

Vodafone Group Plc

Modern Slavery Statement 2026

(for the financial year ended 31 March 2026)



Introduction and scope

This statement is published by Vodafone Group Plc (“Vodafone”) and its relevant subsidiaries pursuant to section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps Vodafone has taken during the financial year ended 31 March 2026 to prevent slavery, servitude, forced or compulsory labour, human trafficking, sexual exploitation and child labour (“modern slavery”) within its operations and supply chains.

Vodafone’s mission is to connect everyone, with the goal of enabling an inclusive, sustainable, and trusted digital society. We seek to embed respect for human rights across our operations and supply chain, with the aim that everyone who works for Vodafone or on our behalf benefits from safe, fair and dignified working conditions, wherever they are located.

This is Vodafone’s eleventh Modern Slavery Statement and is available:

 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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Definitions

In this statement, we use the following definitions:

CAP – Corrective Action Plan; the plan developed by a supplier and approved by Vodafone or JAC, to address non-conformances identified in an audit.

FY26/ FY27 – Vodafone’s financial year 2026 (i.e. the year from 1st April 2025 – 31st March 2026) and Vodafone’s financial year 2027 (i.e. the year from 1st April 2026 – 31st March 2027), respectively.

JAC – the Joint Alliance for CSR, a not-for-profit association of global telecom operators that collaborates to assess and improve Corporate Social Responsibility (CSR) and sustainability across common supply chains.

Severe Human Rights Incident – (based on ESRS guidelines) any non-disputed instance of forced labour, human trafficking or child labour that Vodafone has been made aware of. This includes instances of lawsuits, formal complaints through third-party complaint mechanisms (including JAC), serious allegations in public reports or the media, where these are connected to Vodafone’s value chain workers.

Tier 1 – suppliers who contract directly with Vodafone, to provide it with products and/ or services.

Tier 2 – suppliers who contract with a Tier 1 supplier, to provide elements of a product (for example, component parts) or a service that the Tier 1 supplier sells to Vodafone.



Our business and supply chain



Vodafone is a leading pan European and African telecommunications company providing mobile and fixed connectivity, digital, cloud and Internet of Things (IoT) services that support how people live and work. Our activities span network operations, digital platforms, customer facing services, and financial technology services in Africa, all of which rely on complex global supply chains for products and services.

Our business structure and activities

Whilst Vodafone Group Plc is incorporated and domiciled in England and Wales, at 31 March 2026, we operated mobile and fixed networks in 15 countries and have stakes in a further three countries through joint ventures and associates. We also partner with mobile network operators in over 40 countries outside our own operations.

We provide mobile and fixed communications services to approximately 300 million customers across our operating markets and manage one of the world's largest IoT platforms, with over 244 million IoT device and platform connections. In Africa, our financial technology businesses serve almost 59 million customers across seven countries, processing a higher volume of transactions than any other provider in the region.

Vodafone is not a mass market manufacturer. We do not own or operate large scale electronics manufacturing facilities and do not extract or process raw materials. Except for a small facility in Italy assembling specialist automotive IoT components, the manufacturing of Vodafone branded devices and network equipment is conducted by third party suppliers. The majority of our external spend is centralised in Luxembourg, where VP&C manages procurement activity and supplier relationships, including supply chain human rights due diligence.

Our workforce

Vodafone employs almost 93,000 employees globally and engages approximately 5,000 contractors. Most of our employees are engaged in skilled roles within network operations, technology, corporate functions, and customer services, where Vodafone maintains direct oversight of employment practices. Where we engage contractors, this may include the use of third-party agencies for specialist, short term, or project-based roles.

Our supply chain

Vodafone spends approximately €25 billion a year with around 8,500 Tier 1 suppliers globally. The majority of Vodafone's external spend is with large, well known global suppliers that provide the devices we resell to customers (such as mobile phones, tablets, routers, IoT devices and set top boxes) and the equipment and services required to build, operate and maintain our fixed and mobile networks, but our supply chain includes small and medium sized enterprises. Based on information provided by our suppliers, we estimate that there are approximately 210,900 workers employed across our Tier 1 supply chain.

Our suppliers operate across a wide range of sectors, including electronics manufacturing, network equipment, construction and maintenance services, logistics, IT and professional services, and facilities management. Our Tier 1 suppliers rely on extensive networks of sub suppliers, including electronics manufacturers, sub assemblers, component suppliers, commodity processors, and labour providers. This creates a complex, multi tier supply chain in which modern slavery risks may occur at different points, often beyond Vodafone's direct contractual relationships.

Our top 10 sourcing locations (based on organisation headquarters)

- US
- South Korea
- China
- Germany
- Sweden
- Finland
- Japan
- Ireland
- Greece
- Turkey

Modern slavery risks

Modern slavery risks in our business

Vodafone undertakes human rights impact assessments across our operations, which include assessments of modern slavery risks. These assessments consider the nature of work performed, workforce composition, recruitment practices, geographic context, and the level of operational oversight exercised by Vodafone's operating companies. Our most recent external risk review concluded that the risk of modern slavery in Vodafone's direct operations, including our retail business, is low. This reflects the regulated environments in which we operate, the direct oversight exercised by Vodafone over employment practices, standardised onboarding, training, grievance mechanisms, and prevalence of roles with lower inherent modern slavery risks.

Modern slavery risks in our supply chain

Vodafone's most significant modern slavery risks arise within our supply chain rather than our direct operations. The primary labour related risks include forced labour, child labour, health and safety, freedom of association, discrimination, disciplinary practices, working hours, wages and compensation, and business ethics. These risks may have a direct or indirect causal link to modern slavery, particularly where labour intensive work, multi tier subcontracting, reliance on labour brokers, recruitment practices that may involve worker paid fees, excessive hours and limited access to grievance mechanisms is present.

Our greatest areas of potential exposure remain linked to the procurement of manufactured electronics and components, network deployment and services, and our downstream and service-related supply chains:

Manufactured electronics and components

Electronics and components used in Vodafone's networks and devices are primarily manufactured by third party suppliers through complex, multi tier global supply chains, outside Vodafone's direct operational control, particularly in parts of Asia. These conditions can lead to elevated modern slavery risks, including unfair recruitment practices, excessive working hours, and limited access to grievance mechanisms, making electronics manufacturing a continued focus of Vodafone's due diligence and monitoring.

Electronics supply chains commonly operate on "just in time" production models, which we recognise can place pressure on suppliers to meet short lead times and fluctuating order volumes. These dynamics may contribute to risks such as excessive working hours, reliance on flexible or agency labour, delayed wage payments, and constraints on suppliers' ability to plan their workforce effectively. Where production pressure is combined with weak worker representation, limited freedom of association or reliance on temporary and agency labour, these conditions can increase vulnerability to forced labour indicators such as excessive working hours, involuntary overtime, and restricted job mobility. Vodafone therefore treats working time controls, contract transparency, and worker voice as critical elements of modern slavery prevention in electronics supply chains.

Network deployment and services

Across our operating countries, network equipment must be installed, upgraded, and maintained. These activities involve skilled labour and are subject to oversight through Vodafone's local operating companies, which reduces the overall risk of modern slavery compared to manufacturing supply chains. However, risks may still arise during subcontracting, particularly in higher-risk geographies, construction, maintenance services for mobile and fixed assets, and these activities are therefore included within Vodafone's risk assessment and due diligence processes.

