

Balancing our responsibilities

Government Disclosures Transparency Report



Executive summary

Transparency is essential for a trusted digital society

Connectivity is an essential part of our lives. Through our services, Vodafone helps customers make the most of connectivity – from keeping in touch with family and friends, creating, learning, and playing, through to growing businesses and transforming public services.

As a result, personal communication today plays a fundamental role in underpinning human rights such as expression, privacy, liberty and security. It enables the free exchange of ideas, secure interactions, effective organisation and advocacy. At Vodafone, we recognise that the right to privacy is the cornerstone for how we treat network traffic. Wherever we operate, we are committed to protect and promote human rights for our customers, colleagues, and communities.

This is not always easy. The telecommunications sector – including Vodafone – continues to face challenges, including potential human rights abuses linked to law enforcement requirements. These may include targeted attempts to intimidate or suppress political opponents, minorities, or human rights activists. Such law enforcement assistance (LEA) requirements are sometimes deemed domestically lawful.

Operators and their employees could face criminal charges for non-compliance, putting our employees at risk of both legal censure and physical harm. Democracy and the rule of law is increasingly under threat or even in retreat in some countries – we are concerned that individual freedoms are becoming further circumscribed or restricted, including the ability of citizens to use the power of communication for their freedoms.

On the other hand, we equally believe that law enforcement, when correctly applied, helps ensure the rights of the many are not undermined by the unlawful activities of the few. Criminals use connectivity and the various applications and social media platforms it enables to commit awful acts like terrorism, human trafficking, or sexual offences. Criminality not only impacts victims and their families, but can also can undermine citizens' confidence in the rule of law. In turn, this can erode trust in a properly functioning society. This is why governments require operators to assist law enforcement agencies in combatting crime and protecting victims as part of their state-granted licences. When applied correctly within a fair and transparent legal framework, law enforcement assistance plays a valuable role in societies.

**Overview**

- 1 Executive summary
- 2 Introduction to Vodafone
- 3 Respecting Human Rights
- 4 Our vision

Context

- 5 Agencies' use of data
- 7 Governance
- 11 Case studies

Data

- 15 Data and disclosures

Of course, Vodafone is just one among many private and public players in the LEA ecosystem. When faced with conflicting requirements, we seek ways to honour the principles of international human rights. We are grateful to the courageous individuals and organisations seeking to improve human rights, often under extraordinarily challenging circumstances and at high personal risks. We hope that this renewed Transparency Report helps them bring further awareness to the topic and enriches the much-needed conversation about best practices.

Joakim Reiter

Chief External and Corporate Affairs Officer

Human rights: In this report, human rights refers to those rights articulated in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Introduction to Vodafone

Our purpose is to connect for a better future.

We aim to create a digital society where everyone can thrive. As one of the largest European and African telecoms companies, we acknowledge our unique position to support making the world a better place.

Vodafone is a leading European and African telecommunications company transforming the way our customers live and work through our technology, platforms, products and services.



For more information about Vodafone's Purpose strategy, see our Annual Report



Empowering People

We want everyone to fully benefit from the digital society, regardless of who they are or where they live. We aim to close digital divides and help our customers benefit fully from digitalisation. We support communities, especially those in need, leaving no-one behind.



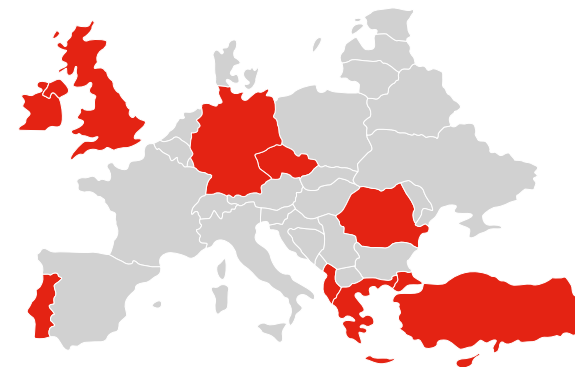
Protecting the Planet

We seek to protect the planet and enable our customers to do the same. We strive to reduce carbon emissions and achieve net zero from our operations and value chains. We contribute to the circular economy and empower our customers to reduce their environmental footprint.



Maintaining Trust

We strive to deliver our services securely and responsibly and earn the trust of our customers in everything we do.



9
countries

98m
mobile customers

17m
fixed customers



6
countries

157m
mobile customers

Respecting Human Rights

Respecting
Human Rights

Respect and support for human rights is embedded in our company's culture. This means protecting the communities we serve, as well as keeping our employees safe.



Read our Human Rights Policy Statement here
vodafone.com/human-rights-policy-statement

Communication rights address both “freedom of opinion and expression” and rights and freedoms “without distinction of ... language” (United Nations, 1948) and have been enshrined in multiple international conventions and declarations.

We seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We aim to ensure that we are not, directly or indirectly, in any way complicit in human rights abuses.

