

ANNUAL SUSTAINABILITY REPORT

Vodafone Ukraine
2024



Content

CEO Statement

Key performance results in 2024

About Vodafone Ukraine Group

13	About Vodafone Ukraine
21	Corporate governance
27	Stakeholder engagement and identification of material topics

The Group’s Strategy

35	Key strategic activities
37	Our Sustainable Development Strategy

Group’s ethical standards and compliance

41	Corporate ethics
43	Anti-corruption and anti-competitive behavior
47	Customer privacy and consumer safety

Creating economic value

51	Vodafone Ukraine products and services
55	Digital and innovation
59	Development of Infrastructure and network
65	Marketing and communication
71	Procurement activities

Contribution to social welfare

77	Human capital management and talent acquisition
89	Inclusion and Human Rights
97	Career development
105	Occupational health and safety
113	Contribution to the development of local communities

Environmental responsibility

123	Energy consumption
127	Impact on climate change and air emissions
131	Water resources usage
132	Waste management

About this report and background information

135	About this report
139	GRI content index
155	Appendix: numerical indicators
163	Independent practitioner’s limited assurance report
167	Contacts

CEO Statement

The past three years have been a test of resilience for the Vodafone Ukraine Group of companies.

2022 was a year of shock. The full-scale Russian invasion changed everything — we faced unprecedented network destruction, huge losses and the mass migration of our customers both within the country and abroad. We had to restructure our business within weeks in order to quickly restore network operations and provide reliable connectivity to people under any circumstances.

2023 was a year of battling the darkness. Massive attacks on Ukraine's energy infrastructure required enormous investments and, at times, superhuman efforts to keep the network running during frequent and prolonged blackouts. Once again, our priority was to provide uninterrupted connectivity under any circumstances, which we largely accomplished.

Over the past years, we have become faster, more efficient and more resilient. However, 2024 brought new realities that required even greater resilience, adaptability and perseverance. Our key challenges included ensuring the energy resilience of the network, maximizing investment efficiency amid rising costs for network restoration and development, achieving energy independence, expanding fixed internet access with GPON technology, participating in tenders for new frequencies, navigating intensifying market competition, maintaining investor confidence in challenging economic conditions and preserving our team.

Despite the enormous losses caused by the war, our investments reached a record UAH 15.5 billion over the three years of war. Ukrainians fully rely on Vodafone as connectivity is available day and night, even during shelling and power outages. Behind this stability lies a tremendous effort. We have restored more than 1,000 base stations and reconnected approximately 900 settlements. We have launched over 7,000 new base stations, enhancing coverage in the regions where our customers have massively migrated to. We acquired new 4G licenses to increase network capacity and performance. Our backup energy capacity for network operation during power outages has significantly increased — we have expanded our battery stock eightfold and increased the number of available generators by a third.

We not only strengthened our network in 2024 but also expanded the capabilities of digital technologies. We started implementing a new state-of-the-art billing system that will enable the launch of new high-tech services for our customers. We firmly believe that digitalization, technologies and innovation are crucial to the recovery and development of our country. That is why we invest in creating digital solutions that help businesses, the government and citizens optimise their use of resources. Our solutions in AI, Big Data and IoT are already improving the quality of life and the efficiency of processes in various sectors, from transportation and energy to social services. Today we are actively working on digital solutions that are transforming the telecom industry and preparing Ukraine for the implementation of cutting-edge technologies, including 5G.



