlines our responsibilities to our people, partners and shareholders.

The Code of Conduct helps us all make informed decisions and tells us where to go for more information.

“Trust is fundamental to everything we do.”

### About our Business Principles

Our Business Principles are the foundation for how we do business everywhere we operate, and are at the heart of our Code of Conduct. You can find them highlighted at the beginning of each section in the Code of Conduct.

### What is the Code of Conduct?

The Code of Conduct is our central policy document, outlining the requirements that every single person working for and with Vodafone must comply with, regardless of location. You may also have additional policies you need to adhere to that are specific to your role or your local market.

### Who is the Code of Conduct for?

Our Code of Conduct is for everyone working for and with Vodafone: employees, directors, contractors, subsidiaries, joint ventures and suppliers. We expect our suppliers and business partners to uphold the same standards and to abide by our Code of Ethical Purchasing.

### What are the consequences of not complying?

There are very serious consequences for not complying with our Code of Conduct. We take disciplinary action and even dismiss people where necessary.



# The Spirit of Vodafone – beliefs and behaviours

## The future is exciting. And we're ready for it.

We want to be a trusted partner to **connect for a better future**. That's who we aspire to be. To get there we must be **restless and passionate** about improving the lives of our **customers, colleagues and communities**.

We are always open to new things, and **curious** to create solutions that our customers will love. It starts with us. No matter where we work in Vodafone, we act as one. Together, we create a place where everyone can truly be themselves and **belong**.

### How we do it

#### Earn customer loyalty

It starts and ends with the customer. We aspire to be a brand they love, by earning their trust and providing brilliant experiences. We work hard to simplify things for them and deliver what our customers want and need, every day.

#### Create the future

We think big, taking risks to break new ground. We ask 'what if' to build amazing products and services for our customers. We are courageous in creating a better future for all.

#### Experiment, learn fast

We are always learning. We try things, and measure our success, keeping the best and learning from the rest. This is how we move rapidly to grow ourselves and our business.

#### Get it done, together

We give and take ownership to make the most of our many talents. We trust each other to get things done. It's up to each of us to make it happen.

**Our Code of conduct underpins the Spirit behaviors** – if we do not act ethically, responsibly and in accordance with applicable laws we cannot bring the Spirit to life.



## Ethical decision making – taking the right risks

We want to think big, taking risks to break new ground. In order to do this we need to make high quality decisions. When faced with tough choices the ethical decision making model can help you and your team get to the right answer.

To help you decide if you are doing what's right, you should ask yourself the following:



**Think**



**Ask**



**Act**



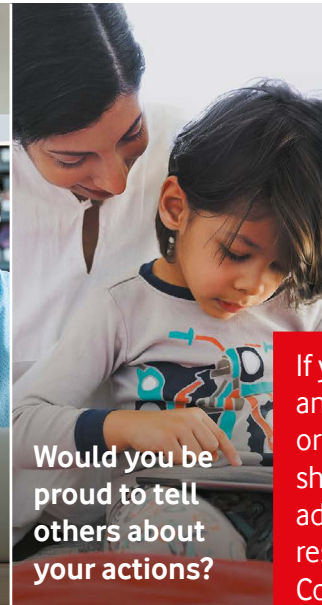
**Is this legal and ethical?**



**Is this in line with our Code?**



**Is this right for our Customers?**



**Would you be proud to tell others about your actions?**

If you answer 'no' to any of these questions, or are unsure, you should stop, and ask for advice or consult the respective section of the Code and our policies.



**Preferred contact:**

Your line manager

Your local Compliance team



## What does this mean for me?

We expect you to do the following:

- Behave in an ethical manner, taking pride in your actions and decisions
- Comply with the principles and rules in our Code of Conduct and fulfil your legal and regulatory obligations
- Understand The Spirit of Vodafone and use the principles set out in this Code in your day to day work
- Speak up if you feel a working practice is not ethical or safe or if it breaches our Code of Conduct.

### Following the law

Vodafone operates across multiple countries. Our Code of Conduct cannot cover all of the laws and regulations in all of those countries. Always be familiar with the relevant laws and regulations that apply where you work. If there is a difference between a local legal requirement and our Code, apply the most stringent standard.

If in any doubt, contact your line manager, Legal, HR, or Compliance team.

### Line Managers

**If you are a line manager, you have an important role in ensuring our Code of Conduct is understood and applied by your team. In particular, we expect you to do the following:**

- Be a role model for Doing what's right
- Ensure your team members are familiar with our Code and that they understand it
- Hold your team members accountable for complying with our Code.





# Speak up

> [How do I Speak up?](#)

☰ [Our Code of Conduct | Doing What's Right](#)



## Speak up

If you see or hear behaviour at work which you feel may be a breach of our Code of Conduct or seems illegal or unethical, please report it. You must report any behaviour which you suspect to be unlawful or criminal. This could be bribery, fraud, price fixing or a breach of data privacy.

You must also report abuse of our systems, processes or policies. This could be bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues.

Vodafone has a non-retaliation policy when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if there is no proven unlawful conduct or compliance breach.

I am a contractor working on a Vodafone contract and I have a concern to report. Can I use the external Speak up line?

Yes. The external Speak up line is for the use of employees and contractors as well as suppliers, business partners, joint venture partners and agents of Vodafone.

I am concerned that my colleagues will find out if I raise a concern. Will it be kept confidential?

Protecting the identity of people who raise a concern in good faith is our priority. Vodafone will not tolerate retaliation against an employee who raises a genuine concern. We will keep what you tell us private and confidential throughout the investigation process, subject to our legal obligations. Anonymous reporting is also available in most markets, including as an option when reporting through our external Speak up line, although note that this may limit our ability to conduct an investigation.

I have a concern about the actions of a colleague. How should I report this?

The most important thing is that you report your concern. Ultimately, it doesn't matter which route you choose. If you feel comfortable talking to your line manager, do that. Your line manager is there to support you and can help you choose the correct course of action.

## How do I Speak up?

### Step 1. Report it to your line manager:

We know it is not always easy to raise your concerns. To make it easier, we have an open communications policy so we encourage you to discuss any issues or potential issues that concern you with your line manager.

### Step 2. Report it to your local HR team:

If it's not appropriate to discuss the issue with your line manager, you should discuss the matter with your local HR team.

### Step 3. Report it confidentially to our external Speak up hotline available via phone or the app:


You may want to report your concern to someone who is further removed from the situation. There may be occasions when reporting a concern internally is not appropriate or doesn't feel like the right approach. Everyone working for or with Vodafone has access to making a report via the external hotline which can be contacted confidentially via phone or a dedicated app.


### What happens next?

The steps below outline what we do when someone raises a concern:

- When you raise a concern, a decision will be made as to which area will progress the matter: Human Resources, Corporate Security or Legal teams or the Group equivalents
- We will then contact the person raising the concern (this can be done through the external Speak up line by providing an access pin), to ensure we have all the information we need and talk through our next steps
- If we decide to proceed with an investigation, a qualified expert will investigate, keeping the person who raised the concern informed throughout the process
- We will keep transparent and accurate records of all disclosures and subsequent actions.



 Further information available on the Vodafone internal network

 **Preferred contact:**  
Your line manager  
Local HR team

# Individual conduct

- › **Bribery and improper payments**
- › **Conflicts of interest**
- › **Gifts and hospitality**
- › **Travel and expenses**
- › **Managing our information and documents**
- › **Security**
- › **Information classification and protection**
- › **Our brand**
- › **Intellectual Property Rights (IPR)**



## Bribery and improper payments

The law prohibits bribery in every kind of commercial setting. At Vodafone we are committed to countering all forms of bribery.

A bribe can come in many forms; some examples are:

- Facilitation payments and kickbacks
- Giving or accepting gifts and hospitality might also be bribery in certain situations.

Facilitation payments are illegal. Vodafone will not tolerate them unless an employee's personal safety is at risk, in which case the matter should be reported to your local Legal team as soon as possible.

Many countries prohibit offering or giving anything of value to Public Officials ⓘ in order to influence their actions. One of the ways we make sure this does not happen is by not making any political donations.

Local ways of working are not an exception to these rules. These rules apply not only to all Vodafone employees but also to anyone authorised to act on behalf of the company or represent it, such as agents, advisors, representatives or intermediaries.

“Vodafone has zero tolerance towards bribery – no Vodafone employee should give or receive a bribe of any form. Bribery is not only illegal, it is also unethical.”

### Business principle | Individual conduct

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 pursue mutually beneficial relationships and seek to promote the application of our Business Principles with our business partners and suppliers.