This report sets out some of the ways that we seek to prevent and mitigate human rights harms relating to LEA requests, including through our human rights policy, due diligence, and governance processes. It describes our view of how LEA should function in a manner that respects human rights. In the countries we operate in, we will use this report to advocate for a transparent, rights-respecting LEA request framework with governments, regulators and other third parties.

Vodafone believes that responsible operators must strive to respect human rights, including when meeting law enforcement obligations. We recognise that some law enforcement requests occur in societies where the domestic legal framework does not align with our views on what is required to protect human rights. Requests also happen in circumstances or contexts where human rights safeguards are not respected by law enforcement or other authorities. This threatens people's privacy or freedom of expression. Notwithstanding, we always endeavour to honour the principles of human rights, even where local law does not.

We believe that providing telecommunications services supports digital inclusion and human rights, as well as the UN

Sustainable Development Goals. In many countries, legal safeguards ensure that operators receive requests that respect human rights and are relevant, necessary, proportionate, and transparent. For example, local law may provide for independent judicial oversight of, or the application of human rights tests to, the use of those powers. However, there are still countries where Law Enforcement Agencies ('Agencies')¹ have wide ranging powers that can have a substantially negative impact on human rights. In some cases, Vodafone's freedom to discuss or disclose specific regimes is itself restricted by law. In those cases, and to the extent possible, we try to engage the government to encourage more transparency of the legal requirements.

As part of our due diligence process for potential new markets, we always evaluate that country's respect for human rights, how local law would affect our ability to comply with our human rights policy, and how we can mitigate the risk of negative human rights impacts. These are complex evaluations. In some countries, where telecommunications infrastructure is underdeveloped and/or dominated by a state operator, the introduction of our services can improve the lives and human rights of citizens.

Of course, the human rights issues discussed in this report are not static. As with our technology, the underlying geopolitical and political factors constantly evolve. We therefore commit to keep our actions under review and to aim for continuous improvement.

Note:

1. A Law Enforcement Agency is any government agency responsible for law enforcement within a specific jurisdiction.

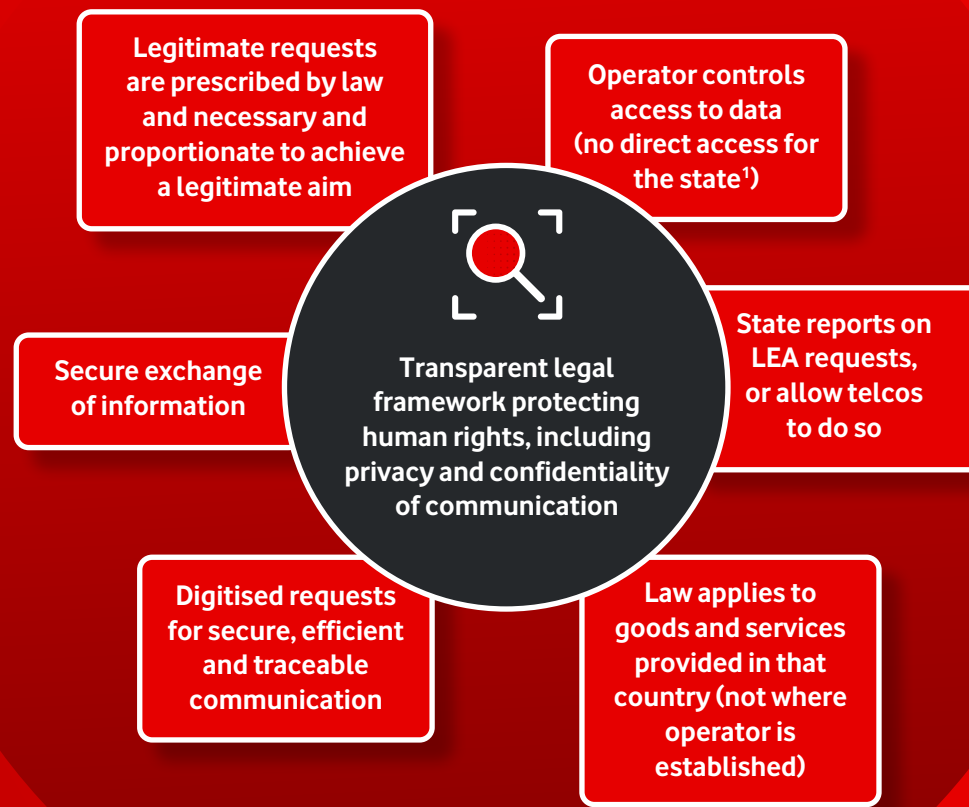
Building responsible and effective law enforcement assistance

Our vision of an optimal, human-rights respecting framework for law enforcement assistance

“It is vital that investigatory powers are properly regulated and subject to appropriate safeguards and oversight”

Ministerial foreword, UK Home Office Consultation on revised notices regimes in the Investigatory Powers Act 2016

For Vodafone, effective and responsible cooperation between Agencies and communications providers would operate under the following ideal principles:



Note:

1. Direct access means the right and ability for authorities to access mobile operators' data streams directly, instead of via a request to the operator. In markets where we are obligated to allow direct access, Vodafone does not have visibility of the extent of any surveillance and cannot provide statistics. Given the risk of human rights abuses, it is Vodafone's view that understanding the level and nature of surveillance is in the public interest. This is particularly the case in respect of the direct access to, and use of, real-time communications.

