

**Vodafone Group Plc**

Modern Slavery Statement 2024/25



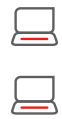


# Introduction

**Vodafone's purpose is to connect everyone. We aim to build an inclusive, sustainable and trusted digital society where individuals and businesses can thrive.**

**Maintaining trust with our customers, employees, suppliers and the societies we serve is at the heart of everything we do. This includes our aim that everyone who works for Vodafone – in any capacity, anywhere in the world – should benefit from a working environment in which their fundamental rights and freedoms are respected.**

This statement is published by Vodafone Group Plc ('Vodafone') and its relevant subsidiaries (see page 9), pursuant to section 54(1) of the UK Modern Slavery Act 2015. This statement reports on what we do to mitigate the risk of slavery, servitude and forced, bonded or compulsory labour, human trafficking, sexual exploitation and child labour ('modern slavery') within our operations and supply chain. It relates to the financial year ended 31 March 2025 and is our tenth Modern Slavery Statement.



It can be found on Vodafone's website  
[vodafone.com/sustainability-reports](https://www.vodafone.com/sustainability-reports)



and on the UK Government registry  
<https://modern-slavery-statement-registry.service.gov.uk>

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# Our business and supply chain

Vodafone is a leading European and African telecoms company. We are transforming the way our customers live and work through our innovation, technology, connectivity, platforms, products and services.

### Our business structure

Whilst Vodafone Group Plc is incorporated and domiciled in England and Wales, we operate mobile and fixed networks in 15 countries and have stakes in a further five countries through our joint ventures and associates. We also partner with mobile networks in over 40 countries outside our own operations.

As of 31 March 2025, we provide mobile and fixed communications services to over 340 million customers in 15 countries and we have one of the world's largest Internet of Things (IoT) platforms. In Africa, our financial technology businesses serve almost 88 million customers across seven countries.

We are not a mass-market manufacturer and do not directly own or operate large factories or other production facilities, apart from a small plant that assembles specialist automotive IoT components, based in Italy. We do not own, operate or control the manufacturing operations that make Vodafone-branded devices, nor do we handle raw materials or commodities.

Vodafone Procurement Company and our shared services division Vodafone Intelligent Solutions (VOIS) manage our external spend with suppliers and provide services to Vodafone.

Top 10 tier one supplier sourcing countries <sup>1</sup> (headquarter location)	
– Germany	– South Korea
– United Kingdom	– South Africa
– China	– Egypt
– Sweden	– United States
– Finland	– Japan

1. Based on an analysis of over 90% of our global spend

### Our workforce

We have over 87,000 employees and over 5,000 contractors working globally.

### Our supply chain

We spend approximately €21 billion a year with 8,500 direct suppliers. We estimate that there are around 190,000 in our supply chain. Our suppliers range from small businesses to large multinational companies. Our direct suppliers have many suppliers of their own, such as electronics manufacturers, sub-assemblers, component and commodity suppliers. The complexity and dynamic nature of our supply chain impacts our ability to map the entire supply chain beyond our direct suppliers. However, we know which regions our first-tier suppliers operate in, the level of spend and category of procurement activity.

The majority of our external spend is with large well-known global suppliers that provide us with the devices we resell to our customers (for example: mobile phones, tablets, routers, IoT devices and set-top boxes that connect to our network) and equipment and services we need for those devices to connect and have access to our fixed and mobile networks where we operate. The components and assembly required for devices and network equipment are largely manufactured in Asia – a key focus area for Vodafone and our industry in terms of modern slavery risks. Network equipment may be installed, upgraded and/or maintained in the countries where we operate, constituting a lower risk of modern slavery. This is because the work is highly skilled, and we have oversight through our own local operating companies.

The majority of our external spend is managed by our Vodafone Procurement Company that is based in Luxembourg and our VOIS shared services team. This centralised approach helps to ensure that we maintain a consistent approach to supplier management across Vodafone, from on-boarding and vetting suppliers, to raising orders and paying for delivered goods and services. This not only makes it easier to monitor and improve supplier performance across our markets but also aims to ensure fair treatment of suppliers during the competitive tender process.

We also procure a wide variety of goods and services to support our general business, such as cloud and software services and other categories needed for our functions, including marketing, content, travel, professional advisory support, facilities management, catering and cleaning, for example, where our risk focus is on procurement with a strong association to our brand.