## Do

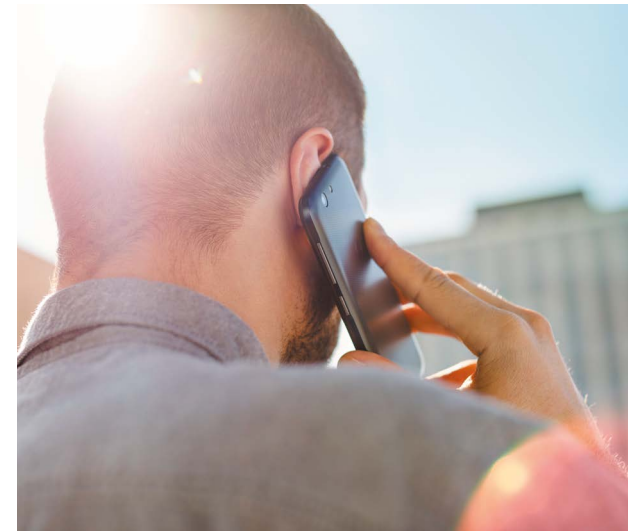
- Be cautious when giving or receiving gifts or hospitality, especially when a Public Official is involved. See the Gifts and Hospitality section for more information ⓘ
- Ensure that all gifts and hospitality are permitted by local law
- Be aware that Vodafone may be liable for the actions of third parties
- Be aware that even charitable donations can be seen as bribes if payments are made to facilitate a process or secure a commercial advantage
- If in doubt, ask your Legal team.

## Don't

- Give or receive a bribe ⓘ in any form
- Pay facilitation payments
- Use your position at Vodafone to try and influence any other person (inside or outside of Vodafone) to make political contributions or provide support to any political parties.

My team wants to raise money for a local charity, are there any restrictions on who to donate to?

There are no restrictions on giving personal donations. Any donations made on behalf of Vodafone should always be made through the Vodafone Foundation.



## Conflicts of interest

If you find yourself in a position where your personal and business interests potentially come into conflict, you are required to declare, obtain approval and register these potential conflicts of interests. Any actual conflicts must be avoided/removed.

To help you decide whether you are facing a potential conflict of interest, imagine you are explaining your actions to friends, a colleague or the media and consider whether you would feel comfortable. Your line manager will be able to assist you in determining whether a conflict exists, and whether it is an actual or potential case.

In order to prevent any potential or perceived conflict additional rules apply when hiring Government or other Public sector employees. Please read the Conflicts of interest Policy for more information.



I work part-time in my family business. Do I need to speak to my line manager?

Yes. Even if the business is not related to Vodafone. Your line manager will assist you in determining whether your situation is an actual conflict or a potential conflict, and will guide you on what steps need to be taken in either circumstance.

A close friend is applying for a job in Vodafone, is this OK?

We encourage you to recommend Vodafone as a great place to work. However, you must ensure that you are not involved in the recruitment process and the job role in question is not reporting to you.

Here are some examples of **actual conflicts of interest**, which must be avoided or immediately resolved:

- Any outside business activity that detracts from your ability to devote appropriate time and attention to your responsibilities within Vodafone
- Recruiting or managing a relative or partner
- Recruiting an individual due to their significant political connections which you intend to leverage for Vodafone's benefit
- A personal interest in a supplier, customer or competitor which influences your decisions at work
- Using Vodafone resources for political activities.

Here are some examples of **potential conflicts of interest**, which are situations that require you to agree a way of ensuring the conflict does not materialise, obtain approval and register the interest:

- Board membership (by yourself or a close relative) of another company or organisation
- Other employment
- A close relationship with a senior manager of a competitor or supplier
- Working in the same department as your partner or close relative
- A material financial interest (by yourself or a close relative) in a supplier or enterprise customer. If you're unsure if your interest is material consult your local HR team.



Further information available on the Vodafone internal network



**Preferred contact:**  
Your line manager  
Local HR team

## Do

- Act in Vodafone's best interests, recognising potential conflicts of interest
- Discuss concerns with your line manager/HR team and register any potential conflict of interest
- Remove yourself from business areas where you have a personal interest.

### What to do if you see yourself in a situation of potential conflicts of interest?

**Step 1** Declare your potential conflict of interest by informing your line manager and HR business partner.

**Step 2** Agree how it will be managed and get the approval from your line manager and local HR team.

**Step 3** Register the situation online via the [conflicts of interest register](#) so you and the company are protected.

## Gifts and hospitality

We support the reasonable and proportionate ⓘ giving and receiving of hospitality as part of a normal business relationship. However, we prohibit the giving or receiving of any gifts or hospitality that are excessive or improper ⓘ.

We need to ensure that we are never influenced by, or seek to influence through, the provision of gifts or hospitality. For example, we do not give or receive gifts or hospitality during a tender process or during contract negotiations.

Vodafone's Anti-Bribery Policy outlines the principles we all need to follow, including the requirements for gaining approval and registering items given or received.

We also have additional approval processes for giving or receiving gifts or hospitality to Public Officials.

### Do

- Ensure the giving or receiving of gifts is rare
- Think about the context of the gift or hospitality and ensure there is a legitimate business reason: imagine how it might look to someone outside Vodafone or on the front page of the newspaper
- If any gift or hospitality involves a Public Official, please consult with your Local Compliance team as you may need additional approval from the Group External Affairs Director
- Know and understand the gifts and hospitality rules for your market
- Seek approval and record gifts or hospitality where required by your policy.

### Don't

- Give or accept any gifts or hospitality of inappropriate value
- Give or accept any gifts or hospitality during a tender process or during contract negotiations
- Give or accept any cash or cash equivalent
- Give or accept gifts or hospitality which is not intended for a legitimate business interest
- Ask for gifts or hospitality.





I've been invited out to dinner by a potential supplier currently bidding for a new contract. What should I do?

You should decline. It is inappropriate to go for lunch/dinner or any other hospitality event with a supplier during a tender process or request for proposal process.

I've been sent a high value gift by a supplier and don't want to cause offence by returning it. What should I do?

It is important that you notify your line manager and seek guidance from your local HR or Legal team. Ideally you should politely refuse and return the gift. If this is not possible then the item should be donated to charity.

I am travelling abroad later this month and need to get a work visa quickly. The person processing my request at the embassy has said that they can speed up the process if I pay a small fee in cash. Is this okay?

No. This sounds like a facilitation payment, which is a form of bribery and is illegal. You should decline the offer and report the matter to your local Legal team. If there is an option for an official faster service process, such as part of a publicly available fast-track service, you may proceed. However, if you are unsure, you should always consult your local Legal team for advice first.

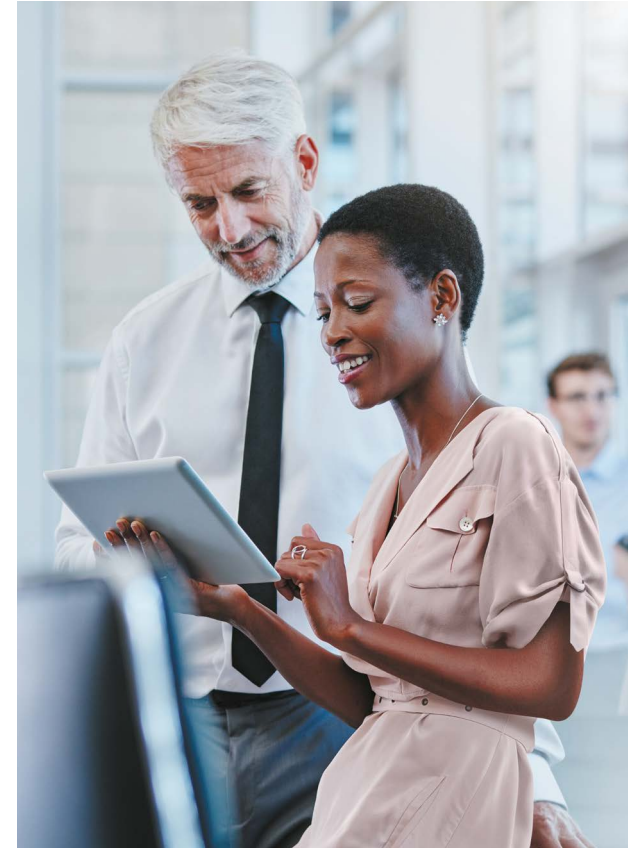


Further information available on the Vodafone internal network



**Preferred contact:**

Your line manager  
Your local Legal team  
Group Anti-bribery team



## Travel and expenses

Your local Travel and Expenses Policy sets out the rules you need to follow. It contains all the relevant information, including instructions on how to use our designated travel agency and how to book online.

Please note that travel and accommodation bookings made through other channels will not be reimbursed.

When planning your travel, try to find the right balance between business need, environmental impact, financial cost and your health and well-being.



