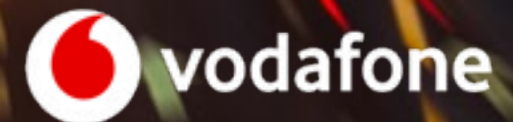


A night city street scene with light trails from cars and streetlights. A large red circle graphic is overlaid on the left side of the image, partially enclosing the main title text.

Vodafone's Alignment with the Telecommunications Industry Dialogue Guiding Principles

Digital Rights and Freedoms
Vodafone Group Plc



Implementing the Telecommunications Industry Dialogue Guiding Principles

Vodafone was a founding member of the [Telecommunications Industry Dialogue on Freedom of Expression and Privacy](#) which was created in order to advance freedom of expression and privacy rights in the telecoms industry. You can find out more about the work of the Telecommunications Industry Dialogue (TID) in its [annual report](#).

We are a signatory to the Industry Dialogue Guiding Principles on Freedom of Expression and Privacy. These set out a common approach to dealing with privacy and freedom of expression in a principled, coherent and systematic way across the industry. They are closely aligned with Vodafone's own existing Global Policy Standard on [Law Enforcement Assistance](#). We continue to work to embed this policy and its guiding principles and drive continuous improvement.

Since 2013, the Telecommunications Industry Dialogue on Freedom of Expression and Privacy and the multi-stakeholder [Global Network Initiative \(GNI\)](#) have worked together to address the challenges faced by communications and technology companies

whenever state authority and agency lawful demands for assistance appear to be in conflict with the citizen's right to privacy and freedom of expression. The GNI brings together information, communications and technology companies, civil society groups (including human rights and media freedom groups), academics and investors with a shared commitment to promote and advance freedom of expression and privacy worldwide.

In February 2016, the [GNI](#) announced a closer alignment with members of the Industry Dialogue under which Vodafone became an observer member. One year on, in [March 2017](#), Vodafone became a full member of the GNI Board

Our [Digital Rights and Freedoms Reporting Centre](#) provides more detail on our principles and approach to privacy, freedom of expression and responding to law enforcement demands.

On the following pages, we have detailed Vodafone's alignment with the Industry Dialogue Guiding Principles on Freedom of Expression and Privacy. The ten principles are listed with Vodafone's status and activities against each one.



Vodafone's alignment with the Industry Dialogue Guiding Principles

Guiding Principle	Vodafone's alignment
<p>Principle 1</p> <p>Create relevant policies, with Board oversight or equivalent, outlining commitment to prevent, assess, and mitigate to the best of their ability the risks to freedom of expression and privacy associated with designing, selling, and operating telecommunications technology and telecommunications services.</p>	<p>Policy</p> <p>We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. We are committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations. Our respect for individuals' human rights is enshrined in our Code of Conduct, which underpins everything we do. The Code was updated during 2015-16 to expand the references to human rights. The relevant section states: "We respect all internationally proclaimed human rights, including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations."</p> <p>Our Privacy Commitments set out the principles that govern our approach to privacy and also form part of our Code of Conduct. Vodafone's Global Policy Standard on Law Enforcement Assistance sets out the requirements for balancing the potentially conflicting requirements of respecting privacy and freedom of expression and assisting law enforcement.</p> <p>In addition to these policies, in 2014 we published a set of Law Enforcement Principles and in 2015 we published a set of Freedom of Expression Principles.</p> <p>Governance and oversight</p> <p>Our efforts to embed our Code of Conduct and global policy framework are led from the top of the Group with overall governance oversight from the Group Chief Executive and the Group Executive Committee (ExCo). All Vodafone Group policy standards, including the Policy Standard on Law Enforcement Assistance, have ExCo sponsorship and accountability. Each of our local market chief executives is responsible for ensuring policy compliance programmes are implemented effectively in their respective local market with the support of local specialists and a dedicated Group team.</p> <p>In 2015-16, there were three main activities that delivered oversight of compliance:</p> <ul style="list-style-type: none"> • Vodafone's internal audit function: which carries out Privacy audits; • the policy compliance review (carried out for each high-risk policy area, including privacy): desk-based assessment of three key privacy controls across all local markets; and • policy 'deep dive' analysis: onsite review of a minimum of two local markets and their compliance with the Group Privacy policy.

