

Foundation Policy Standard

Code of Conduct

Doing what's right

Objective/Risk

Our Code of Conduct sets out the standards upheld by the Vodafone Foundation in all of our work. Anyone working for or with the Foundation is expected to behave in accordance with these standards.

This document also sets out the obligation to report wrongdoing and the ways in which to do so.

Policy Owner

Lisa Felton

Policy Champion

Chris Dixon

Version/Date

V5.0, January
2025

Scope and Compliance

Our Code of Conduct applies to anyone working for or with the Vodafone Foundation: Trustees, Foundation employees, Vodafone employees, contractors, suppliers and delivery partners.

Failure to uphold the principles set out in this document may result in disciplinary action, withdrawal of funding or loss of future contracts with the Vodafone Foundation.

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1 The Code of Conduct

1.1 Principles

Vodafone Foundation and its network of local foundations exists to deliver public benefit through charitable activities. Wherever these activities take place, the Foundation will respect the communities in which we operate and will comply with all applicable law, including UK and local charity laws. To ensure these values are upheld, anyone working for or with the Foundation is obliged to abide by the following principles.

Appropriate use of funds

- We do not use Foundation funds in any way that contravenes local charity laws or, where using funds from Vodafone (Group) Foundation, UK charity law.
- We do not use Foundation funds to make any payment that will benefit the Vodafone business in anything more than a legitimately incidental manner.
- We only use Foundation funds to work with Approved Organisations.

Safeguarding beneficiaries

- We actively seek to protect the welfare of all beneficiaries, especially children and vulnerable adults. [Refer to the Vodafone Foundation Safeguarding Policy for further information]

Preventing corruption

- We never seek or accept money or any other assets from a grant applicant (or any other person) in return for assistance or the awarding of funding.
- We do not use Foundation funds to make payments to, or as directed by, public officials, political parties or government departments, or to organisations or persons connected with public officials or their families.
- We do not use Foundation funds to benefit private personal interests or to influence an advantage for Vodafone Foundation or Vodafone's business.
- We do not give or receive hospitality or gifts of any type, value or in a manner that could reasonably be considered to affect our impartiality or be perceived as unreasonable. Gifts and Hospitality to Public Officials or their families of more than €100 requires prior approval from the Group External Affairs Director. [Refer to Vodafone's Anti-bribery Policy for further information]

Privacy and data security

- We apply appropriate data management practices to govern the processing of personal data and only retain and process personal data with appropriate consent.

Protecting the environment

- We are committed to reducing our impact on the environment. We review environmental sustainability within project planning and design and, where possible, endeavour to use renewable sources of energy to power our projects.
- Where disposal of electronic waste is necessary, waste is stored correctly and disposed of by appropriately licensed contractors.

Locally-led development

- We strive to support locally-led development. We seek, where possible and practical, to work with local implementing partners. We listen to local voices in the design, evaluation and evolution of our programmes.
- We strive to avoid imbalances in our relationships with local partners. We are respectful of local communities and cultures. We treat partners and communities we work with as equals, regardless of race, gender, sexual orientation, disability, socioeconomic status, cultural background or belief.

1.2 Definitions

Foundation funds	Funds received from local operating company, Vodafone Foundation or any other source
Approved Organisation	a registered charity (or charity that are exempt from registration under local laws), not-for-profit NGO of international repute, UN agency, educational institution (other than state funded institutions providing compulsory education to the public) and professional advisers, consultants or third parties whose products, services or advice are in each case necessary for the running of the Local Foundation

2 Reporting unethical behaviour

Behaviour that breaches this Code of Conduct should be reported immediately so that it can be dealt with appropriately. Any reports of wrongdoing on the part of staff or delivery partners will be taken seriously and will be investigated fully.

You can report breaches of this Code of Conduct directly to the Director of the Foundation, Lisa Felton, via email lisa.felton@vodafone.com or phone +447880738302.

You can report breaches confidentially via Vodafone's own reporting channel: speakup.foundation@vodafone.com.

Alternatively, you can report confidentially via an external, independent hotline: [EthicsPoint - Vodafone](#). This reporting line is administered by NAVEX on behalf of Vodafone Group Plc.

3 Serious Incident Reporting

3.1 Definitions

Serious Incident	An adverse event, actual or alleged, which results in or risks: loss or misappropriation of the charity's money or assets; damage to the charity's property; or harm to the charity's work, beneficiaries or reputation.
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3.2 Responding to Serious Incidents

All employees, volunteers and partners are required to report any Serious Incident to the Foundation Director immediately upon becoming aware of it.

In the event of a Serious Incident, the Foundation Director shall in the first instance report the matter to the Foundation Audit & Risk Committee. It shall be for the Audit & Risk Committee to determine the seriousness of the report and whether the matter should be reported to the UK Charity Commission, with the approval of the Board of Trustees.

4 Roles and responsibilities

4.1 Group Policy Owner

The Group Policy Owner is ultimately responsible for ensuring the Policy is written, approved, implemented, maintained and monitored.

4.2 Group Policy Champion

The Group Policy Champion is accountable to the policy owner and responsible for managing the operation of the policy, including reporting on compliance.

4.3 Local Foundation Trustees

Local Foundation Trustees are responsible for ensuring local compliance with the principles of this policy

5 Document history

Version	Date	Changes	Approved by
2.0	20/02/18	Reformatted to fit Group Policy Standard template.	Andrew Dunnett
3.0	26/06/19	Addition of privacy and environmental principles and procedures for Serious Incident Reporting	Andrew Dunnett
4.0	28/10/22	Addition of principles on locally-led development	Andrew Dunnett
5.0	24/01/25	Change of policy owner to Lisa Felton	Lisa Felton