



**GRI Standards
index 2019**

GRI Standards index 2019

Vodafone's 2019 Sustainable Business Report (SBR) has been prepared in reference to the Global Reporting Initiative's (GRI) Sustainability Standards 2016. The GRI Standards allow companies to report their material impacts for a range of economic, environmental and social issues.

This index shows where Vodafone references the GRI Standards. Wherever a 'Y' appears in the '2019 inclusion' column in the index below, it indicates that Vodafone meets the disclosure standards; where a 'P' appears Vodafone has partially disclosed this GRI Standard. An 'N' indicates that Vodafone is not including this in its GRI disclosure.

Key

Y	Included	ARA	Annual Report and Accounts
N	Not included	SBR	Sustainable Business Report
P	Partially included		

Disclosure number	Disclosure title	2019 inclusion	Location
GRI 102: GENERAL STANDARDS			
102-1	Name of the organization	Y	Vodafone Group Plc
102-2	Activities, brands, products and services	Y	See What we do and page 6 of the Annual Report (ARA)
102-3	Location of headquarters	Y	London (UK)
102-4	Location of operations	Y	See Where we are , page 7 of the ARA and Scope of reporting in the Sustainable Business Report (SBR) Appendix on page 65
102-5	Ownership and legal form	Y	See Governance
102-6	Markets served	Y	See Where we are and What we do
102-7	Scale of the organization	Y	See ARA , Where we are and What we do
102-8	Information on employees and other workers	P	See page 59 in the People chapter of the SBR
102-9	Supply chain	Y	See page 37 in the Operating responsibly chapter of the SBR
102-10	Significant changes to the organization and its supply chain	Y	On 31 August 2018, Vodafone announced the completion of the merger between Vodafone India and Idea Cellular to create Vodafone Idea. Vodafone Idea is a joint venture controlled by Vodafone and the Aditya Birla Group. Vodafone no longer has operational control of this business, and therefore, Vodafone Idea is no longer consolidated into Group data, apart from the exceptions noted in the SBR Appendix on page 70
102-11	Precautionary principle or approach	Y	See page 56 in the Operating responsibly chapter of the SBR as an example of how the principle is addressed and Risk management on page 44 of the ARA

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GRI 102: GENERAL STANDARDS			
102-12	External initiatives	Y	See page 65 in the SBR Appendix and the Women's empowerment chapter of the SBR
102-13	Membership of associations	Y	See page 65 in the SBR Appendix and the Operating responsibly chapter of the SBR
102-14	Statement from senior decision-maker	Y	See the introduction from our Chief executive on page 5 of the SBR
102-15	Key impacts, risks and opportunities	Y	See page 69 in of the SBR Appendix and Risk management on page 44 of the ARA
102-16	Values, principles, standards and norms of behaviour	Y	See page 36 in the Operating responsibly chapter of the SBR
102-17	Mechanisms for advice and concerns about ethics	Y	See page 48 in the Operating responsibly chapter of the SBR . Our Anti-Bribery, Compliance and local Legal teams are the main points of contact
102-18	Governance structure	Y	See Governance and page 67 of the SBR Appendix
102-19	Delegating authority	Y	See page 67 in the SBR Appendix
102-20	Executive-level responsibility for economic, environmental and social topics	Y	See page 67 in the SBR Appendix
102-21	Consulting stakeholders on economic, environmental and social topics	Y	Key stakeholder issues are reported via our Sustainable Business team, see page 67 in the SBR Appendix and page 62 of the ARA . All shareholders are invited to the Annual General Meeting
102-22	Composition of the highest governance body and its committees	Y	See Governance and our governance framework on page 54 of the ARA
102-23	Chair of the highest governance body	Y	The role of Chair and Chief executive is split, see page 54 of the ARA
102-24	Nominating and selecting the highest governance body	Y	See Governance and our governance framework on page 54 of the ARA
102-25	Conflicts of interest	Y	See the Nominations and Governance Committee report on page 68 of the ARA and our Code of Conduct
102-26	Role of highest governance body in setting purpose, values and strategy	Y	See page 67 in the SBR Appendix . The sustainable business strategy was approved by the Group Executive Committee in November 2015
102-27	Collective knowledge of highest governance body	Y	See Board activities on page 60 of the ARA
102-28	Evaluating the highest governance body's performance	P	See Board evaluation on page 66 of the ARA
102-29	Identifying and managing economic, environmental and social impacts	Y	See Risk management on page 44 of the ARA
102-30	Effectiveness of risk management processes	Y	See Risk management on page 44 of the ARA
102-31	Review of economic, environmental and social topics	Y	See Risk management on page 44 of the ARA
102-32	Highest governance body's role in sustainability reporting	Y	The report is approved by the Disclosure Committee, see page 54 of the ARA
102-33	Communicating critical concerns	Y	See Governance and page 67 in the SBR Appendix
102-34	Nature and total number of critical concerns	N	
102-35	Remuneration policies	Y	See Remuneration Committee on page 77 of the ARA
102-36	Process for determining remuneration	Y	See Remuneration Committee on page 77 of the ARA
102-37	Stakeholders' involvement in remuneration	Y	See Remuneration Committee and Annual General Meeting on page 77 of the ARA
102-38	Annual total compensation ratio	N	