### Do

- Follow your local policy rules on travel and expenses
- Book an appropriate class of travel and a hotel from the pre-approved list
- Have a cost conscious approach and only claim reasonable and necessary expenses for business purposes
- Consider your impact on the environment and use web/video/audio facilities instead of travelling
- Get the appropriate approvals for your expenses
- Provide the right evidence for your expense claims.

My travel costs into the office are expensive. Can I claim some of it back?

Normal travel into your place of work can't be reclaimed. There may be exceptions for out of hours working; check your local policy for details.

Can I claim expenses for my partner or spouse to travel with me?

Taking your partner, friend or family member on a business trip is not a claimable expense. The only exception is certain international assignments where we do offer support with travel costs – where applicable these will be discussed with you directly prior to your assignment.

## Managing our information and documents

If there is no business reason or legal requirement for documents to be retained they should be destroyed in an environmentally friendly way. Keeping information longer than necessary only increases our need for storage facilities.

### Do

- Comply with the procedures relevant to you, which are set out in your local Management and Retention of Documents Policy
- Only keep documents for as long as your local document retention schedule requires.

I think I am going to retain all my documents, in case they are needed in the future. Is that OK?

You need to be selective. Some documents do need to be retained for audit, tax or legal purposes. For example, documents relevant to an investigation or litigation should be kept until the investigation or litigation is completely resolved. By contrast, an invitation to a meeting that has already taken place is an example of a document you should destroy.



Further information available on the Vodafone internal network



**Preferred contact:**  
Your line manager  
Your local Legal team



# Security

Security of our assets, people, and customer information is critical for us to deliver on our promise of creating a secure digital future. Each one of us is responsible and accountable for protecting and securing Vodafone and its customers. The Cyber Code is the cornerstone for how we expect all employees at Vodafone to behave and work in order to safeguard our cyber security.

**The Cyber Code**

- ALWAYS** use multi-factor authentication for remote systems that hold sensitive information
- NEVER** allow unsupported end of life systems in Vodafone infrastructure, or release unsecured products or services
- ALWAYS** apply the latest security patches, close critical and high vulnerabilities and configure systems securely
- NEVER** click on links or download without knowing who it is from. Report suspicious behaviour
- ALWAYS** remove access when staff change roles or leave Vodafone. Secure privileged access and only use it for privileged tasks
- NEVER** share or reuse your passwords. Longer is stronger
- ALWAYS** classify, label and protect information you work with






“Each one of us is responsible and accountable for protecting and securing Vodafone and its customers.”

## Do

- Abide by the Cyber Code at all times
- Ensure all employees and guests wear and display their identity badges when on Vodafone premises, and remove them in public places
- Download the International SOS app and save the 24/7 helpline number in case you need it
- Report any data breach within 72 hours to [csoc@vodafone.com](mailto:csoc@vodafone.com).

## Don't

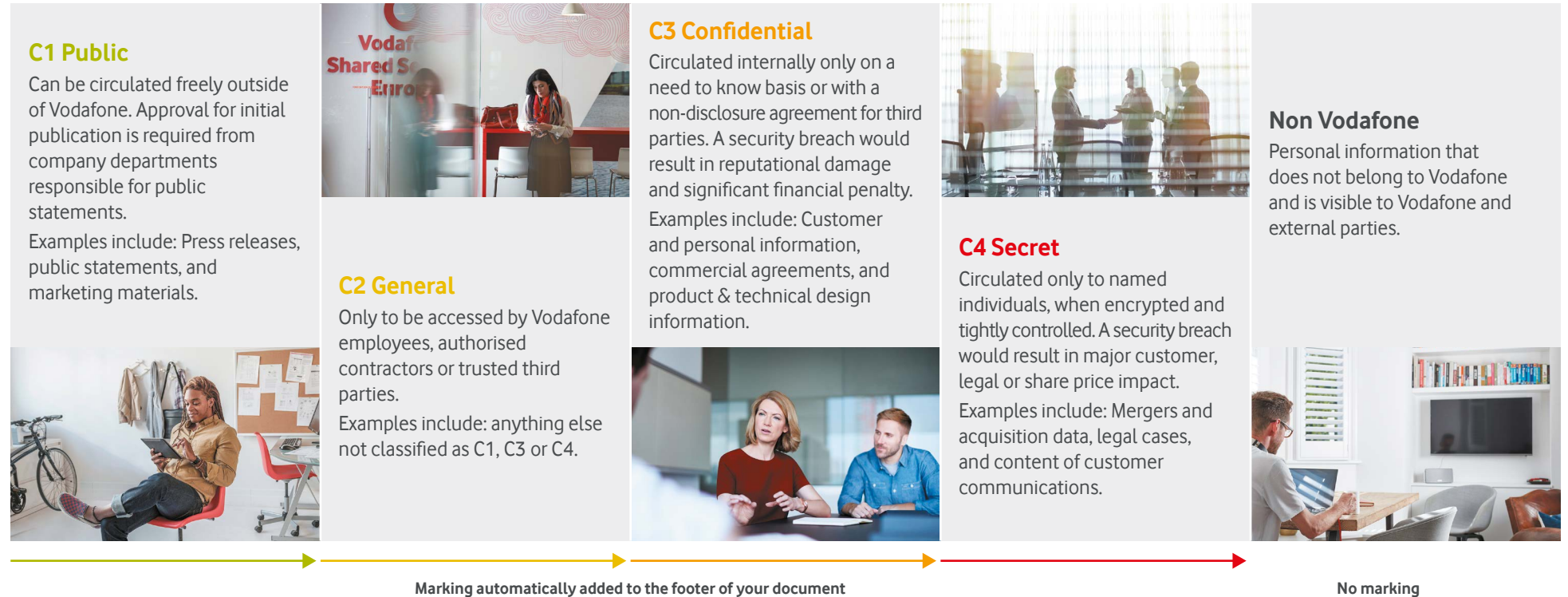
- Connect to a free/public wi-fi unless you are using an approved Virtual Private Network
- Share sensitive/confidential information with anyone who doesn't need to know ⓘ
- Leave your computer unlocked when you are away from it
- Discuss or work with confidential information when in public places.

 Further information available on the Vodafone internal network  
[Security Policy Library](#)  
[Vodafone Security Portal](#)

 **Preferred contact:**  
Local Security Team

# Information classification and protection

All documents, presentations and emails represent essential business information which must be classified correctly.



## Our brand

We have one of the world's most valuable brands. We must protect this valuable asset by using it consistently. You can help protect the Vodafone brand by following our brand guidelines. This will help ensure that our brand is well managed, protected and builds trust, loyalty and admiration.

### Do

- Comply with our [brand guidelines](#)
- Report any suspected misuse of trade marks, logos or other Vodafone IPR including counterfeit goods.

### Don't


- Allow any third parties to use the Vodafone brand or logo without discussing it first with your local Legal team.




# Intellectual Property Rights (IPR)

Our IPR is a valuable asset which differentiates us from our competitors. If we fail to protect and record this IPR, we lose the asset. We obtain patents to protect our ideas including technological advances, new products and services. Each of us is responsible for ensuring we manage our IPR and prevent its unauthorised use. It is equally important that we respect the IPR of others.

It is a further responsibility that we put in place the correct legal frameworks with our partners and suppliers that support our business objectives and effectively manage the benefits and risks.

 Further information available on the Vodafone internal network

 **Preferred contact:**  
Your local Legal team  
[Trade Marks team](#)  
[IPR team](#)

## Do

- Ensure your innovative technical product ideas are reviewed for potential patent protection
- Immediately pass all IPR related queries to your local Legal team.

## Don't

- Use open source software without checking the licence conditions.

I'm not sure whether an idea I've had might be worth something. Can I discuss it with our suppliers to get their views?

No. You should initially discuss the idea with your team. If you want further input, please contact your local Legal team or [IPR team](#).

Sometimes I see products bearing the Vodafone logo on a stall at my local market. I think they are counterfeit. Do I need to let someone know?

Yes. You should report your concerns to your local Legal team and send as much information as possible to the [Trade Marks team](#). It is important that we protect our brand and reputation. You may be asked to purchase an example of the item to help the investigation.

In my team we discuss extensions for existing products and services but have not found a place to capture our ideas. Does such a place exist?

Yes – an ideation tool is available on the intranet which makes it very simple to share an idea, a new concept or a proposition.

# Compliance with the law

- › **Insider dealing**
- › **Competition laws**
- › **Anti-money laundering**
- › **Sanctions**
- › **Trade controls**

“We seek to comply with all applicable domestic and international laws and appropriate standards and principles.”



## Insider dealing

In many countries it is illegal for people to profit from insider dealing. This means using information which is not generally available, but which you have access to as a result of your job or business relationships, to inform the purchase or sale of shares or securities.

Such information could have an impact on the value of those shares or securities if it was made public. The trading of securities or the manipulation of share prices based on information we may have as result of working for Vodafone is prohibited. These rules apply even after you stop working for Vodafone.