Guiding Principle	Vodafone's alignment
<p>Principle 2</p> <p>Conduct regular human rights impact assessments and use due diligence processes, as appropriate to the company, to identify, mitigate and manage risks to freedom of expression and privacy – whether in relation to particular technologies, products, services or countries – in accordance with the Guiding Principles for the implementation of the UN ‘Protect, Respect and Remedy’ framework.</p>	<p>A range of due diligence processes are in place. These include:</p> <ul style="list-style-type: none"> • regular formal reviews of the most significant privacy and security risks affecting our businesses at Group-level, and the strategies to respond to the most critical risks. • a due diligence process undertaken before entering new markets, acquiring businesses or establishing new partnerships. This process incorporates human rights issues such as corruption, respect for privacy, internet freedom and freedom of expression. • a key part of Vodafone's approach is to seek to ensure that a privacy and legal impact assessment of new products and services (together with associated processing such as billing) is carried out by the relevant expert teams to ensure that the potential for non-compliance can be identified early and appropriate remedial actions implemented. At a Group level, this is achieved through the Global Advisory Forum, a cross-functional group of experts from across Vodafone Group who provide input on potential new products, services and technologies. This process helps to ensure that privacy and freedom of expression are taken into account at the earliest stage of the design process. We conduct privacy impact assessments, require compliance with the law and evaluate the potential impact on the customer. Similar processes exist in local markets to achieve the same goal.
<p>Principle 3</p> <p>Create operational processes and routines to evaluate and handle government requests that may have an impact on freedom of expression and privacy.</p>	<p>Our Global Policy Standard on Law Enforcement Assistance includes guidance for evaluating, handling and, where necessary, escalating demands from law enforcement agencies.</p> <p>During 2016, we updated our Group crisis escalation criteria to include explicit reference to events with the potential to curtail freedom of expression. Our operating companies are required to make immediate contact with senior Group-level executives with international responsibilities for security, privacy and human rights whenever we have been ordered by a government to shut down one or more networks, shut down or block services or send our customers communications from a government or its agencies.</p>
<p>Principle 4</p> <p>Adopt, where feasible, strategies to anticipate, respond and minimise the potential impact on freedom of expression and privacy in the event that a government demand or request is received that is unlawful or where governments are believed to be mis-using products or technology for illegitimate purposes.</p>	<p>The Global Policy Standard on Law Enforcement Assistance sets out how we should seek to challenge law enforcement demands where we have reasonable grounds to believe that the demand is not legally mandated or is unlawful. The Policy requires our operating companies to convene the appropriate experts internally in order to consider the possible impacts and actions.</p> <p>During 2016, we developed an internal toolkit which provides advice and guidance to our local operating company teams on key policy positions as well as supporting examples and source materials to use when engaging with governments and regulators on issues such as national security, cyber security, freedom of expression and online child protection. This toolkit includes best-practice examples and advice and support on how best to engage with governments when new legislation is under development or when faced with a demand to block or restrict access to communication services or content.</p>

