



Global Policy Standard

Speak Up

Doing What's Right

Objective/risk

The purpose of this document is to outline the process for addressing "Speak Up" matters raised globally.

This process addresses the risk that an employee or a business partner feels unable to raise a genuine concern that might otherwise be damaging to our reputation or our people.

Policy Owner

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Version/Date

V5 July 2017

Scope and compliance

This standard applies to all matters reported via the external 'Expolink' hotline as well as matters reported internally or via other means (verbally, letters, emails, etc).

The local market HR Director (HRD) is responsible for the Speak Up process in their local market. This Policy Standard is mandatory for all employees in Vodafone subsidiaries and Joint Ventures with an interest of more than 50%.

Compliance levels will be monitored on a regular basis and results reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary actions in accordance with the provisions of the relevant local HR policy.

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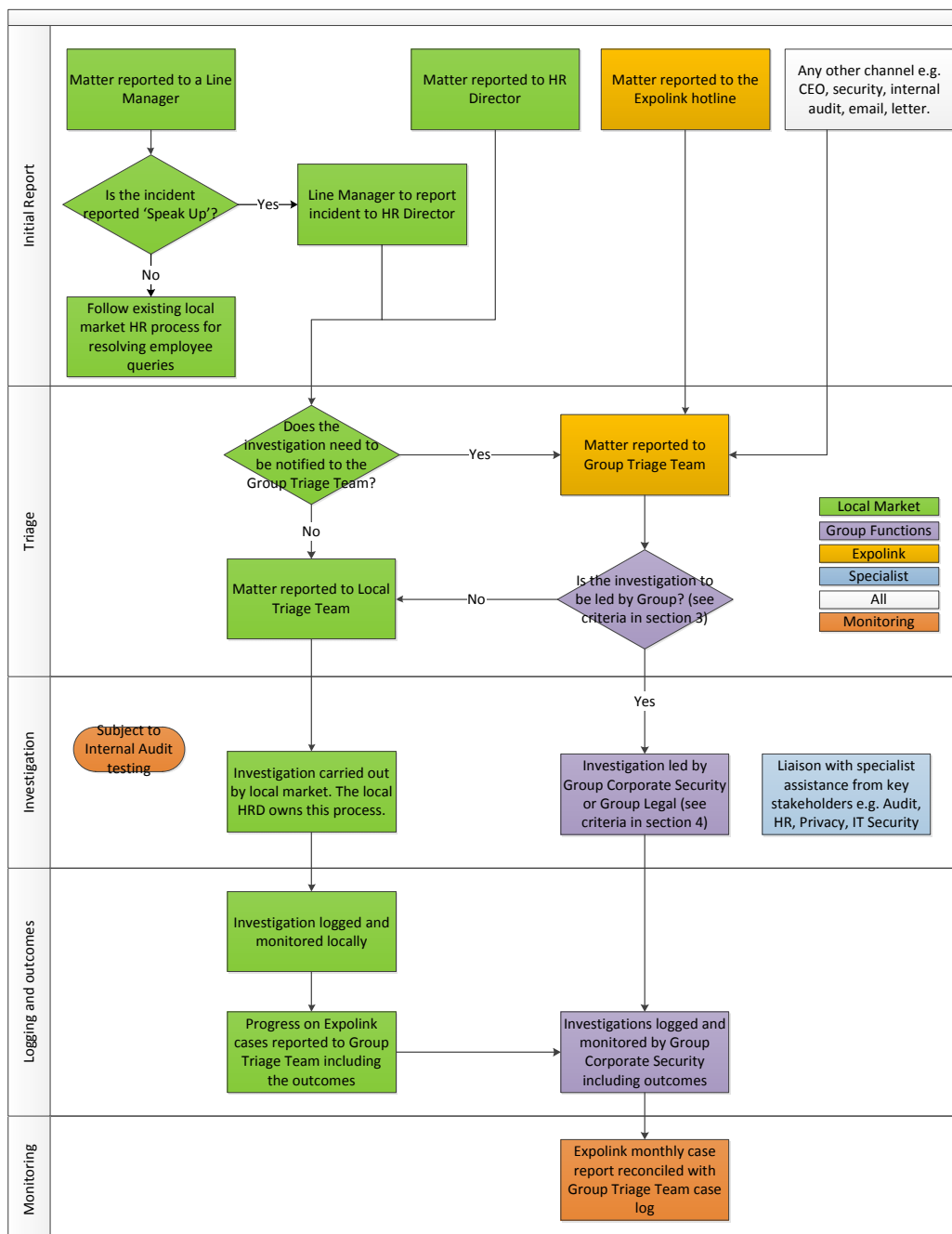
1 The policy standard

1.1 Principles

Having a standard process will ensure:

- all “Speak Up” matters are processed in a consistent manner in all local markets;
- appropriate specialist involvement is present in relevant investigations;
- data privacy requirements are adhered to; and
- appropriate records and tracking is maintained for Audit Committee and other required reporting.