Insider trading results in severe penalties in most countries with participants facing either a heavy fine, a prison sentence or both. So please discuss any concerns or queries you have with the Group Corporate Secretariat team.

### Do

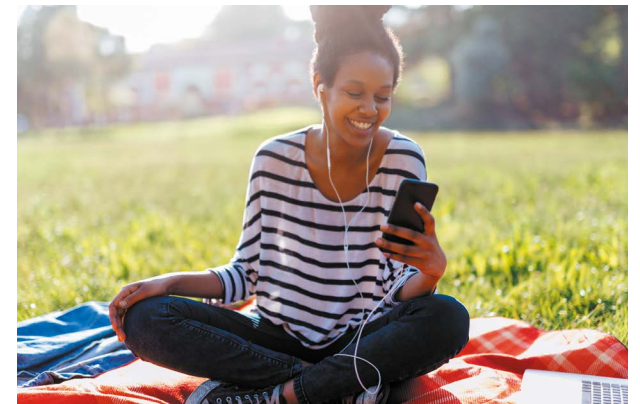
- Discuss any concerns or queries you have with the Group Corporate Secretariat team.

### Don't

- Buy, sell or otherwise deal in Vodafone securities if you have inside information
- Sell or otherwise deal in any securities of any company if you have inside information ⓘ
- Pass inside information to third parties. This is not only a breach of confidentiality but you may also be committing an offence.

My friend is thinking about selling some Vodafone shares in the next few days. I know Vodafone is due to make an announcement that will have a positive impact on the share price. Is it okay if I drop hints to my friend that he should wait to sell?

No. You should never leak information about Vodafone's business which is not publicly available. Neither should you use inside information to influence the investment decisions of others.



### Business principle | Compliance with the law


We seek to comply with all applicable domestic and international laws and appropriate standards and principles.

# Competition laws

We believe in free and fair competition. Most markets where we operate have laws designed to protect free and fair competition. These laws forbid arrangements ⓘ with competitors that affect trading in the market and can apply both to Vodafone and other organisations. You should never seek, accept or discuss confidential information with competitors.

Anti-competitive practices can damage our business. You should never encourage customers, suppliers or former employees of competitors to provide information that they should keep confidential.

 Further information available on the Vodafone internal network

 **Preferred contact:**  
Your local Legal team  
[Competition Law team](#)

## Do

- Ensure you understand how competition law could apply to your role
- Remember that anti-competitive practices include informal agreements and sharing of information with competitors, as well as formal contracts
- Recognise that it is not always obvious who our competitors are. Some of our suppliers, customers and business partners also compete with us. For example, many of our distributors are direct competitors of our own retail channels.

I find out that one of Vodafone's distributors has been offering Vodafone handsets at a significant discount to the recommended retail price. What should I do?

Nothing – the partner has the right to discount. Emailing your counterpart at the distributor to ask them to stop discounting would amount to resale price maintenance, which could be a breach of competition law.

## Don't

- Share sensitive information with competitors (such as prices, costs and sales volumes)
- Agree to fix the price of products or services, including discounts, rebates and commissions with competitors
- Agree to divide certain accounts, regions and markets between us and competitors
- Establish – directly or indirectly – a minimum resale price.

I am at a party and someone who used to work for Vodafone and now works for a competitor mentions that the company is leaving a number of Enterprise markets, to focus on consumer business. What is the right thing to do to ensure that there is no competition law risk for Vodafone?

This is forward looking commercial information, and is competitively sensitive. You need to stop the conversation and make sure that this information is not spread within Vodafone.

## Anti-money laundering

Harnessing our technology to create new and innovative digital services to improve the lives of our customers is at the heart of Vodafone. Our financial services products, like M-Pesa, have many social benefits and are improving financial inclusion in our markets.

It is vital these ambitions and benefits are not compromised by the same services being abused for criminal purposes.

We take a robust approach to the prevention, detection and reporting of money laundering and terrorist financing. We have appropriate risk-based systems and controls in place on our financial products. All employees, including contractors, are required to report any suspicion of money laundering to their local Money Laundering Reporting Officer, or the Vodafone Group AML Policy Champion.


Why does Vodafone need to comply with anti-money laundering regulations – I thought it was aimed at banks?


Vodafone offers financial services in some local markets, such as the M-Pesa product, which brings us into the scope of anti-money laundering regulations.

I have seen a transaction that doesn't seem right – I'm not sure if it is money laundering, it may be legitimate – what should I do?

You do not need solid evidence to validate your suspicion. If there are any grounds to suspect the transaction may be linked to the proceeds of a crime, you are required to make a report to your local Money Laundering Reporting Officer. Once a report has been made, ensure the matter is kept confidential.



 Further information available on the Vodafone internal network

 **Preferred contact:**  
Your local Legal team

## Sanctions

Vodafone must comply with Sanctions laws in multiple countries. These laws prevent Vodafone dealing with certain people, companies, countries and regions. There are extra requirements if you are a US citizen, dealing in US dollars or interacting with a US product or service as US sanctions legislation applies to where US people, products or currency are involved.

We have a global Economic Sanctions policy and supporting programme to ensure compliance with relevant laws.

### Do

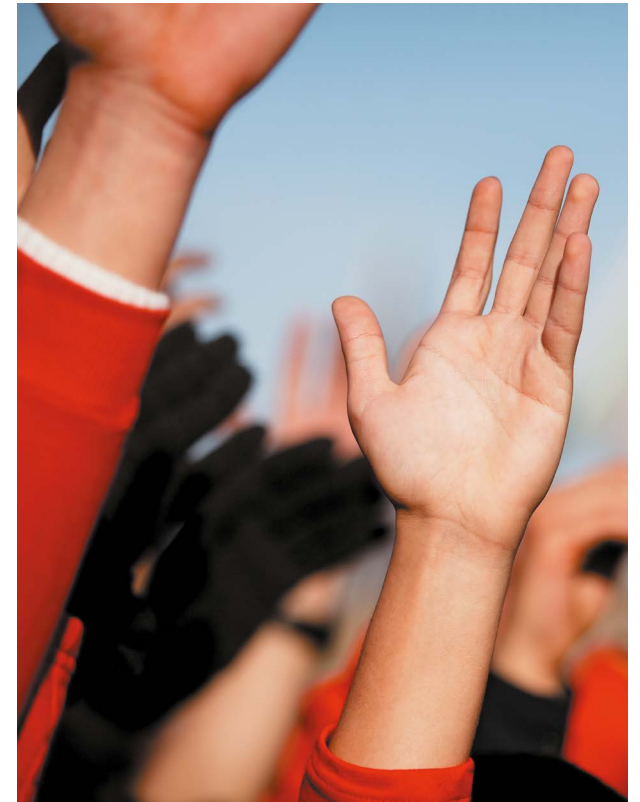
- Know which countries are considered high risk for sanctions
- Be aware of sanctions risks when entering into agreements in high risk countries
- Consult with your local Sanctions Policy Champion or your Legal team immediately if in doubt.

I am selecting a new supplier through the Vodafone Procurement Company (VPC), do I need to screen against sanction lists?

No, the central VPC on-boarding process involves screening the supplier against compliance red flags including the sanctions list. Refer to your local Sanctions Champion regarding screening of locally contracted suppliers.

I am a US Green Card holder, are there any requirements I am expected to follow?

Because US Sanctions legislation applies to all US persons, including Green Card holders and dual nationals wherever located, our programme requires all US persons to complete the online training for Sanctions and Trade Controls Awareness and consult with your Legal team before dealing in high risk jurisdictions.





## Trade controls

As Vodafone is an international company, exporting both goods and services to its customers, partners, suppliers and staff worldwide, we need to comply with all applicable trade control laws.

Trade controls aim to control the flow of certain goods, technology (whether in physical or electronic form), know-how and services from one country to another. Some controlled goods are obvious like weapons and chemicals but others are not so obvious like certain routers, antennas, satellites, power cables and network chassis.

When transporting these goods across national borders these controlled goods may need an import or export licence. Trade controls are relevant to all Vodafone employees, but in particular those that are involved in the following activities: import, export or re-export of products (hardware or software), technology or services (including intra-Group); research and development.

 Further information available on the Vodafone internal network

 **Preferred contact:**  
[Group Export Controls team](#)  
Local Trade Control Champion  
Your local Legal team

We have a global Trade Controls Policy and supporting programme to ensure compliance when exporting or re-exporting products and technology supplied by third parties or developed in-house.

### Do

- Complete a Trade Classification Validation Form prior to the export or re-export of any Vodafone or third party developed product, technology or service, to identify if a licence is required
- Always comply with export/import licence conditions and reporting requirements
- If in doubt, contact your local Legal team.