Disclosure number	Disclosure title	2019 inclusion	Location
GRI 102: GENERAL STANDARDS			
102-39	Percentage increase in annual total compensation ratio	N	
102-40	List of stakeholder groups	P	See pages 62–64 of the ARA and 68 in the SBR Appendix
102-41	Collective bargaining agreements	N	
102-42	Identifying and selecting stakeholders	N	
102-43	Approach to stakeholder engagement	P	See pages 62–64 of the ARA and page 68 in the SBR Appendix
102-44	Key topics and concerns raised	P	See pages 62–64 of the ARA and page 68 in the SBR Appendix
102-45	Entities included in the consolidated financial statements	Y	See the ARA
102-46	Defining report content and topic boundaries	Y	See page 70 in the SBR Appendix
102-47	List of material topics	Y	See page 68 in the SBR
102-48	Restatements of information	Y	See in the SBR Appendix
102-49	Changes in reporting	Y	On 31 August 2018, Vodafone announced the completion of the merger between Vodafone India and Idea Cellular to create Vodafone Idea. Vodafone Idea is a joint venture controlled by Vodafone and the Aditya Birla Group. Vodafone no longer has operational control of this business, and therefore, Vodafone Idea is no longer consolidated into Group data, apart from the exceptions highlighted above
102-50	Reporting period	Y	We report on a fiscal year basis from 1 April to 31 March
102-51	Date of most recent report	Y	Our last report was published in June 2018
102-52	Reporting cycle	Y	We report on an annual basis
102-53	Contact point for questions regarding the report	P	See back cover of the SBR
102-54	Claims of reporting in accordance with the GRI Standards	P	See page 1 of this report
102-55	GRI content index	Y	See this report
102-56	External assurance	Y	See page 79 in the SBR Appendix
GRI 103: MANAGEMENT APPROACH			
103-1	Explanation of the material topic and its boundary	N	
103-2	The management approach and its components	N	
103-3	Evaluation of the management approach	N	

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GRI 201: ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed	Y	See page 2 of the ARA
201-2	Financial implications and other risks and opportunities due to climate change	P	See page 27 in the Energy innovation chapter of the SBR
201-3	Defined benefit plan obligations and other retirement plans	Y	See page 172 in the Post-employment benefits section of the ARA
201-4	Financial assistance received from government	N	
GRI 202: MARKET PRESENCE			
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	N	
202-2	Proportion of senior management hired from the local community	N	
GRI 203: INDIRECT ECONOMIC IMPACTS			
203-1	Infrastructure investments and services supported	Y	See page 10 of the ARA
203-2	Significant indirect economic impacts	Y	See Taxation and our total economic contribution to public finances 2017/18 report
GRI 204: PROCUREMENT PRACTICES			
204-1	Proportion of spending on local suppliers	P	See Investing for the future report
GRI 205: ANTI-CORRUPTION			
205-1	Operations assessed for risks related to corruption	Y	See page 48 in the Operating responsibly chapter of the SBR . Risk assessment is carried out in all local markets
205-2	Communication and training about anti-corruption policies and procedures	P	See page 48 in the Operating responsibly chapter of the SBR and Code of Conduct
205-3	Confirmed incidents of corruption and actions taken	N	
GRI 206: ANTI-COMPETITIVE BEHAVIOR			
206-1	Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	N	
GRI 301: MATERIALS			
301-1	Materials used by weight or volume	N	
301-2	Recycled input materials used	N	
301-3	Reclaimed products and their packaging materials	N	
GRI 302: ENERGY			
302-1	Energy consumption within the organization	Y	See page 30 in the Energy innovation chapter of the SBR
302-2	Energy consumption outside of the organization	N	
302-3	Energy intensity	Y	See page 30 in the Energy innovation chapter of the SBR
302-4	Reduction of energy consumption	Y	See page 30 in the Energy innovation chapter of the SBR
302-5	Reductions in energy requirements of products and services	Y	See page 30 in the Energy innovation chapter of the SBR