# Modern slavery risks

## Modern slavery risks in our business

An external risk review found that the risk of modern slavery in our direct operations (including our retail business) is low, given the relatively high-skilled profile of our direct hires, the nature of work conducted and the direct oversight by our operating companies. Security and other checks (such as 'right to work checks') required in the recruitment of our people also mitigate against modern slavery risks. Our Talent Acquisition Policy includes specific requirements on minimum age and checks to make sure candidates have not paid a fee to get a job with Vodafone. Other business activities which are outsourced and therefore potentially carry a higher risk – such as property maintenance, logistics, warehousing and catering – are subject to our supply chain due diligence processes, which seek to mitigate these risks.

## Modern slavery risks in our supply chain

Our greatest areas of potential exposure to modern slavery remain consistent and are linked to our procurement of manufactured electronic products, as well as, where carried out in higher risk geographies, the construction services for our mobile and fixed assets, maintenance and support services at our offices, warehousing of products, and customer support and telesales activities.

The main risks in our supply chain that have either a direct or indirect causal link to modern slavery and form part of our audit and verification criteria are child labour, forced labour, health and safety, freedom of association, discrimination, disciplinary practices, working hours, wages and compensation and business ethics.

## Identifying, assessing and managing modern slavery risks

### Supply chain due diligence

We aim to identify modern slavery risks before we take on a new supplier and monitor them for compliance against our Code of Ethical Purchasing and Code of Conduct in the life of the contract. We work collaboratively with others in our sector to identify risks.

### Qualification process

- All suppliers we work with must always be fully compliant with our Code of Ethical Purchasing, which includes explicit provisions related to modern slavery. They must cascade the provisions (or their equivalent) to their own supply chains.
- Our supply chain employees are required to complete Code of Ethical Purchasing refresher training annually as part of their personal objectives so that they can communicate it effectively to our suppliers.
- All suppliers must demonstrate policies and procedures that support safe working, diversity in the workplace and climate commitments in their tender through an ethical, labour and environmental risk questionnaire, comprising up to 20% of the overall evaluation (5% on diversity and inclusion, 5% on the environment and 10% on health and safety in high-risk categories).

### Risk assessment

Risk profiling is undertaken during the qualification process.

### Based on industry

We review our supplier base and contact key suppliers to better understand the risk. The information is fed into our supplier on-boarding process to ensure that our areas of greatest potential exposure are identified and assessed for risk.

### Based on country

Depending on the category of what we are buying, we then also take into consideration the country context risk.

### Improvement plans

We continue to monitor compliance and promote improved performance through our supplier performance management system, focusing particularly on high-risk and strategic suppliers.

In 2025, we plan to conduct an assessment of the Vodafone supply chain to increase the depth of understanding of potential human rights risks and onboard a new ESG performance management system to better assess human rights risks in supply chain, improving our supply chain mapping, assessment of suppliers, and ability to manage performance and trigger corrective action plans when necessary.

### Enhanced due diligence for branded products

Vodafone has in place a system to assess key risks when on-boarding new suppliers that we intend to work with. The system, called Supplier Assurance Risk Management (SARM), uses a proprietary framework to identify suppliers with risks that are material to Vodafone. Modern slavery risks are considered under 'Responsible Sourcing', where we review suppliers of Vodafone branded products (such as branded uniforms or broadband routers). In these cases, we recognise that we may have greater ability to influence supplier practices. Suppliers are required to provide information related to our policy requirements, and we validate supplier policies related to child labour, disciplinary practices, non-discrimination, forced labour, health and safety, managing their own suppliers, including:

- whether accommodation is provided by employers
- confirmation that fines are not used as a disciplinary measure.
- that freedom of association is permitted.
- the existence of a defined process to pay their employees.
- Ensuring conditions of employment are communicated, which include payment terms and working hours.

We also assess the suppliers' major manufacturing and/or major sub-contractor locations and request evidence of an audit report including declaring any legal violations during the last three years.

The responses are reviewed by experts in our procurement organisation who will evaluate the risk and if necessary, identify any remedial actions required before on-boarding, which may include an on-site Vodafone or JAC audit, or a review of any existing audit reports shared by the supplier.

