



**Artificial
Intelligence
Framework**

Introduction

Vodafone Group's Artificial Intelligence (AI) Framework sets out our approach to working with AI technologies and outlines how we intend to develop and employ it in a responsible manner across our international business; this also applies to the standards we expect from third parties developing AI systems in collaboration with and on behalf of Vodafone. We define AI as the application of advanced analytical techniques (such as Machine Learning, and Natural Language Processing) combined with automation to solve problems, develop personalised products and services and seize opportunities in new ways.

At Vodafone, we are using AI to help to improve our products and services and to run our business as effectively as possible. For example:

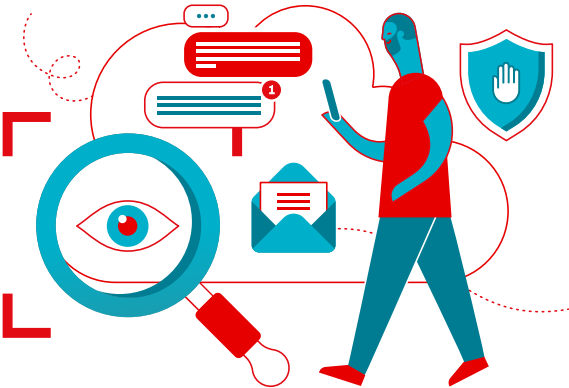
- AI-powered chat bots increase the speed with which customer enquiries can be resolved;
- AI techniques in our networks are used to identify where capacity is needed so that our customers can enjoy optimised data services, such as high quality video streaming;
- Vodafone employees use AI tools and software to help them work more efficiently; and
- We increasingly use AI to help support good decision-making, utilising 'big data' analysis based on large, anonymised data sets.

As AI grows in usage and impact across geographies and industries, Vodafone has a responsibility to consider how our use of this technology affects our **customers**, our **employees**, and wider **society**. We believe it is critical to ensure that the AI technologies we create and employ are designed to respect the **privacy** and **security** of the end user's data and their associated **fundamental rights**. The customer data we use is **pseudonymised** and **permissioned**. We will also seek to make AI-driven decisions that are fair and free of any harmful bias.



Vodafone's AI Framework

Transparency and Accountability



We endeavour to clearly inform our customers and employees when they communicate directly with AI-powered systems.

AI-based systems, like intelligent chat bots, have the ability to seem increasingly human in their responses. We believe that people should be informed about when they interact with an algorithm or some form of AI/non-human system.

A non-human system that acts as the primary interface for Vodafone customers or employees (for example, customer care chat bots) will identify itself as a non-human operator.

We strive to clearly inform our customers and employees about what data we collect on our users and how our systems utilise that data.

Vodafone AI systems should empower human beings, enabling them to make informed decisions.

Ethics and Fairness



We endeavour to develop AI in an ethical way so that it can be trusted.

State-of-the-art AI-based systems leverage large anonymised or pseudonymised data sets. It is critical that the outputs from these data-driven systems do not inadvertently guide us to make decisions that may affect any group or individual in an unfair way. Vodafone will strive to ensure that there is effective oversight and a 'human-in-control' approach to the use of AI. Beyond that, it is also important that Vodafone contributes to the debate about how this technology affects the societies we live in and is made as widely available as possible.

All our AI experts and data scientists are subject to our [Code of Conduct](#), which includes explicit provisions for nondiscrimination and fair treatment.

Vodafone will proactively participate in the scientific community, industry coalitions and self-regulatory bodies working on research, laws, regulations and ethical guidelines for AI, such as the EU High Level Expert Group on AI.

Vodafone will seek to reduce any digital divide that occurs in our markets because of differential access to AI-based technologies. That will include building capacity for greater AI usage through awareness-raising and educational partnerships.

Preservation of Privacy and Security



We endeavour to respect the privacy and protect the security of all individuals served by the AI we develop.

