

# VODAFONE GROUP PLC

Technology & Security Governance

## ISO / SOC CERTIFICATIONS AND REGULATORY COMPLIANCE STATEMENT

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Prepared By	Group Information Security & Compliance
Approved By	Chief Security Officer, Vodafone Group
Issue Date	01 February 2026
Review Date	01 February 2027

### 1. Executive Summary

Vodafone Group Plc and its subsidiary entities (collectively "Vodafone") maintain a comprehensive portfolio of internationally recognised information security, privacy, and operational certifications. This document serves as the official compliance statement confirming the status of all active ISO certifications, SOC audit reports, and adherence to applicable telecommunications regulatory frameworks across Vodafone's global operations.

Vodafone's commitment to security, privacy, and operational excellence is embedded within the Group's Enterprise Risk Management framework. Certifications and audits are governed by the Group Security & Resilience function and are subject to annual independent third-party verification. All certificates listed herein are valid as of the document issue date stated above.

### 2. ISO Certifications

Vodafone holds the following International Organisation for Standardisation (ISO) certifications across its Group operations and regional entities. Certification audits are conducted by accredited Certification Bodies (CBs) in accordance with IAF (International Accreditation Forum) requirements.

## 2.1 Active ISO Certifications

Certification / Standard	Scope	Issue Date	Expiry Date	Status
ISO/IEC 27001:2022	Information Security Management — Global IT Infrastructure & Cloud	15 Mar 2023	14 Mar 2026	Active
ISO/IEC 27017:2015	Cloud Security Controls — Vodafone Business Cloud Services	20 Jun 2023	19 Jun 2026	Active
ISO/IEC 27018:2019	Protection of PII in Public Cloud — Vodafone Cloud	20 Jun 2023	19 Jun 2026	Active
ISO/IEC 27701:2019	Privacy Information Management System (PIMS) — EU Operations	10 Sep 2023	09 Sep 2026	Active
ISO/IEC 22301:2019	Business Continuity Management — Core Network Operations	05 Jan 2024	04 Jan 2027	Active
ISO 9001:2015	Quality Management System — Customer Operations & IT Services	12 Nov 2022	11 Nov 2025	Active
ISO 14001:2015	Environmental Management — Group Operations & Facilities	18 Feb 2023	17 Feb 2026	Active
ISO 45001:2018	Occupational Health & Safety — UK & European Operations	30 Apr 2023	29 Apr 2026	Active
ISO/IEC 20000-1:2018	IT Service Management — Managed Services Division	08 Aug 2023	07 Aug 2026	Active
ISO 37001:2016	Anti-Bribery Management — Group-wide	22 Oct 2022	21 Oct 2025	Active

## 2.2 Certification Governance

ISO certifications are managed under a three-year certification cycle with mandatory annual surveillance audits. The following principles govern Vodafone's ISO certification programme:

- All certification audits are conducted by UKAS (United Kingdom Accreditation Service) or DAkkS (Deutsche Akkreditierungsstelle) accredited Certification Bodies.
- Internal audit programmes are maintained as per the requirements of each standard, with a minimum of one full internal audit cycle per year.
- Non-conformances identified during surveillance or recertification audits are subject to formal corrective action plans with defined closure timescales.
- Scope expansions or reductions are submitted to the relevant CB for approval prior to implementation.
- Certificate copies are available upon request from the Group Security Governance team ([security.governance@vodafone.com](mailto:security.governance@vodafone.com)).

### 3. SOC Audit Reports (AICPA)

Vodafone Business Cloud and Managed Services divisions undergo annual Service Organisation Controls (SOC) examinations in accordance with AICPA (American Institute of Certified Public Accountants) AT-C Section 205 and 320 standards. SOC examinations are carried out by independent Big Four audit firms.

