Vodafone – Forced Labor & Modern Slavery Risk Assessment (2023/24)

# 1. Strengths and Positive Practices

- Vodafone publishes an annual Modern Slavery Statement, aligning with GRI 409 and 414 themes.  
- Extensive governance structure: ESG and Reputation Committee, Human Rights Advisory Group, and dedicated Human Rights Manager.  
- Applies a Code of Ethical Purchasing to ~8,000 direct suppliers, requiring zero tolerance for forced labor and cascading commitments downstream.  
- Conducts supplier qualification that includes up to 20% weighting on ethics, labor, safety, and inclusion in tenders.  
- Member of the Joint Alliance for CSR (JAC), using its audit framework to assess labor conditions—150 supplier site audits were conducted in 2024 (up from 83 in 2023).  
- Offers off-site anonymous mobile worker surveys during audits.  
- Conducted training for 94% of employees on the Code of Conduct ('Doing What’s Right').  
- 649 'Speak Up' whistleblower reports submitted internally in 2024.  
- Risk assessment considers country and sector risks, with high-risk categories flagged for enhanced oversight.

# 2. Key Figures and Scope

- €19 billion in annual supplier spend.  
- ~8,000 tier-one suppliers.  
- ~200,000 estimated workers in Vodafone's extended supply chain.  
- Top sourcing countries: United States, Germany, UK, South Korea, China, Turkey, South Africa, Finland, Ireland, Sweden.  
- 150 supplier audits conducted via JAC in 2024.  
- 94% employee training completion; 649 Speak Up reports in 2024.

# 3. Risk Areas and Weaknesses

- Vodafone’s supply chain includes high-risk geographies (e.g., China, Turkey, South Africa) and high-risk sectors (electronics, warehousing, catering, construction).  
- No audit findings or corrective action outcomes are disclosed.  
- Tier-2 and beyond supplier risk visibility remains low; mapping complexity acknowledged.  
- While GRI-aligned in substance, Vodafone does not provide a formal GRI Content Index or explicitly label disclosures under GRI 409/414.  
- Partner markets and joint ventures (e.g., VodafoneZiggo) are excluded from oversight due to lack of control.  
- Worker voice mechanisms exist only in JAC audits—not guaranteed across all supplier sites.

# 4. Conclusion

Vodafone shows a high level of maturity in managing forced labor and modern slavery risks across its supply chain. Its audit mechanisms, procurement controls, and anonymous feedback tools align well with international standards such as GRI 409 and 414. However, the absence of public audit findings, limited coverage of non-tier-one suppliers, and incomplete alignment with formal GRI indexing reflect areas for improvement. Vodafone’s exposure to high-risk countries and outsourcing sectors necessitates ongoing diligence and expanded transparency.