Context

What do Agencies want from operators and why?

Agencies frequently seek access to data to progress their investigations. They typically make two types of requests:

Communications Data

Requests for the metadata retained on our systems. This is the information about a communications event and can include information like the users' identifier (e.g. an IP address or a telephone number), the timestamp and duration of a call, the location of the device when a call was made, and details about the registered subscriber of a number, but not the content of the communication itself.

Lawful Intercept

This is a more intrusive but less common type of request, where Agencies seek access to the content of the communication. It is intercepted during its transmission, together with real-time location data.



Context continued

How do Agencies use data?

Law enforcement officers use communications data and lawful intercept to investigate serious crimes and to tackle national security threats. The data that Vodafone discloses can provide invaluable insights to investigators about suspects' movements and activity. When disclosed in a timely manner, it can support law enforcement to apprehend dangerous suspects and disrupt crimes in progress like kidnaps and armed robberies. It can also be used to prosecute offences and ensure that victims have the crimes committed towards them heard in a court of law. As such, our data can be key to preventing major national incidents, saving lives, and upholding rule of law.

We urge all governments to publish the detail of their LEA systems and to provide meaningful data on their use for citizens to see. This is necessary to ensure full accountability or effectively monitor respect for human rights and the rule of law. Although domestic law sometimes inhibits our ability to do this, Vodafone remains committed to the greatest possible clarity and transparency of our role in LEA.

“Access to data related to internet and electronic communications has become an essential part of most criminal investigations¹”

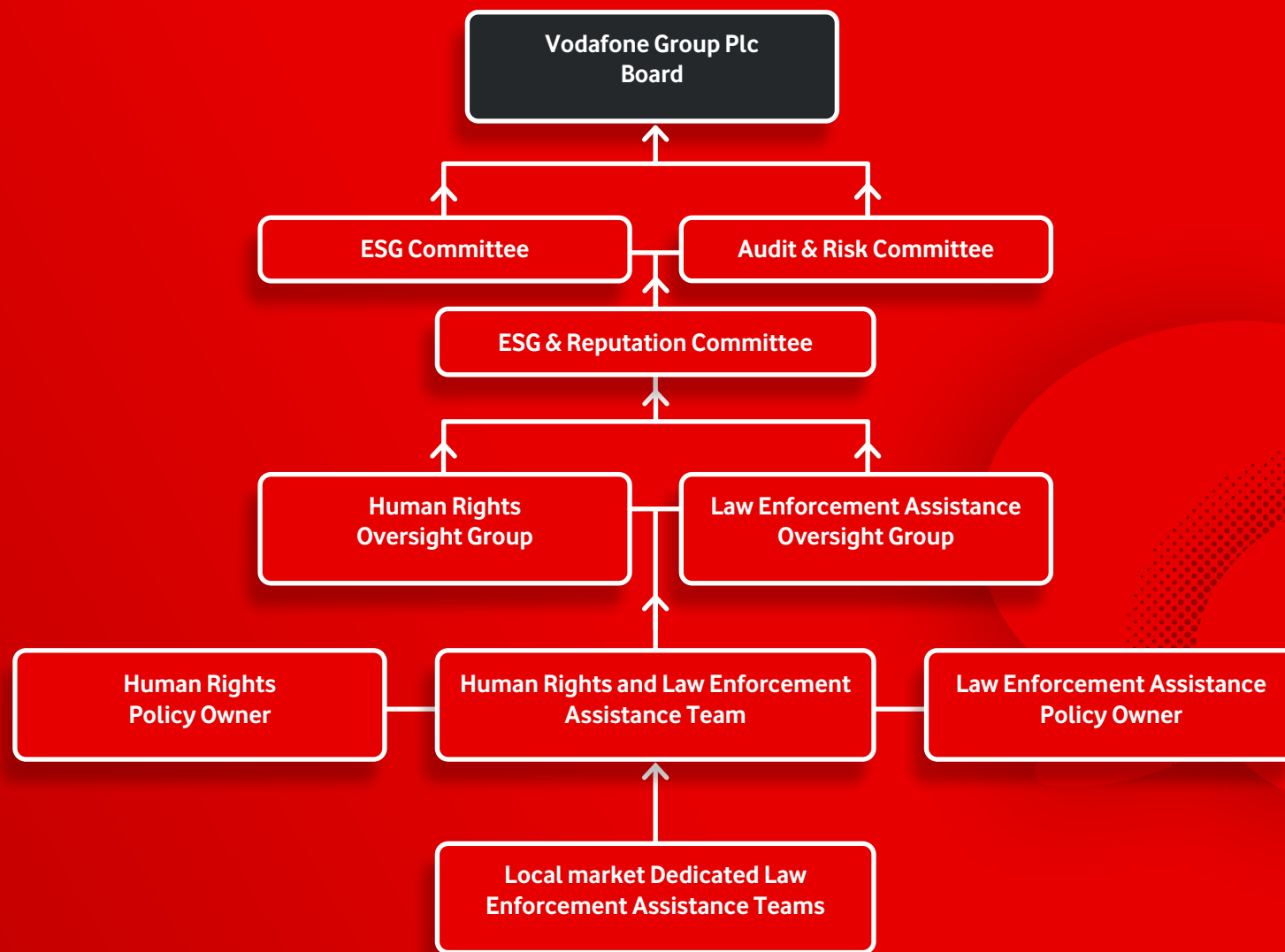
Note:

