

2 October 2019



Nick Read

Chief Executive Officer, Vodafone Group Plc
Vodafone House
The Connection, Newbury
Berkshire, RG14 2FN, England

Dear Mr. Read,

Access Now is a global organization fighting to defend and extend human rights in the digital age, particularly for users most at risk. We are writing to draw your attention to your company’s performance in the [2019 Ranking Digital Rights \(RDR\) Corporate Accountability Index](#). As you may be aware, the RDR Index evaluated 24 of the world’s leading internet, mobile, and telecommunications companies, including yours, and found that all companies could make significant improvements in disclosing policies and commitments that affect their users’ rights to freedom of expression and privacy.

Transparency on these issues not only supports human rights, but also helps ensure user trust. Investors also depend on disclosures to verify that companies are upholding their duty to respect human rights. Therefore, we invite you to offer a public response to the 2019 RDR Index results.

Vodafone ranked second out of the 12 telecommunications companies evaluated, and saw a 0.34% increase in its RDR Index score from 2018. The company’s score was based on an evaluation of its disclosed policies for its pre- and post-paid mobile services and fixed-line broadband service for its UK-based company, Vodafone UK. Vodafone made some key improvements, notably improving disclosure about handling of user data. Vodafone also continues to disclose more than most of its peers about its process for responding to network shutdown demands. We commend Vodafone for responding to our previous letter and making its perspectives public.

However, there is still room for improvement. We encourage you and the relevant officers within your company to read through the full RDR Index findings and recommendations, and the “report card” for your company in particular, and develop a public response to the issues raised here. But we have narrowed our recommendation to one timely, and achievable, objective based on our insights into the most acute issues facing at-risk users.

Recommendation:

Vodafone should better inform users about third-party requests to block content and to shut down networks, and disclose where laws may prevent it from being fully transparent about these types of requests.



This is an opportunity to distinguish your company from others in the sector as a leader on these issues, and to demonstrate a commitment to your users to respect their rights. Your company's report card can be found at: <https://rankingdigitalrights.org/index2019/companies/vodafone/index/>. For your convenience I am also attaching PDFs of the full report as well as your company's report card.

We encourage you to send a response for publication by **October 16, 2019**, to demonstrate to your users and stakeholders that your company is serious about upholding freedom of expression and privacy. Please send your letter via email to Peter Micek at peter@accessnow.org. The Access Now team would be happy to speak with you about your results and provide feedback as you develop your response.

Sincerely,

Peter Micek
General Counsel, Access Now
peter@accessnow.org