Downstream and service-related supply chains

Beyond manufacturing and network related activities, Vodafone also procures a wide range of goods and services that support product distribution, the delivery of services to end users and its general business operations. These include cloud and software services, marketing and content, travel and logistics, professional advisory services, and facilities management, catering and cleaning, many of which are delivered through third party providers and subcontractors. Modern slavery risks may arise where these services are labour intensive, including retail operations, call centres, field services, installation, maintenance, and in life customer support.

Vodafone recognises that modern slavery risks are often enabled by broader labour rights failures. Risks such as excessive working hours, unfair wages, insecure contracts, restrictions on freedom of association and weak grievance mechanisms can create conditions in which forced labour and other severe human rights abuses are more likely to occur. Our approach therefore focuses on strengthening respect for fundamental labour rights as a core mechanism for preventing modern slavery.



Governance and policies

Policy ownership and oversight

The Human Rights Policy is owned by the Executive Committee member, Chief External and Corporate Affairs Officer, with oversight provided by the Executive level ESG & Reputation Committee and the ESG Committee of the Vodafone Group Plc Board. Vodafone's Audit and Risk Committee oversees the Group's systems of internal control, risk management framework, and compliance activities.

Operational oversight

Day to day management of our supply chain human rights programme, including modern slavery risks, is managed by the Supply Chain Sustainability Team in conjunction with the Group Human Rights function. We have dedicated personnel for human rights risk management, due diligence, supplier audits, CAP management, performance management, and capability building, and for awareness raising and training of Vodafone employees. This programme is governed and directed by a cross functional internal governance structure, including a bi monthly Human Rights Steering Committee.

The Human Rights Steering Committee, chaired by the CEO of Vodafone Procure & Connect, brings together senior leaders from across the business, including representatives from Supply Chain and Procurement, Vodafone Group Human Rights, Supply Chain Sustainability, Group Sustainability, Devices and Product Supply Chains, Finance and Legal. The Committee provides strategic oversight of Vodafone's approach to human rights and modern slavery, reviews the identification and management of salient risks, monitors audit progress and systemic issues, and serves as the formal escalation forum for severe or complex matters, enabling agreement on – and supporting – stakeholder engagement, remediation, enhanced monitoring or escalation within Vodafone's wider governance framework.

Senior leadership accountability

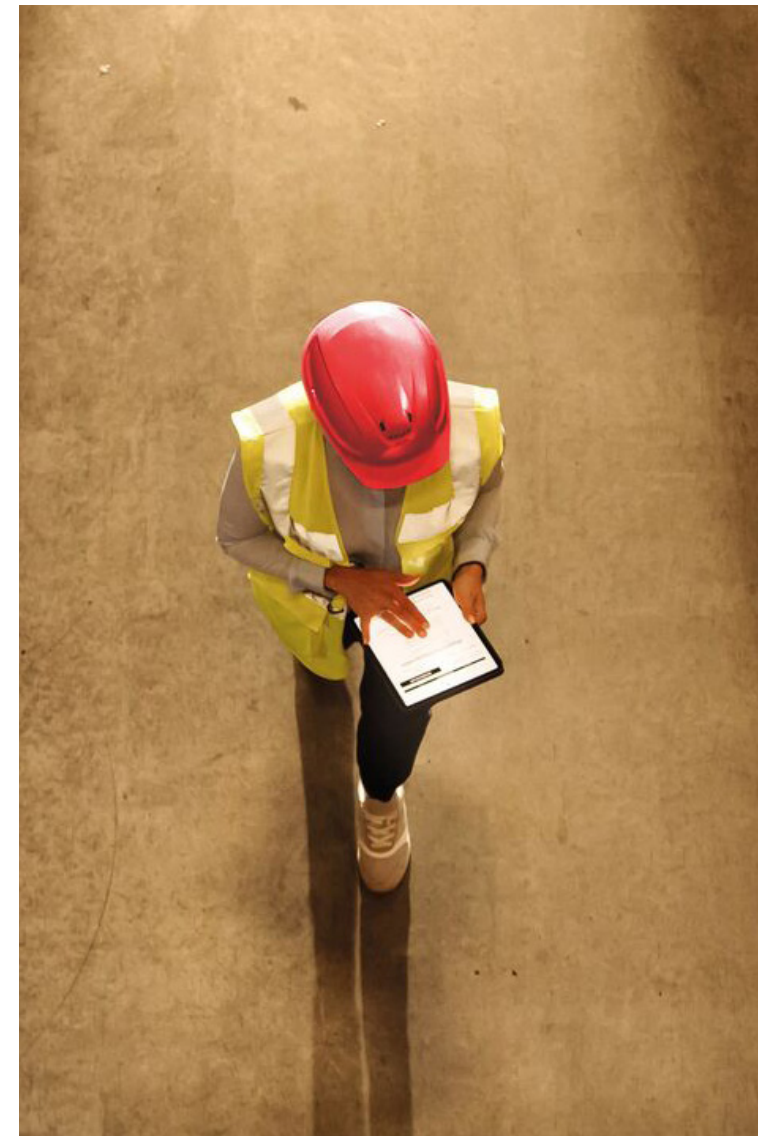
In FY26, human rights objectives were introduced for the Chief Procurement Officer and the Senior Leadership Team at Vodafone Procure & Connect. All were accountable for delivering audits on high-risk suppliers in their categories and markets as well as onboarding their strategic suppliers to the supplier engagement programme.

Our policies and commitments to manage modern slavery risks

Vodafone's approach to human rights is guided by internationally recognised human rights standards including the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) core conventions and the OECD Due Diligence Guidelines for Responsible Business Conduct. This means we work to:

- ensure our policies and standards; governance and due diligence processes take account of human rights risks.
- embed responsible business conduct into our supply chain policies, management systems, and operations.
- monitor, track, and communicate our performance; and
- address adverse human impacts that we cause or contribute to (taking steps to prevent or cease, mitigate and remediate them, as applicable).



We set out below our policies most relevant to addressing the risk of modern slavery in our business and supply chain. All policies (and the detailed standards that support them) apply to all companies in which Vodafone Group holds an interest of over 50%, or where we have management control.¹



1. Excluding Vodafone Limited, Talkmobile Limited and other entities under VodafoneThree Holdings Limited. Following the Vodafone UK and Three UK merger on 31 May 2025, the integration of policies, systems and processes relating to modern slavery remains ongoing. During the reporting period, VodafoneThree Limited implemented its own Human Rights Policy, which applies to Vodafone Limited and Talkmobile Limited.





