



Vodafone Group Sanctions & Trade Controls 2021 statement

Vodafone is legally obliged to comply with applicable laws in the countries in which it does business. Vodafone's Global Sanctions and Trade Controls policies apply to Vodafone Group Plc and all its subsidiaries including any companies and joint ventures in which Vodafone Group Plc has a direct or indirect interest of 50% or more, or management control.

Vodafone has established sound internal compliance programmes for its Sanctions and Trade Controls compliance frameworks which include global policies, senior management engagement and ongoing assessment mechanisms to verify that the key controls are being adhered to. Our frameworks are designed to help mitigate the risks of breaching UK, EU, US or other locally applicable sanctions and trade controls legislation.

Vodafone's Sanctions compliance programme includes specific control requirements in respect of both direct and indirect relationships in high risk and sensitive countries or regions, against which comprehensive sanctions or other restrictions have been imposed by relevant jurisdictions. .

Vodafone has established global processes and procedures in relation to classification, export control review, licensing and screening. The Trade Controls compliance programme framework sets out key controls to ensure that dual-use goods are appropriately reviewed prior to export to ensure that they will be sent under licence if required and in compliance with the licence conditions.

Consistent with its purpose of enabling connectivity for all but through responsible growth, Vodafone has embedded the requirement for good trade controls and sanctions governance within its Code of Conduct. Vodafone continues to be passionate about fostering a culture of compliance not just internally but externally and assures its clients, partners and suppliers of its serious commitment to comply with applicable trade controls and sanctions regulations.

For more information on Vodafone's approach to Sanctions and Trade Controls, please refer to our [code of conduct](#). To understand the obligations that we place on our suppliers, please refer to our [sanctions and trade supplier policy](#). In accordance with Vodafone's obligations as a US listed company, we also comply with SEC's requirements, we report any Iranian activities on an annual basis. Our Iran notice can be found within our [20-F](#).