

Policy Statement

of

Vodafone GmbH

Implementation of due diligence obligations under Section 6(2)
of the Supply Chain Due Diligence Act (LkSG)

As at 24 August 2026

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1. Foreword

Our mission is: We connect for a better future. We recognise that we play an important role in the digital society. We aim to contribute to its development in a way that supports the protection and promotion of fundamental human rights, freedom and the environment. We are aware that our business activities may involve risks to people and the environment.

We have a responsibility to respect human rights and protect the environment. In our [Code of Conduct](#), we have therefore recognised all international human rights, including the UN Charter of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We have also committed to implementing the UN Guiding Principles on Business and Human Rights across all our businesses.

This means that we identify actual and potential adverse impacts on human rights and the environment that we cause ourselves or in which we are involved through our business relationships or products and services, and define appropriate preventive or remedial measures.

In this policy statement, we set out how we proceed in this regard, particularly with regard to the provisions of the Supply Chain Due Diligence Act (LkSG), and what human rights and environmental risks exist within our own business operations and amongst our suppliers.

2. Human rights and environmental expectations of our own employees and suppliers

We are committed to respecting human rights and environmental concerns, and to upholding and promoting their protection within our own business operations and amongst our suppliers, to the extent that we are able to influence them. We are committed to treating our employees and business partners with respect and to promoting sustainable business practices and processes that are in line with our social responsibility. We expect both our employees and our suppliers to ensure compliance with human rights and respect for the environment, and to share our principles and values.

Our [Code of Conduct](#) sets out our expectations. It applies to all employees, directors, managers, contractors, subsidiaries, joint ventures and suppliers.

We expect our suppliers to commit to adhering to our principles and to develop and embed appropriate and effective processes to address and prevent the risks and breaches we have identified, as well as to identify and minimise any further potential risks. Our [Code of Ethical Purchasing](#), as a binding part of our contracts, sets out our expectations and values for our suppliers and business partners and forms the foundation for our collaboration. We communicate this to our suppliers as part of our onboarding process.

3. Our approach to implementing human rights and environmental due diligence obligations

Our risk management system for fulfilling the statutory due diligence obligations under the LkSG is an ongoing process comprising the following steps, which build on one another:

3.1 Responsibilities

We have established an LkSG risk management system that takes into account the sector-specific characteristics of our company and have embedded it in our relevant business processes through appropriate measures. The basis of any LkSG risk management system is a clear allocation of responsibilities. We have defined clear and non-overlapping internal responsibilities for both the operational implementation of due diligence obligations and the monitoring of risk management.

Overall responsibility for human rights and environmental due diligence obligations lies with the Executive Board. The Corporate Integrity and Supply Chain Management departments are responsible for the operational implementation of due diligence obligations. The Corporate Integrity department is responsible for the operational implementation of due diligence obligations within its own business area, as well as for the complaints procedure and internal and external reporting under the LkSG. The Supply Chain Management department focuses on the implementation of due diligence obligations among our suppliers.

To oversee the implementation of due diligence obligations, we have established a committee comprising members from the two aforementioned departments, known as the LkSG Board. The LkSG Board is a decision-making body that acts on behalf of the Executive Board. The aim of the LkSG Board is to provide centralised operational oversight and to monitor the appropriate and effective implementation of the statutory due diligence obligations under the LkSG.

The Human Rights Officer is responsible for overseeing risk management across the entire organisation. At our company, this role is held by the Head of Corporate Integrity. She reports to the Executive Board on the LkSG risk management system at least once a year and, where necessary, on an ad hoc basis. To implement the LkSG risk management system, we have appointed responsible individuals – known as Risk Owners and Risk Managers – in our subsidiaries and across all relevant business areas, including Supply Chain Management. The Risk Owners and Risk Managers bear primary responsibility for the risks associated with their respective subsidiaries or business areas. The Risk Managers, acting as delegates of the Risk Owner, are responsible for identifying and assessing the risks associated with their respective subsidiaries or business areas.

3.2 Conducting the risk analysis

We carry out annual risk analyses to identify human rights and environmental risks within our own business areas and amongst our suppliers. In addition, we have established processes for ad hoc risk analyses in the event that, as a result of our business activities, we anticipate a significantly altered or expanded risk situation in the supply chain, or where we have actual evidence of human rights violations among indirect suppliers.