Governance and policies continued

Modern slavery related policies

Vodafone Group Policy	Relevance to modern slavery	Application
Talent Acquisition Standard  (Vodafone internal policy)	<ul style="list-style-type: none"> – Sets out the overarching principles and controls to ensure that employee resourcing is conducted in a fair, open and transparent manner. – 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. – 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. 	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. ¹
Fair Pay Principles  Available at: vodafone.com/fair-pay	<ul style="list-style-type: none"> – Covers competitive and fair pay to all employees irrespective of level, location, or role. – Strives to ensure a good standard of living for all employees. 	Applies to all companies in respect of which Vodafone holds an interest of over 50% or more, or management control. ¹
Human Rights (including Child Rights) Policy  Vodafone's Human Rights Policy Statement is available at: vodafone.com/human-rights-policystatement	<ul style="list-style-type: none"> – Sets out the minimum requirements we follow to respect the rights of our customers, colleagues, business partners, and communities. – Includes our commitment to the prevention of slavery and human trafficking. 	Applies to all companies in which Vodafone Group holds an interest of over 50% or has management control. ¹
Supplier Code of Ethical Purchasing  Available at: vodafone.com/code-of-ethicalpurchasing	<p>The Code is owned by the CEO of Vodafone Procure & Connect. It was developed in consultation with employees, suppliers and NGOs, and sets out our expectations of our suppliers (including their sub-suppliers). The code covers the following International Labour Organization (ILO) indicators:</p> <ul style="list-style-type: none"> – Freedom of workers to terminate employment – Freedom of movement – Freedom of association – Safe and healthy working environment – Fair wages. <p>The Code prohibits:</p> <ul style="list-style-type: none"> – any threat of violence, harassment, and intimidation – the use of worker-paid recruitment fees – compulsory overtime – child labour – discrimination – confiscation of workers' original identification documents <p>These labour rights requirements address known drivers of modern slavery risk by strengthening workers' ability to freely leave employment, organise, access fair wages, and raise concerns without retaliation.</p>	Every supplier must comply with the Code and cascade it to sub-suppliers.

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Governance and policies continued

Vodafone Group Policy	Relevance to modern slavery	Application
Code of Conduct  Available at: vodafone.com/code-of-conduct	Details what we expect from our suppliers and business partners in upholding the same standards and to act ethically. <ul style="list-style-type: none"> – Refers to our commitment to prevent complicity in human rights abuses. – Refers to Vodafone's policy against any form of child labour. 	Underpins all Vodafone's activities and extends to everyone working for and on behalf of Vodafone.
Responsible Mineral Policy  Vodafone's Responsible Minerals Statement available at: vodafone.com/responsibleminerals	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. <ul style="list-style-type: none"> – Recognises the risks associated with the sourcing of certain minerals used throughout the global electronics industry. – Strives to ensure that we do not contribute to or profit from conflict nor human rights abuses, related to the sourcing of minerals. 	Extends to everyone working for and on behalf of Vodafone and our direct suppliers.
Speak Up Policy  Available at: vodafone.com/about-vodafone/howwe-operate/suppliers/supplier-ethics  It can also be found in Vodafone's Code of Conduct: vodafone.com/code-of-conduct (p8)	Encourages everyone to report suspected breaches of our codes and policies, via our anonymous external confidential reporting service. <p>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.</p>	Applies to all Vodafone employees, contractors and direct suppliers.

Embedding modern slavery awareness in our business

By embedding awareness of modern slavery issues in our business, we mitigate our risks by strengthening our ability to identify, escalate and address potential indicators early, embedding due diligence responsibilities into day-to-day decision making, and supporting timely corrective action and remediation where issues are found.

- All Vodafone employees must complete our mandatory 'Doing What's Right' training, which supports our Code of Conduct.
- Everyone in our global supply chain organisation must complete annual training on our Code of Ethical Purchasing, to ensure procurement teams understand their role in supplier selection, contracting and ongoing supplier management.

- In FY26, we invested in social audit training for 10 employees from cross functional teams spanning Supply Chain ESG, Group ESG, ESG Finance, Vodafone Foundation and Vodacom. The training strengthened capability across supplier audits, CAP management, supplier relationship management and human rights governance.
- We also hosted internal webinars to build awareness of modern slavery risks, share themes from audit findings and reinforce the role colleagues play in embedding human rights into business decision making.



Approach to due diligence

Due diligence when recruiting for our own operations

While the risk of modern slavery in Vodafone's direct operations is low, we perform due diligence in recruitment to ensure that all employment is freely chosen, and that no worker is subjected to coercion, deception, or exploitation at any stage of the hiring process. Vodafone's Global Talent Acquisition Standard, under our Working at Vodafone Policy, applies when recruiting workers for our own operations and imposes specific requirements in respect of age verification, identity verification, and the steps our talent acquisition teams must take to ensure that candidates have not paid fees to secure employment with us. Vodafone also employs non-permanent workers, including contractors and agency workers, primarily in specialist, short-term or project-based roles. While these roles are subject to Vodafone's policies and oversight, Vodafone recognises that non-permanent workers may face different risk profiles and therefore includes them within its risk assessment and monitoring processes.

Due diligence in our supply chain

Supply chain due diligence is central to Vodafone's approach to preventing, identifying, and addressing modern slavery risks. In FY25, we strengthened this approach through the establishment of a new Supply Chain Sustainability Team within Vodafone Procurement & Connect, enabling a more consistent and robust application of due diligence across Vodafone's operating entities. Our approach is structured around a five step due diligence framework that provides a standardised, end to end process for the ongoing identification, assessment, and management of risk across our supply chain. This framework operates as a continuous cycle and is applied through a combination of Vodafone led due diligence activities and our participation in the Joint Alliance for CSR (JAC) due diligence programme, enabling collective assessments, shared insights, and consistent standards across key ICT supply chains.

Enhancing due diligence through industry collaboration

We collaborate with suppliers and industry peers to identify, mitigate and remediate risks in manufacturing supply chains where our leverage is greatest. 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.

Vodafone holds the current JAC Vice Chair and co-chairs a JAC working group on Mitigation and Remediation.

Vodafone also participates in the UN Human Rights B-Tech Project Community of Practice, the Modern Slavery Working Group hosted by the UN Global Compact Network UK and the BSR Human Rights Working Group.



Vodafone Supply Chain Human Rights Due Diligence Framework

Step 1	Step 2	Step 3	Step 4	Step 5
				
Map & scope our supply chain	Risk identification & prioritisation	Prevent & mitigate risks	Remediate human rights impacts	Report & communicate progress
<ul style="list-style-type: none"> – Map global supply chain – Identify high risk areas – Map high risk categories beyond tier 1 (FY27) 	<ul style="list-style-type: none"> – Assess suppliers – Prioritise based on risk level – Align with procurement strategies (FY27) 	<ul style="list-style-type: none"> – Apply preventative controls – Strengthen policies, processes & contract terms – Training & awareness 	<ul style="list-style-type: none"> – Engage suppliers – Address corrective action plans – Resolve risk areas 	<ul style="list-style-type: none"> – Monitor performance – Report transparently on outcomes & effectiveness – Engage stakeholders

Approach to due diligence continued

Step 1: Map and scope our supply chain

Vodafone's supply chain is global and multi tiered, covering a wide range of products and services. We map and scope our supply chain using a risk based approach that considers spend, category, geography, and workforce characteristics, with particular focus on labour intensive activities and complex value chains. This process identifies priority risk areas such as electronics manufacturing, network deployment, and service related supply chains, and is supported using specific risk management software to map our Tier 1 suppliers and assess their ESG risk.

In FY27 Vodafone will further strengthen its approach to Tier-2 due diligence by enhancing supply-chain risk mapping. Our goal is to ultimately map down to raw-material sourcing where feasible. This will support improved identification of priority risk areas and enable Vodafone to strengthen ongoing risk identification and due diligence activities which include addressing risks through category specific procurement strategies.

Step 2: Risk identification and prioritisation

Supplier onboarding & qualification

Vodafone screens for potential human rights issues (including modern slavery) in our supply chain through a combination of preventive controls, supplier onboarding, risk profiling by supplier, category and geography, grievance mechanisms, industry initiatives, independent audits, and ongoing supplier oversight, recognising that no single mechanism is sufficient on its own.