1. Note from the Presidency of the Council of the EU to the Coordinating Committee in the area of police and judicial cooperation in criminal matters. Subject: Going Dark: Justice perspective

Governance framework

How is Vodafone's law enforcement assistance provided and supervised?

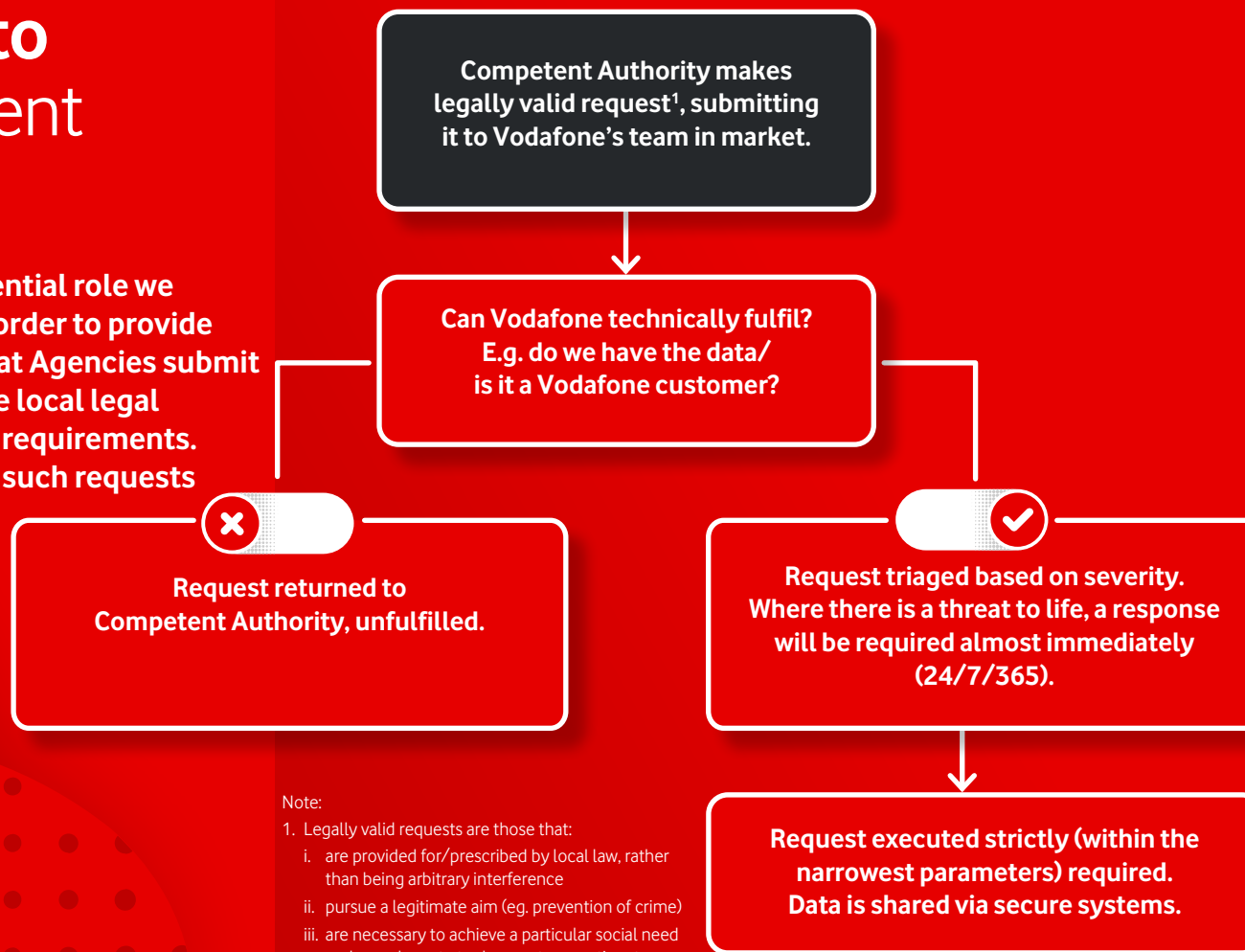
We have robust procedures in place to ensure that we both meet our law enforcement assistance obligations and respect human rights. Our activities have a line of oversight to two of the Executive Committee sub-committees, and the board of Vodafone Group Plc.

