

Vodacom Group Human Rights Public Policy Statement

Committed to respecting
the human rights of all



Further together



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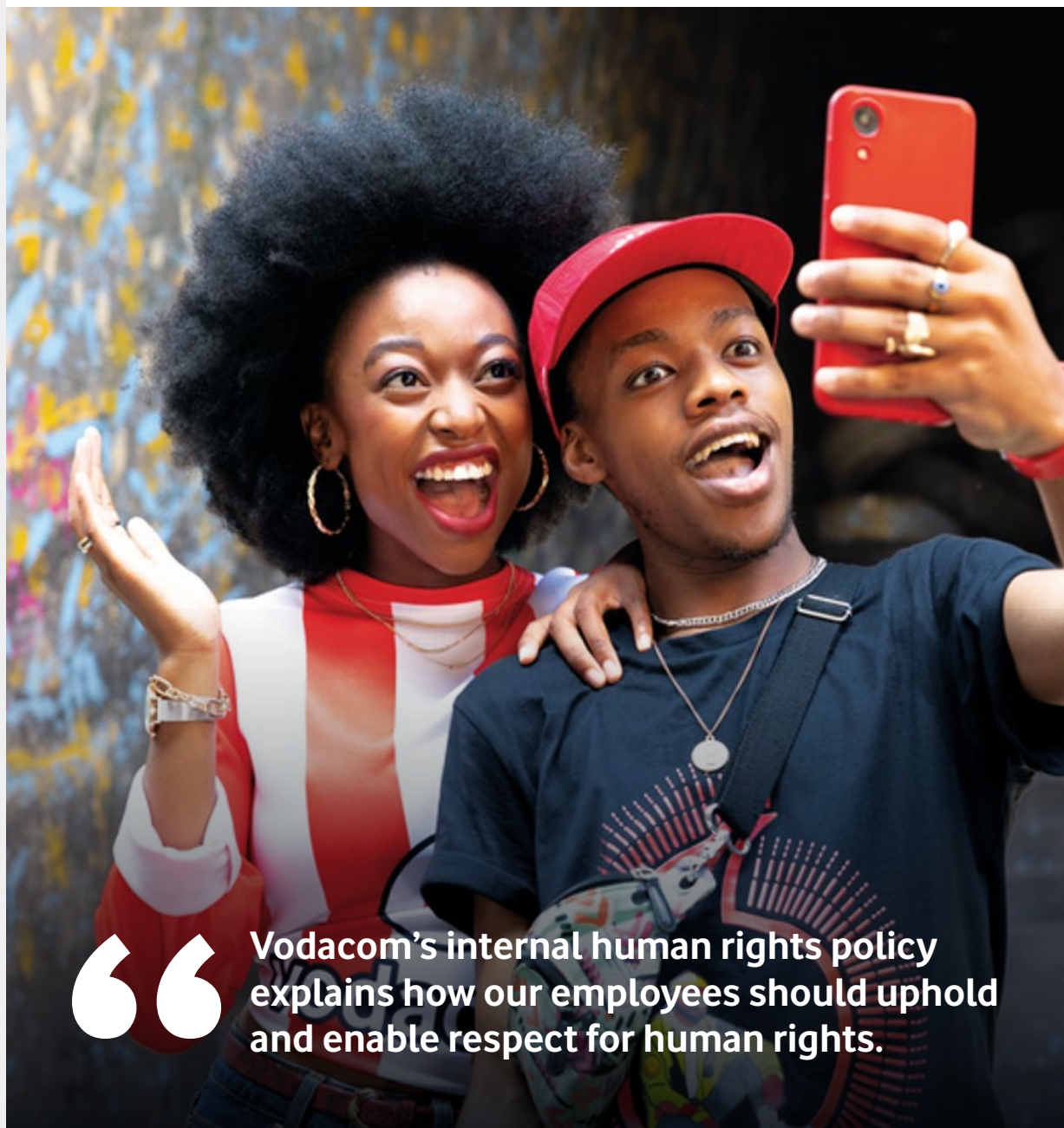
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Vodacom's internal human rights policy explains how our employees should uphold and enable respect for human rights.