These processes are designed to move beyond reliance on policy commitments alone and to support the identification of risks in practice, particularly in high-risk supply chains such as electronics manufacturing and labour-intensive services.

Vodafone works collaboratively with industry peers and multistakeholder initiatives to share intelligence, identify emerging risks and strengthen due diligence approaches, recognising that many risks are systemic and extend beyond individual supplier relationships.

All suppliers must comply with Vodafone's Code of Ethical Purchasing, which sets mandatory standards on labour rights, human rights, and ethical conduct. These requirements are embedded in contracts, onboarding, tenders, and ongoing supplier engagement, and must be cascaded through suppliers' own supply chains. Compliance is a condition of doing business with Vodafone and underpins ongoing monitoring and corrective action. Suppliers are required to promptly report any serious breaches of the Code and agree CAPs with Vodafone.

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. This ensures that our suppliers conduct their own human rights and environmental due diligence, necessary to support prevention of modern slavery into our supply chain.

Supply chain-wide risk assessments

Vodafone reviews its supplier base and engages with key suppliers to better understand industry specific risks. These insights are incorporated into our supplier onboarding and risk assessment processes to identify areas of greatest potential exposure. We assess country level risk based on the nature of the goods or services procured. By combining industry specific risk indicators with country context, Vodafone is better able to identify systemic risks and tailor mitigation measures to the realities faced by workers in different operating environments.

In addition to the policy framework and pre-emptive risk assessments that we conduct on our supplier base, in FY26, Vodafone increased our approach to ESG risk identification and supplier performance management, to support a more structured and continuous approach by assessing over 11,000 Tier 1 suppliers specifically in relation to human rights and modern slavery via two risk management platforms (Exiger & EcoVadis).

External value chain and supply chain risk assessment

In FY26, Vodafone engaged Business for Social Responsibility (BSR) to conduct an upstream value chain and supply chain risk assessment to inform its sustainability strategy. The assessment identified and prioritised potential human rights risks across Vodafone's sourcing portfolio, with a particular focus on activities beyond Tier 1 suppliers. Risks were assessed across 10 thematic areas, including labour rights, modern slavery, occupational health and safety, and conflict affected and high-risk areas. The assessment identified Networks, IT & Enterprise, Corporate Services and Devices as categories with heightened exposure to these risks. The analysis was informed by external research, consultation with internal stakeholders, and a review of internal documents, including policies, due diligence processes and sustainability reporting.

Audits

Audits form an essential part of our ongoing risk identification. See page 6 – Audit programme – for further information.

Step 3: Prevent and mitigate risks

High risk and strategic suppliers continue to be subject to closer oversight and enhanced due diligence through Vodafone's Supplier Performance Management programme, and Vodafone is reviewing how this approach can be expanded over time to provide greater visibility and monitoring of additional high risk suppliers.

Through this programme, suppliers are assessed on an annual basis against defined human rights related key performance indicators, and improvement plans are developed to support ongoing progress where gaps are identified. The programme also enables suppliers to access online training modules on human rights and ethical conduct to support awareness raising and capability building across the supply chain. At the end of FY26, 58% of our procurement spend was with partners that were assessed by EcoVadis in the performance management programme. In FY27 we are committed to increase this percentage and to develop capability by aligning suppliers to programme KPIs.

We support continuous supplier capability building and improvement to mitigate our risks through the JAC due diligence programme, including assessments, capability building activities, published scorecards and supplier recognition. In FY27, Vodafone will ask suppliers to complete EcoVadis Academy training modules on labour and human rights, to strengthen policies, management systems, and reporting practices in line with international standards and Vodafone's expectations.

Step 4: Remediating human rights impacts

Our approach to remedy is described on page 15 – Remediation.

Step 5: Report & communicate progress

Our approach to reporting is described on page 11 – Effectiveness, KPIs and Outcomes.

Our supply chain audit programme

Vodafone's audits and enhanced due diligence focus not only on identifying indicators of forced labour, but also on assessing the effectiveness of labour rights protections in practice, including working time management, contract terms, wage payment systems, freedom of association and access to grievance mechanisms. We recognise that audits alone may not always identify hidden or complex instances of modern slavery; however, when used as part of a broader, risk-based human rights due-diligence approach, they remain an important tool for gaining insight into supplier operations, identifying labour-related risks, and understanding practices that may be associated with forced labour and other human rights issues.

Approach to audits

We use independent third-party auditors with appropriate local knowledge and language capability, selected based on their ability to conduct audits in line with Vodafone standards and applicable local legal requirements, and to assess practices beyond formal compliance. Where local language capability is not available, Vodafone requires audit firms to provide appropriate translation support to enable effective worker engagement and accurate assessment.

Supplier selection

Vodafone takes a risk-based approach to supplier selection for audits, prioritising those suppliers and sites where the potential for human rights and modern slavery risks is greatest. The risk analysis is informed by factors such as the category of goods or services provided, country and sector risk, workforce characteristics (including reliance on migrant, temporary or agency labour), supplier performance data, and issues or allegations raised through monitoring or grievance mechanisms. We also consider the level of Vodafone's spend with the supplier, which will affect our leverage to address findings. Where severe or systemic issues are identified in one audit, a supplier may be selected for re-audit or enhanced monitoring even after the closure of the relevant CAP.

In addition to assessing and auditing Tier-1 suppliers, Vodafone also conducts audits of Tier 2 suppliers in selected high-risk categories, including the production of Vodafone-branded devices and clothing, component manufacturing, sub-assembly, and original design manufacturing (ODM). These assessments focus on suppliers operating in higher-risk regions, such as China and India. Auditing at this level helps Vodafone gain greater visibility into lower tiers of the supply chain, where transparency is typically more limited, including risks related to the use of agency labour, wage practices, and excessive working hours.

Collaborating to increase audit coverage

In FY26, JAC conducted 151 audits of common suppliers on behalf of its members (reported on a calendar year basis). JAC members have agreed audit criteria, ensuring that all audits meet a common standard. Vodafone contributed 18 JAC audits in FY26 and performed an additional 3 non-JAC audits of suppliers presenting higher risk issues for Vodafone (for example, Own Device Manufacturers).

Other opportunities to observe supplier practices

In addition to formal audits 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.

Enhanced supplier due diligence and on-site audits

Enhanced due diligence for minerals sourcing

Vodafone has undertaken extensive upstream mapping of relevant minerals supply chains, including tracing certain minerals used in Vodafone branded products down to smelters and refiners, in line with regulatory requirements and international standards for responsible minerals sourcing. This work focuses on conflict affected and high risk areas (CAHRAs), where risks of forced labour and other severe human rights abuses are recognised to be heightened.

Through its responsible minerals due diligence programme, Vodafone identifies and assesses risks associated with the sourcing of minerals such as tin, tantalum, tungsten, gold and cobalt, and works with suppliers and industry initiatives to improve traceability, address non-conformant smelters and refiners, and mitigate identified risks. While this programme is primarily driven by responsible minerals and conflict minerals requirements, Vodafone recognises its relevance for modern slavery risk identification, particularly in upstream extraction and processing stages where visibility is typically limited. Vodafone is therefore strengthening how insights from its minerals mapping are reflected in its broader modern slavery risk assessment and disclosure.