> 200specialist
employees**24/7/365**Our teams are available
24 hours a day,
365 days a year

Governance structure

Responding to law enforcement requests

While we recognise the essential role we play in combatting crime, in order to provide information, it is essential that Agencies submit requests in accordance to the local legal frameworks and governance requirements. Failure to do so, will result in such requests being rejected by Vodafone.



While crimes and security threats do not respect borders, there is no global legal framework governing these investigative techniques or our ability to report on them. In each country where we operate, we employ local teams of specialists and lawyers to ensure that any law enforcement assistance is both lawful and limited to only the data required for the Agencies to do their job. We undertake in-depth due diligence on the legislative regimes of every country in which we operate, ensuring that we understand the legal framework and can identify any potential misalignment between Vodafone's values, human rights, and local law.

Vodafone receives little or no information about the context of most requests. It is therefore critical that our governance process is followed, to ensure that we only share the information that is strictly required and has been requested in accordance with local law.

Governance structure

Law enforcement assistance that respects rights

We understand the value of Vodafone's role in supporting lawful requests for assistance as part of fighting crimes within our societies. However, we are only one participant in a large ecosystem. Human rights are best protected when all parts of the ecosystem participate responsibly and operate under clear, proportionate, and transparent legal frameworks.

Notes:

1. Typically, nonprofit organisations formed independent of government, to provide services or advocate a public policy.
2. Independent bodies established under local law, to promote and protect human rights at national level.

Non-governmental organisations¹ and citizens' voice
Engage with other ecosystem players and hold them to account.

App and platform providers
Also comply with lawful requests whilst respecting privacy.

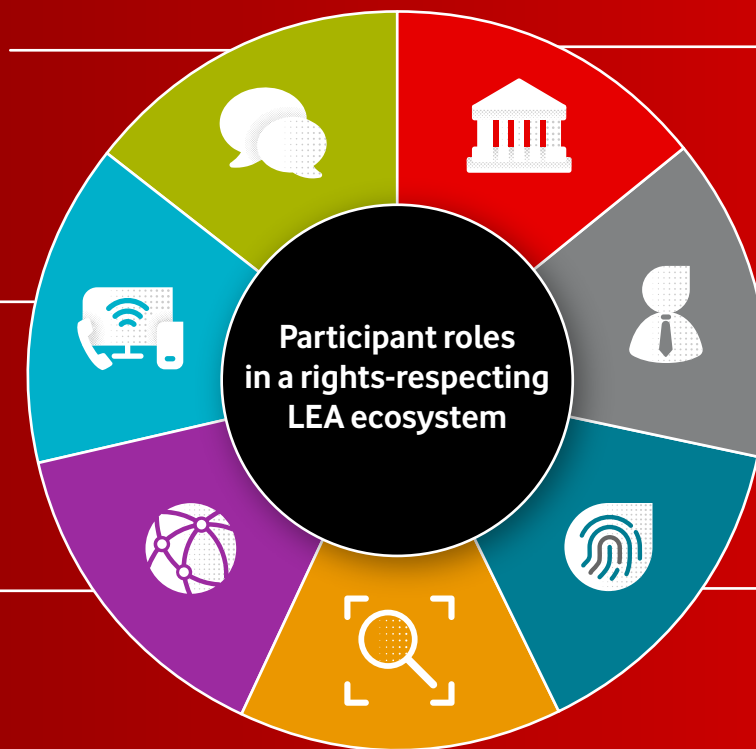
Communications network providers
Comply with lawful requests, never disclosing more than is necessary.

Oversight bodies
Including regulators and National human rights institutions² hold ecosystem participants to account for complying with the law.

Governments
Establish legal frameworks that are consistent with international human rights law. They should publish data on the exercise of these rights by Agencies.

Judiciary
Perform thorough oversight over applications for warrants (or local equivalent).

Agencies
Make only legal, proportionate and necessary requests, via due processes.



Privacy and law enforcement principles

Law enforcement assistance by operators is an essential tool in combatting crime, but it must be exercised lawfully and proportionately.

Respecting our customers' right to privacy is core to Vodafone's values, so requests are dealt with in line with the following principles:

- We are committed to upholding internationally recognised human rights laws to the fullest extent possible while also meeting our obligations to comply with local laws.
- We only fulfil demands issued by an Agency or authority with the appropriate lawful mandate.
- We only fulfil demands with legally compliant form and scope.
- We do not go beyond what is required under legal due process when responding to access requests to customer data. The only exceptions are cases where there is an imminent risk to life, such as assisting the police with an active kidnapping, or where refusal to comply would put our employees at risk.
- We use specialist, highly trained and security cleared teams to handle law enforcement assistance requests.
- We handle data in secure environments. Access is restricted to those with a need to know and is strictly monitored. Respect for customer data is a fundamental obligation for all Vodafone employees.

By adhering to these principles, we seek to achieve the best balance between respect for our customers' privacy and meeting our legal obligations.