# Risk identification

## Screening for issues

- Vodafone's Code of Ethical Purchasing requires that suppliers shall immediately report to us any serious breaches of the Code and that we will together agree a schedule for corrective action.
- We monitor our strategic suppliers through our Supplier Performance Management programme, which requires suppliers to evidence whether they have a responsible supply chain through an annual questionnaire.
- We review human rights allegations made against our direct suppliers to assess the risk of their potential involvement in human rights violations.

## On-site assessments

- As members of Joint Alliance for Corporate Social Responsibility ('JAC'), using independent third-party auditors, we undertake regular audits of suppliers in information and communication technology ('ICT') value chains. The industry aligned and standardised audits cover labour, health and safety, environmental, ethics and management systems. Vodafone uses these assessments in addition to our own to identify and manage risks in our supply chain (see 'evaluating our progress' (page 8).
- We use independent third-party auditors with local language knowledge, selected based on their ability to deliver audits to Vodafone and JAC standards (for the relevant type of audit) and in line with local law.
- In addition to formal assessments on specific supplier sites, we also assess risks during other supplier assessments such as safety visits to network sites and regular visits to manufacturing centres whereby any observations that have cause for concern can be raised directly with our experts in our procurement teams.

## Worker voice

- Suppliers undergoing a JAC assessment are required to allow their employees to complete an offsite worker survey. Workers use their mobile to reply anonymously to pre-recorded questions in their local language at any time and from any location.
- Findings that require action are incorporated into the relevant supplier's corrective action plan.

## Speak up

Everyone who works for Vodafone has a responsibility to report any behaviour at work that may be unlawful or criminal, or could amount to an abuse of our policies, systems or processes and, therefore, be a breach of our Code of Conduct. Employees can raise concerns with a line manager or with a colleague from Human Resources. Both employees and workers in our supply chain may make a report through our anonymous third-party helpline, Speak Up, which is accessible in local languages online or by telephone.

Speak Up reports are confidentially investigated by local specialist teams, with a senior team in place to triage reports. Following investigation, a corrective action plan may be put in place, or remediation identified. Each grievance is monitored to verify that any corrective action plan or remediation is completed.

We have a non-retaliation policy when a genuine concern has been reported. Everyone who raises a concern in good faith is treated fairly, with no negative consequences for their employment with Vodafone, regardless of the outcome of any subsequent investigation.

Vodafone is a member of the Joint Alliance for Corporate Social Responsibility ('JAC'); a non-profit association of telecoms operators aiming to verify, assess and apply corporate social responsibility and sustainability practices across the products and manufacturing sites of its key suppliers. JAC members share resources and best practices to develop and implement long term corporate social responsibility. Membership of JAC enables Vodafone to deliver risk reduction by coordinating with other members in respect of audits and the implementation and verification of corrective action plans across different tiers of the ICT supply chain globally.

# Risk mitigation and issue remediation

## Risk mitigation

### Capability building

- All Vodafone employees must complete our 'Doing What's Right' mandatory training course, which supports our Code of Conduct.
- We require everyone in our global supply chain organisation to complete annual training on our Code of Ethical Purchasing.
- We have strengthened resource in the Supply Chain team to focus on executing against a heightened Human Rights strategic action plan.

### Collaboration, peer learning and best practice sharing

- Vodafone is a board member and current Chair of JAC, and co-chairs a JAC working Group on Mitigation and Remediation.
- Vodafone participates in the UN Human Rights B-Tech Project Community of Practice.
- Vodafone participates in the Modern Slavery Working Group hosted by the UN Global Compact Network UK.

### Recognition

- We consider suppliers for future contracts if they comply with our policies and display behaviour in line with our Code of Conduct and Code of Ethical Purchasing.
- Vodafone provides recognition awards for our outstanding suppliers.

## Mitigation and remediation

When we identify a negative human rights impact (including relating to forced labour), we work to address it, including supporting our partners to remediate it and seeking to avoid recurrences. We establish corrective action plans (CAPs) (including remediation), with the timescale for resolution determined by reference to the severity of the impact. We track CAPs and verify their delivery. Our Code of Ethical Purchasing allows Vodafone to terminate supplier contracts, and whilst this is not our option of first resort, it may be necessary where suppliers breach our rules, fail to improve and pose a great threat to workers' health, safety and other human rights, including in respect of matters relating to modern slavery.