#### 3.1 SOC Report Summary

Certification / Standard	Scope	Issue Date	Expiry Date	Status
SOC 2 Type II	Vodafone Business Cloud — Security, Availability, Confidentiality	01 Oct 2024	30 Sep 2025	Active
SOC 2 Type II	Vodafone IoT Platform — Security & Availability TSCs	01 Oct 2024	30 Sep 2025	Active
SOC 2 Type II	Managed Connectivity Services — Security, Confidentiality	01 Apr 2024	31 Mar 2025	Active
SOC 1 Type II	Vodafone Payment Processing Services — ICFR Controls	01 Jan 2025	31 Dec 2025	Active
SOC 3 (Public)	Vodafone Business Cloud — Public Trust Report	30 Sep 2025	N/A	Active

#### 3.2 Trust Service Criteria (TSC) In Scope

Vodafone's SOC 2 examinations assess controls relevant to the following Trust Service Criteria as defined by the AICPA:

- Security (CC) — Common Criteria, including logical and physical access controls, system monitoring, change management, and incident response.
- Availability (A) — System availability in accordance with committed service levels and uptime obligations.
- Confidentiality (C) — Protection of confidential information in accordance with Vodafone's Data Classification Policy.
- Processing Integrity (PI) — Complete, valid, accurate, timely, and authorised processing of system transactions (IoT platform only).

#### 3.3 Audit Firm & Distribution

SOC examinations are performed by KPMG LLP (UK), a registered PCAOB firm. SOC 2 Type II reports are distributed to customers and prospects under a Non-Disclosure Agreement (NDA). SOC 3 reports are available publicly on the Vodafone Trust Centre at [trust.vodafone.com](http://trust.vodafone.com). Requests for SOC report access should be directed to: [security.assurance@vodafone.com](mailto:security.assurance@vodafone.com).

## 4. Regulatory Compliance Statement

Vodafone operates within a complex multi-jurisdictional regulatory landscape. The Group maintains active compliance with all applicable national and international regulations governing telecommunications, data protection, cybersecurity, and financial services. The following table summarises the principal frameworks to which Vodafone is subject.

### 4.1 Compliance Framework Register

Regulatory Framework	Applicable Region / Scope	Compliance Status
UK GDPR / Data Protection Act 2018	United Kingdom — all personal data processing	Compliant
EU GDPR (Regulation 2016/679)	European Union — 12 operating markets	Compliant
NIS2 Directive (EU) 2022/2555	EU — Critical infrastructure & Essential Services	Compliant
UK NIS Regulations 2018	United Kingdom — Network & Information Systems	Compliant
EU ePrivacy Directive 2002/58/EC	EU — Electronic Communications	Compliant
Ofcom General Conditions of Entitlement	United Kingdom — Telecommunications	Compliant
Communications Act 2003 (UK)	United Kingdom — Spectrum & Licensing	Compliant
PCI DSS v4.0	Global — Payment Card Data Processing	Compliant
DORA (EU) 2022/2554	EU Financial Entities — Digital Operational Resilience Act	In Progress
Cyber Resilience Act (EU) 2024	EU — Connected Product Cybersecurity	In Progress
Electronic Communications Code (UK)	United Kingdom — Infrastructure Deployment	Compliant
CCPA / CPRA	California, USA — Business Cloud Customers	Compliant
India PDPB (DPDPA 2023)	India — Vodafone Idea Ltd. Data Processing	Compliant
South African POPIA	South Africa — Vodafone SA Operations	Compliant

Regulatory Framework	Applicable Region / Scope	Compliance Status
HIPAA (via BAA)	USA — Healthcare Sector Customers (Vodafone Business)	Compliant
SOX Section 302 & 404	USA — NYSE Listed Entity Financial Controls	Compliant

## 4.2 Telecommunications-Specific Regulatory Obligations

As a licensed telecommunications provider operating in over 20 countries, Vodafone is subject to sector-specific regulations including but not limited to:

- Lawful Interception (LI) — Vodafone complies with all lawful interception obligations as mandated by national legislation in each jurisdiction of operation, in strict accordance with published Vodafone Law Enforcement Disclosure Reports and the Vodafone Principles on Law Enforcement Assistance.
- Spectrum Licensing — All radio frequency spectrum used by Vodafone networks is licensed from the appropriate national regulatory authority (e.g., Ofcom UK, Bundesnetzagentur DE, TRAI IN).
- Network Security Duties — Vodafone fulfils its duty of care obligations under the Telecommunications Security Act 2021 (UK) and equivalent legislation in each operating country, including implementation of the Telecoms Security Requirements (TSR) Code of Practice.
- Emergency Services — Vodafone maintains mandatory interconnection with national emergency service numbering plans (999, 112, 911, and equivalents) in all markets.
- Universal Service Obligations (USO) — Where designated, Vodafone meets USO requirements for broadband and voice connectivity.

