



VODAFONE US INC.

Accessibility Plan

Progress Report

2025

This accessibility plan progress report can be found at: <https://www.vodafone.com/about-vodafone/where-we-operate/vodafone-markets/vodafone-in-the-americas>.



Table of Contents

1.0 General	1
a. Introduction	1
b. Feedback Process	1
Accessibility Statement	2
2.0 Policies, Procedures, Programs and Services	2
a. Employment	3
b. Built Environment	3
c. Information and Communication Technologies	3
c.1 Communication, other than Information and Communication Technologies	3
d. Procurement of Goods, Services and Facilities	3
e. Design and Delivery of Programs and Services	4
f. Transportation	4
3.0 Consultations	4
4.0 Feedback	4
a. Accessibility Coordinator	4
b. Feedback Received	5
5.0 Appendices	5
Appendix A – ACA Section 6, Principles	5



1.0 General

a. Introduction

This Progress Report has been prepared in accordance with the requirements of the Accessible Canada Regulations: SOR/2021-241 and Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations: SOR/2021-160 under the Accessible Canada Act (“ACA”).

The regulations under the ACA require that Vodafone US Inc. (“Vodafone”) publish a Progress Report concerning the implementation of its Accessibility Plan. This progress report, dated June 1, 2025, is publicly available, including in an accessible format upon request.

b. Feedback Process

Vodafone has a procedure for receiving and responding to feedback, including comments on how services are delivered to persons with disabilities.

You can provide accessibility feedback (including feedback on this Progress Report) or request an alternate format of our Accessibility Plan or description of our feedback process in a number of ways, including, by:

- Phone: +1 720 498 3063
- Email: bryan.ganno@vodafone.com
- Regular mail: 1615 Platte Street, Suite 02-115, Denver, CO 80202
- For more information visit www.vodafone.com/accessibility

The person responsible for receiving accessibility feedback at Vodafone is the Compliance Manager. Feedback can be provided anonymously and will be treated confidentially, unless the submitter specifically consents to the disclosure of such information.

In addition, Vodafone will provide a copy of this Plan to any member of the public upon request, and in alternative formats including print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the parties agree upon. Requests for copies can be sent to bryan.ganno@vodafone.com.



Principles of the ACA

Vodafone's Accessibility Plan, and this Progress Report, has been written in accordance with principles set out in the ACA (see Appendix A).

VODAFONE US INC. Overview

Vodafone US Inc. provides hundreds of customers in the US and around the world technology and telecommunication services such as wireless, fixed, hardware and platforms.

In the Americas region, which consists of the United States, Canada, and Latin America, Vodafone:

- Is focused on delivering fixed and wireless solutions to multinational customers.

We deliver and manage services in various languages and countries from our state-of-the-art worldwide communications network.

Accessibility Statement

Vodafone US Inc. is committed to treating all people in a way that allows them to maintain their dignity and independence. Our purpose is to advance how people connect with each other and the world – including persons with disabilities. An important part of doing this is to identify and remove barriers persons with disabilities encounter.

2.0 Policies, Procedures, Programs and Services

Vodafone delivers its services to Enterprise Business Customers and is committed to making its services accessible in a way that promotes equality and strives to prevent and remove barriers that limit equitable access to all people. We are dedicated to meeting the needs of persons with disabilities effectively and efficiently in order to create an accessible user and employee experience. The Plan provides guidance for the development of Vodafone's processes and procedures related to the implementation of products, services and platform engagements. Vodafone supports the principles contained in the ACA and considers the principles detailed in Appendix A as it continues to implement its Plan.



a. Employment

The Plan applies to all Vodafone employees responsible for developing, designing, managing, maintaining and auditing Vodafone's websites, website portals, mobile applications, products and services.

To further implement its Plan, Vodafone incorporates harassment prevention training into its annual training programs intended to reinforce the company's commitment to the principles above. Further, Vodafone Group employs an Accessibility team to assist employees in understanding disability awareness, ensuring access on workplace accommodations.

b. Built Environment

Vodafone does not operate retail locations within Canada and maintains two network locations within the country, which it rents. In order to ensure equitable access to its network locations, Vodafone utilizes third parties who must adhere to Vodafone's Supplier Code of Conduct, which clearly identifies its principles and requirements governing accessibility for its suppliers.

c. Information and Communication Technologies

Vodafone delivers managed connectivity, communications and security solutions to its enterprise business customers. The company's advanced communications services and products are accessible by persons with disabilities. That said, Vodafone continues to identify barriers and implement measures consistent with the principles of the ACA and its Plan.

c.1 Communication, other than Information and Communication Technologies

Vodafone works closely with its partners and internal creative teams to ensure our digital brand presence and advanced communications services and products adhere to accessibility guidelines and requirements so that persons with disabilities can access and understand all of the critical information therein.

d. Procurement of Goods, Services and Facilities

Vodafone requires all of its underlying providers to comply with a Supplier Code of Conduct, and its procurement team takes proactive measures to enable businesses owned by minorities, women, veterans and service-disabled veterans, to fully participate as an integral part of our supplier base. To further address barriers, the company continually evaluates its accessibility requirements and Supplier Code of Conduct to meet the standards contained in this Plan.



e. Design and Delivery of Programs and Services

The Plan applies to Vodafone's information and telecommunications services including VoIP data services, internet access services, equipment sales and security services and the tools that support the services, including but not limited to: websites, connection portals and detailed services specifications. Additionally, these obligations extend to telecommunication services or products Vodafone may acquire from a third-party provider. Vodafone strives to ensure its products and services are routinely enhanced to provide more accessibility. Vodafone employs compliance checklists in accordance with industry guidance to be utilized before any new product, service or update is deployed in order to ensure and optimize accessibility.

f. Transportation

Transportation, as identified in the ACA, does not currently apply to Vodafone US Inc. as it neither maintains vehicles nor has any employees within Canada. However, any third-party contractors utilized by Vodafone, within Canada, must adhere to Vodafone's Supplier Code of Conduct policy, which clearly identifies its principles and requirements governing accessibility for its suppliers.

3.0 Consultation

As part of developing Vodafone's Progress Report, it engaged in consultation of its employees, particularly members of Vodafone Group's various accessibility functions throughout the world to ensure best practices are implemented and built upon.

4.0 Feedback

a. Accessibility Coordinator

Vodafone's Compliance Manager is responsible for responding to comments and inquiries regarding the Plan.

b. Feedback Received

At the time of this Progress Report, Vodafone's Compliance Manager has received no comments, complaints or inquiries regarding its published plan. Vodafone is prepared to provide a copy of its Plan to any member of the public upon request and in alternative formats that the parties agree upon. Requests for copies can be sent to bryan.ganno@vodafone.com



5.0 Appendices

Appendix A – ACA Section 6, Principles

In preparing this Accessibility Plan Progress Report, we have taken into account the principles set out in section 6 of the ACA.

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.