# Governance and policies

## Governance

Our Human Rights Policy is owned by the Vodafone Chief External and Corporate Affairs Officer and overseen by the Group ESG and Reputation Committee.




Our Code of Ethical Purchasing is owned by the CEO of Vodafone Procurement Company and Group Supply Chain Director.

This year, to ensure regular monitoring and oversight of issues relating to our environmental and human rights impacts by senior leaders responsible for our supply chains, we have established a quarterly ESG Committee for relevant members of the supply chain leadership team.






## Our policies and commitments to manage modern slavery risks

Our policies are implemented in all our subsidiaries where we own more than 50% or have management control and our Supplier Code of Ethical Purchasing and Code of Conduct extend our commitments through the tiers of our supply chain.

Our approach is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs). This means we work to make sure our policies, governance and due diligence processes take account of human rights risks so that we can properly manage and mitigate them and remediate adverse human impacts that we cause or contribute to. This includes policy controls, impact assessments, mitigation and monitoring, tracking our performance, employee training and stakeholder communication. We set out below our policies which are relevant to preventing the risk of modern slavery in our business and supply chain.

Vodafone Group Policy	Relevance to modern slavery	Application
<div>Talent Acquisition Policy</div> <div> (Vodafone internal policy)</div>	<ul style="list-style-type: none"><li>– Sets out the overarching principles and controls to ensure that employee resourcing is conducted in a fair, open and transparent manner.</li><li>– Aligns Vodafone’s resourcing processes so that all resourcing activity is of a high standard, and that every candidate’s experience will be similar across Vodafone.</li><li>– Contains provisions that seek to ensure respect for human rights, including in relation to minimum age, identity verification and ensuring that candidates do not pay recruitment fees.</li></ul>	<ul style="list-style-type: none"><li>– Applies to all internal or external hiring, by internal resourcing and HR teams and external providers, across all Vodafone Companies in respect of which Vodafone holds an interest of over 50%, or management control.</li></ul>
<div>Fair Pay Principles</div> <div> Available at: <a href="https://vodafone.com/fair-pay">vodafone.com/fair-pay</a></div>	<ul style="list-style-type: none"><li>– Covers competitive and fair pay to all employees irrespective of level, location or role.</li><li>– Strives to ensure a good standard of living for all employees.</li></ul>	<ul style="list-style-type: none"><li>– Applies to all companies in respect of which Vodafone holds an interest of over 50% or more, or management control.</li></ul>
<div>Human Rights (including Child Rights) Policy</div> <div> Vodafone’s Human Rights Policy Statement is available at: <a href="https://vodafone.com/human-rights-policy-statement">vodafone.com/human-rights-policy-statement</a></div>	<ul style="list-style-type: none"><li>– Sets out the minimum requirements we observe to respect the rights of our customers, colleagues, business partners and communities.</li><li>– Includes our commitment to the prevention of slavery and human trafficking.</li></ul>	<ul style="list-style-type: none"><li>– Applies to all companies in which Vodafone Group holds an interest of over 50% or has management control.</li></ul>