1.2 The process





2 Process explanation

2.1 Initial Report

The initial report may come via a variety of channels, including:

- an employee's line manager;
- the HR Director;
- the external Expolink hotline;
- security department;
- a supplier, third party or business partner;
- email or written correspondence received by any team; or
- a newspaper article or pre-publication allegation made by a journalist.

2.2 Triage, Investigation, logging and reporting

Local reports

If a report is submitted locally the following process must be used:

- If an incident is reported locally through a line manager, the line manager will determine if the case ought to be treated as 'Speak Up' or not. The local HR team may support here. Any cases to be treated as 'Speak Up' must be reported to the local market HRD.
- If a standard 'Ask HR' question (without any specific incident being reported) is raised by an employee, the employee is coached by the line manager or HR on where to go to resolve the question (e.g. intranet, Ask HR, the HRD etc).
- If an incident is reported locally (e.g. through a line manager, security or HR etc) that meets the criteria set out in section 3, it is the responsibility of the local market HRD to notify the Group Triage Team by emailing GroupTriageTeam@vodafone.com. This must be done immediately for Category A issues and within 48hrs for Category B issues.
- Each local market must establish a Local Triage Team, which should mirror the Group Triage team, consisting of at least two members one of whom must be the local HRD. If the matter does not meet the criteria in section 3 and will be handled locally, the Local Triage Team must be notified and will decide if local HR or local security is to investigate.



Reports to Expolink

If a report is submitted to Expolink the following process must be used:

- All incident reports made via Expolink will be sent to the Group Triage Team. The members of the Group Triage Team are the Group Risk & Compliance Director and the Group Reward & Policy Director.
- The Group Triage Team will make a decision regarding the required next steps for each incident reported, which will be communicated to the local HRD for the relevant market involved.
- If an investigation is required, the decision on appropriate individuals to involve will be based on the severity of the incident, seniority of reported individuals and financial and reputational impact. Please see the full criteria for Group involvement in investigations set out in section 3 below.
- If it is determined that the investigation should be conducted by the local market, the Local Triage Team will be provided with all relevant information (Expolink report etc) to conduct the investigation locally.
- When a report is received by the Local Triage Team, they must:
 - a. **Step 1: Acknowledge receipt**
 - b. **Step 2: Assign responsibility** to review or investigate. This may involve HR, security, legal (or a combination) depending on the case.
 - c. **Step 3: Take appropriate action** as required e.g. disciplinary, dismissal, and reporting outcome back to whistle-blower.
 - d. **Step 4: Advise on the outcome** to Group Triage at the time of resolution.

Throughout this process the relevant local HRD will be responsible for ensuring that the case is **logged, tracked and monitored** in accordance with the [Internal Investigations Policy Standard](#).

Incidents or potential issues reported by other channels

- All reports, allegations or suspicions involving any of the issues or potential issues set out in section 3 below must also be reported to the Group Triage Team within the timelines indicated. This includes issues reported or identified locally through any channel, including for example through the media, a customer, a supplier, a report to the security team, HR or audit.



Confidentiality of report

- The initial report cannot be shared with anyone outside of the persons, who have been assigned responsibility for investigating it.

3 What must be reported to the Group Triage Team

All reports, allegations or suspicions involving any of the following issues must be reported to the Group Triage Team. All reports must be sent to grouptriateteam@vodafone.com

This is not an exhaustive list and it is expected that local markets will report other issues to the Group Triage Team where they deem it necessary or appropriate, including those existing requirements as defined in the [Internal Investigations Policy Standard](#).

3.1 Category A: issues to be reported to the Group Triage Team immediately

- **Bribery or corruption** – Attempts, potential or suspected bribery or corruption; or
- **Competition law** – Potential or suspected breach of competition law.

3.2 Category B: issues to be reported to the Group Triage Team within 48 hours

- Serious breach of Policy / Code of Conduct by any employee at Band E or above.
- Criminal conduct by any employee at Band E level or above.
- Customer data – substantiated incidents of serious loss of customer data. All other lower level losses should only be reported through the existing security quarterly KPI's.

