



April 14, 2016

Vodafone Group Plc  
Vodafone House  
The Connection  
Newbury  
Berkshire  
RG14 2FN  
England

Dear Chairman Gerard Kleisterlee,

We are writing to draw your attention to the results of the [Ranking Digital Rights Corporate Accountability Index](#). The Index ranked 16 of the world's leading internet and telecommunications companies on their disclosure with respect to privacy and freedom of expression online. As you may already be aware, the results were disappointing. Several companies performed poorly on objective indicators that measure adherence to best practices for reporting and transparency.

Now is an opportune time for you to respond publicly to these results and demonstrate your company's support for transparency and accountability.

Respecting human rights in an accountable and transparent manner is good for business. Your company's health and wealth depend on the trust of your customers. Investors require accurate and meaningful data on your firm's performance -- financial and otherwise -- to show why they should continue to commit to your growth. Policymakers seeking to protect their constituents' interests look to you for clear statements and policies to verify that you are complying with laws and norms.

This first release of results from the Corporate Accountability Index, the methodology for which was developed through years of research and consultation with a diverse range of stakeholders, shows why it is urgent that the entire sector must engage with the range of stakeholders and groups who advocate for the rights of people affected by your business.

On the bright side, a roadmap is available for you to follow. The Index's indicators on data protection, transparency about content restriction, digital security, and remedy, among other issues, show how companies can proceed on the path towards demonstrating respect for digital rights. Every company evaluated in the Index has already taken at least some steps toward meeting their responsibility to respect human rights and remedy abuses. As Vodafone knows

well, transparency reporting on government requests for customers' information has become a trend, and companies worldwide are publicly declaring their commitment to human rights.

Positively, among telecommunications companies, Vodafone's public commitments to transparently address its privacy and free expression challenges, and its measures taken to implement those commitments, stand out. Additionally, Vodafone UK has clearly stated its policy to not prioritize traffic. The company should continue to lead the sector by constantly improving its privacy and free expression disclosures.

To extend its leadership, Vodafone, at the group level, should:

- Improve commitments to human rights, privacy, and freedom of expression by having a third party assure its impact assessments.

For its operating company in the United Kingdom, Vodafone, should:

- Provide aggregate data related to all of the requests (including private requests) it receives that it is legally allowed to publish under UK law, like copyright takedown requests and content blocked upon the request of the Counter Terrorism Internet Referral Unit,
- Explain the process of how Vodafone handles requests by private parties for user data
- More clearly disclose its sharing and retention policies for user information that it holds

Vodafone should make similar disclosures for all other operating companies to the greatest extent legally possible in those markets.

In some cases, laws restrict what companies can tell their customers. But many of these steps do *not* require a new law before a company can execute them. Your company can raise its score in the Index by taking the steps outlined above, and by continuing to address sector-wide challenges in organizations like the Global Network Initiative. By doing so, you would distinguish yourself in the sector as a leader, and earn a reputation among your customers as a champion of their privacy and other human rights.

As a first step, we recommend that you convene your corporate officers to digest this first Corporate Accountability Index report and develop a response. Whether you need a cross-team task force, an independent chairperson on human rights, or additional training for your staff, we trust that your company can meet the challenge of responding to the report. However, remember that if you don't make your response public, stakeholders in your company will remain in the dark about how you treat customers' rights. Their trust hangs in the balance.

We are happy to speak with you about your results and assist you in developing a response.

Sincerely,

A handwritten signature in black ink, appearing to read 'PM', with a stylized flourish at the end.

Peter Micek  
Global Policy & Legal Counsel  
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