

VODAFONE GROUP PLC

● Telecommunications Company

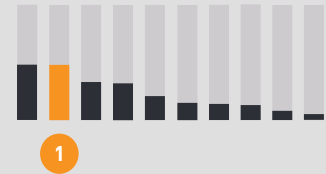
Key Findings:

- Vodafone tied with AT&T as the top-ranked telecommunications company in the 2017 Index.
- While it excelled in disclosures about network management and shutdowns, Vodafone had uneven disclosure about the circumstances and extent of content and account restrictions.
- Vodafone led the telecommunications companies in disclosures related to how user information is collected, shared, and otherwise handled, but could significantly improve its disclosure of how it secures user information.

OVERALL SCORE

48%

TELECOMMUNICATIONS RANK



OPERATING COMPANY EVALUATED

VODAFONE UK

United Kingdom

SERVICES EVALUATED

- Pre-Paid Mobile
- Post-Paid Mobile
- Fixed-Line Broadband

ANALYSIS

Vodafone tied with AT&T as the top-ranking telecommunications company of the 2017 Index, outpacing the third-ranked telecommunications company, Telefónica, by a 15-percentage point margin.¹ A member of the Telecommunications Industry Dialogue (TID), Vodafone made strong commitments to freedom of expression and privacy, but there is much room for improvement. At the corporate level, Vodafone made strong commitments to protect freedom of expression and privacy as human rights, but had notably weaker disclosure of its actual policies that affect users' freedom of expression and privacy in practice. The company should for instance produce evidence that it regularly conducts human rights impact assessments and should improve its transparency reporting by providing more detailed data on the government and private requests it receives to remove content or restrict accounts.

About Vodafone Group PLC

Vodafone Group Plc provides telecommunications services in Europe, Asia, Middle East, and Africa. The company serves 462 million mobile, 13.4 million fixed broadband, and 9.5 million TV customers.²

Market Cap: USD 65,290 million³

LSE: VOD

Domicile: United Kingdom

Website: www.vodafone.com

¹ For Vodafone's performance in the 2015 Index, see: <https://rankingdigitalrights.org/index2015/companies/vodafone>.

² "2016 Annual Report" (Vodafone, 2016), http://www.vodafone.com/content/annualreport/annual_report16/downloads/vodafone-overview-2016.pdf.

³ S&P Capital IQ, accessed February 13, 2017.



GOVERNANCE 81%

Vodafone was the highest-scoring telecommunications company in the Governance category, topping AT&T by a wide margin, and receiving the second-best score of all 22 companies evaluated.

Vodafone publicly committed to respect freedom of expression and privacy as human rights (G1), and provided evidence of senior level oversight over these issues within the company (G2). However, Vodafone did not clearly disclose

that it conducts regular human rights due diligence related to its products and services.⁴ Vodafone tied with Bharti Airtel for the highest score on disclosure of its grievance and remedy mechanisms (G6); however, gaps remained in its disclosure. While Vodafone provided users with several options to submit complaints, including those related to freedom of expression and privacy, it offered no information about the number of complaints it receives or any evidence that it is responding to complaints.



FREEDOM OF EXPRESSION 45%

Vodafone was the highest-scoring telecommunications company in the Freedom of Expression category, outscoring AT&T by four percentage points and Telefónica by nearly 20.

Content and account restriction requests: Vodafone UK lagged behind AT&T for its disclosure of how it handles government and private requests to restrict content and accounts, but was one of only four telecommunications companies to receive any credit on these indicators (F5-F7). While the company had notably strong disclosure of its process for handling requests made by governments to remove or block content or restrict user accounts, it did not fully disclose how it handles such requests from other types of third parties (F5). It also disclosed no data about the number of requests it receives from governments or other

third parties to restrict content or accounts (F6, F7).

Network management and shutdowns: Vodafone UK earned the highest score for its disclosure of its network management policies and was the only company to receive full credit for clearly committing not to block or prioritize content (F9). Like all telecommunications companies evaluated, it revealed little about its network shutdown policies, although it tied with Telefónica for the highest score on this indicator (F10).

Identity policy: Vodafone UK and AT&T were the only two telecommunications companies evaluated that did not disclose a requirement that users verify their identity with a government-issued ID for prepaid mobile services (F11).



PRIVACY 37%

In the Privacy category, Vodafone ranked second of 10 telecommunication companies, behind AT&T and ahead of Telefónica.

Handling of user information: Vodafone UK disclosed more than all other telecommunications companies about how it handles user information, including AT&T (P3-P8). However, it still did not sufficiently disclose what user information it collects (P3), shares (P4), and why (P5). It disclosed nothing about how long it retains user information (P6), like all telecommunications companies apart from AT&T. Notably, the company offered more information than any other telecommunications company about how users can access the information that Vodafone holds on them (P8).

Requests for user information: Vodafone UK disclosed less than AT&T about how it handles government and private requests for user information, but more than any other telecommunications company evaluated (P10, P11). Unlike AT&T, Vodafone did not disclose its process for responding to requests from private parties (P10).

Security: Vodafone UK disclosed less of its security policies than AT&T and Telefónica, the top-scoring telecommunications companies on these indicators (P13-P18). But it was one of only three companies in the entire Index to reveal any information about how it handles data breaches (P15), although its disclosure on this indicator was still significantly lacking in comparison to Telefónica, the top-scoring company on this indicator.

⁴"Sustainable Business Report 2015-16," <http://www.vodafone.com/content/dam/vodafone-images/sustainability/downloads/report2016.pdf>.