The results of the risk analysis serve as the basis both for this policy statement and for the definition of (further) preventive and, where necessary, remedial measures.

Procedure for the regular risk analysis within our own business division

Risk analysis within each business unit is carried out on the basis of risk catalogues containing illustrative risk scenarios relating to the human rights and environmental risks set out in the LkSG. These catalogues have been drawn up by the relevant subject matter experts at Vodafone GmbH. The risk catalogues serve as a starting point for risk managers to identify and assess risks, and may be supplemented by them to include company- or division-specific risks.

For each risk scenario, the risk managers assess the probability of occurrence and the potential severity of the breach. Both a gross and a net assessment are carried out.

Following a plausibility check of the assessment by the risk owner, the risks are reported to the Corporate Integrity department. The Corporate Integrity department documents the risks and the assessment in a risk inventory, which it uses as the basis for reporting.

Procedure for the regular risk analysis of direct suppliers

The starting point for the risk analysis of direct suppliers is the identification of all suppliers for the period under review, along with their order or invoice volumes. In an abstract risk assessment, we identify high-risk suppliers from the pool of suppliers by taking into account country and sector risks. We then assess these suppliers individually in a detailed analysis.

To this end, the risk managers collect the necessary information about each supplier using questionnaires and assess the probability of occurrence and the potential severity of the breach for each risk scenario. Both a gross and a net assessment are carried out.

Following a plausibility check of the assessment by the risk owner, the risks are reported to the Corporate Integrity department. The Corporate Integrity department documents the risks and their assessment in a risk inventory, which it uses as the basis for reporting.

Procedure for event-driven risk analysis

An ad hoc risk analysis may, for example, be necessary following the launch of new products or due to changes in business activities or the business environment that result in a significantly altered or expanded risk profile amongst suppliers or within our own business unit. The relevant department is obliged to report such cases immediately to Corporate Integrity so that the latter can take the necessary further steps or involve the relevant specialist departments or business units. Corporate Integrity, together with the relevant specialist departments, assesses the report to determine whether, as a result of the trigger event, we must indeed expect a significantly altered or significantly expanded risk profile within the supply chain. If the assessment is positive, a new, interim risk analysis is initiated. This follows the same methodology as the regular risk analysis.

In addition to this ad hoc risk analysis triggered by a changing risk situation, we have also established a process for risk analysis relating to indirect suppliers. Upon becoming aware of a potential human rights or environmental risk at an indirect supplier to Vodafone GmbH or one of its subsidiaries – for example, through reports received as part of the complaints procedure – Supply Chain Management first investigates the facts to determine whether there is any actual evidence. If a human rights or environmental violation is possible, we carry out a case-specific risk analysis. This follows the same methodology as the regular risk analysis. Depending on the outcome, we then devise and implement preventive and/or remedial measures.

3.3 Preventive measures within our own business division, ‘ ‘

To address identified risks, we follow an integrated prevention strategy that takes into account both our own business activities and those of our suppliers. To reduce the risk of human rights violations and environmental breaches, we have established the following measures within our own business division:

- **Communication & training:**

We raise our employees' awareness of the requirements of the LkSG and the associated respect for human rights and environmental concerns through various communication measures, such as articles on the intranet or presentations at departmental meetings and committee meetings. In this way, we ensure that all employees are made aware of human rights and environmental obligations and our corresponding values. In addition, we have provided separate and more detailed training on the requirements of the LkSG to those involved in risk management, so that they have the necessary specialist knowledge to carry out their duties. In the procurement department, we regularly share knowledge and thereby promote expertise through in-depth information and training sessions for procurement staff both within and outside Supply Chain Management, including procurement staff in international group companies, particularly the Vodafone Group's central procurement company, the Vodafone Procurement Company (VPC).

- **Procurement strategies & purchasing practices:**

When selecting suppliers, we take human rights and environmental expectations into account and apply appropriate procurement strategies and purchasing practices to prevent or minimise the identified risks.

At least once a year, and as and when necessary, we review whether the measures we have put in place within our own business area are effective in preventing or minimising the identified risks and in ensuring compliance with human rights and environmental protection.