Our privacy controls are subject to rigorous and regular evidence-based testing by our privacy, risk, and compliance teams



Prague shooting case study

Collaborating with law enforcement to protect lives

Mobile phone data can be a valuable tool for solving crimes and protecting the public. This was amply demonstrated during the Prague shooting incident on 22nd December 2023.

In Czechia's capital city of Prague, 14 people were killed and 22 injured in a mass shooting on 22 December 2023, at the Charles University's Faculty of Arts. At the time of the shooting, the perpetrator was already in a circle of suspects for a recent double murder of a father and his two-month-old daughter. This position had been reached with the support of analytical work performed by Czech mobile operators including Vodafone Czechia's LEA team.

On the day of the Charles University shooting, upon request from the police and in line with Czech legal framework, Vodafone's LEA team provided information and support that allowed the police to narrow the pool of suspects under time pressure.

Experienced analysts from Vodafone's LEA team worked through extensive amounts of data, relying on long-established collaboration with the Czech police and acting within the boundaries of local law and Vodafone's human rights policy.

This case demonstrates Vodafone's approach to respecting human rights and to mitigating potential adverse impacts. Mobile operator data can contribute significantly to protecting life and health of citizens, but observing privacy requirements is equally as important. Access to data must always be justified pursuant to applicable law and processed in accordance with established standards, through secure communication lines.



South Africa case study

Helping protect wild Rhinos

South Africa is home to the world's largest rhino population and the epicentre of its poaching. Endangered black rhinos and near-threatened white rhinos are poached for their horns, which are in demand in East Asia for use in traditional medicine.

South Africa is home to the world's largest rhino population and the epicentre of its poaching. Endangered black rhinos and near-threatened white rhinos are poached for their horns, which are in demand in East Asia for traditional medicine. Whilst in some areas, Agencies and conservationists have succeeded in reducing poaching, the overall numbers continue to grow. Poachers have shifted their focus from national parks to smaller parks and reserves. Poaching often involves international and local criminal syndicates.

Vodacom South Africa has helped the South African Police Services (SAPS) to battle the illegal wildlife trade. Between January 2021 and November 2023, Vodacom South Africa helped the SAPS and the Green Scorpions, the environment management inspectorate, to identify, track and trace the individuals and groups attacking rhinos. Responding to subpoenas, the Vodacom team was able to demonstrate communication between suspects and suggest the locations in which they were most active. Once SAPS and the Green Scorpions had gathered sufficient evidence, multiple arrests were made. Thanks to the thorough investigation and integration between Vodacom, SAPS and the Green Scorpions, there was a successful conviction with one of the accused found guilty on six counts. Vodacom South Africa is proud that the efforts of its employees are contributing to the protection of wild rhinos and leaving a legacy for future generations.

“During 2023, 499 rhinos were poached across South Africa”

Barbara Creecy,
South Africa's minister of Forestry,
Fisheries and the Environment.



Political Context

Vodafone operates in **diverse** geopolitical environments

With a global footprint, Vodafone operates in diverse political and legal environments. This means that our customers' ability to freely access information and to express themselves varies across the countries in which we operate. It also means that our legal obligations, our employees' ability to challenge states safely, and the volumes and types of cases we receive vary across markets.

With national elections taking place in more than 60 countries and for the European Parliament, more voters around the world will head to the polls in 2024 than at any time in history. In election periods, at times of rising political tensions, or in outright conflict, demands for communications data and lawful interception might increase. These could be valid to protect society. For example, human trafficking can increase in times of conflict and operator data can help law enforcement fight this. But we remain alert to the risks to rights from such requests. Our commitment to complying only with lawful requests remains critical. We conduct horizon scanning to identify developments that might affect the number and nature of requests, and we continue to engage Agencies and governments to press for law enforcement assistance ecosystems that uphold human rights.

See [Law enforcement assistance that respects rights \(page 9\)](#)



Some types of organised crime are 'seasonal' in nature. Human trafficking enquiries are often higher during periods of fine weather and the Christmas period is associated with a spike in illegal wildlife trade.

Social discontent and polarisation were common themes in 2023, with many countries affected by protests, riots and strikes. We expect to see this intensify in 2024 and our local teams are alert to the challenges they may face.

Safeguarding our communities

Network shutdowns

Shutdowns continue to increase year-on-year despite international concern.¹ Vodafone continues to advocate against shutdowns due to the great and indiscriminate harms they cause. Shutdowns limit citizens' freedom of expression, potentially shielding governments from scrutiny and often isolating vulnerable communities at times of their greatest need. They prevent citizens accessing essential services such as mobile money and online education. While we must comply with such orders when compelled to do so in accordance with local laws, Vodafone urges governments to refrain from the indiscriminate use of these measures. Exceptional

circumstances or national emergencies can lead states to consider shutdowns, but the potential for significant harm makes them extremely difficult to justify.

Despite the international trend, there is also hope. In 2023, the government of the Democratic Republic of the Congo honoured its commitment to ensure unhindered internet access throughout the electoral process. We hope that this and other similar examples can help create a global standard among governments to refrain from shutdowns in the future.