Our supply chain audit programme continued

Enhanced due diligence for branded products

Vodafone has in place a system to assess key risks when on-boarding proposed new suppliers. The system, called Supplier Assurance Risk Management, uses a 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, and managing their own suppliers, including:

- whether accommodation is provided by employers
- confirmation that fines are not used as a disciplinary measure
- confirmation that freedom of association is permitted
- the existence of a defined process to pay their employees
- ensuring conditions of employment are communicated to employees and 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. Where risks are identified, Vodafone works with suppliers to address gaps prior to on-boarding and may require additional verification, including on-site assessments or independent audits, to gain assurance that risks to workers have been adequately mitigated.

Grievance Mechanisms

Vodafone has a non retaliation commitment in place, and anyone who raises a concern in good faith is treated fairly and protected from adverse consequences, regardless of the outcome of any subsequent investigation. We require our suppliers to make the same commitment.

Worker Voice

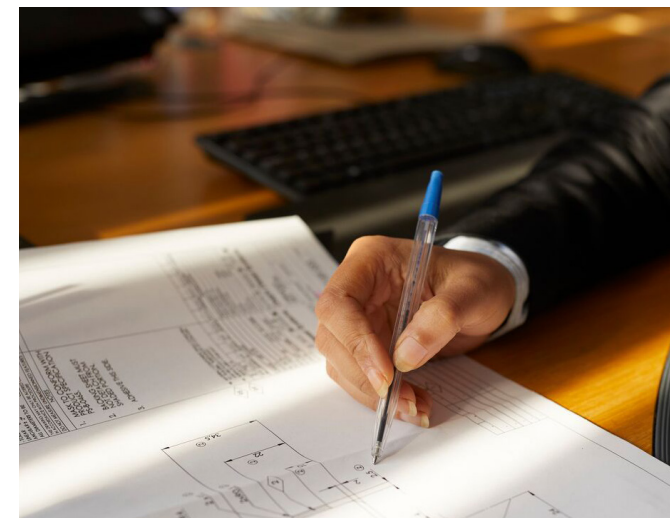
Effective worker voice and access to remedy are critical safeguards against modern slavery, enabling workers to raise concerns about excessive working hours, unfair treatment, or coercive practices before they escalate into severe abuse. Vodafone therefore views worker voice mechanisms as a core element of modern slavery prevention, not only a detection tool.

Suppliers undergoing a JAC audit are required to allow their employees to complete an off site worker survey, enabling anonymous responses via mobile devices to questions in local languages, at any time and from any location. As part of the assessment, auditors also conduct individual worker interviews without management present, providing employees with the opportunity to speak freely and honestly. Any issues raised through these channels are reported anonymously to reduce the risk of retaliation or penalisation. In FY26, 450 workers were interviewed in this programme.

Findings that require action are incorporated into the relevant supplier's CAP. While these mechanisms support the identification of worker concerns and indicators of potential modern slavery risks, Vodafone recognises that surveys and interviews alone do not constitute meaningful worker engagement. These tools should be complemented by additional approaches that enable dialogue, follow up and worker centred remediation where issues are identified.

Speak up

Everyone who works for Vodafone has a responsibility to report any behaviour that may be unlawful or criminal, or that could amount to an abuse of our policies, systems or processes and therefore constitute a breach of our Code of Conduct. Employees can raise concerns with their line manager or Human Resources, and both employees and workers in our supply chain can report concerns through Speak Up, Vodafone's confidential, third-party reporting mechanism, which is available online and by telephone in local languages.



Vodafone makes Speak Up available to supply chain workers through supplier policies and publicly accessible channels, including the Supplier Code of Ethical Purchasing. Vodafone recognises that awareness and understanding of Speak Up at worker level may vary depending on supplier practices, location and working environment. Strengthening how Speak Up is communicated and embedded in practice across supply chains is therefore an area of ongoing focus.

Speak Up reports are confidentially reviewed and investigated by specialist teams, with senior oversight to ensure appropriate triage and escalation where required. Following investigation, actions may include supplier engagement, CAPs, or remediation, which are monitored to completion. In 2026, Vodafone received no Speak Up reports relating to modern slavery concerns in the supply chain. In FY27, we will review the use statistics and communication of Speak Up in our suppliers' sites to increase visibility and effectiveness of the service.

Effectiveness, KPIs and outcomes

In FY26, Vodafone conducted a deliberate and substantial strengthening in our human rights due diligence programme to address salient risks, including modern slavery. Risks assessments, triage of suppliers by risk level, enhanced due diligence, supplier performance management programmes and increased volume of audits have together strengthened the effectiveness of our approach to mitigation of human rights risks.

The Director and Senior Leadership Team of the Supply Chain function introduced ESG objectives in FY26 to strengthen supplier onboarding into the performance management programme. These objectives focused on improving the identification and prioritisation of higher-risk suppliers and increasing audit coverage across relevant procurement categories and markets. This approach reinforces accountability within Vodafone's procurement teams for addressing priority risk areas in the supply chain.

This helped to further strengthen our transformation in audit coverage and corrective action delivery, restoring Vodafone's leadership position within the Joint Alliance for CSR (JAC) and improving visibility of human rights risks across priority categories and geographies. The programme enabled more consistent identification of issues and timely remediation through structured CAPs, supported by enhanced governance and escalation mechanisms. While this approach significantly improved execution and oversight in FY26, Vodafone recognises the need to further embed due diligence into business decision making and to better measure performance over time.

Supplier monitoring and corrective action

We report data on our audit activity and findings to support evaluation of our efforts to identify modern slavery risks in our supply chain. This includes annual data from JAC third party site audits of common suppliers conducted on behalf of all its members.

In FY26, Vodafone expanded its audit programme to cover a broader range of supplier categories, including devices, facilities management, customer operations, logistics, consulting services, and network suppliers. Audits were conducted across Africa, Europe, and Asia, strengthening Vodafone's

risk-based approach to identifying and addressing modern slavery risks across its global supply chain.

The significantly higher number of findings reported this year reflects the expansion of our audit programme and improved transparency, rather than an increase in modern slavery incidents. We broadened audit scope and coverage and now disclose all labour related findings identified, not only those linked to forced or child labour, providing greater insight into underlying risk factors and enabling earlier preventative action.

Vodafone acknowledges the significant risks of modern slavery that exist in complex global supply chains like our own. As our audit programme continues to evolve to better identify these risks, we anticipate increased findings. This was the case in FY26, where our findings are attributable to an increase in the number of audits, and prioritising audits based on risks – including by auditing Tier 2 suppliers. Findings are an essential step in our ability to remediate negative impacts and to mitigate future risks.

In this statement, we have also expanded the categories of audit findings that we disclose, in line with our commitment to increased transparency.

Findings in FY26

Severe human rights incidents

Despite enhancements to our audit programme in FY26, we had no severe human rights incidents in either our own audit programme (21 audits, including 18 audits for JAC) or in the wider JAC programme (JAC members including Vodafone completed 151 audits in calendar year 2025).

Other findings relevant to modern slavery

We did identify four incidents of non-conformance amongst our suppliers related to forced and child labour risks. These were primarily linked to gaps in supplier policies and supporting documentation. Three of these findings have been remediated through Vodafone-approved updates to supplier policies. One finding remains in progress and is being tracked by Vodafone.