Misconduct by any vendor / supplier against any Vodafone Group company above Euro 50,000.

4 Additional local HRD responsibilities

The local HRD is responsible for driving communication and awareness of Speak Up in their market this includes:

- **Hub content** – ensuring Speak Up information is available on the local Hub and is up-to-date. This must include the local number and be in the local language, if required.
- **Awareness campaigns** – running regular high profile internal communications campaigns to drive local awareness. This should be in conjunction with internal communications and include posters in common areas (e.g. coffee and print rooms) and be in the local language, if required.
- **Line manager training** – ensure line managers are equipped to handle issues reported and understand the policy of non-retaliation.



5 Investigation standards

The investigation process is covered in the separate [Internal Investigations Policy Standard](#).

Any remedial action required should be assessed in accordance with local market legislation, HR policies and procedures.

Local market teams assigned to investigate issues reported to the Group Triage team shall be responsible for notifying and keeping informed the relevant members of the Local Senior Management team. Group investigation teams shall likewise notify and keep the Senior Management informed.

Group Legal will have primary responsibility for all investigations resulting from Category A reports whilst Group Corporate Security will have primary responsibility for all investigations resulting from Category B reports, as set out in section 3 above.

6 Dealing with employees who report a concern

It is recognised that some employees may not wish to use Speak Up for fear of reprisal or the response of colleagues. This policy outlines there will be no adverse consequences for anyone who reports a whistleblowing concern in good faith. Protecting employees from victimisation, harassment or disciplinary action as a result of any disclosure is important to ensure individuals can voice concerns in a safe and protected manner.

Vodafone will not tolerate any retaliation against an employee who raises a genuine concern, regardless of whether the concern is substantiated or not. It is the responsibility of the HRD or line manager involved in a Speak Up case to ensure that employees reporting genuine concerns are not the victims of retaliatory actions.

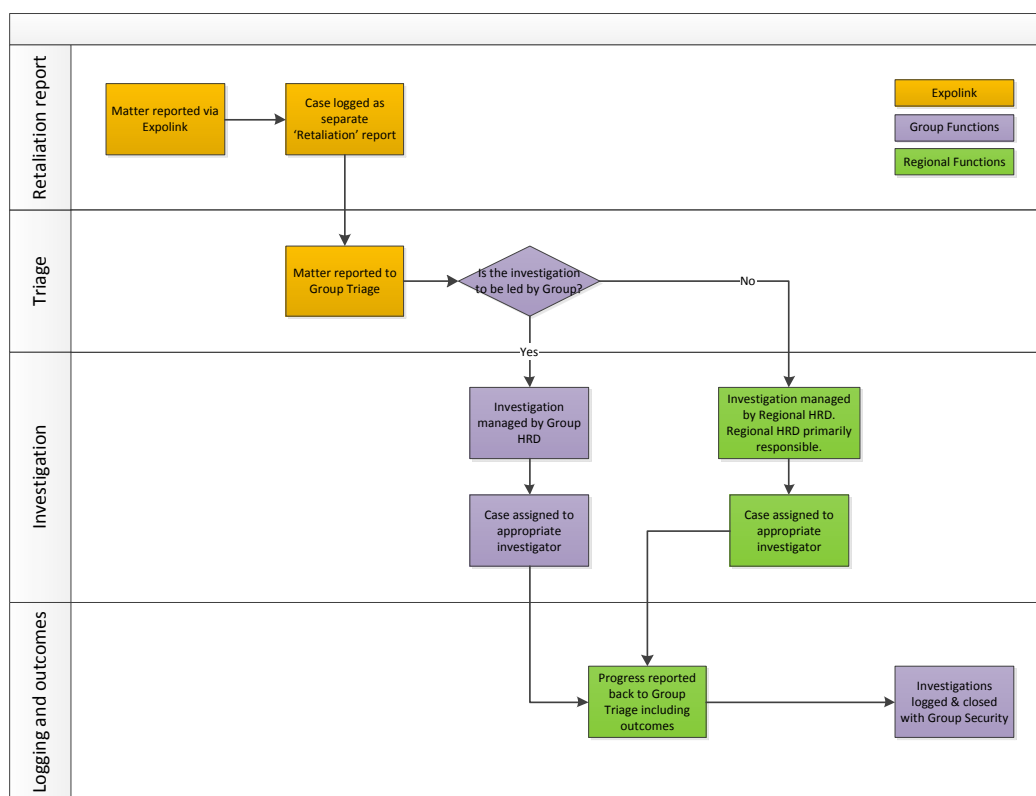
If an employee feels they are being retaliated against due to having used Speak Up, they are encouraged to report the matter to Expolink. The matter will then be:

- Logged as a separate case by Expolink to the original Speak Up incident recorded.
- Passed to the Group Triage Team by Expolink who will inform the Group HRD or Regional HRD.
- Overseen by the Group HRD or Regional HRD.
- Handled by an appropriate investigator.

