



Vodafone Responsible Minerals Statement



Our commitment

Vodafone believes in supporting the responsible sourcing of minerals globally.

Vodafone has a responsibility to respect human rights and honour the principles of internationally recognised human rights.

We recognise the risks associated with the sourcing of certain minerals used throughout the global electronics industry. We strive to ensure that we do not contribute to conflict, nor by any means profit from, or contribute to, any forms of torture, inhumane treatment, forced labour, child labour, human rights violations, or other serious violations of international human rights and humanitarian law, crimes against humanity or genocide related to the sourcing of these minerals.

While our ability to influence the manufacturing of materials, parts, ingredients or components of electronic equipment in our supply chain remains limited, we expect our suppliers to take steps to ensure conflict minerals are not used in any of the equipment related to our supply chain. We also continue to monitor the extent of human rights risks relating to conflict minerals and cobalt within our supply chain.

This Responsible Minerals Statement addresses the responsible sourcing of minerals in many of the products we sell, where we significantly influence the design or their manufacture. It focuses on the following “Relevant Minerals”: tin, tungsten, tantalum and gold (together known as “conflict minerals” or 3TG metals), and cobalt.

We want to make sure that our use of Relevant Minerals does not directly or indirectly finance conflict or benefit armed groups, contribute to gross human rights violations and abuses and other risks identified in the *OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas* (OECD Due Diligence Guidance), including those located in the Democratic Republic of the Congo or an adjoining country (the “Covered Countries” defined by the US Securities and Exchange Commission’s Conflict Minerals Rule).

However, we recognise that eliminating the acquisition of Relevant Minerals from conflict-affected and high-risk areas may cause economic harm and risk further endangering vulnerable people. Therefore, we do not explicitly ban or stop our suppliers from sourcing from conflict-affected and high-risk areas including the Covered Countries. Instead, we support the use of verified, responsibly mined Relevant Minerals which we consider to responsibly sourced (“Responsible Minerals”).



Due diligence

We comply with the relevant Conflict Minerals Regulations, including the US Securities and Exchange Commission's Conflict Minerals Rule. Our due diligence measures conform to the Five-Step Framework for Risk-Based Due Diligence described in the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance.

We strive to use Relevant Minerals whose source can be traced to smelters and refiners that conform with the Responsible Minerals Initiative's Responsible Minerals Assurance Process (RMAP). We work with our suppliers and industry bodies such as the Responsible Minerals Initiative to collectively identify and verify smelters and refiners as conformant.

Our procedures help to ensure that Relevant Minerals can be traced back to their source smelter or refiner and that this information is made public.

If we identify products that contain Relevant Minerals sourced from smelters or refiners that are not conformant with RMAP requirements, we will work with the supplier that reported sourcing minerals from these smelters or refiners to:

- a. Encourage the smelters or refiners to participate in the RMAP process; or
- b. Remove the non-conformant smelters or refiners from the supply chain.

We will not knowingly contract with a supplier for new products if that supplier has non-conformant smelters in its supply chain until this issue is resolved. We will not work with suppliers who refuse to cooperate with our due diligence measures or those who refuse to commit to eliminating non-conformant smelters from their supply chain.

Engaging with suppliers

We embed our approach into contractual and working relationships with suppliers that provide us with products which contain Relevant Minerals where we have influence over the design of the products we are buying.

Suppliers must provide us with information to support our due diligence and fulfil our reporting obligations to the relevant authorities. Suppliers must work in good faith to source Relevant Minerals responsibly, but must not place an embargo on conflict-affected and high-risk areas which could further undermine local economies.

Vodafone may terminate its relationship with any supplier failing to meet these requirements if the supplier does not take action to remedy the situation.



Application of this statement

This Responsible Minerals Statement applies to all Vodafone employees, contractors and direct suppliers. All suppliers must also conform to our supplier policies such as the Code of Ethical Purchasing located here. The Vodafone Group Chief Commercial Officer is accountable for the implementation of this Statement.

Dated 18. May 2021

The [Disclosure Committee](#) reporting to the Chief Executive and Chief Financial Officer has approved this statement.

* Definition of “Conflict Minerals”: As defined by the US legislation, currently include the metals tantalum, tin, tungsten and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively. Downstream companies often refer to the extracts of these minerals as 3TG. (Source: RMI)