

VODAFONE GROUP REVOLVING DOORS STATEMENT

Introduction

In April 2018, Vodafone introduced a new practice in regard to the employment of people who have previously worked in government or the public sector before joining our team.

To address any potential conflict of interest, Vodafone has introduced a global approach which mandates a minimum “cooling off” period. For the first six months of their employment at Vodafone, any new hires from the government or public sector may not work directly with former colleagues or with the departments in which they worked in their previous role.

Please find the full statement of practice below.

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Vodafone recognises that potential (or perceived potential) conflicts of interest can arise when Vodafone or its subsidiaries hire people whose most recent prior employment was in a government or other public sector role. The potential for a perceived or actual conflict of interest is particularly acute if the individual is subsequently employed by Vodafone to work on projects that are directly relevant to their previous role.

We believe that every individual should be free to apply their skills – and choose who they work for – as they see fit. However, we also believe it is important to have rules in place to ensure that former government or other public sector employees do not have undue influence over, or inappropriate levels of access to, their former colleagues on relevant issues.

Vodafone has therefore introduced a mandatory global approach that prohibits former government or other public sector employees from working on projects for Vodafone that are relevant to their former role, from engaging directly with any former colleagues, or from interacting directly with departments or other bodies with whom they worked in their previous role. This formal “cooling off” period lasts a minimum of six months or for the duration of any local market government or public sector “purdah” rules, whichever is the longer. It applies to all employees at all levels.

Ends.