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GRI 303: WATER			
303-1	Water withdrawal by source	P	See page 69 of the Appendix in the SBR
303-2	Water sources significantly affected by withdrawal of water	N	
303-3	Water recycled and reused	N	
GRI 304: BIODIVERSITY			
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	N	
304-2	Significant impacts of activities, products and services on biodiversity	N	
304-3	Habitats protected or restored	N	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	N	
GRI 305: EMISSIONS			
305-1	Direct (Scope 1) GHG emissions	Y	See Energy innovation chapter of the SBR , page 28
305-2	Energy indirect (Scope 2) GHG emissions	Y	See Energy innovation chapter of the SBR , page 28
305-3	Other indirect (Scope 3) GHG emissions	Y	See Energy innovation chapter of the SBR , page 33
305-4	GHG emissions intensity	Y	See Energy innovation chapter of the SBR , page 28
305-5	Reduction of GHG emissions	Y	See Energy innovation chapter of the SBR , page 28
305-6	Emissions of ozone-depleting substances (ODS)	N	
305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x) and other significant air emissions	N	
GRI 306: EFFLUENTS AND WASTE			
306-1	Water discharge by quality and destination	N	
306-2	Waste by type and disposal method	P	See page 69 of the Appendix in the SBR
306-3	Significant spills	N	
306-4	Transport of hazardous waste	N	
306-5	Water bodies affected by water discharges and/or runoff	N	
GRI 307: ENVIRONMENTAL COMPLIANCE			
307-1	Non-compliance with environmental laws and regulations	N	
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT			
308-1	New suppliers that were screened using environmental criteria	Y	See page 37 in the Supply chain integrity and safety section of the SBR
308-2	Negative environmental impacts in the supply chain and actions taken	Y	See page 37 in the Supply chain integrity and safety section of the SBR

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GRI 401: EMPLOYMENT			
401-1	New employee hires and employee turnover	P	See page 59 in the People chapter of the SBR
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	N	
401-3	Parental leave	N	See our global maternity policy on page 17 in the Women's empowerment chapter of the SBR
GRI 402: LABOR/MANAGEMENT RELATIONS			
402-1	Minimum notice periods regarding operational changes	N	
GRI 403: OCCUPATIONAL HEALTH AND SAFETY			
403-1	Workers representation in formal joint management-worker health and safety committees	N	
403-2	Types of injury and rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities	P	See page 45 in the Safety section of the SBR
403-3	Workers with high incidence or high risk of diseases related to their occupation	N	
403-4	Health and safety topics covered in formal agreements with trade unions	N	
GRI 404: TRAINING AND EDUCATION			
404-1	Average hours of training per year per employee	Y	We report on training on page 60 in the People chapter of the SBR
404-2	Programmes for upgrading employee skills and transition assistance programmes	N	
404-3	Percentage of employees receiving regular performance and career development reviews	Y	All employees receive regular development reviews
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY			
405-1	Diversity of governance bodies and employees	Y	See page 61 in the People chapter of the SBR
405-2	Ratio of basic salary and remuneration of women to men	N	
GRI 406: NON-DISCRIMINATION			
406-1	Incidents of discrimination and corrective actions taken	N	
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Y	See page 37 in the Supply chain integrity and safety section of the SBR
GRI 408: CHILD LABOR			
408-1	Operations and suppliers at significant risk for incidents of child labour	Y	See page 37 in the Supply chain integrity and safety section of the SBR and Slavery and human trafficking statement

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GRI 409: FORCED OR COMPULSORY LABOR			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Y	See page 37 in the Supply chain integrity and safety section of the SBR and Slavery and human trafficking statement
GRI 410: SECURITY PRACTICES			
410-1	Security personnel trained in human rights policies or procedures	N	
GRI 411: RIGHTS OF INDIGENOUS PEOPLES			
411-1	Incidents of violations involving rights of indigenous peoples	N	
GRI 412: HUMAN RIGHTS ASSESSMENT			
412-1	Operations that have been subject to human rights reviews or impact assessments	N	See page 46 for our approach to Human rights in the Operating responsibly chapter of the SBR
412-2	Employee training on human rights policies or procedures	N	See page 46 in the Operating responsibly chapter of the SBR
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	N	See page 46 in the Operating responsibly chapter of the SBR
GRI 413: LOCAL COMMUNITIES			
413-1	Operations with local community engagement, impact assessments and development programs	N	
413-2	Operations with significant actual and potential negative impacts on local communities	N	
GRI 414: SUPPLIER SOCIAL ASSESSMENT			
414-1	New suppliers that were screened using social criteria	Y	See page 38 in the Supply chain integrity and safety section of the SBR
414-2	Negative social impacts in the supply chain and actions taken	Y	See page 39 in the Supply chain integrity and safety section of the SBR , our Slavery and human trafficking statement and our Conflict minerals report
GRI 415: PUBLIC POLICY			
415-1	Political contributions	Y	As a matter of policy we will not make political contributions to political parties, elected officials or candidates for election, see the Our approach to political engagement section on page 51 of the SBR
GRI 416: CUSTOMER HEALTH AND SAFETY			
416-1	Assessment of the health and safety impacts of product and service categories	N	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	N	
GRI 417: MARKETING AND LABELING			
417-1	Requirements for product and service information and labelling	N	
417-2	Incidents of non-compliance concerning product and service information and labelling	N	
417-3	Incidents of non-compliance concerning marketing communications	N	

Disclosure number	Disclosure title	2019 inclusion	Location
GRI 418: CUSTOMER PRIVACY			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	N	
GRI 419: SOCIOECONOMIC COMPLIANCE			
419-1	Non-compliance with laws and regulations in the social and economic area	N	