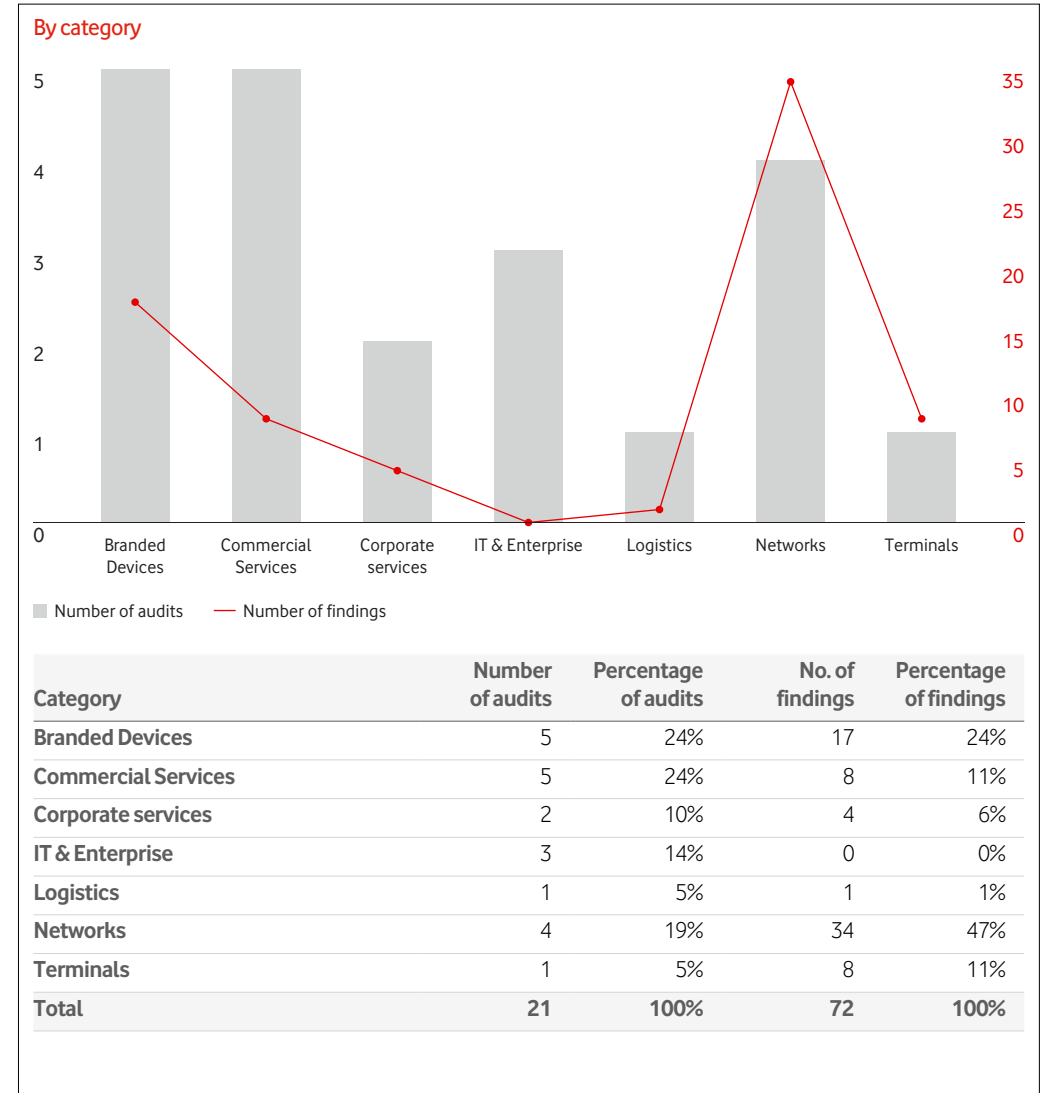
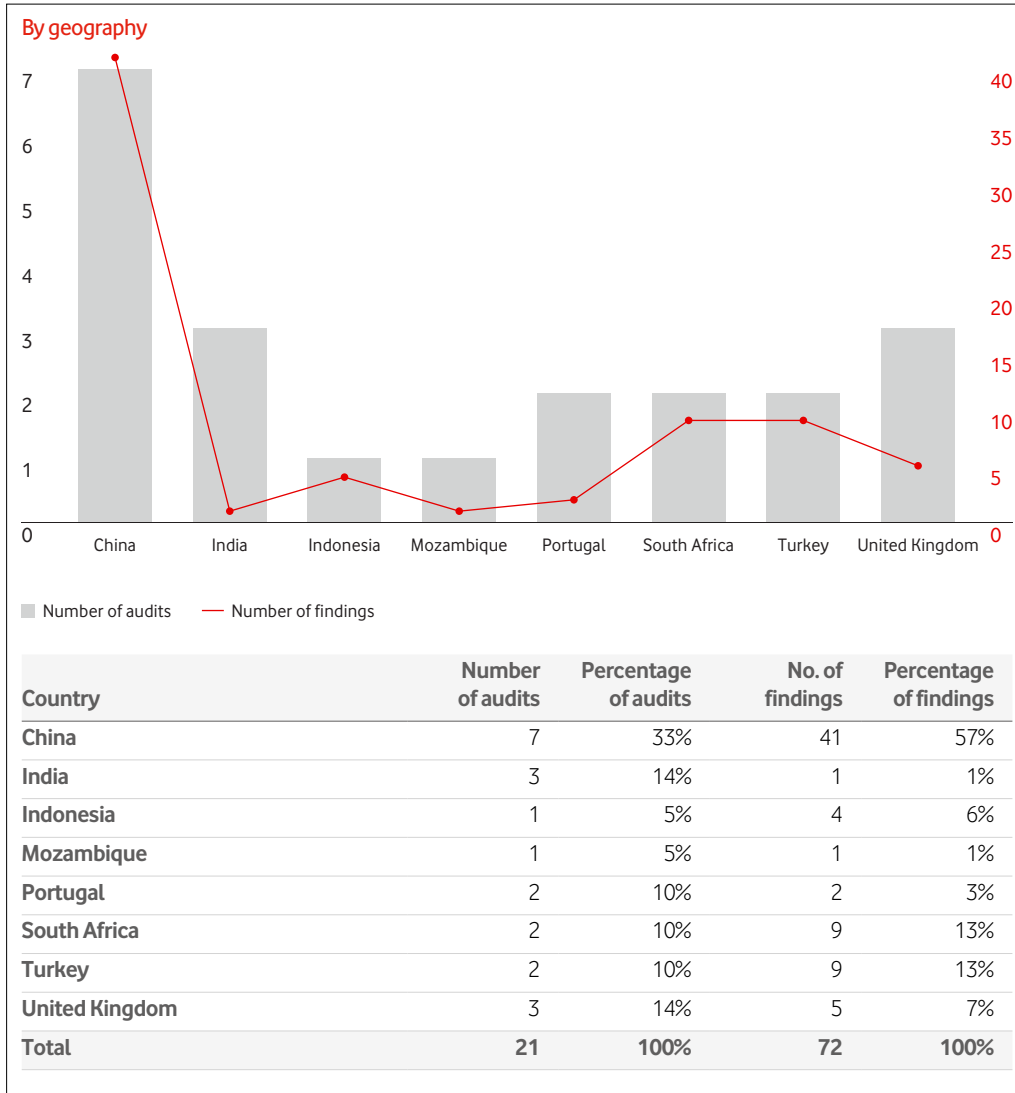
We discovered twelve non conformances related to excessive working hours. These findings were predominantly in Asia and Africa, with overtime hours exceeding legal limits or workers having inadequate regular days off. Vodafone has issued CAPs and we are monitoring supplier implementation of those plans.

