

04 July 2025

Private Bag X9904,  
Sandton,  
2146

## **RE: Response to Access Now joint letter to Vodacom regarding Safaricom**

Dear Access Now and signatories

Thank you for your letter dated 27<sup>th</sup> June 2025, addressed to our CEO, Mr Shameel Joosub, in which you expressed your concerns relating to Safaricom Plc's alleged enablement of human rights abuses, and the request for transparency on their law enforcement assistance practices. I am responding as the Executive Committee member responsible for human rights. At the outset, it is important to state that Vodacom Group takes allegations outlined in your letter very seriously and recognises and values the important role that civil society organisations, such as Access Now, play in advancing human rights and responsible business practices.

### **Vodacom's commitment to human rights**

We are committed to human rights and to ensuring that our growth as a leading technology is rooted in respecting and promoting human rights across our operations. We connect over 200 million customers (including Safaricom customers) and understand that our responsibility towards these customers extends beyond connectivity, we must proactively safeguard the rights of those we serve.

Guided by international frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs), we have an established human rights programme that integrates these principles into our operations, governance, and decision-making.

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Our human rights approach is detailed within Vodacom's Environmental, Social and Governance Report. Our human rights policy is aligned with international standards including the UNGPs. This policy applies to all companies in which Vodacom Group holds an interest of 50.1%, or more, or where we have management control.

We respect the rights to freedom of expression and the right to privacy especially during times of heightened tension. We recognise the important role connectivity plays in enabling individuals to mobilise and exercise their civil and political rights. We support initiatives that protect digital rights and are concerned when connectivity is restricted or used as a political lever. We believe that access to connectivity and the internet should never be weaponised and encourage all governments to uphold the free flow of information and respect for the privacy of communications, as cornerstones of freedom of expression.

### **Safaricom's policies and practices**

Safaricom's response to law enforcement requests is guided by and aligns with local legal framework. Our understanding of Safaricom's policies and practices is that they are commensurate with international standards and practices. We have engaged with the entity on the allegations regarding the arrest and tragic death of Mr. Ojwang and received assurances that Safaricom has no case to answer. As a shareholder, Vodacom welcomes Safaricom's transparency where it has publicly confirmed that at no point was there any contact between Safaricom and any security agency in arresting or investigating Mr. Ojwang. Additionally, Safaricom has called for a credible, timely and transparent investigation into his arrest and death.

### **Recommendations and requests**

We are committed to respecting human rights including via our shareholdings. We will continue to take steps, to satisfy ourselves that Safaricom operates in a manner that respects human rights and adheres to international human rights standards. Also that Safaricom implements processes and controls consistent with those we expect from a mature telecommunications provider. The Vodacom Group human rights team will continue to engage with Safaricom and provide support where needed in their human rights journey.

### **Gaps in transparency**

While our transparency on matters relating to law enforcement assistance and lawful intercept is determined by local laws that apply to all telecommunications providers, Vodacom Group is committed to progressively strengthen transparency measures to align with international best practices. We also encourage governments to adopt more progressive and enabling approaches to transparency and accountability.

We would appreciate the support of organisations such as yours in advocating for regulatory reforms that promote greater transparency and open disclosure.

In closing, we welcome further dialogue and ongoing engagement with Access Now so to build a relationship that enables us as a company to do better.

Yours sincerely

Stephen Chege  
Chief Officer: Regulatory and External Affairs

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