### Don't

- Apply for an import or trade control licence without the help of your local Trade Controls Champion.

I am sending third party equipment to another country, how do I know if the item is trade controlled?

You can contact the third party manufacturer to request the export control classification number (ECCN) of the product(s). Your local Trade Controls Champion will be able to use the ECCN to inform you whether the equipment is controlled or not.

How can I apply for an import or export licence?

When you complete a Trade Validation Classification Form, you will receive expert guidance on whether a licence is required or not.





# Health and safety

- › **The Absolute Rules**
- › **Electromagnetic Fields (EMF)**
- › **Drugs and alcohol**

“We protect the health, safety and wellbeing of our customers, employees, partners and the communities in which we operate.”

## Health and safety

We expect everyone at Vodafone to behave in a safe and responsible manner at all times. We will intervene quickly if health or safety is ever compromised.

It is only through collective responsibility that we can ensure that our products and services are safe for our customers to use.



### Business principle | Health and safety

We protect the health, safety and wellbeing of our customers, employees, partners and the communities in which we operate and disclose any information that comes to our knowledge that clearly demonstrates that any of our products or services breach internationally accepted safety standards or guidelines.

### Do

- Follow the Absolute Rules to look after ourselves and the safety of others
- Intervene when we think someone's safety is at risk
- Report incidents, hazards and near misses to help learning and prevention
- Consider the impact that unsafe actions can have on others who may be affected
- Value and recognise good safety performance.


You are travelling with a new work colleague; you get into a taxi at an airport. As the taxi drives off your colleague has not put their seat belt on, what should you do?


Remind them of the Absolute Rule and why it is important for their safety. Ensure they fasten their seat belt.


I often think when I walk through the office that I see things that are potentially dangerous, I don't mean things that are likely to kill someone but could easily cause injury. I am not sure if I have the authority to stop people and tell them what they are doing is dangerous?


Everyone in Vodafone has the authority to intervene and stop something that is dangerous. The person may not realise that it is dangerous until you point it out. In general, if it looks dangerous it probably is.


## The Absolute Rules


  
WE ALWAYS drive safely and legally: we always wear a seatbelt


  
WE ALWAYS drive safely and legally: we never use a handheld mobile device when driving

  
WE ALWAYS drive safely and legally: we always obey the speed limit

  
WE NEVER work under the influence of alcohol or drugs

  
NEVER carry out work on any electrical equipment unless you're qualified

  
NEVER undertake any street or underground work activities unless competent to do so

  
When working at height, ALWAYS wear protective gear, attach a safety harness and use fall protection equipment

## Electromagnetic Fields (EMF)

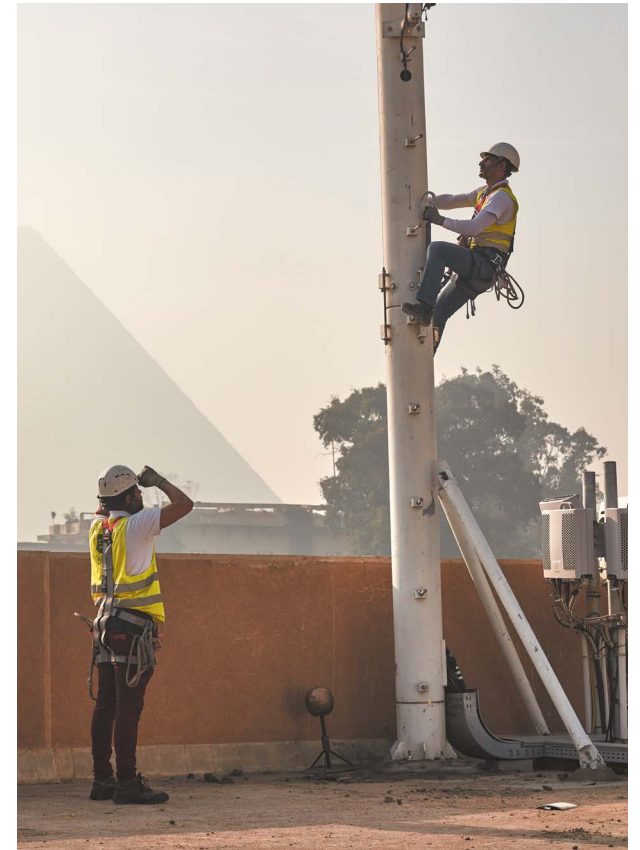
The safety of our customers, the wider public, our employees and our contractors is an absolute priority for Vodafone. We comply with all applicable EMF laws in every jurisdiction where we operate and closely monitor independent scientific research that is peer-reviewed and of the highest standard.


We understand that some people remain concerned about mobile technology and health. We remain committed to openly providing information and responding transparently to public concerns about mobiles, masts and health.

Our mobile technology operates well within the safety limits set out by international guidelines. The opinion of the independent World Health Organization (WHO) remains the same: there is no evidence to convince experts that this technology poses any risk to human health.

### Do

- Take a look at the [introductory training](#) on how mobile phones work which includes basic information you can share with your friends and family about mobiles, masts and health
- [Visit the mobiles, masts and health section](#) of our website to read about the science, the technology and the latest research
- Visit the [Vodafone Sustainability Report](#) for more information.



 Further information available on the Vodafone internal network



## Drugs and alcohol

Any use, sale or distribution of illegal substances will be treated extremely seriously. Please support your colleagues by reporting any breaches of this Code to your local HR team. We will provide support to those affected by problems with alcohol or drugs.

### Do

- Report any concerns you have about a colleague's use of alcohol or drugs to your local HR team
- Familiarise yourself with local laws, cultures and customs when travelling.

### Don't


- Work under the influence of illegal drugs or alcohol.


My colleague regularly arrives at work appearing to be under the influence of alcohol. I know he is having difficulties at home. What should I do?

It is important that you discuss the issue with your line manager. The use of alcohol is likely to be affecting his wellbeing and the quality of his work. It is likely that your colleague needs help and support in dealing with his difficulties.

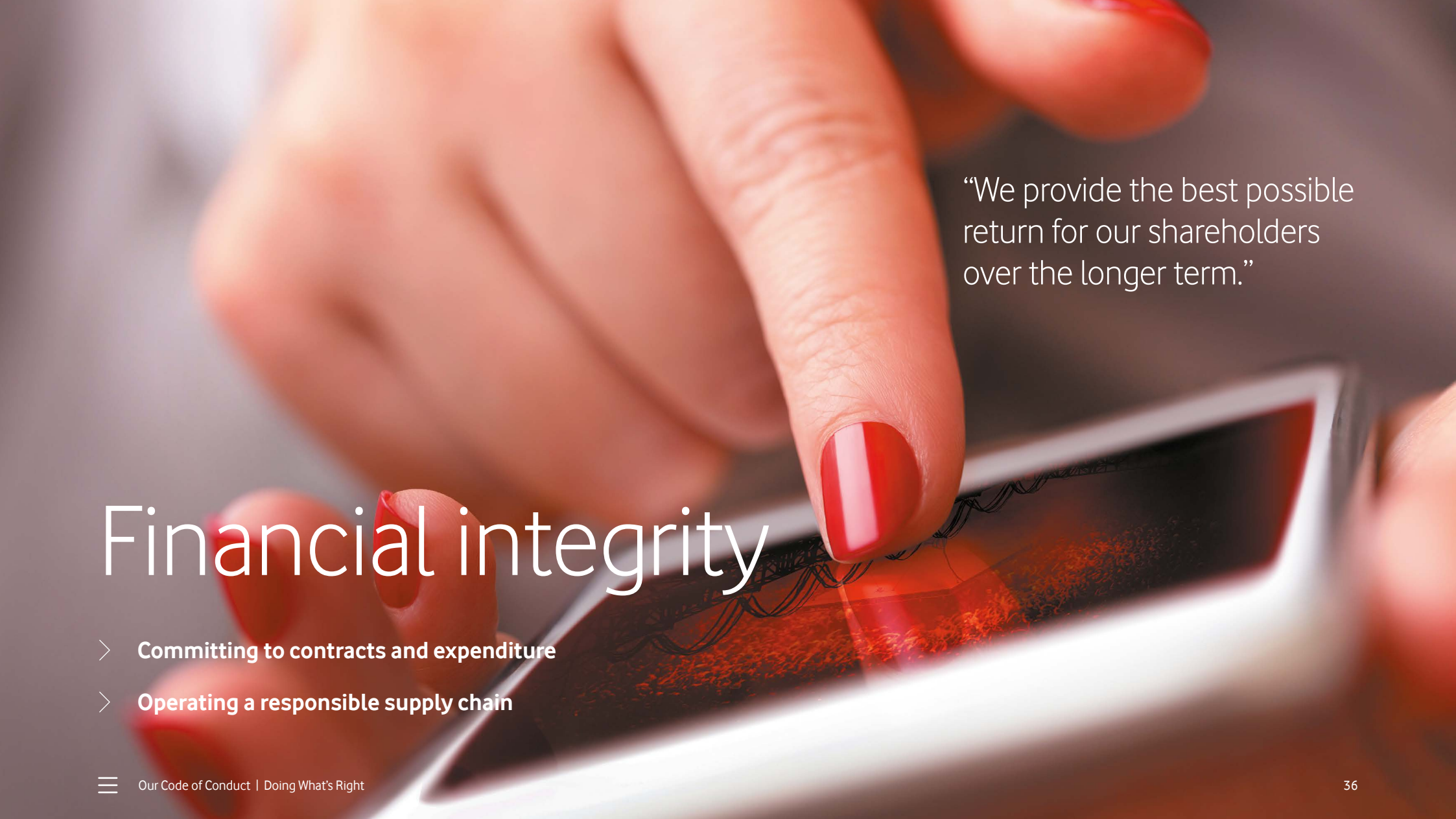
“We will not tolerate anyone being under the influence of alcohol or illegal drugs in the workplace.”