Olga Ustinova,

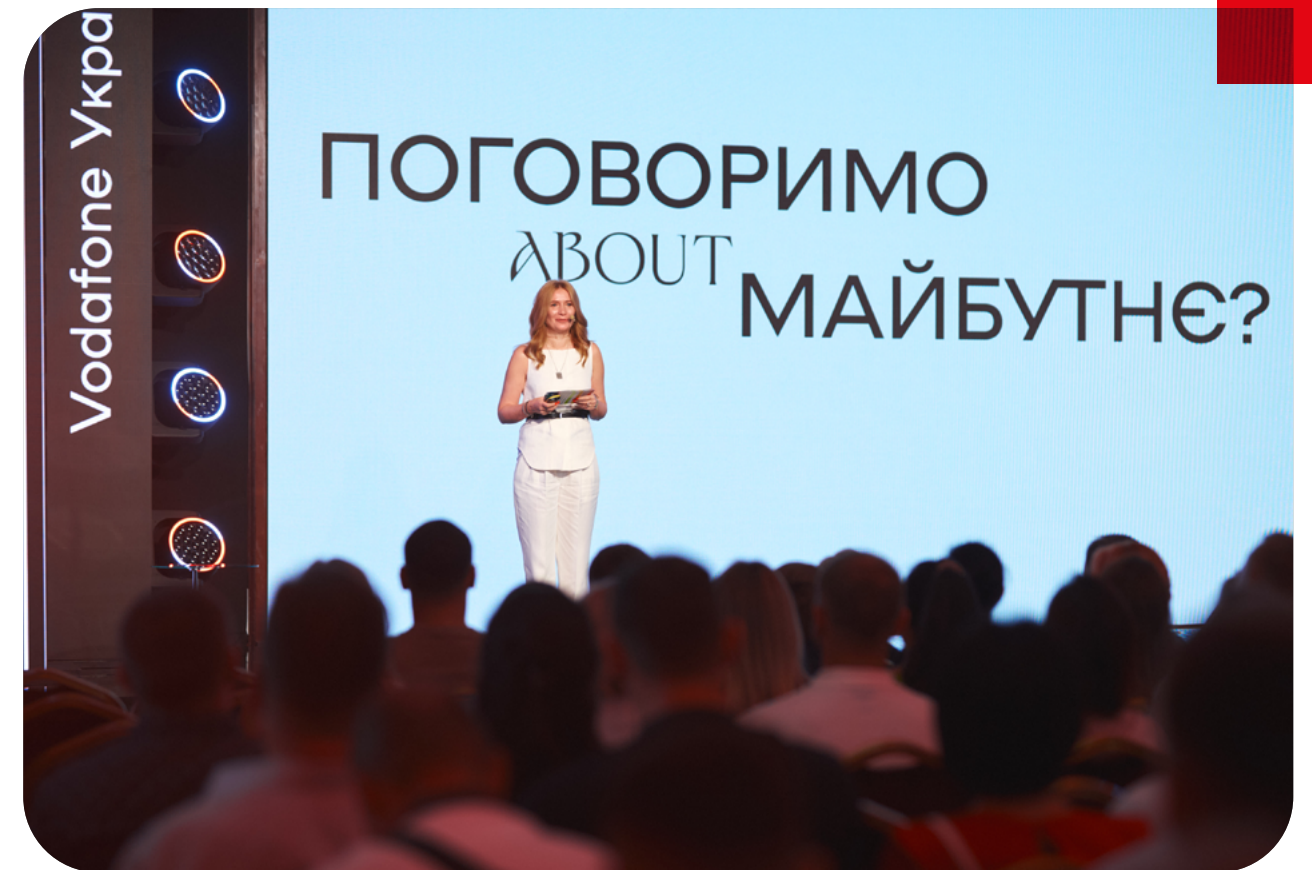
CEO
Vodafone Ukraine

Environmental responsibility remains one of our key priorities. Vodafone is committed to implementing energy-efficient technologies, thus reducing electricity consumption and CO₂ emissions. In 2024, we launched a pilot project using solar power plants as backup energy sources power for base stations.

Vodafone also actively supports educational initiatives aimed at enhancing overall digital literacy and modern high-quality technological education. We are developing cybersecurity programs to help Ukrainians adapt to the new digital reality, investing in engineering education and creating wider opportunities for learning and for hands-on experience with advanced technologies. We also continue training highly professional Big Data analysts through our own academy.

In response to the challenges of our time, we are transforming ourselves. Vodafone Ukraine has evolved into a Group of companies, comprising a mobile network operator, a fixed-line provider, a dedicated tech retail network, its own IT company, and a tower company committed to network expansion.

We realise that even greater challenges lie ahead. As long as the war persists, new and diverse difficulties will inevitably arise. Yet, the Vodafone team has consistently demonstrated its ability to overcome obstacles and will continue to rise to the occasion, in order to fulfil our most important mission — delivering reliable connectivity to people, regardless of the circumstances.