Vodacom Group human rights public policy statement

Vodacom is more than just a telecommunications provider – we are a purpose-led organisation that seeks to connect for a better future. We are committed to using our technology and resources to create positive change in the communities we serve. Our commitment to respect and promote human rights is a moral imperative and a foundation for how we do business.

The [Vodacom Code of Conduct](#) sets out our expectations for all Vodacom employees at all our operations. The Code includes our commitment to respecting human rights.

Vodacom's internal human rights policy explains how our employees and contractors should uphold and enable respect for human rights. The policy includes guidance on human rights within associated policies such as those covering artificial intelligence; responsible minerals; health, safety and well-being; human resources; data privacy; marketing; business resilience; and law enforcement assistance. Our human rights policy framework includes requirements that provide further guidance on respecting children's rights; assessing risks in business operations and third parties; operating in high-risk contexts; and handling law enforcement assistance requests.

Scope

The Group human rights policy sets out the minimum requirements for everyone that works for and with Vodacom.

This policy applies to:

- All Vodacom companies in which Vodacom Group holds an interest of 50.1% or more;
- All companies over which Vodacom has management control;
- All Vodacom services including mobile, fixed, Internet of Things (IoT) and financial solutions across our consumer and enterprise segments; and
- Our employees and contractors.

We expect our suppliers and business partners to uphold the same standards as enshrined in our [Code of Ethical Purchasing](#).

Our commitment

We are committed to honouring internationally recognised human rights standards even when faced with conflicting requirements. We strive towards not being involved, directly or indirectly, in any human rights violations.



Policy alignment

The following international and regional standards inform our Group human rights policy:

- ✓ Universal Declaration of Human Rights
- ✓ United Nations (UN) Convention on the Rights of the Child
- ✓ UNICEF's Children's Rights and Business Principles
- ✓ African Charter on Human and Peoples' Rights
- ✓ African Charter on the Rights and Welfare of the Child
- ✓ International Covenant on Civil and Political Rights
- ✓ International Covenant on Economic, Social and Cultural Rights
- ✓ International Labour Organization Declaration on Fundamental Principles and Rights at Work
- ✓ UN Guiding Principles on Business and Human Rights
- ✓ UN Global Compact
- ✓ Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct
- ✓ Global Network Initiative Principles on Freedom of Expression and Privacy

Our operations, products and services

Right to privacy and freedom of expression

Vodacom is committed to handling personal data honestly, responsibly, ethically and with integrity while abiding by national laws and staying true to our values. We strive to be open and transparent about how we use personal data. Vodacom offers fair choices in how we use this data, and our services to our customers and employees are secure.

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

Law enforcement authorities sometimes require licensed operators such as Vodacom to provide personal data or limit certain network services. These requests are usually made to protect the public, investigate crime, safeguard the economy or protect important national infrastructure.

We work to respect our customers' right to privacy and freedom of expression while ensuring we comply with the laws in all countries where we operate. We assist authorities under strictly defined situations. We may challenge demands that appear overly broad, insufficiently targeted or inappropriate. We process all assistance requests using a governance framework defined in our Group Law Enforcement Detailed Requirements.

If we receive requests to restrict services or block content, we do not block access unless:

- We receive a lawful demand from a competent agency or authority;
- In collaboration with the Internet Watch Foundation or similar schemes that intend to prevent access to online child abuse material;
- A customer directly requests us to do so through parental controls software;
- A customer directly implements user-defined filters, which use simple methods to opt in or opt out; or
- To protect the integrity of our customers' data, manage traffic or maintain the quality of the network, which require measures such as blocking spam or malware and attempting to prevent hacker attacks.



Human rights by design

Vodacom prioritises ethical and human rights principles in the development and adoption of our products and services with a strong focus on protecting our customers' privacy and security. We are committed to ethical market conduct and the principles of treating customers fairly as essential components of our commitment to human rights. We conduct a human rights impact assessment when we create or use products and services, including new technologies such as artificial intelligence and IoT, to minimise the risk of any associated adverse impacts.

We engage with industry peers and relevant experts such as academics and civil society when developing emerging technologies to ensure users can fully exercise their rights and freedoms.



We are committed to upholding children's rights throughout our business operations. Vodacom seeks to support children and their parents in becoming responsible digital citizens.