The Group Triage team will be informed by the Group HRD or Regional HRD once the matter reaches a suitable conclusion. Upon receipt of closure, the Group Triage team will notify Group Security for reporting purposes.



6.1 The process



Any employee report made maliciously or for personal gain will not be tolerated and the matter will be dealt with in accordance with local market disciplinary actions.

6.2 Feedback

The level of feedback that can be provided to employees using the Speak Up process will vary on a case by case basis. Where an employee submits a case on an anonymous basis it will not be possible to provide feedback. In all other cases, an appropriate level of feedback will be provided based on the context of the case. This feedback will be provided by the relevant triage team responsible for investigating the case, once the investigation has been completed. As a minimum, an employee using the Speak Up process in a non-anonymous manner can expect the following feedback:

- Notification that an investigation has been conducted.
- Confirmation as to whether or not the concerns raised have been substantiated.
- If the concerns have been substantiated, an acknowledgement that appropriate action has or will be taken.

Due to the nature of the cases reported through the Speak Up process it will not usually be possible to communicate specific details of either the investigation or the subsequent actions taken.



7 Logging and reporting

All matters reported to the Group Triage Team via the Expolink external hotline will be logged onto the tool Vodafone Case management Tool (“VCMT”) and tracked through to resolution to allow an appropriate level of reporting to Audit Committee.

In addition, all other Group lead ‘Speak Up’ investigations will be logged on VCMT and tracked through to resolution by Group Legal Litigation team or Group Corporate Security.

Tracking of all local market investigations will be conducted in accordance with the [Internal Investigations Policy Standard](#) and tracked using VCMT. It is the responsibility for the local market HRD to ensure it is able to support the reporting requirements of the Group Triage Team.

The collection of personal data should be carried out in accordance with the requirements of the [Internal Investigations Policy Standard](#) and the retention periods for personal data with respect to any reported incident or investigation under the local or Group processes are provided in section 8 below.

8 Data retention

Set out in the table below are the retention periods and mandatory actions to protect the personal data of reporters and (alleged) offenders:

Scenario	Retention period and actions required
Unsubstantiated claim (made in good faith) with no investigation required or no substantiation of claim following initial investigation.	Reporter and alleged offender data retained for 6 years , the Group or Local Triage Team (following guidance above) decides that no further action is required.
Malicious claim with no investigation required or no substantiation of claim following initial investigation.	<p>If reporter is an employee: summary details of claim, with details of any appropriate disciplinary action taken recorded on HR records, retained for 7 years after employment ceases.</p> <p>If reporter is not an employee: data retained for 7 years, the Group or Local Triage Team decides that no further action is required (subject to any legal action being pursued against the reporter, in which case details retained for 12 years after the date such action is concluded).</p> <p>In any event: alleged offender data retained for 7 years, the Group or Local Triage Team decides that no further action is required.</p>
Substantiated claim or investigation reveals claims to be factually correct; remedial action may be required.	<p>Offender data retained for 12 years. Details recorded on offender’s HR records, retained for 7 years after employment ceases.</p> <p>Reporter data deleted immediately the relevant investigating team / the Group or Local Triage Team concludes the investigation.</p>



9 Exceptions

If an incident is reported which names or involves either one of the Group Triage Team, Expolink will send the incident report to the Group HR Director. The appropriate means of investigation will be determined by the Group HRD.

Germany – A modified process shall apply due to local legislation.

10 Supporting documents

[Internal Investigations Policy Standard](#)

11 Document history

Vers.	Date	Changes	Other standards affected	Approved by
1	30/08/2012	Original document	None	RS
2	12/06/2013	Updated process	None	
3	16/09/2014	Updated process & non-retaliation guidance	None	
4	01/11/2016	Updated wording to align with new Internal Investigations Policy Standard	None	Ronald Schellekens
5	TBC	Addition of section 6.2 Feedback	None	Ronald Schellekens