Key performance results in 2024

31.9%

Vodafone Ukraine's market share by revenue¹

15,787,366

Number of active mobile subscribers as of 12/31/2024

289 thousand

Number of active subscribers of fixed-line Internet services

424

Number of brand outlets as of 12/31/2024

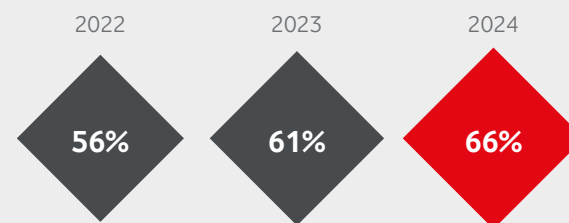
4,461

People in the team

Number of 4G customers, million people



4G users, % of base

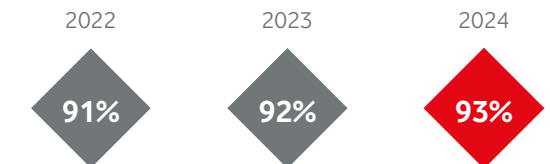


1. The market share is reflected as of the 2nd quarter of 2024, as there is no comprehensive data about subscriber base and revenues of other market operators in the public domain for subsequent periods.

Volume of data traffic per user, MB



4G LTE network coverage of the population of Ukraine²



Investments in energy sustainability in 2024

- About UAH 754 million was invested in the blackouts support project
- Mobile and fixed networks were equipped with 34,592 batteries and 347 generators
- More than 1.28 million households were provided with Internet access that works without electricity
- Vodafone Ukraine has built 3 solar power plants in Poltava and Dnipro regions

Invested UAH 988 million in the acquisition of 4G licenses, which will increase network capacity and service quality, as well as introduce advanced technologies such as VoLTE

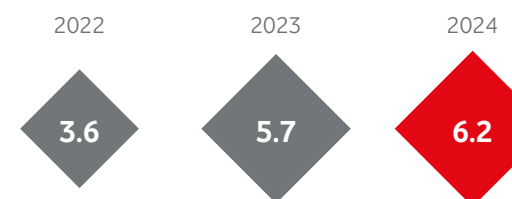
Launched a revolutionary convergent offer COMBO — mobile + fixed Internet + TV

Capital raising and partnerships

- During February 2025 the Group redeemed its Notes with a total face value of USD 99.88 million (UAH 4,161 million), and made its scheduled semi-annual interest payment.
- In June 2024 Vodafone Ukraine and Vodafone Global signed an extension cooperation agreement for the next five years, granting Vodafone Ukraine access to Vodafone's expertise in IT transformation, Internet of Things (IoT) and 5G-based services.

Financial indicators, UAH billion

Total investments of the Group amounted



OIBDA in 2024



2. Calculated for 20 regions (excluding regions under partial or full territorial occupation).

ABOUT

VODAFONE UKRAINE

GROUP

- About Vodafone Ukraine
- Corporate governance
- Stakeholder engagement and identification of material topics



About Vodafone Ukraine

Vodafone Ukraine is a group of companies that provides a wide range of telecommunication services, including mobile communications, Internet access, pay television, as well as the sale of equipment and accessories. Since the beginning of full-scale russian invasion of Ukraine, the Group has focused its efforts on ensuring the resilience and continuity of service delivery and supporting Ukraine during the challenging wartime conditions.

Vodafone is actively investing in the Ukrainian economy, demonstrating its level of business stability, high operational performance, and strong financial results. The Group of Companies is working on restoring damaged infrastructure, strengthening the energy resilience of its mobile and fixed communication facilities, and

expanding network capacity. These efforts allow us to provide customers with uninterrupted communication and high-quality Internet.

The Group of Companies continues to develop fourth (4G) and fifth (5G) generation networks, delivering high data transmission speeds and improved communication quality. Vodafone Ukraine is implementing modern fibre-optic technologies for fixed Internet access, enabling high-speed Internet in apartment buildings and enhancing urban infrastructure. In addition, the Group is advancing NB-IoT networks for reliable communication in hard-to-reach areas and is also introducing energy efficient solutions for mobile communication facilities amid unstable power supply conditions.