3.4 Preventive measures for (direct) suppliers

To reduce the risk of human rights violations and environmental breaches, we have established the following measures with our (direct) suppliers:

- **Supplier Code**

Our [Code of Ethical Purchasing](#) is a binding part of our contractual terms and conditions with all direct contractual partners, through which we set out our expectations and values with regard to human rights and environmental issues.

- **Contractual assurance**

In the case of direct suppliers where we have identified relevant LkSG risks as part of our risk analysis, we also ensure, through the terms of the contract, that they undertake to comply with human rights and environmental expectations within their own business operations and that they also appropriately address these expectations with their own suppliers throughout their supply chain. At the same time, we agree on appropriate monitoring mechanisms to enable us to verify compliance with our expectations.

At least once a year, and as and when necessary, we check whether the measures we have put in place with our (direct) suppliers are effective.

3.5 Remedial measures

If we determine that a breach of a human rights-related or environmental obligation has occurred or is imminent, we shall immediately take remedial action to prevent or put an end to the breach, or to minimise its extent. Should these measures fail to achieve the desired outcome, termination of the business relationship with the supplier may be considered as a last resort.

At least once a year, and as and when necessary, we review whether our measures to prevent or minimise the identified breach are effective.

3.6 Complaints Procedure

We reject any form of human rights or environmental violation. An appropriate and effective complaints management system is therefore a key component of our processes, enabling us to effectively prevent and remedy any potential adverse human rights and environmental impacts arising from our company and our business activities. We have established a complaints procedure that enables all affected individuals to draw attention to human rights and environmental risks, as well as to breaches of human rights and environmental obligations. Further information on the complaints procedure is publicly available on our [website](#). The website also features a set of procedural rules in [German](#) and English, which outline the process followed upon receipt of complaints. At least once a year, and on an ad hoc basis where necessary, we review the effectiveness of our complaints procedure and report on the results of the review.

3.7 Documentation and reporting obligations

We continuously document our compliance with our due diligence obligations.

In light of the Act amending the Supply Chain Due Diligence Act (LkSG), which was passed by the Federal Cabinet on 3 September 2025, the Federal Office for Economic Affairs and Export Control (BAFA) has suspended the review of company reports in accordance with Sections 12 and 13 of the LkSG with immediate effect.

With the directive issued in this regard, the Federal Government is pre-empting the intended amendment to the Act. It is therefore no longer possible to submit a report under the LkSG via the portals provided by the BAFA.

4. Prioritised risks & preventive and remedial measures taken

Based on the risk analysis we have carried out, we consider the following human rights and environmental risks to be priorities for our companies:

- **Identified priority risks within our own business area**

As part of the risk analysis within our own business division, we have not identified any significant or high net risks following a review of the existing measures.

- **Identified priority risks among direct suppliers**

As part of the risk analysis of direct suppliers, we have not identified any significant or high net risks based on the completed questionnaires.

To manage the identified priority risks, we have implemented the following remedial measures:

- **Corrective measures within our own business division**

The risk analysis for our own business unit reveals no risks that require further measures to mitigate them. Therefore, there is no further need for action at this time.

- **Corrective measures for direct suppliers**

In the detailed risk analysis, we identified only low or medium net risks. Consequently, as outlined above, no corrective measures are, in principle, required for these suppliers.

As a precautionary measure, we have asked suppliers for whom a full risk analysis was not possible to agree to our Code of Ethical Purchasing, which covers LkSG-related issues.

5. About the Policy Statement & Continuous Improvement

This Policy Statement outlines our approach to fulfilling our corporate due diligence obligations under the LkSG and sets out binding principles regarding respect for human rights and environmental concerns throughout our entire supply chain. The processes we have implemented to ensure compliance with human rights and environmental concerns are subject to our ongoing review, particularly in light of our business activities and applicable national and international standards. We review the Policy Statement regularly and as and when necessary, and update it promptly where required.

6. Change history

Version	Date	Changes	Release
1.0	5 June 2023	Initial drafting and adoption of the policy statement	ExCo
1.1	12 June 2024	Inclusion of the link to the report; inclusion of the link to the English version of the Rules of Procedure for the complaints procedure; editorial amendments	Human Rights Commissioner
1.2	20 October 2025	Review of the content of the policy statement; review and update of links contained in the document	Human Rights Commissioner
1.3	24 August 2026	Review of the content of the policy statement; review and updating of links contained in the document; details regarding the reporting obligation to the BAFA.	Human Rights Commissioner