 Further information available on the Vodafone internal network

 **Preferred contact:**  
Local Health and Safety team  
Your line manager





“We provide the best possible return for our shareholders over the longer term.”

# Financial integrity

- **Committing to contracts and expenditure**
- **Operating a responsible supply chain**

## Financial integrity

You should only ever spend company money where there is a legitimate business need and where the cost is worth the benefit. You should know the local expenditure limits and financial policies which directly apply to your role.

Our managers have an extra duty to ensure that their teams manage budgets well and spend company money carefully.

When assessing value for money, it is important to consider: quality, service, reliability, sustainability, compliance with our Code of Ethical Purchasing and any terms and conditions.

### Do

- Understand and apply the finance and expense policies relevant to your role
- Strive to find the best value when spending company money
- Understand when you can and when you can't commit Vodafone's funds
- Purchase goods and services only through our registered suppliers.

I think my colleague is regularly claiming taxi fares for working after hours but actually takes public transport home. What should I do?

You should speak to your line manager in the first instance. Alternatively, follow the other Speak up routes if you feel it is more appropriate.



### Business principle | Financial integrity

We provide the best possible return for our shareholders over the longer term. We base our investment decisions, acquisitions and business relationships on economic criteria but we also take into account social and environmental considerations.

## Committing to contracts and expenditure

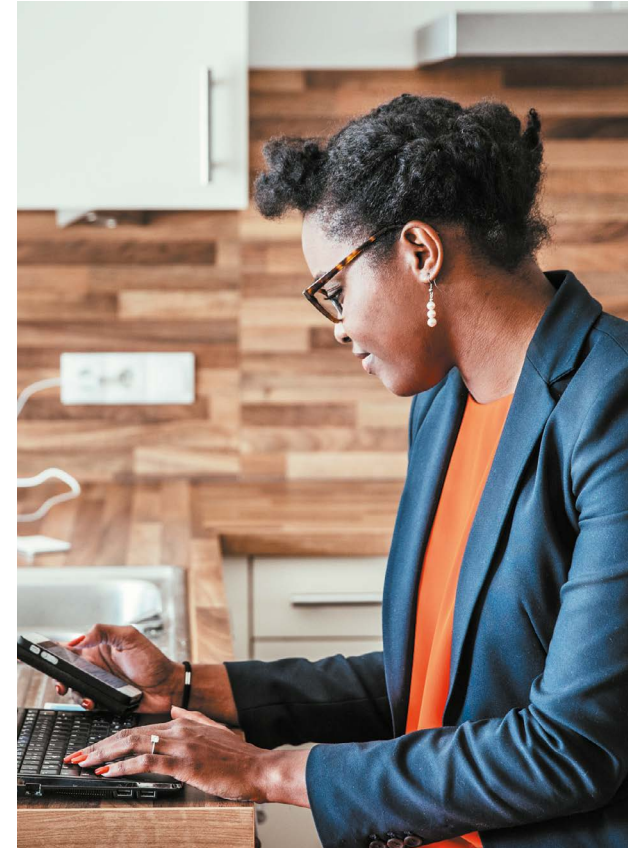
You must not commit Vodafone to a contract or incur expenses without appropriate authorisation.

Vodafone needs legally binding contracts, with agreed terms and conditions before it commits its resources. Without these agreements Vodafone is open to financial, commercial, tax and legal risks.

The Delegation of Authority (DoA) shows what level of authority you need before you can commit Vodafone to a contract or expense. Everyone is expected to understand how the Delegation of Authority rules apply to their work.

### Do

- Read the Delegation of Authority Policy and understand how it applies to your role
- Ensure you are authorised to commit Vodafone to a contract or payment
- Seek legal and other relevant advice where appropriate
- Review all contracts to ensure you understand the terms and that the agreement is in Vodafone's best interests.



## Operating a responsible supply chain

We base all of our procurement on our [Code of Ethical Purchasing](#). We do this to responsibly manage the wider impact our business has on communities, society and the environment.

We also expect our suppliers and contractors to act responsibly. We work closely with each of them to make sure they follow our requirements in their operations and supply chains.



I have the power of attorney to sign a contract in my local market, which is higher than the allowance I have in the Delegation of Authority. Can I sign the contract as I have power of attorney, even if it's not aligned with Delegation of Authority?


No. You have to comply with both the Delegation of Authority and your Power of Attorney. Ideally both should be consistent.


I have a supplier that I suspect has breached the Code of Ethical Purchasing. What should I do?

You should report this to your local Supply Chain team immediately. Alternatively you can use the Speak up process to escalate your concern.

Where will I find out the details of my Delegation of Authority limits?

You will find the Delegation of Authority Policy on the Global Policy Portal accessible via our Vodafone intranet.

 Further information available on the Vodafone internal network

 **Preferred contact:**  
Your line manager  
Your local Legal team  
Local Supply Chain team





# Public policy and communications

- **Speaking on behalf of Vodafone**
- **Using social media**

“We want to empower all of our employees to be good ambassadors for our brand.”





## Speaking on behalf of Vodafone

We must communicate relevant information to our teams quickly and clearly. Internal communication should always be professional, even when it is informal.

No one should make comments on behalf of Vodafone unless they have prior approval, in accordance with the External Communications and Investor Communications Policy.

We must always be aware that we are all representatives of Vodafone and that whatever we do and say in public represents the company.

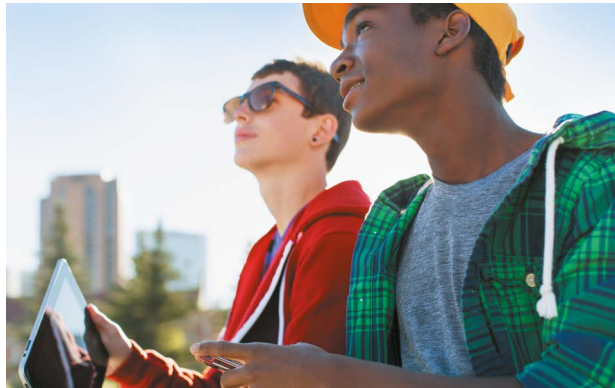
### Business principle | Public policy and communications

We communicate openly and transparently with all our stakeholders within the bounds of commercial confidentiality. We protect confidential information from improper disclosure, and any authorised communication of confidential information should be limited to individuals who need it to carry out their work.



## Using social media

We want to empower all of our employees to be good ambassadors for our brand. However, we don't want you to say anything that could have unintended consequences.



“Provide clear and honest information at all times in language that is easy to understand.”

### Do

- Ensure your internal and external communications are professional, timely and, when necessary, approved
- Act professionally when representing Vodafone, particularly when wearing a Vodafone uniform, using one of our vehicles or attending events on our behalf
- Keep confidential information confidential.

### Don't


- Make statements that could have a negative impact on Vodafone's reputation or brand
- Make personal comments that could be interpreted, even mistakenly, as a comment or endorsement made by Vodafone
- Release financial information or information about new products or services without approval – leaked, incorrect or misleading messages can seriously affect the success of a product or service.


Am I allowed to say where I work on my social network profile?

Yes. You can disclose on your 'About' page or bio that you are a Vodafone employee. Be clear about which part of the organisation you represent and what your responsibilities include. You can include a link to your local Vodafone website.

There are a lot of guidelines to follow when using social media, can you summarise them please?

As a general guideline; 'Be yourself', 'Use common sense' and 'Respect the law'.

 Further information available on the Vodafone internal network

 **Preferred contact:**  
Local Internal Communication team  
Local External Communication team



# Privacy

- › **Our Privacy Commitment**
- › **Privacy Principles**
- › **How to apply our Privacy Principles**



“We value the trust our customers place in us and safeguard the information provided to us.”