Organisational Structure

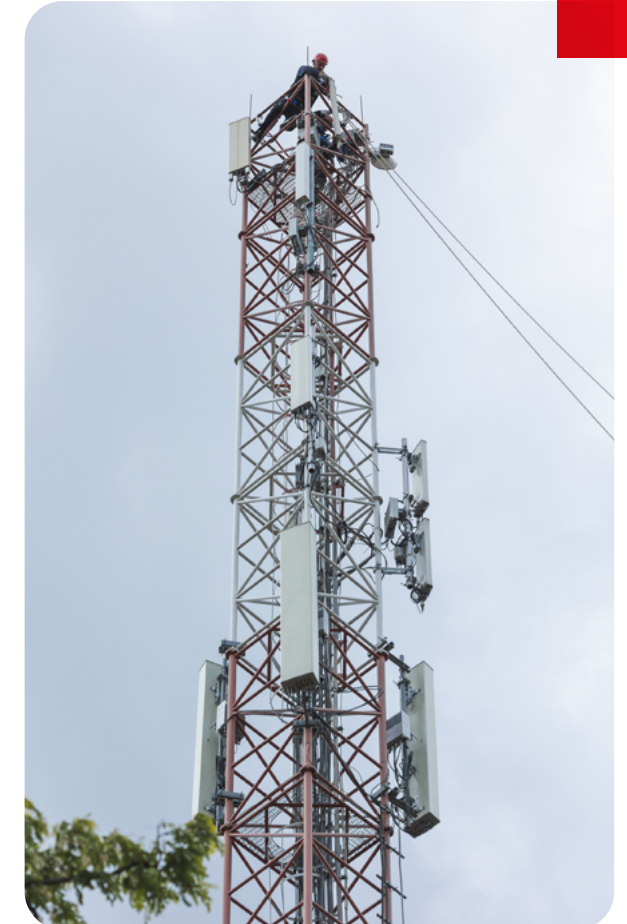
Vodafone Ukraine comprises a number of companies that perform various functions in the telecommunications sector. The main operating company is **VF Ukraine**, which offers mobile communication services, modern and comprehensive packages of digital services, Big Data and Internet of Things (IoT) solutions.

Subsidiaries:

- **VF Retail**, a network of mobile & gadget stores serving Vodafone customers in 35 cities across Ukraine.
- **ITSF**, a support services provider specializing in software development and digital innovations for Big Data and IaaS.
- **Farlep-Invest** and **Freenet** provide fixed Internet access and telephone communication services.
- **Ukrainian Network Solutions (UNS)** conducts management of passive tower infrastructure, as well as its maintenance and development.

The synergy of companies with diverse profiles allows the Group to implement the best global practices.

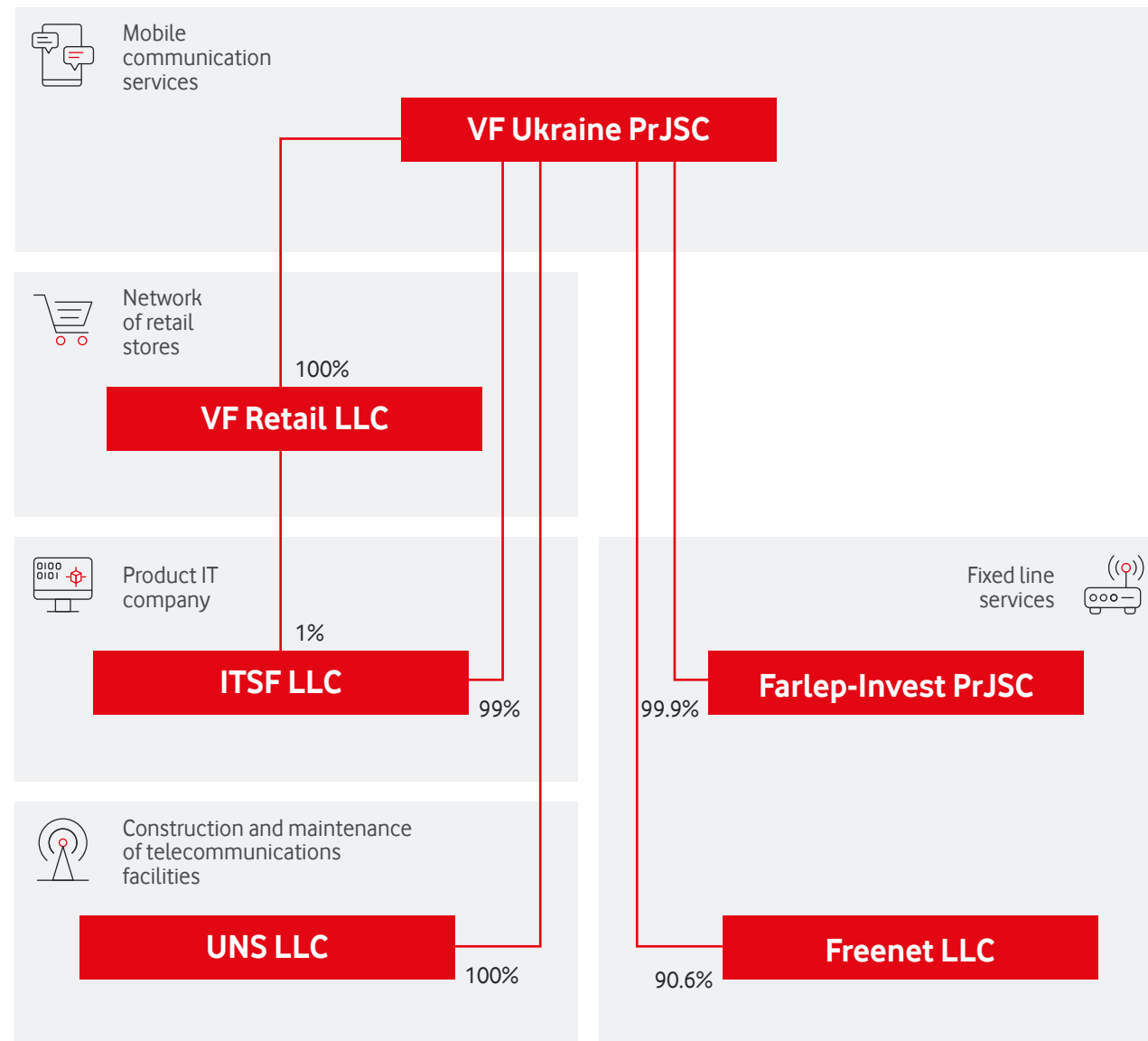
In addition, there are entities belonging to Vodafone Ukraine that perform special auxiliary functions, but do not have separate personnel and do not engage in active operations. Those are CABLE TV-FINANCE LLC, which operates in the telecommunications sector (as of the report date, it is in the process of termination), and VFU Funding PLC, founded in England and Wales to issue bonds.