Network shutdowns ('shutdowns') refer to the intentional disruption of electronic communications mandated by a government. These can be geographically targeted and therefore affect specific communities, or implemented nationally and can apply to all communications and/or specific platforms.

Note:

1. Access Now and the #KeepItOn coalition (2023), Shrinking democracy, growing violence: internet shutdowns in 2023.



Data

Scope

The information set out in this report relates to entities under the control of Vodafone Group Plc. To provide further transparency on Vodafone’s potential human rights impacts, we will seek to widen the scope of future reports.

This report sets out our LEA data for our financial years ending 31 March 2023 and 31 March 2024. In future, we will report our data annually.

Methodology

Reflecting the varying national procedures for law enforcement assistance, Vodafone’s Law Enforcement Assistance teams do not all record data in the same way. Save where specified otherwise, the data in this report should be interpreted as follows:

Disclosure	Description
Number of law enforcement requests for communications data	The total number of unique requests (warrants) received from Agencies in the reporting year (April to March) for customer information. This includes: – Customer generated information such as emails, texts, and recorded information; and – Information such as email addresses, names, countries of residence, gender and system generated data such as IP addresses and traffic data. Except where stated otherwise, each warrant may relate to multiple customers and/or pieces of information.

Number of lawful interception ('LI') requests

The total number of unique requests (warrants) received from government or Agencies in the reporting year (April to March) for the interception of communications (including the ability to view/hear their content).

The information contained in this report has not been independently verified or assured. While all reasonable care has been taken to ensure the accuracy of the data, Vodafone has not arranged for independent verification of the data with respect to its accuracy or completeness.

Interpretive Notes

The following notes apply to language used in certain data tables:

- Cannot disclose:** In some cases, although local laws do not expressly prohibit disclosure, the authorities have told us directly that we cannot disclose this information.
- Capability not enabled:** Despite the technical requirements necessary to enable lawful interception being in place, some countries have not yet enabled those capabilities.
- Disclosure unlawful:** The law prohibits disclosure of the aggregate demand information held by Vodafone, as well as any disclosure related to the mechanisms used to enable Agency and authority access. This is particularly the case in matters related to national security.
- Government/other public body publishes:** The government or a credible independent public body, such as a regulator, already publishes statistical information for certain types of demands issued to all operators in that country. Wherever this is the case, we highlight relevant sources.
- Unable to obtain guidance:** The law on disclosure is unclear and we have been unable to engage with the government or a relevant Agency or authority to discuss options for publication. This could be during a period of political tension or where disclosure could expose our employees to consequent risk.

Data continued

New shape of the Group

Following the announced sale of Vodafone Spain and Vodafone Italy as part of right-sizing our portfolio for growth, both businesses are now treated as discontinued operations. In the interests of transparency about the LEA activities of Vodafone Group Plc during the reporting period, all LEA data is included in this report disaggregated between our continuing and discontinued operations at 31 March 2024.

Democracy Index and Freedom Scores

Democracy index means the Economist Intelligence Unit's Democracy Index (2023) score, which provides a snapshot of the state of democracy in 165 independent states and two territories. The rating is on a scale of 1 – 10, with 10 being the most democratic.

Global Freedom Status means the status from the Freedom House 'Freedom in the World' Index (2024). This index evaluates the state of freedom in 195 countries and 15 territories during calendar year 2023. Global freedom statuses are calculated on a weighted scale, with a maximum total possible score of 100. The combination of the overall score awarded for political rights and the overall score awarded for civil liberties, after being equally weighted, determines the status of Free, Partly Free, or Not Free. Further is available on the [Freedom House Website](#).

Internet Freedom Score means the score from the Freedom House 'Freedom on the Net' Index (2023). This index measures 70 countries' level of Internet and digital media freedom, as well as the access and openness of other digital means of transmitting information. The overall score determines the status of Free, Partly Free, or Not Free. Further is available on the [Freedom House Website](#).

Data continued

Data by Market

Continuing operations

Albania		
Democracy Index – overall score	6.3	
Freedom House – Global Freedom Status	68 (Partly Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information	3,353	3,404
Number of Lawful Interception ('LI') requests	Disclosure unlawful	Disclosure unlawful

Czech Republic		
Democracy Index – overall score	8.0	
Freedom House – Global Freedom Status	94 (Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information ¹	278,407	261,332
Number of Lawful Interception ('LI') requests	6,853	6,883

Note:
1. In Czech Republic, each IMEI number subject to a request requires a unique warrant.

