

Rules of Procedure for the Complaints Procedure

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General information

Objectives

Everything we do is based on trust – the trust of our customers, our employees, our business partners, our suppliers and the local communities we work with. We are aware that doing what is right and acting with integrity are critical to winning and retaining the trust of our partners. In addition to that, we only collaborate with sales partners and suppliers who act with integrity.

We need to know about potential wrongdoing or unethical behaviour on the part of our employees, sales partners and suppliers because we can only fulfil our responsibilities with that knowledge. To make that possible we established the Speak Up whistle-blowing system. Speak Up serves as an early warning system for potential violations – both within our organisation and in our operating environment, e.g. in our supply chain. We can only put a stop to wrongdoing and violations and take any necessary action against the individuals concerned if we are aware of them. The reports made and any subsequent internal investigations also help us to identify potential for improvement and process weaknesses.

Scope of application

These Rules of Procedure apply to all information and complaints which have relevance under the German Supply Chain Due Diligence Act [*Lieferkettensorgfaltspflichtengesetz*]. They extend to all reports of human rights and environmental risks and violations along the entire Vodafone supply chain. For the purposes of these Rules of Procedure, “Vodafone” refers to Vodafone GmbH and its branch offices, all subsidiaries and affiliates in which it holds a share of 50% or more and their majority-owned subsidiaries and affiliates.

Complaints can be filed if violations of or risks affecting one of the following protected legal positions are observed or perceived at Vodafone or at one of Vodafone’s direct or indirect suppliers.

Protected legal positions

- Protection of employees
- Protection of livelihoods
- Protection from harm as a result of the deployment of security forces
- Protection when handling mercury
- Protection when handling persistent organic pollutants
- Protection when handling hazardous waste

The protected legal positions are also listed in this document’s “**Annex 1** Protected legal positions”.

Good to know: We don’t process complaints about our products or services via the whistle-blowing system. These are customer service issues.

Are you unsure whether one of the above-mentioned companies or protected legal positions is actually affected? Please use the whistle-blowing system anyway. This will allow us to examine the legal basis, clarify the facts and categorise the reported wrongdoing.

These Rules of Procedure are supplemented by internal policies and detailed requirements, which contain more detailed provisions on topics such as the responsibilities for processing complaints.

Reporting potential violations

How are complaints filed?

Complaints can be filed free of charge at any time of the day or night, seven days a week, via [Speak Up](#), Vodafone's digital whistle-blowing system. Whistleblowers have the option to provide their contact details or file an anonymous complaint. The system is confidential and secure. It also allows us to communicate with the whistleblower anonymously via a secure inbox. The Vodafone whistle-blowing system is the responsibility of our Chief Compliance Officer. Depending on the subject matter of the reported violation or wrongdoing, other central or local departments may be involved, such as HR, Legal or Sustainability.

Who can use the whistle-blowing system?

In principle, any person who has perceived a violation of or a risk to one of the above-mentioned protected legal positions can report it. The person does not have to be affected by the issue in order to file a complaint. This means that people who have only observed or heard about violations or risks can also report them. Complaints can also be filed by representatives. Both Vodafone employees and external persons can use the whistle-blowing system.

Vodafone particularly encourages all employees and trainees, interns and working students to report wrongdoing. The same applies to the employees of Vodafone's direct and indirect suppliers and business partners.

What's important when filing a complaint?

Complaints that are filed should be as detailed and comprehensible as possible so that we have sufficient information to launch an investigation or decide how to proceed.

Use the following questions for guidance:

- **What happened?** Provide a description of the facts and circumstances in chronological order – the more details, the better.
- **Who committed the violation?** If known, provide the name, position and the Vodafone entity or supplier or business partner concerned.
- **Who is affected or damaged by the violation?** Name and number of persons or groups of persons affected, severity of the violation, etc.
- **When did the violation happen? Is it still ongoing?** Date and time or duration of the violation.
- **Where did the violation happen?** Location, department etc.
- **Is there documentary evidence or are there witnesses?** Documentary evidence such as photos or emails can be included with the report.
- **Has a complaint already been made elsewhere?** For example, to a line manager.
- **How do you want to stay in contact?** For example, state whether you are willing to answer questions or whether you wish to remain anonymous.

We process all complaints which are filed, regardless of how detailed they are or whether all the listed questions have been answered. The more information we have, the faster and more efficiently a complaint can be processed.

Process of the complaints procedure

What happens when a complaint is filed?

Our Corporate Investigation team processes all filed complaints in a defined procedure.



The team follows up every complaint. First of all, it is checked for plausibility. If the content of the complaint is plausible and there is reason to believe that one of the above-mentioned protected legal positions has been violated, the team launches an investigation. If the content is implausible or the reported facts are definitely outside the scope of the Act on Corporate Due Diligence Obligations in Supply Chains, the whistleblower is informed. The facts are discussed with the whistleblower beforehand so that we can gain a better understanding of them. Further information on this is provided in section **To what extent are whistleblowers involved in an investigation?**

The Corporate Investigation team conducts investigations in accordance with uniform standards. As a rule, the whistleblower is asked questions as part of the investigation and the reported facts are discussed with them so we can obtain additional information and gain a clearer picture. This can also take place anonymously via the Vodafone Speak Up whistle-blowing system's secure inbox. **Important:** You will receive special login credentials which must be kept safe. This is the only way you can regularly log into your electronic inbox and our only means of communication with you.

Persons who are reported by whistleblowers are presumed innocent until a violation has been proven. We focus on fairness and transparency in our investigations. If the Corporate Investigation team has evidence of violations or risks affecting one of the above-mentioned protected legal positions or other incidents of wrongdoing: Vodafone will take appropriate action as quickly as possible to permanently eliminate the violation or risk. If you are personally affected, the actions taken can also be discussed with you.