Health and safety issues represent our most significant risk area, with findings identified across suppliers in Africa, Europe, and Asia. Aligned to our risk assessments, analysis on specific findings by both category and geography show that the manufacture of electronics and components is where the greatest number of non-conformances are found, we are working with all suppliers to find long term solutions to the issues and will continue to closely monitor these countries and categories in FY27.



Effectiveness, KPIs and outcomes continued

Supplier audits and findings



Effectiveness, KPIs and outcomes continued

Our approach to Corrective Action Plans (CAPs)

We collaborate with suppliers to close all CAPs within the JAC timescale guidelines: priority findings within 30 days, major within 60 days and minor with 90 days. As most of our FY26 audits were conducted late in the year, many of the CAPs are still in progress but are expected to be closed within these standard timelines, early in FY27.

Vodafone is committed not only to closing non-conformances but also to ensuring that corrective actions are effective and sustained over the long term. We continue to engage closely with suppliers and monitor progress through evidence review and re-audits, verifying that actions have been fully implemented and remain effective over time. Before any non-conformance is closed, Vodafone carefully reviews submitted evidence and may request additional verification from audit firms where necessary. Where evidence is insufficient, suppliers are provided with further guidance to support effective and long-term remediation.

Audits Undertaken

Metric	Metric description	2023	2024	2025	2026
Number of on-site audits conducted collectively by Joint Alliance for CSR ('JAC') initiative members¹	In collaboration with other JAC members, we investigate practices by suppliers in the ICT supply chain that could result in modern slavery conditions.	83	150	150	151
Number of sites where JAC have conducted a confidential survey of supplier employees via their personal mobile phones¹	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.	15	13	11	15
Number of workers in facilities where Mobile Workers Surveys ('MWS') were conducted by JAC¹			10,345	20,427	12,552
		FY23	FY24	FY25	FY26
Number of Audits conducted by Vodafone²	We investigate practices by suppliers in our supply chain who fall both within and outside of the JAC remit.	2	4	6	21

Notes:

- JAC audits 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 2025, Vodafone carried out fifteen on-site audits as part of our contribution to JAC.
- Vodafone reports audit activity on a fiscal-year basis. In FY26, Vodafone completed 21 supplier site audits in total (18 through the JAC audit programme and 3 non-JAC audits). These audits included 7 Tier 2 suppliers.

Effectiveness, KPIs and outcomes continued

Audit Findings	FY24	FY25	FY26	Example action taken
Number of substantiated severe human rights incidents connected to workers in the value chain identified in the reporting period ¹	–	–	0	–
Number of reports to Vodafone's external Speak Up hotline related to modern slavery concerns	1	0	0	
Number of issues related to human rights concerns identified by audits conducted by Vodafone ²	–	12	72	
– Forced & child labour indicators (including excessive working hours)	–	12	16	Audits identified risks related to excessive working hours and gaps in formal child and forced labour policy controls. (No incidents of child labour were found). Suppliers were required to conduct root cause analysis, update policies and procedures, which are reviewed and approved by Vodafone.
– Health & safety non-conformances (major and priority findings only)		–	56	Findings related to health and safety and working conditions resulted in suppliers implementing corrective actions such as improved risk assessments, provision of personal protective equipment (PPE), enhanced safety training, and updates to wage and working hours management practices.
Number of corrective actions closed in reporting period		11	29	
– Forced & child labour indicators (including excessive working hours)		11	6	Corrective actions were closed following supplier implementation of formal child and forced labour policies, strengthened recruitment controls, and management training. Evidence was reviewed and validated by the audit firm and approved by Vodafone prior to closure.
– Health & safety non-conformances (major and priority findings only)		–	22	Suppliers provided evidence of corrective actions including installation of safety equipment and establishment of a freedom of association policy.
Number of carried over corrective actions closed in reporting period³			1	The supplier has submitted evidence for closure, which was reviewed by the audit firm. In addition, the supplier was audited by another JAC member, and no issues related to working hours were identified.
Number of corrective actions in progress to be closed in next reporting year³		1	44	
– Forced & child labour indicators (including excessive working hours)		1	10	Only one corrective action related to forced labour will be carried forward. The remaining actions are linked to working hours. Suppliers are actively implementing corrective action plans to address these non-conformances and support timely closure.
– Health & safety non-conformances (major and priority findings only)		–	34	All corrective actions are currently in progress with the suppliers and will be closed upon submission and verification of sufficient supporting evidence.

1. A severe human rights incident is classed as any non-disputed instance of forced labour, human trafficking or child labour³ that Vodafone have been made aware of. This includes instances of lawsuits, formal complaints through third-party complaint mechanisms (including JAC), serious allegations in public reports or the media, where these are connected to Vodafone's value chain workers.

2. As Vodafone increased the number of audits conducted in FY26 and prioritised higher-risk suppliers, the increase in identified findings was expected. This reflects enhanced transparency and due diligence and is viewed positively as it enables the identification of issues and the implementation of corrective actions

3. Corrective actions have been opened for all non-conformances related to human rights concerns identified by audits conducted by Vodafone, however the timing of audits and the standard timelines of associated corrective action plans meant that it was not possible for remaining 49 to be closed in current reporting period. Therefore, these in progress corrective action plans will be carried forward to be closed into FY27 to be reported in FY27 reporting.

Remediation

Remediation focuses on restoring affected workers' labour rights and preventing recurrence. In many cases, addressing modern slavery indicators requires correcting underlying labour rights failures, such as insecure contracts, excessive working hours, or unlawful deductions. In line with the JAC CSR parameters, issues identified through audits are assigned defined timeframes for resolution based on their severity (priority, major or minor).

Where Vodafone identifies a negative human rights impact, including forced-labour risks, we work with suppliers to address the issue, support remediation, and prevent recurrence. Auditors provide initial recommendations during the closing meeting; however, suppliers are required to conduct a root-cause analysis and submit a CAP within two weeks, setting out how the issue will be resolved and recurrence avoided. Vodafone tracks CAP implementation and supports delivery of corrective actions, including strengthening policies, controls, and management systems.

In FY26, Vodafone identified forced labour indicators in the supplier base, primarily related to excessive working hours and non-compliant employment contracts. Corrective actions included contract revisions, working time controls and strengthened monitoring. Vodafone recognises the importance of worker-centred remediation and is strengthening engagement with affected stakeholders to ensure remedies are effective. Where Vodafone considers a finding to be priority, suppliers are required to prioritise its closure even if rated as minor by the auditor.

For issues relating to worker-paid recruitment fees or unlawful wage deductions, Vodafone expects business partners to repay affected workers. While Vodafone's preference is to collaborate with suppliers to achieve remediation, our Code of Ethical Purchasing allows for supplier disengagement, including contract termination, where suppliers breach our requirements, fail to improve, and continue to pose a serious risk to workers' health, safety, or human rights. We monitor implementation through evidence review and, where appropriate, follow-up and re-audits to verify that actions have been embedded and that risks to workers have been addressed.

Case study: Forced Labour risk in branded devices supply chain

Our audit programme identified an indicator of forced labour at a tier 2 supplier in China, where workers with more than ten years of service were engaged on successive fixed term contracts. This practice can negatively impact workers' job security and benefits and their mental wellbeing. Given the severity of the issue, Vodafone worked closely with the supplier to address the root cause and prevent recurrence. As part of the remediation that was closed in FY26, the supplier reviewed its workforce records, identified all 70 workers with ten or more years of service, and issued open ended contracts in line with local legal requirements. The supplier also implemented a system to regularly monitor contract duration to ensure timely conversion to long term contracts where applicable. Vodafone will continue to monitor implementation through follow up and periodic audits to verify the effectiveness of corrective actions and ensure that workers' rights are respected.



