



28 May 2021

Isedua Oribhabor  
Access Now  
463 Lincoln Place #241  
Brooklyn, New York 11238

Dear Isedua

Thank you for writing to us on 18 May 2021 about our performance in the 2020 Ranking Digital Rights Index, in which we were ranked second in the telecommunications company category, for the second year in a row.

At Vodafone, we connect for a better future and recognise that we have a significant role to play in a digital society. We believe that wherever we operate, we contribute to the wealth and development of countries, regions and local communities in a way that advances the protection and promotion of a number of fundamental human rights and freedoms and supports the full realisation of socio-economic development. We have committed to implementing the UN Guiding Principles on Business and Human Rights (UNGP), which are generally accepted as the authoritative guide on the corporate duty to respect human rights.

We recognise how important the Ranking Digital Rights Index is in helping to drive improvements in practices on the specific issues of privacy and free expression in the ICT sector. We have actively engaged with the Ranking Digital Rights team throughout the years since the Index's inception. Last year we participated in the consultation for the 2020 methodology and gave detailed comments on the new indicators to help ensure the revised methodology continues to provide a meaningful reflection on the participating communications service providers.

The Ranking Digital Rights Index focuses on the importance of transparency to support human rights. You can read more about our commitments [here](#) including our human rights policy statement and information on our most salient risks to human rights. We always welcome suggestions on how to improve our approach and are actively reviewing Ranking Digital Rights' dashboard on Vodafone to see how we can make our commitment to digital rights even more transparent.

In the same way that we engage with Ranking Digital Rights, we think it's important to collaborate with a range of other stakeholders to drive change. In that respect, we are a Board member of the Global Network Initiative, a multi-stakeholder initiative that works to protect and advance freedom of expression and privacy and privacy in the ICT sector. And we are one of twelve companies actively participating in the UN's multi-stakeholder B-Tech project aimed at advancing the implementation of the UNGP in the tech sector. We look forward to continuing engagement on these issues at RightsCon this year.

With warm regards,

A handwritten signature in black ink, appearing to read 'Moira Thompson Oliver', is written over the closing text.

Moira Thompson Oliver.