## Our Privacy Commitment

We value privacy because of its value to people. It's about more than legal compliance – it's about building a culture that respects privacy and justifies the trust placed in us. Vodafone is committed to process personal data honestly, ethically, with integrity, and always consistent with applicable laws and our values, which is why we adhere to the [Privacy Principles](#) when processing personal data.

### Do

- Understand how the Privacy Principles apply to your role
- Ensure that you think Privacy in your day-to-day decision making
- Familiarise yourself with the privacy processes that apply to your role, for example, privacy by design.

### Business principle | Privacy

We value the trust our customers place in us and safeguard the information provided to us.





# Privacy Principles

## Accountability

We are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers.

## Fairness and lawfulness

We comply with privacy laws, and we will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.

## Openness and honesty

We communicate clearly about actions we take that may impact privacy.

## Choice and access

We give people the ability to make simple and meaningful choices about their privacy and allow them – where appropriate – to access, update or delete their personal data.

## Privacy by design

Respect for privacy is a key component in the design, development and delivery of our products and services.

## Responsible data management and limited disclosure

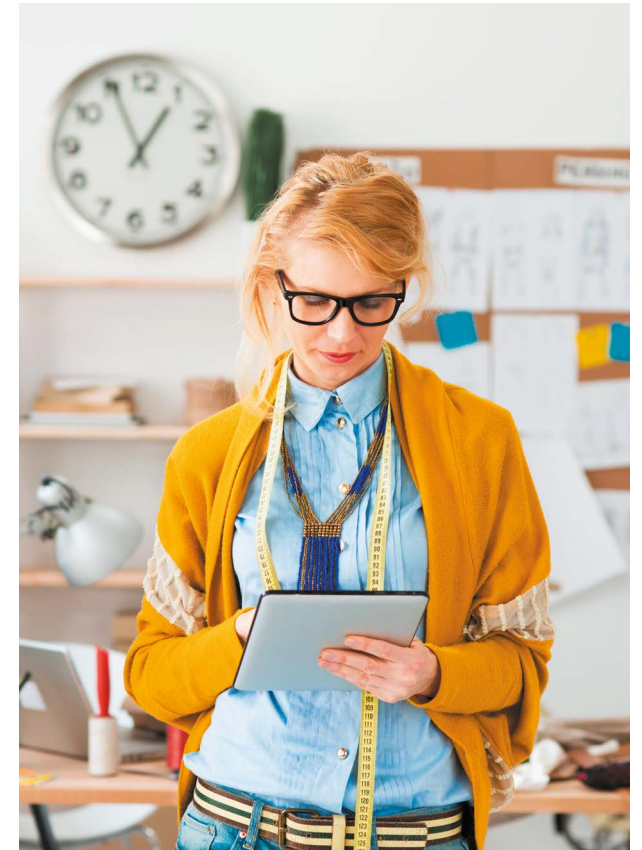
We apply appropriate data management practices to govern the processing of personal data. We limit disclosures of personal data to our partners to what is described in our privacy notices or to what has been authorised by our customers.

## Security safeguards

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, use, modification or loss.

## Balance

When we are required to balance the right to privacy against other obligations necessary in a free and secure society, we work to minimise privacy impacts.





## How to apply our Privacy Principles

Your Privacy Officers can help you understand how to apply our Privacy Principles. They can explain:

- What the Privacy Principles mean for you and your team
- Particular processes and guidelines you need to follow
- How to get training and where to find other support materials.

You can become an advocate for privacy by joining our [Privacy Community](#) on the Vodafone intranet.

I've been contacted by the law enforcement authorities in my country with a request for access to personal information. What do I do?

While we may be required by law to respond to a Government or law enforcement request for information, there are other requirements to consider. Make sure you're familiar with the need to balance our legal obligations to respond and support law enforcement, with respect for our customers' human rights and due process. More information can be found in our Privacy and Law Enforcement Policy.

I'm working on a project involving the use of customer information that is not covered by law. Do I still have to think about privacy?

Yes. Our Privacy commitment is to respect customers' privacy. Regardless of whether there is a law or not, everything we do should be consistent with our Privacy Principles.

I'm building a Vodafone application that will use personal information. How do I make sure privacy is protected – can I simply add a privacy policy to the app?

No. Our privacy by design commitment means we make sure privacy is built into our applications and services, not just as an afterthought. For more information see our guidance on mobile applications on our Privacy Matters site, or contact your local Privacy Officer.



Further information available on the Vodafone internal network



**Preferred contact:**  
Local Privacy Officer



# Employees

- > **Diversity and inclusion**
- > **Preventing harassment and bullying**

“We aim to create an inclusive environment where everyone feels respected and valued and can truly belong.”

## Diversity and inclusion

We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.

We recognise and celebrate the importance of diversity in our work spaces so that we are as diverse as the customers we serve. We will 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 and between employees on respect for individuals and their human rights. We will not tolerate any form of child labour.

We must all challenge discriminatory behaviour when we see it. We want everyone to feel able to raise any concerns. In the first instance, please speak to the individuals concerned before consulting your local HR team or going through the Speak up process.

### Do

- Act fairly and show respect towards others in all your dealings
- Challenge discriminatory behaviour
- Raise any concerns through your local HR team or the Speak up process
- Base any employment decision you make purely on merit.

What should I do if I hear a negative comment about someone's sexual orientation during a meeting or in an informal work context, such as at the coffee machine or in a break out area?

This kind of behaviour is unacceptable and you should challenge it if you feel able to. Speak to your Line Manager or Local HR Manager. If you do not feel comfortable doing this, then use the Speak up reporting line.

### Business principle | Employees

We base relationships with and between employees on respect for individuals and their human rights. We do not tolerate child labour. We do not accept any form of discrimination, harassment or bullying. We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.

Does being LGBT+ mean that I can never travel on business to a country where being LGBT+ is illegal?

Many LGBT+ colleagues travel to or are based in countries where being LGBT+ is illegal. In both cases they have Vodafone's full support. Before travelling, you can speak to the Security team who will be able to advise you on local legislation, culture and levels of LGBT+ acceptance. Alternatively, you can email their confidential hotline at [travelsecurity@vodafone.com](mailto:travelsecurity@vodafone.com).

The local Security team have a range of materials available on this topic and you will receive further support online and over the phone from our security provider. This should help you to decide if you are happy to travel and, if you are, how much of your personal life you would be willing to share when in business meetings or when socialising in the country in question. Whatever your decision, you will have Vodafone's backing.






## Preventing harassment and bullying


Vodafone will not tolerate inappropriate behaviour, including harassment, bullying or abuse of authority. ⓘ

Harassment includes any improper or unwelcome conduct including words, gestures or actions that may cause offence or humiliation to another person. This includes sexual harassment. Harassment can occur between members of the same sex or opposite sex, outside the workplace and/or outside working hours and may be a one off incident or a series of incidents.

We will instigate disciplinary or legal action against people who harass, bully or abuse their authority. We will treat each other respectfully and challenge any unfair behaviour. We are all responsible for ensuring this doesn't happen at Vodafone.

We provide enhanced support to victims of domestic violence and abuse - see details in your local HR policy. Perpetrators of domestic violence that use our property and/or services to harass or bully will be subject to disciplinary action.

 Guidance is available in your [local HR policies](#)

 **Preferred contact:**  
Local HR team

### Do

- Build trust in your teams by treating everyone with respect
- Make sure all your communication abides by this Code, no matter how informal you are being
- Speak up if you think you or a colleague is being harassed or bullied.

### Don't

- Be derogatory or abusive to or about your colleagues.

Does sexual harassment necessarily involve physical contact or unwanted touching?

No. Sexual harassment can be verbal or non-verbal. Words or gestures can be just as offensive as physical acts and contact. Jokes, stories and inappropriate comments can be sexually harassing if they cause offence or humiliation to the individual or others.

“We aim to create an inclusive environment where everyone feels respected, valued and confident that they belong at Vodafone.”





# Communities and society

> **Local communities**

“We will engage with local communities to help us understand and respond to any concerns they may have.”

## Local communities

Through being open and honest, respecting local cultures and traditions, we aim to gain the trust and support of our local communities.

We always listen to the concerns local communities have, for example in relation to network deployment, and seek to answer the questions they raise. We will be inclusive and will always do our best to make sure that everyone is heard.

### Do

- Be sensitive to your local communities' needs – listen and respond to the concerns people have about Vodafone's operations
- Get involved in your local community via the Vodafone Foundation.

### Business principle | Communities and society


We aim to deliver products and services that can transform people's lives and contribute to more sustainable living by empowering individuals, contributing to wider development goals and reducing environmental impacts.


To do this, we must operate responsibly wherever we do business to maintain the trust of society.