Guiding Principle	Vodafone's alignment
<p>Principle 5 Always seek to ensure the safety and liberty of company personnel who may be placed at risk.</p>	<p>Vodafone's Code of Conduct includes a high-level commitment to protect the health, safety and well-being of our employees. The Global Policy Standard on Law Enforcement Assistance requires potential personal risk to individuals to be considered in any decision to challenge law enforcement demands.</p>
<p>Principle 6 Raise awareness and train relevant employees in related policies and processes.</p>	<p>Our Global Policy Standard on Law Enforcement Assistance includes a requirement to ensure appropriate training and awareness-raising activities within each operating company and at Group level.</p>
<p>Principle 7 Share knowledge and insights, where relevant, with all relevant and interested stakeholders to improve understanding of the applicable legal framework and the effectiveness of these principles in practice, and to provide support for the implementation and further development of the principles.</p>	<p>We share knowledge and engage with stakeholders on these issues through a number of activities and forums including:</p> <ul style="list-style-type: none"> • Reporting: Vodafone publishes information and views on privacy, freedom of expression, law enforcement and other matters within its Digital Rights and Freedoms Reporting Centre. Information disclosed includes lawful interception and communications data statistics (where lawful and appropriate) and a Legal Annexe which outlines some of the most common types of legal powers used to demand assistance from local licensed operators. • The Global Network Initiative: In February 2016, Vodafone became an observer member of the multi-stakeholder GNI. One year later, in March 2017, Vodafone became a full member of the GNI Board. The GNI was formed in 2008 to promote and advance freedom of expression and privacy around the world. This builds on an existing collaboration between the GNI and the Telecommunications Industry Dialogue (see below). • Telecommunications Industry Dialogue on Freedom of Expression and Privacy: Vodafone was a founding member of this industry group. Since April 2014, the Industry Dialogue's quarterly meetings have been regularly extended to include a roundtable discussion with stakeholders including investors, government officials, members of civil society and academia and other companies. During these meetings, Industry Dialogue companies have shared the challenges they face and progress they have made in implementing the Industry Dialogue Guiding Principles (see their annual report for more details on this and other engagement activities). • We have frequent engagement with a wide range of NGOs, activists, politicians, regulators, academics, researchers, journalists and a variety of civil society groups.
<p>Principle 8 Report externally on an annual basis, and whenever circumstances make it relevant, on their progress in implementing the principles, and on major events occurring in this regard.</p>	<p>As explained above, Vodafone publishes information and views on privacy, freedom of expression, law enforcement and other matters within its Digital Rights and Freedoms Reporting Centre. This includes reporting against the Industry Dialogue Guiding Principles as well as annual lawful interception and communications data statistics (where lawful and appropriate) and a Legal Annexe which outlines some of the most common types of legal powers used to demand assistance from local licensed operators.</p>

Guiding Principles	Vodafone's alignment
<p>Principle 9</p> <p>Help to inform the development of policy and regulations to support freedom of expression and privacy, including, alone or in cooperation with other entities, using its leverage to seek to mitigate potential negative impacts from policies or regulations.</p>	<p>The Global Policy Standard on Law Enforcement Assistance covers engagement with governments on these issues and we regularly contribute to the dialogue on the development of policies on a national and international level. We seek to ensure that legal provisions governing the use of powers to access information about customers or users of our services contain adequate protection for human rights.</p> <p>We are committed to working towards better legal frameworks, transparency, clarity, consistency and due diligence processes in government demands for assistance. During 2016, our local market colleagues engaged on these topics with governments including Australia, Germany, the Netherlands, New Zealand and the UK. We also contribute to the dialogue on the development of policies at a national and international level through the Telecommunications Industry Dialogue. For example, during 2016, TID provided input to the study being conducted by the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, on the responsibilities of the Telecommunications and Internet Access sectors to promote freedom of expression in the digital age. TID also provided input to the Australian Government's draft guidelines for the use of Section 313(3) of the Telecommunications Act 1997 by government agencies for the lawful disruption of access to online services.</p>
<p>Principle 10</p> <p>Examine, as a group, options for implementing relevant grievance mechanisms, as outlined in Principle 31 of the UN Guiding Principles for Business and Human Rights.</p>	<p>Vodafone has a number of mechanisms whereby grievances can be raised. Employees and contractors in all local markets can use our global external reporting scheme, Speak Up, to report concerns. Customers can raise complaints or concerns through established contact channels, which vary in the countries where we operate. They include direct communication with privacy or data protection officers in some countries, or complaints through third-party mechanisms such as the BBFC content classification process in the UK.</p>