Case study: Child labour risk mitigation in upstream mineral supply chains

While Vodafone has not identified instances of child labour within its direct supply chain, we recognise that child labour remains a prevalent and systemic risk in the artisanal and small scale mining of certain minerals, including cobalt, which are used in the production of telecommunications equipment and devices. Given the complexity and depth of mineral supply chains, and the heightened risks associated with mining in high risk geographies, Vodafone focuses on industry collaboration and long term remediation initiatives to address these risks beyond tier one suppliers.

Vodafone supports the **Child Labour Remediation Hub** in the Democratic Republic of Congo (DRC), a long term initiative founded by **Save the Children**, the Fair Cobalt Alliance and the Centre for Child Rights and Business. The Hub operates in cobalt and copper mining communities where child labour risks are known to be concentrated and provides child centred remediation when cases are identified. This includes withdrawing children from hazardous work, reintegrating them into education, providing case management and psychosocial support, and supporting families through school fees and stipends to address the root causes of child labour. By prioritising sustainable, locally delivered remediation rather than short term interventions, the Hub helps protect children's rights while supporting systemic improvements in upstream mineral supply chains relevant to the ICT sector.

Gaps, limitations, and commitment to continuous improvement

Vodafone acknowledges that there are gaps in its current visibility across parts of the supply chain, particularly beyond Tier 1 and in relation to workforce characteristics, labour recruitment practices, and certain commodities. Addressing these gaps is essential to strengthening our approach to preventing modern slavery. As part of our broader human rights strategy, Vodafone is progressing plans to:

- improve supply chain mapping, including greater visibility of high-risk geographies and activities.
- enhance data collection on workforce types and vulnerability indicators where feasible.
- strengthen assessment of procurement and purchasing practices that may affect working conditions; and
- expand disclosure over time as data quality and coverage improve.
- Engage with rights holders to ensure remediation plan is at their advantage.

This risk based and transparent approach reflects Vodafone's recognition that effective prevention of modern slavery requires continuous improvement, informed by a clear understanding of where risks are most likely to occur and where action can have the greatest impact. Expanded audit coverage has resulted in a higher number of findings, reflecting improved identification of risks across our supply chain rather than a deterioration in standards. We consider this a positive measure of effectiveness, as it enables targeted corrective action, earlier remediation, and tangible improvements in working conditions for workers, supporting sustained prevention of more severe human rights impacts.

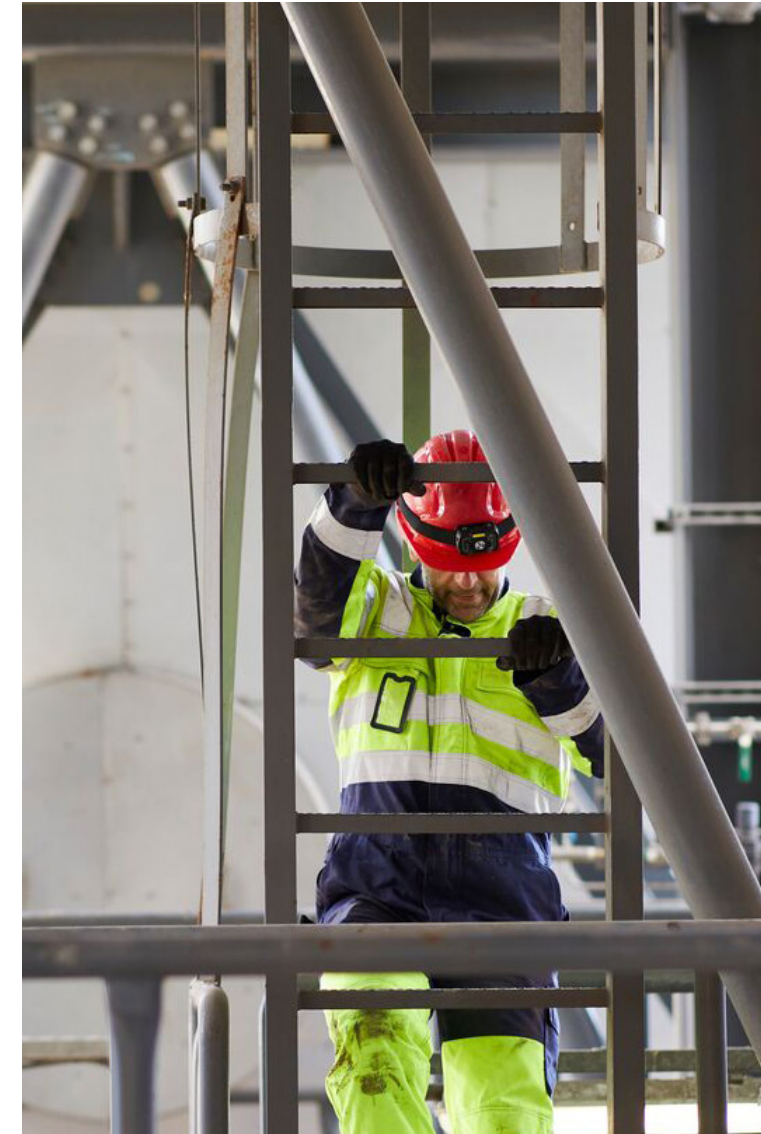
What we will do next year

Next year, Vodafone:

- i. aims to further strengthen our ability to identify, prevent and address modern slavery risks, while improving oversight of suppliers and working in collaboration with suppliers, peers, and civil society to drive sustained improvements in working conditions across the supply chain.
- ii. will explore and implement steps to support the increased visibility of Speak Up for workers in our supply chains.
- iii. will begin to use KPIs that will increasingly track not only audit coverage and remediation, but also indicators linked to labour rights outcomes, such as worker engagement, training coverage, and corrective action effectiveness, recognising their role in preventing modern slavery, enabling clearer oversight, continuous improvement, and alignment with evolving regulatory expectations.
- iv. will host an in-person supplier human rights forum for strategic suppliers in African markets, to discuss local challenges and strengthen responsible business practices and ethical conduct; and
- v. will develop enhanced, targeted human rights and modern slavery training for procurement teams, to strengthen understanding of forced labour risks, Vodafone's due diligence processes, and the practical application of these responsibilities through real life case scenarios.

Closing statement

The increase in findings in FY26 reflects a deliberate and substantial strengthening of our supply chain due diligence this year, including expanded audit coverage and a targeted focus on higher risk entities. As scrutiny has increased where risks are greatest, more issues have been identified. We will continue this proactive, risk based approach, and therefore anticipate that further findings are likely to emerge in future years. Vodafone will continue to collaborate with suppliers to address findings and minimise risk of severe modern slavery incidents.



Appendix

This Statement describes the activities that Vodafone Group Plc has undertaken in the financial year 2025/26 to identify, mitigate and remediate 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 by the Vodafone Group Plc Board, which approved it on May 6th, 2026. This Statement has been signed on behalf of the board by the Vodafone Group Plc Chief Executive.



Margherita Della Valle

Chief Executive, Vodafone Group Plc

May 6th, 2026