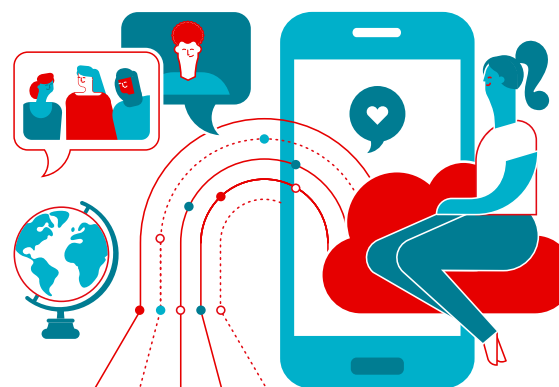
Customer trust is our number one priority. Respecting the privacy of our customers is essential to maintaining their trust in our business. Managing privacy risks effectively, including securing our network and putting customers in control of their data, is core to our approach.

We will ensure that customer data is carefully managed, in line with our strong [privacy commitments](#) and prevailing legislation and only used with AI systems when we have established a clear legal basis to do so.

Our customer data will always be securely stored under strict access control and in compliance with our Group data security policies and applicable local laws.

We will make sure that our security systems for AI are continually updated as the threat landscape evolves.

Human Rights, Diversity and Inclusivity



We will ensure that we respect international human rights standards and best practice around ensuring AI systems foster diversity, accessibility and inclusivity.

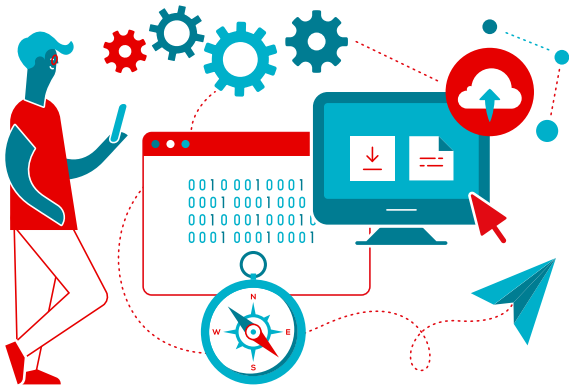
Vodafone upholds international human rights across its business footprint. Many of the issues that arise in the context of AI and human rights are not novel, but are exacerbated by the scale, proliferation, and real-life impact that AI facilitates. Because of this, the potential of AI to both strengthen and diminish human rights is much greater than in previous waves of technological development.

We will act responsibly and in accordance with technology industry best practice to minimise the risks of our systems being unlawfully used to the detriment of people's human rights.

Vodafone will proactively engage with industry peers and other relevant experts (e.g. academics and civil society) in consultation exercises to ensure that AI-based systems are human-centric and foster diversity and inclusivity.

We will establish and maintain a regular dialogue with our customers as to how we should use data and AI tools to serve them.

Maximising the Benefits of AI While Managing the Disruption of its Implementation



Vodafone is a responsible employer and is determined to become a leading, human-centric, digital business.

“ AI is not an end in itself, but rather a promising means to increase human flourishing, thereby enhancing individual and societal well-being and the common good, as well as bringing progress and innovation.”

Ethics Guidelines for Trustworthy AI, European Commission

Over time, we expect AI to automate an increasing number of routine tasks, enabling our employees to spend more time on higher value and rewarding activities, including the innovation needed to underpin sustainable business growth into the future.

We will support our existing employees to gain new skills so that they can apply for appropriate roles that are created by our improved digital capability.

We will deploy AI-based systems to provide more effective work environments, simplifying the work of our employees and improving their experience. We will provide training and education to help our employees use AI-based systems to support their work.

We will strive to ensure that our AI teams – in line with all other teams in Vodafone – are diverse.

Right of redress

Anyone who feels they have been unfairly treated as a result of a decision made by an AI system deployed by Vodafone will have the opportunity to escalate their concerns under the published process for Vodafone complaints in their country of operation.

Updates to this document

Vodafone will regularly review and update this Framework, in light of new products and technological developments. As the Framework evolves over time, we pledge to report on key learnings and observations regarding the development of ethical AI and the dissemination of these Framework commitments across the business.



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