## 5. Independent Security Assurance

In addition to formal certification and compliance programmes, Vodafone maintains a continuous independent security assurance programme encompassing the following activities:

### 5.1 Penetration Testing

- Infrastructure and application penetration testing is conducted at minimum annually by CREST-accredited third-party security firms.
- Critical systems and externally exposed assets undergo penetration testing on a bi-annual basis.
- Red team exercises simulating advanced persistent threat (APT) actors are conducted annually against Vodafone's core network and crown-jewel assets.
- All penetration test findings are tracked through Vodafone's Vulnerability Management system with risk-based remediation SLAs.

### 5.2 Bug Bounty Programme

Vodafone operates a coordinated vulnerability disclosure programme via the HackerOne platform. The programme covers Vodafone's customer-facing web and mobile applications and is open to security researchers worldwide. Details are available at: [hackerone.com/vodafone](https://hackerone.com/vodafone).

### 5.3 Third-Party Risk Management

All third-party suppliers with access to Vodafone systems or data are subject to mandatory security due diligence assessments commensurate with their risk tier. Critical suppliers are required to maintain ISO/IEC 27001 certification or equivalent and are subject to annual re-assessment.

## 6. Data Protection & Privacy Governance

Vodafone's Group Data Protection Officer (DPO) is registered with the UK Information Commissioner's Office (ICO) and the relevant EU supervisory authorities. The Group Privacy framework encompasses:

- A Group-wide Privacy Policy reviewed annually and updated in response to legislative developments.
- Data Protection Impact Assessment (DPIA) processes embedded within Vodafone's project and change management lifecycle.
- Records of Processing Activities (RoPA) maintained across all Group entities in compliance with Article 30 of the UK/EU GDPR.
- Standard Contractual Clauses (SCCs) and Transfer Impact Assessments (TIAs) in place for all international data transfers outside the UK/EEA.
- Privacy-by-Design and Privacy-by-Default principles applied to all new products and services.
- Employee data protection training conducted at onboarding and annually thereafter; completion tracked centrally.

## 7. Statement of Applicability

This Compliance Statement applies to all Vodafone Group entities involved in the delivery of telecommunications, managed services, IoT, cloud, and enterprise connectivity services. Subsidiary

entities not within scope of Group-level certifications maintain equivalent local certifications approved by the Group Security Council.

This document does not constitute a legal opinion and should be read in conjunction with the applicable service agreements, data processing addenda, and Vodafone's published security policies available on the Vodafone Trust Centre ([trust.vodafone.com](http://trust.vodafone.com)).

## 8. Contact & Document Control

<b>Document Owner</b>	Group Security Governance, Vodafone Group Plc
<b>Certification Queries</b>	<a href="mailto:security.governance@vodafone.com">security.governance@vodafone.com</a>
<b>SOC Report Requests</b>	<a href="mailto:security.assurance@vodafone.com">security.assurance@vodafone.com</a>
<b>Privacy / Data Protection</b>	<a href="mailto:groupdpo@vodafone.com">groupdpo@vodafone.com</a>
<b>Trust Centre</b>	<a href="http://trust.vodafone.com">trust.vodafone.com</a>
<b>Registered Address</b>	Vodafone House, The Connection, Newbury, Berkshire, RG14 2FN, United Kingdom
<b>Company Registration</b>	England & Wales No. 1833679

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*DISCLAIMER: This document is prepared for informational purposes and reflects Vodafone's compliance posture as at the issue date. Certification and compliance status is subject to ongoing audit cycles and may be updated. This is a dummy/specimen document prepared for demonstration purposes only. All certification numbers, dates, and audit references are illustrative.*

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