I thought human rights ⓘ were the government's responsibility? Why do I have to worry about them?

While governments have the duty to protect the human rights of their citizens, businesses including Vodafone have a responsibility to respect human rights and to ensure we do not infringe these rights in our business operations.



 Further information available on the Vodafone internal network

 **Preferred contact:**  
[Vodafone Sustainable Business](#)



“We are committed to protecting the environment. Wherever possible, we will reduce our use of resources and cut any harmful emissions for which we are responsible from our operations.”

# Environment



## Environment

We are committed to protecting the environment. Wherever possible, we will reduce our use of resources and cut any harmful emissions for which we are responsible from our operations. We invest in energy efficiency measures to mitigate the effects of climate change and reduce, reuse and recycle telecommunication equipment to reduce waste through careful planning, design, installation and maintenance and end of life.

Any wastes which cannot be avoided through design considerations, should be resold, reused and recycled where possible. Where disposal is necessary, wastes shall be stored correctly and dealt with by appropriately licenced contractors, with sufficient confidence in the final disposal.

We comply with relevant national and international legislation and standards, and set global policies. In countries where environmental legislation is not evident or enforced, we will ensure that responsible practices for managing environmental impacts are in place.

We work with customers, suppliers and contractors to develop products and services to minimise the impact we have on the environment. We will maintain stakeholder confidence by being open and responsive to the concerns of customers, regulators and the local communities in which we operate.

Is there a Global Environmental Policy?

No, Environmental Policies exist in each local market.

Where can I find further information on our environmental performance?

See the annual Sustainable Business Report and Sustainable Business microsite for more information.

Do we have any global environmental targets?

Yes, see Sustainable business website for our current environmental targets.






## Do

- Familiarise yourself with relevant environmental local market laws, regulations and policies
- Look to use your resources wisely to reduce waste wherever possible following the waste hierarchy (reduce, reuse, recycle)
- Use the local market recycling facilities wherever possible for paper, equipment, batteries, etc.
- Walk, cycle or use public transport where you can. Consider using local market car-sharing with a colleague if you need a car
- Avoid unnecessary travel to reduce carbon emissions – use conference call facilities or videoconferencing where possible
- Always consider the environment when making purchasing decisions: is this product needed? Is there a less environmentally damaging or more efficient alternative?
- Consider the whole lifecycle of the product on the environment including maintenance and recycling not just upfront costs.



 Further information available on the Vodafone internal network

 **Preferred contact:**  
Local External Affairs team





# Definitions



## Definitions

### What are 'facilitation payments' and 'kickbacks'? 12

A facilitation payment is usually a small, unofficial cash payment made to speed up a routine government action, for example paying \$10 to an official to speed up a visa application. A kickback is a payment made to an individual in return for a referral, transaction or contract with another party.

### What is a bribe? 13

A bribe involves the giving or receiving of cash, or anything else of value, in order to get someone to act 'improperly' (usually resulting in an unfair personal gain). Nothing of value needs to change hands, just the offer or promise is enough to break the law.

### What is a 'Public Official'? 13

Any officer (whether elected or appointed) or employee of a government department who holds a legislative, judicial or administrative position of any kind, even on a non-permanent basis. This includes: members of the royal family; any person who performs public functions in any branch of the national, local or municipal/regional government; or any person who exercises a public function for any public agency or public enterprise, or private entity controlled by the State, such as employees of state-owned or state-controlled enterprises, or working in state-owned media; members or political parties or candidates for political office. It also includes any official or agent of a public international organisation, such as the UN or the World Bank.

### What does 'reasonable and proportionate' mean? 16

As a general rule it covers low-value, Vodafone branded items in connection with promoting, demonstrating or explaining our products and services. It can also cover some hospitality which is done for a clear business purpose, for example inviting a group of prospective clients to an event, and which is not 'lavish' or 'over the top'.

### What is an "excessive or improper" gift or benefit? 16

Something of value outside of the monetary limits outlined in the Group Anti-Bribery Policy. Alternatively, it may be something which is valuable to the individual which may give the impression that it is enough to influence a business decision.

What is 'sensitive information'? 21

Sensitive information can include legal agreements, technical specifications or any other information which is unlikely to be publicly known and may have commercial value.

What is inside information? 26

Information that:

- Is precise
- Has not been made public
- Relates to Vodafone
- If made public, would be likely to have a significant effect on the price of Vodafone securities.

What is an arrangement? 27

Typical examples include:

- Sharing information such as prices, costs or sales volumes with competitors
- Agreeing with competitors to fix the price of products or services, including discounts, rebates and commissions
- Agreeing with competitors not to compete for certain accounts or regions, or agreeing market shares
- Agreeing with resellers to fix the minimum resale price of products or services.

What do we mean by 'discrimination'? 48

For these purposes, 'discrimination' includes discriminating against someone because of age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

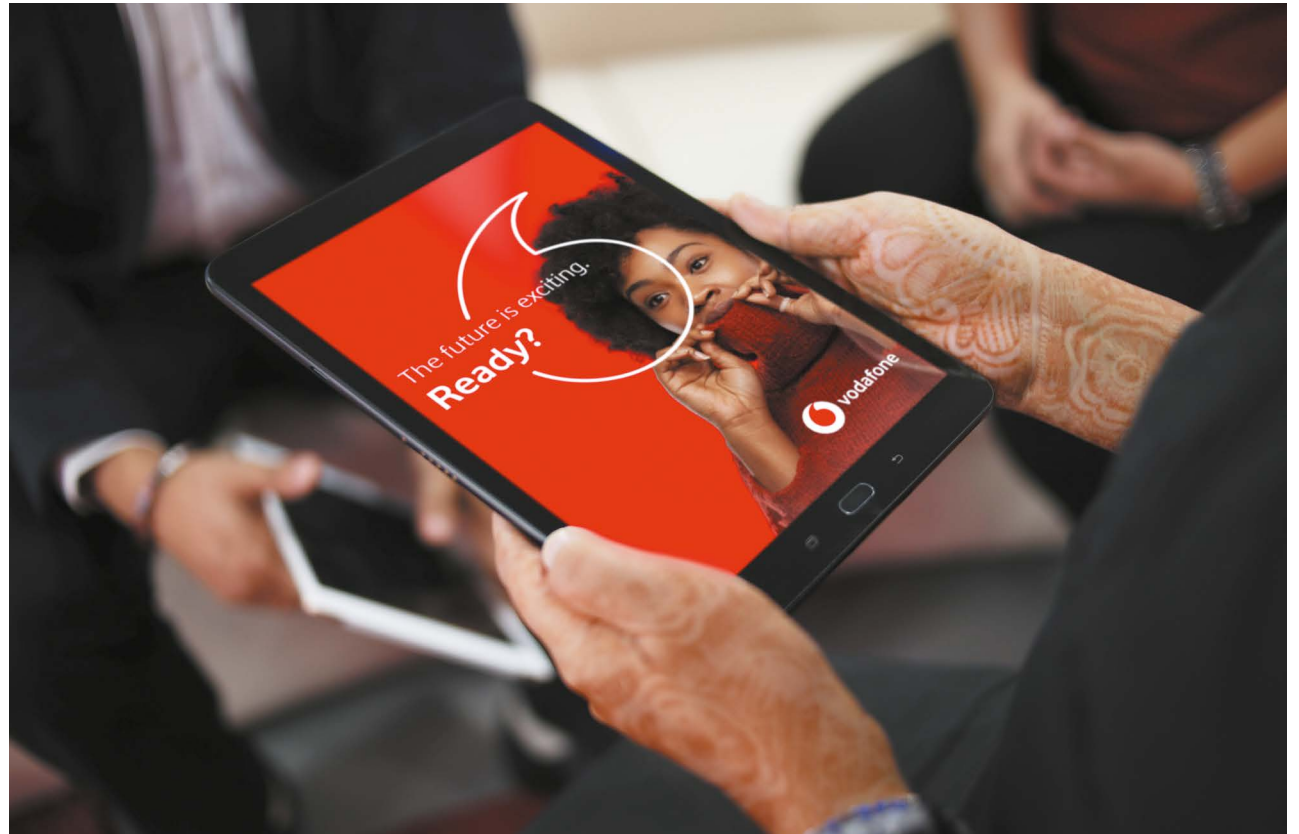
What do we mean by 'harassment and bullying'? 50

We define harassment and bullying as unwanted behaviour from another person which is intimidating, malicious, offensive, insulting, humiliating or degrading. It may be related but not limited to age, gender, gender identity, sexual orientation, race, disability, religion or belief, and can be either a repeated or a one-off incident. It can be verbal, non-verbal, physical and isn't always face-to-face.

What do we mean by 'human rights'?

52

We respect all internationally proclaimed human rights, including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations.



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