Data continued

Democratic Republic of Congo (DRC)

Democracy Index – overall score	1.68	
Freedom House – Global Freedom Status	19 (Not free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information	1,631	1,259
Number of Lawful Interception ('LI') requests	0	0

Egypt

Democracy Index – overall score	2.9	
Freedom House – Global Freedom Status	18 (Not free)	
Freedom House – Internet Freedom Score	28 (Not free)	
	2023	2024
Number of law enforcement requests for information	Disclosure unlawful	Disclosure unlawful
Number of Lawful Interception ('LI') requests	Disclosure unlawful	Disclosure unlawful

Germany

Democracy Index – overall score	8.8	
Freedom House – Global Freedom Status	93 (Free)	
Freedom House – Internet Freedom Score	77 (Free)	
	2023	2024
Number of law enforcement requests for information ¹	Call Data: 63,565 Subscriber Data ² : 51,354	Call Data: 65,143 Subscriber Data ² : 37,731
Number of Lawful Interception ('LI') requests ³	41,938	48,414

Government/other public body publishes: Ministry of Justice: BfJ - Justizstatistiken ([bundesjustizamt.de](https://www.bundesjustizamt.de))

Notes:
1. Request through automated interface not included
2, 3. Number of intercepted lines / subscribers

Data continued

Greece

Democracy Index – overall score	8.1
Freedom House – Global Freedom Status	85 (Free)
Freedom House – Internet Freedom Score	Not evaluated

	2023	2024
Number of law enforcement requests for information	Government/ Other body publishes	Government/ Other body publishes
Number of Lawful Interception ('LI') requests	Government/ Other body publishes	Government/ Other body publishes

The Hellenic Authority for Communication Security and Privacy (ADAΕ) publishes [annual reports](#) related to lawful interception and communications data demands issued by agencies and authorities.

Ireland

Democracy Index – overall score	9.2
Freedom House – Global Freedom Status	97 (Free)
Freedom House – Internet Freedom Score	Not evaluated

	2023	2024
Number of law enforcement requests for information	1,883	984
Number of Lawful Interception ('LI') requests	Cannot disclose	Cannot disclose

Lesotho

Democracy Index – overall score	6.1
Freedom House – Global Freedom Status	66 (Free)
Freedom House – Internet Freedom Score	Not evaluated

	2023	2024
Number of law enforcement requests for information	2,354	3,670
Number of Lawful Interception ('LI') requests	Capability not enabled	Capability not enabled

Mozambique

Democracy Index – overall score	3.5
Freedom House – Global Freedom Status	44 (Partly Free)
Freedom House – Internet Freedom Score	Not evaluated

	2023	2024
Number of law enforcement requests for information	Unable to obtain guidance	Unable to obtain guidance
Number of Lawful Interception ('LI') requests	Capability not enabled	Capability not enabled

Data continued

Portugal

Democracy Index – overall score	7.8	
Freedom House – Global Freedom Status	96 (Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information ¹	27,961	23,069
Number of Lawful Interception ('LI') requests ²	3,945	3,666

- Notes:
- 1. In Portugal, it is common practice for certain types of law enforcement requests to be addressed to all local operators. The volume of requests reflects this practice (Vodafone does not hold (and will never have held) data relating to all warrants).
 - 2. Reflects the number of LI targets (MSISDN or IMEI)

Romania

Democracy Index – overall score	6.5	
Freedom House – Global Freedom Status	83 (Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information	Disclosure unlawful	Disclosure unlawful
Number of Lawful Interception ('LI') requests	Disclosure unlawful	Disclosure unlawful

South Africa

Democracy Index – overall score	7.1	
Freedom House – Global Freedom Status	79 (Free)	
Freedom House – Internet Freedom Score	73 (Free)	
	2023	2024
Number of law enforcement requests for information	32,259	23,371
Number of Lawful Interception ('LI') requests	498	546

Tanzania

Democracy Index – overall score	5.4	
Freedom House – Global Freedom Status	36 (Partly Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information	14,094	23,669
Number of Lawful Interception ('LI') requests	Disclosure unlawful	Disclosure unlawful

Data continued

Turkey		
Democracy Index – overall score	4.3	
Freedom House – Global Freedom Status	33 (Not Free)	
Freedom House – Internet Freedom Score	30 (Not Free)	
	2023	2024
Number of law enforcement requests for information	Disclosure unlawful	Disclosure unlawful
Number of Lawful Interception ('LI') requests	Disclosure unlawful	Disclosure unlawful
United Kingdom		
Democracy Index – overall score	8.3	
Freedom House – Global Freedom Status	91 (Free)	
Freedom House – Internet Freedom Score	79 (Free)	
	2023	2024
Number of law enforcement requests for information	Government/ Other body publishes	Government/ Other body publishes
Number of Lawful Interception ('LI') requests	Government/ Other body publishes	Government/ Other body publishes

Data continued

Discontinued operations

Italy		
Democracy Index – overall score	7.7	
Freedom House – Global Freedom Status	90 (Free)	
Freedom House – Internet Freedom Score	75 (Free)	
	2023	2024
Number of law enforcement requests for information	56,975	54,046
Number of Lawful Interception ('LI') requests	31,919	28,533
Spain		
Democracy Index – overall score	8.1	
Freedom House – Global Freedom Status	90 (Free)	
Freedom House – Internet Freedom Score	Not evaluated	
	2023	2024
Number of law enforcement requests for information	145,782	151,314
Number of Lawful Interception ('LI') requests	9,579	9,881