## Governance and policies continued

Vodafone Group Policy	Relevance to modern slavery	Application
<b>Supplier Code of Ethical Purchasing</b>   Available at: <a href="https://vodafone.com/code-of-ethical-purchasing">vodafone.com/code-of-ethical-purchasing</a>	<p>The Code was developed in consultation with employees, suppliers and NGOs. It sets out our expectations of our suppliers and covers the following International Labour Organization (ILO) indicators:</p> <ul style="list-style-type: none"> <li>– Freedom of workers to terminate employment</li> <li>– Freedom of movement</li> <li>– Freedom of association</li> <li>– Safe and healthy working environment</li> <li>– Fair wages</li> </ul> <p>The Code prohibits:</p> <ul style="list-style-type: none"> <li>– any threat of violence, harassment and intimidation</li> <li>– the use of worker-paid recruitment fees</li> <li>– compulsory overtime</li> <li>– child labour</li> <li>– discrimination</li> <li>– confiscation of workers' original identification documents</li> </ul>	<ul style="list-style-type: none"> <li>– Every supplier must comply with the Code and cascade it to sub-suppliers.</li> </ul>
<b>Code of Conduct</b>   Available at: <a href="https://vodafone.com/code-of-conduct">vodafone.com/code-of-conduct</a>	<p>Details what we expect from our suppliers and business partners in upholding the same standards and to act ethically.</p> <ul style="list-style-type: none"> <li>– Refers to our commitment to prevent complicity in human rights abuses.</li> <li>– Refers to Vodafone's policy against any form of child labour.</li> </ul>	<ul style="list-style-type: none"> <li>– Underpins all Vodafone's activities and extends to everyone working for and on behalf of Vodafone.</li> </ul>
<b>Responsible Mineral Policy</b>   Vodafone's Responsible Minerals Statement available at: <a href="https://vodafone.com/responsibleminerals">vodafone.com/responsibleminerals</a>	<p>Seeks to ensure that Vodafone's use of relevant minerals (tin, tantalum, tungsten, gold and cobalt) does not directly or indirectly finance conflict or benefit non-state armed groups.</p> <ul style="list-style-type: none"> <li>– Recognises the risks associated with the sourcing of certain minerals used throughout the global electronics industry.</li> <li>– Strives to ensure that we do not contribute to or profit from conflict nor human rights abuses related to the sourcing of these minerals.</li> </ul>	<ul style="list-style-type: none"> <li>– Extends to everyone working for and on behalf of Vodafone and our direct suppliers.</li> </ul>
<b>Speak Up Policy</b>   Available at: <a href="https://vodafone.com/about-vodafone/how-we-operate/suppliers/supplier-ethics">vodafone.com/about-vodafone/how-we-operate/suppliers/supplier-ethics</a>   It can also be found in Vodafone's Code of Conduct: <a href="https://vodafone.com/code-of-conduct">vodafone.com/code-of-conduct</a> (p8)	<ul style="list-style-type: none"> <li>– Encourages everyone to report suspected breaches of our codes and policies, via our anonymous external confidential reporting service.</li> <li>– For suppliers that decide to maintain their own grievance mechanisms, we require that they inform us of any grievances raised relating to work done for Vodafone.</li> </ul>	<ul style="list-style-type: none"> <li>– Applies to all Vodafone employees, contractors and direct suppliers.</li> </ul>



# Evaluating our progress

Modern slavery is a hidden risk, making the evaluation of progress complex. To monitor and report on the effectiveness of our policies and procedures in managing modern slavery risks in our supply chain, we include yearly data from our work with JAC. JAC reports on progress with respect to third party factory audits of common suppliers carried out on behalf of all its members in its own reporting.

We include data from the last 3 years for ease of evaluating our progress. For previous years' data, please refer to Vodafone's Sustainable Business Reporting Centre: [vodafone.com/sustainability-reports](https://vodafone.com/sustainability-reports).

Assessments undertaken					
Metric	Metric description	FY22	FY23	FY24	FY25
Number of site assessments conducted collectively by JAC members <sup>1</sup>	In collaboration with other JAC members, we investigate practices by suppliers in the ICT supply chain that could result in modern slavery conditions.	71	83	150	150
Number of sites where JAC have conducted a confidential survey of supplier employees via their personal mobile phones	The increased provision of an anonymous, local language, confidential survey will support greater transparency of specific worker concerns and indicators that may point to potential modern slavery conditions.	17	15	13	11
Vodafone own (non-JAC related supplier audits) <sup>2</sup>	We investigate practices by suppliers in our supply chain who do not fall within the JAC remit.	–	2	4	6

Notes:  
1. JAC assessments are reported on a calendar year basis. For data on previous JAC reports, please refer to JAC's Annual KPI Reports: <https://jac-initiative.com/resources/>. In the calendar year 2024, Vodafone carried out five onsite audits as part of our contribution to JAC.  
2. Vodafone's own (non-JAC related) assessment numbers were not reported before FY23.