Children's rights

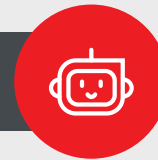


We understand that acting in children's best interests is paramount and we recognise that children are a particularly vulnerable group.

We are committed to upholding children's rights throughout our business operations. Vodacom seeks to support children and their parents in becoming responsible digital citizens. We will continue to provide knowledge, tools, controls and resources to help our customers keep pace with the rapid advances in technology, devices and apps, including how these are used. We have a zero-tolerance approach to child abuse and exploitation.



Artificial intelligence



We recognise the transformative potential of artificial intelligence and its capacity to positively or adversely impact human rights. Our commitment to respecting human rights guides our approach to developing and using artificial intelligence.

Our approach includes:

- Upholding fundamental rights including privacy, freedom of expression and non-discrimination;
- Encouraging transparency and accountability; and
- Conducting regular human rights impact assessments to identify and mitigate potential risks.





Our employees¹

Diversity and inclusion

Equal access to opportunities builds a strong corporate culture and helps us understand our customers' needs. We have a zero-tolerance approach to any form of discrimination related to age, gender, disability, sexual orientation, nationality, cultural background or belief, among others. We build relationships with employees based on respect for their human rights. We encourage our employees to speak up when they see any form of discrimination and raise concerns without fear of retaliation.

Our diversity initiatives demonstrate our commitment to a diverse and inclusive culture. These initiatives enable us to support our employees regardless of their background and location, and focus on addressing barriers around gender, sexuality, race and ethnicity, cultural heritage and disability.

They include:

- Accessibility Forum
- Women's Network Forum
- Men's Forum
- LGBTQIA+ and Friends Network
- Youth Council
- Maternity and parental leave policies
- Domestic violence policy

¹ Including contractors.



Our diversity initiatives demonstrate our commitment to a diverse and inclusive culture.



Health and safety

Our employees' health, safety and well-being are fundamental responsibilities. People who work for or on behalf of Vodacom must always behave safely and responsibly.

Slavery and human trafficking

We do not tolerate forced, bonded or compulsory labour, human trafficking, child labour or other kinds of slavery and servitude either within our operations or within our supply chain. We are committed to taking appropriate steps to ensure that everyone who works for Vodacom – in any capacity, anywhere in the world – benefits from a working environment where their fundamental rights and freedoms are respected.

Employee voice, freedom of association and collective bargaining

It is also vital for employees to have a channel for raising important matters to management. Vodacom enables this through the Africa-wide employee forum where elected representatives from each operation communicate their colleagues' views and concerns. We also recognise the rights of employees to join trade unions and engage in collective bargaining under local law.



Our suppliers

Ethical purchasing

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

Our values guide our robust systems and standards, which we expect our suppliers to uphold. These standards outline our minimum expectations of suppliers as expressed in our Code of Ethical Purchasing.

We engage with our direct suppliers directly to improve performance in our supply chains. Vodafone Group is a member of the Joint Alliance for Corporate Social Responsibility (JAC) and Vodacom benefits from JAC audits, which cover human rights. From monitoring non-compliance to conducting assessments and employee surveys, we work to help suppliers strengthen their compliance and processes. We encourage our suppliers to share our requirements with their suppliers and subcontractors.



Health and safety

Our commitment to safety does not differentiate between employees and contractors of Vodacom and our suppliers. We expect our suppliers to be accountable for managing health and safety risks in their operations and meeting our standards in the Code of Ethical Purchasing. Everyone working for or with Vodacom should return home safely every day.



Responsible sourcing of minerals

We recognise the risks associated with conflict minerals used in the electronics industry. These include tin, tantalum, tungsten and gold (the 3TG metals), and cobalt.

While we have limited influence on the manufacture of materials, parts or components of electronic equipment in our supply chain, we expect our suppliers to take steps to ensure that conflict minerals are not used in any of our equipment.

We source products through third parties, following the Code of Ethical Purchasing, which aligns with the OECD Due Diligence Guidance for Responsible Business Conduct. This is to ensure that the minerals used in manufactured products come from smelters that follow responsible sourcing practices.

Our Responsible Minerals Statement addresses the responsible sourcing of minerals in many of the products we sell and where we significantly influence design or manufacture.



