Policy Statement

of

Vodafone Customer Care GmbH

Implementation of the duty of care pursuant to Section 6(2) of the Supply Chain Due Diligence Act (LkSG)

As at October 2025

Contents

Statement of Principles pursuant to Section 6(2) of the LkSG (as at October 2025)

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 operate where we can contribute to prosperity and development, whilst supporting the protection and promotion of fundamental human rights, freedoms and the environment. We are also aware that our business activities may pose 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 ensuring 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 both for the operational implementation of due diligence obligations and for the monitoring of risk management.

Overall responsibility for human rights and environmental due diligence obligations lies with the management. The operational implementation of these due diligence obligations has been partially delegated to the Corporate Integrity and Supply Chain Management (SCM) departments at Vodafone GmbH. 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. The Supply Chain Management department focuses on the implementation of due diligence obligations amongst our suppliers. Internal and external reporting on the LkSG is handled by Vodafone Customer Care GmbH. The Executive Assistant's Office is responsible for this. It reports to the management at least once a year and, where necessary, on an ad hoc basis regarding the LkSG risk management system. The Executive Assistant's Office also ensures the monitoring of risk management in consultation with the Human Rights Officer at Vodafone GmbH.

To implement the LkSG risk management system, we have appointed responsible individuals – the Risk Owners and Risk Managers – in all relevant business areas, including Supply Chain Management. The Risk Owners and Risk Managers bear primary responsibility for the risks in their respective areas. The Risk Managers, acting as delegates of the Risk Owner, are responsible for identifying and assessing the risks.

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. This serves 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 serves 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, which may lead to a significantly altered or expanded risk profile amongst suppliers or within one's own business unit. The relevant department is obliged to report such cases immediately to the Corporate Integrity division so that it can take the necessary further steps or involve the relevant specialist departments or business units. Corporate Integrity, possibly in conjunction with the relevant specialist departments, assesses the report to determine whether, as a result of the trigger event, we must actually expect a significantly altered or significantly expanded risk situation in 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 of 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 factual evidence. If a human rights or environmental violation is possible, we carry out a 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 approach 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 regarding 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 human rights and environmental expectations with their own suppliers throughout their own 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 review whether our measures are effective amongst our (direct) suppliers.

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 impact. 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 due diligence processes, enabling us to effectively prevent and remedy any potential adverse human rights and environmental impacts arising from our company and our business activities. Vodafone Customer Care GmbH is integrated into Vodafone GmbH's complaints procedure, which enables all affected individuals to raise concerns regarding human rights and environmental risks, as well as 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 outlines 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 document our compliance with our due diligence obligations on an ongoing basis. In addition, we produce an annual report on our compliance with our due diligence obligations during the previous financial year. We publish this report on our website in accordance with the legal requirements of the LkSG.

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 area, we have not identified any significant or high net risks after reviewing the existing measures.

- **Priority risks identified among direct suppliers**
  As part of the risk analysis of our direct suppliers, we have not identified any significant or high net risks on the basis of the questionnaires completed.

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 division reveals no risks that require further measures to mitigate them. Therefore, there is no further need for action at this time.

- **Corrective measures relating to direct suppliers**
  The detailed risk analysis identified only four suppliers; however, these were not considered to be high-risk suppliers. Consequently, as outlined above, no remedial measures are, in principle, required for

these suppliers. As a precautionary measure, we have requested that suppliers for whom a full risk analysis was not possible 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	2 July 2024	Initial drafting and adoption of the policy statement	Management
2.0	20 October 2025	Revision and adoption of the policy statement	Management