Vodafone findings and actions					
This year, we are reporting on findings and actions in audits performed by Vodafone (both as a JAC member and independently). This is a change from previous years, where we reported the overall JAC data.					
Key performance indicator (KPI)	Reason for KPI	FY22	FY23	FY24	FY25
Number of issues found related to forced labour <sup>1</sup>	By monitoring the number of issues identified, we can better adapt our policies and procedures.  For example, decreases might indicate a need for awareness-raising activity and improved grievance mechanisms so that issues are not going unreported. If the numbers significantly increase, we will review our due diligence processes to gain confidence that such activity is investigated and eliminated.	–	–	–	12
Number of remedial actions taken in response to forced labour issues identified <sup>1</sup>	By monitoring the number of remedial actions taken, we gain greater confidence that corrective plans are being actioned, and any activity is investigated and eliminated.	–	–	–	11
Number of reports to Vodafone's external Speak Up hotline related to modern slavery concerns in the supply chain	By monitoring the number of issues identified, we can better adapt our policies and procedures.  For example, decreases might indicate a need for awareness-raising activity; increases may will trigger enhanced due diligence in respect of issues or business areas.	0	0	1	0
<b>Remediation of findings:</b> Vodafone's audits identified 2 common indicators of forced labour: excessive overtime/working hours issues and non-compliant employment contracts. In our combined quality assessments including Vodafone's contribution to JAC and Vodafone's separate supplier audits, we found 12 issues: (i) 9 were related to working hours across 5 suppliers. Of these, corrective action plans have been agreed with 4 suppliers and are a review of appropriate action is being undertaken in respect of the fifth supplier; (ii) 3 issues related to contract terms (for example, employees requiring employer consent to resignation), which have been resolved.					

Note:  
1. A revised definition for this metric has been introduced in 2025 to include working time issues as an indicator of forced labour; information prior to this date is not available.

## What we will do next year

Vodafone has recently completed a strategic review of the approach to human rights in the supply chain. FY26 will see the implementation of this new strategy through the following actions:

- Conduct human rights risk assessment with external expert consultant support to provide deeper insight to the geographical and category based human rights risk across the Vodafone Supply Chain.
- Review Vodafone's human rights audit strategy to address key areas of potential risk.
- Introduction of new external ESG tool to improve our supply chain mapping and assess and manage suppliers' performance in relation to human rights, incorporating publicly available data, industry benchmarks, and supplier (verified) self-assessments.
- Deliver training to relevant Vodafone teams on human rights risks and Vodafone's expectations of suppliers.
- Design reporting and governance structure to track key performance indicators (KPIs) related to human rights due diligence across Vodafone's supply chain. This will involve defining metrics, data collection processes, and reporting mechanisms to monitor progress against internal targets.
- Review all new and renewing contracts with suppliers to ascertain the need for strengthened human rights clauses, outlining expectations of business partners in relation to human rights.
- Increase resource allocation in supply chain to address the topic of human rights, to build capability with suppliers and to implement the strategic action plan.
- Deepen participation in collaborative initiatives, including the Joint Alliance for Corporate Social Responsibility (JAC), Business for Social Responsibility (BSR) and the UN Global Compact, to advance human rights with suppliers, driving positive change within our supply chains and the wider industry.

## Appendix

**This Statement describes the activities that Vodafone Group Plc has undertaken in the financial year 2024/25 to prevent modern slavery in our business operations and supply chains. This Statement is published by Vodafone Group Plc and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.**

The Act requires all large UK businesses (with a turnover of £36 million or more) to publish a modern slavery statement. The following UK-registered entities, which are part of Vodafone, are covered by the content of this Statement, which has been approved by their boards of directors:

- Vodafone Group Services Limited (VGSL), including Vodafone Group Plc – which supports our local operating companies;
- Vodafone Sales and Services Limited (VSSL) – which supports our commercial, marketing and brand functions;
- Vodafone Limited (also known as Vodafone UK) – our local UK operating company;
- Talkmobile Limited – our online-only UK mobile brand;
- Vodafone Global Enterprise Limited (VGEL) – which supports our multinational customers;
- Vodafone Enterprise Global Limited (VEGL) – which provides off-footprint services and support to multinational business customers; and
- Vodafone Global Network Limited (VGNL) – which is responsible for carrier services globally, including ownership of subsea cables and associated assets.

They all delegated authority for Margherita Della Valle to sign this Statement on their behalf.

This Statement has also been reviewed and approved by the Vodafone Group Plc Board and has been signed on its behalf by the Vodafone Group Chief Executive.



**Margherita Della Valle**

Chief Executive

Vodafone Group Plc

13 May 2025