A report is then written on the findings of the investigation and presented to the relevant stakeholders. Even after this has taken place, we remain in contact with the whistleblower as far as possible in order to monitor the effectiveness of the actions taken and to protect them against reprisals.

To what extent are whistleblowers involved in an investigation?

We provide confirmation of receiving the complaint to the whistleblower within 7 days. We also inform the whistleblower of their rights – with regard to protection against discrimination or penalisation as a result of the complaint process, as well as protection against reprisals. Protection against reprisals is provided to all persons who have provided information in good faith and with good intentions. Persons who deliberately make false allegations do not have that protection.

We also keep whistleblowers updated on planned and implemented follow-up actions and the reasons for them during the process. However, this feedback can only be provided in such a way that it does not affect internal enquiries or investigations, or the rights of persons who are the subject matter of a whistleblower report or named in the report. We will endeavour to remain in contact with the whistleblower after we receive their report in order to discuss the issue and gain a better understanding of it. If the whistleblower is personally affected by the reported issue, we will endeavour to work with them to discuss and develop solutions.

How long does an investigation take?

We process all complaints as quickly as possible. However, the length of an investigation can vary depending on how extensive and complex the issue is. Some investigations only take a few days, other investigations take several months. When providing feedback to the whistleblower, we comply with the relevant statutory deadlines, i.e. feedback is provided within 3 months of confirmation of the receipt of the complaint. Whenever possible, we also inform them about the next steps and the expected duration of the process.

What is the result of an investigation?

If an investigation reveals that a violation, risk, offence or act of wrongdoing has actually occurred, Vodafone will immediately take appropriate action. The actions taken and implementation periods vary depending on the type and severity of the issue. Remedial measures in the case of risks to or violations of human rights and environmental concerns are implemented with the highest priority and as quickly as possible.

How are whistleblowers protected?

Vodafone is fully committed to the protection of whistleblowers. They can use our digital Speak Up whistle-blowing system to report wrongdoing without providing contact details. Both the complaint they file and any follow-up communication via the electronic inbox can remain anonymous. Even complaints that are not filed anonymously are treated confidentially.

The Vodafone employees who process complaints are subject to a confidentiality obligation which is part of their employment contracts. In addition, only a limited number of people have access to our whistle-blowing system and the complaints. These employees act impartially. They are trained to carry out this work and they perform this task without being bound to instructions. The principles of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act [*Bundesdatenschutzgesetz*] (BDSG) are also observed.

You can find information on the handling of personal data in the Vodafone Speak Up whistle-blowing system in our [Privacy Policy](#).

Vodafone does not tolerate any disadvantages for whistleblowers or any hostility or intimidation towards them. We protect whistleblowers and, when legally possible, we immediately penalise any reprisals against whistleblowers that we become aware of. This applies in particular to reprisals against Vodafone employees, and also to any reprisals against whistleblowers working for our suppliers that we become aware of. In these cases, we contact the persons affected in order to establish suitable actions to take.

Effectiveness review

The complaints procedure is subject to an annual and an event-driven effectiveness review.

Annex 1 Protected legal positions that can be the subject matter of complaints

Human rights-related risks as defined in the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

<p>Protection of workers Sec. 2 (2), no. 1 – 8 LkSG</p> <ol style="list-style-type: none"> 1. Prohibition of the employment of a child under the age at which compulsory schooling ends according to the law of the place of employment 2. Prohibition of the worst forms of child labour 3. Prohibition of the employment of persons in forced labour 4. Prohibition of all forms of slavery 5. Prohibition of disregarding applicable occupational health and safety obligations 6. Prohibition of disregarding the freedom of association 7. Prohibition of unequal treatment in employment 8. Prohibition of withholding an adequate living wage 	<p>Protection of livelihoods Sec. 2 (2), no. 9 – 10 LkSG</p> <ol style="list-style-type: none"> 9. Prohibition of causing and harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption 10. Prohibition of unlawful eviction and of unlawful taking of land, forests and waters 	<p>Protection from attacks as a result of the deployment of security forces Sec 2 (2), no. 11 LkSG</p> <ol style="list-style-type: none"> 11. Prohibition of hiring or using private or public security forces if, due to a lack of instruction or control on the part of the enterprise, the use of security forces is in violation of the prohibition or torture, damages life or limb or impairs the right to organise and freedom of association
<p>Catch-all provision, Sec 2 (2), no. 12 LkSG:</p> <ol style="list-style-type: none"> 12. "The prohibition of an act or omission in breach of duty that goes beyond numbers 1 to 11, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances in question." 		

Environment-related risks as defined in the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

<p>Handling mercury Sec. 2 (3), no. 1 – 3 LkSG</p> <ol style="list-style-type: none"> 1. Prohibition of the manufacture of mercury-added products 2. Prohibition of the use of mercury and mercury compounds in manufacturing processes 3. Prohibition of the treatment of mercury waste 	<p>Handling persistent organic pollutants Sec. 2 (3), no. 4 – 5 LkSG</p> <ol style="list-style-type: none"> 4. Prohibition of the production and use of certain chemical pollutants 5. Prohibition of the handling, collection, storage and disposal of certain waste in a manner that is not environmentally sound 	<p>Handling hazardous wastes Sec. 2 (2), no. 6 – 8 LkSG</p> <ol style="list-style-type: none"> 6. Prohibition of exports of certain hazardous waste 7. Prohibition of the export of certain hazardous wastes from OECD member states, EC Member States and Liechtenstein to states that are not listed in Annex VII to the Basel Convention 8. Prohibition of the import of certain hazardous waste
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