Assurance

Implementation of the anti-bribery policy is monitored regularly in all local markets as part of the annual Group assurance process, which reviews key anti-bribery controls. This year we completed our end-to-end testing with respect to our businesses in Spain and Mozambique. Further to this, self-assessments and quality reviews were completed in Albania, Italy, Portugal, DRC, Germany, Ireland and South Africa. We tested key high-risk areas of the policy to ensure the markets are implementing the controls effectively. The key outcomes from the assurance activities and actions for the programme for the coming year are documented in the annual assurance paper, which is issued to the Group Risk and Compliance Committee.

The results demonstrate good implementation of the Anti-bribery programme. The markets demonstrated that they have strong robust controls in place to manage bribery risks. A recurring focus area across a few markets is third-party risk management; necessary action plans have been put in place to improve this area.

Fraud

Fraud is a growing threat globally, impacting customers, reputation, and financial performance. The Executive Committee and the Audit and Risk Committee have recognised this through significant investment and focus on developing a future-ready fraud management capability to mitigate the risk of fraud to continue to provide a safe and secure environment for our customers.

We successfully implemented a global organisation and operating model, including a fraud centre of excellence and shared services infrastructure, to manage fraud across local markets, share intelligence, and leverage best practices, to ensure quick and effective responses to any incidences of fraud that may occur and achieve real-time and proactive fraud risk management.

We have invested in advanced fraud detection technologies that leverage artificial intelligence capabilities, which have delivered proven benefits across Vodafone by helping us detect and manage fraud's impact more effectively.

External ESG assurance

KPMG LLP has provided independent limited assurance over selected data within our ESG Addendum and this report, using the assurance standard ISAE (UK) 3000 and ISAE (UK) 3410 for selected greenhouse gas data. KPMG has issued an unqualified opinion over the selected data and their full assurance statement, along with the reporting criteria, is available on our website at investors.vodafone.com/esgaddendum.

The data subject to KPMG LLP's assurance is detailed below;

Pillar	Metric	Unit	2023	Page
Digital Society	Cumulative V-Hub unique users	million	5.2	29
Inclusion for All	Percentage of women in management and senior leadership roles	%	34	35
	Number of financial inclusion customers	million	60.7	32
	4G population coverage (outdoor 1Mbps) – Group	%	85	31
Planet	Total Scope 1 emissions	million tonnes CO₂e	0.28	35
	Total Scope 2 emissions (location-based)	million tonnes CO₂e	2.08	35
	Total Scope 2 emissions (market-based)	million tonnes CO₂e	0.69	35
	Total GHG emissions: Scope 1 and Scope 2 (location-based)	million tonnes CO₂e	2.37	35
	Total GHG emissions: Scope 1 and Scope 2 (market-based)	million tonnes CO ₂ e	0.97	35
	Grid renewable electricity purchased (% of purchased electricity)	%	81	35
	Scope 3 emissions (air travel)	million tonnes CO ₂ e	0.01	_
	Total emissions avoided as a consequence of green digital solutions	million tonnes CO ₂ e	24.9	37

With the exception of the metrics outlined in the Assurance sheet above, the information contained within the purpose and responsible business sections (pages 26 to 49) has not been independently verified or assured. All the information included within these pages has been taken from sources which we deem reliable. 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. Our ESG Addendum includes further information with regard to reporting methodologies for certain metrics.

ESG cautionary statement

In preparing the ESG-related information contained in this document, we have made a number of key judgements, estimations and assumptions. The processes, methodologies and issues involved in preparing this information are complex. The ESG data, models and methodologies used are often relatively new, are rapidly evolving and are not necessarily of the same standard as those available in the context of financial and other information, nor are they subject to the same or equivalent disclosure standards, historical reference points, benchmarks or globally accepted accounting principles. It is not possible to rely on historical data as a strong indicator of future trajectories, in the case of climate change and its evolution. Outputs of models, processed data and methodologies may be affected by underlying data quality, which can be hard to assess and we expect industry guidance, standards, market practice and regulations in this field to continue to evolve. There are also challenges faced in relation to the ability to access certain data on a timely basis and the lack of consistency and comparability between data that is available. This means the ESG-related forward-looking statements, information and targets discussed in this document carry an additional degree of inherent risk and uncertainty.