Our communities

Digital inclusion

We believe that everyone should have access to the opportunities of a digital future. Our goal is to democratise digitalisation by making technology accessible to everyone – leaving no one behind. We work towards closing the digital divide through programmes across our operating companies. Through our technology, we contribute to the work to bridge the divides that exist and help people to enjoy and exercise their fundamental rights while contributing equally and fully to society. Beyond our efforts to close the digital divide, we seek to drive financial inclusion through our various financial platforms and services.



Stakeholder engagement plays a crucial role in our organisation and we value constructive conversations with our stakeholders.



Anti-bribery and corruption

Corruption and bribery can negatively impact human rights. We act with honesty, integrity and fairness in our internal and external dealings. We maintain a zero-tolerance policy towards all forms of bribery and corruption including improper offers of payments or gifts to or from employees, contractors and business partners. We avoid contracts that may lead to, or imply, a conflict of interest between personal activities and business operations. We do not give or accept hospitality intended to influence a decision in favour of the offering organisation (or could create that perception). We closely monitor the implementation of our anti-bribery and corruption policy and thoroughly investigate any issues that may arise.

Stakeholder engagement

Stakeholder engagement plays a crucial role in our organisation and we value constructive conversations with our stakeholders. We engage with stakeholders such as civil society, non-governmental organisations and regional bodies. We promote respect for human rights by having meaningful, fair interactions with all stakeholders.

Community consultation and land rights

Communications networks are infrastructure-intensive and, where relevant, we remain committed to transparent consultation and active engagement with landowners, community leaders and municipal authorities.

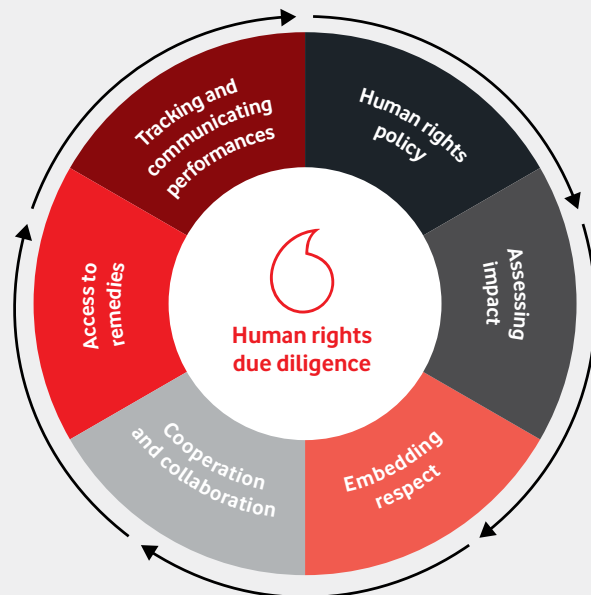


Governance and controls

Human rights due diligence

Our human rights due diligence approach aligns with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. Our due diligence approach enables us to identify, prevent, mitigate and remediate human rights impacts linked to our business practices. Our approach includes policy controls, impact assessments, risk mitigation and monitoring, tracking our performance, employee training and stakeholder communication.

We assess the actual and the potential positive and adverse human rights impacts in a range of situations, including:



Ensuring access to remedy

We encourage everyone to report grievances as soon as possible. Our confidential third-party hotline, Speak Up, is available to stakeholders in their local languages online or through telephone. Anyone who uses Speak Up in good faith is treated fairly and protected from retribution or reprisal.

We believe that transparency is key to reaching a mutual solution. We continue to disclose information on our efforts to respect human rights, how we address human rights issues and engage with stakeholders in our annual company reports.

Roles and responsibility

Our human rights approach is developed and anchored in robust governance and control frameworks. The Group human rights policy is owned by the Group Chief Officer: Regulatory and External Affairs who is a member of the Group Executive Committee. We have an established human rights team that works closely with relevant stakeholders across the Group, across our local markets and with the Vodafone human rights team.

Board-level oversight is ensured through reporting to the Group Social and Ethics Committee.

This policy statement is adopted by the Group CEO and Executive Committee and approved by the Vodacom Group Social and Ethics Committee.

13 March 2025