The ownership structure of VF Ukraine PrJSC is as follows: Telco Investments B.V. (Netherlands) owns 99.00209% of the Company's shares and PTT TELECOM KYIV (Ukraine), an enterprise with 100% foreign investment, owns 0.99791% of the shares. In the reporting year, Telco Solutions B.V. (Netherlands) merged with Telco Investments B.V. (Netherlands), the majority shareholder of VF Ukraine PrJSC.

The chart below illustrates the ownership structure and share size for the Group's entities, with the majority shareholder being Telco Investments B.V. registered in the Netherlands.

Organisation Chart for Vodafone Ukraine Group of Companies³



In 2024, Vega Telecom (which includes Farlep-Invest and Cable TV-Finance) continued its integration into Vodafone Ukraine, which evolved into a bilateral process. Additionally, the integration of Freenet also progressed during the reporting year. Meanwhile, UNS LLC, the subsidiary responsible for the

management, maintenance, and development of VF Ukraine PrJSC's tower infrastructure, began its operations in 2024. Its core activities include construction and maintenance of telecommunications facilities, leasing of its own passive infrastructure assets and carrying out other construction, installation and specialised works.

Functional Structure of the Group

The successful operation of the Group of Companies comes from the close interaction between its directorates and departments that include the functional areas outlined below:

- **Technical Directorate:** responsible for the development, modernisation and uninterrupted operation of the network, as well as for the implementation of digital services
- **Sales and Service:** focuses on growing the customer base, consumer acquisition and service improvement
- **Marketing:** responsible for creating new products and services, managing tariff plans and boosting customer loyalty
- **Human Capital and Administrative Resources Management:** responsible for HR management, building employer brand, internal communications and administrative support of the business
- **Corporate Governance and Control:** handles legal support, interaction with regulators, PR and compliance
- **IT:** responsible for the development of information systems, digitalisation of processes and cybersecurity
- **Finance:** entrusted with financial management, budgeting and cost control
- **Procurement and Logistics:** oversees strategic supplier management, tendering and logistics streamlining
- **Strategy:** ensures a continuous strategic planning process to define the future development and growth paths of Vodafone Ukraine
- **Quality:** focuses on improving quality standards and customer experience
- **Security:** responsible for protecting physical and intellectual property, risk mitigation for core activities
- **Audit:** conducts internal controls, risk assessments and financial audits

This structure fosters a stable development of the Group of Companies, ensures the coordinated work of all units and aligns with the organisation's strategic goals.

3. 9.4% of the authorised capital of Freenet LLC belongs to Telco Investments B.V., which is the majority shareholder of VF Ukraine PrJSC.

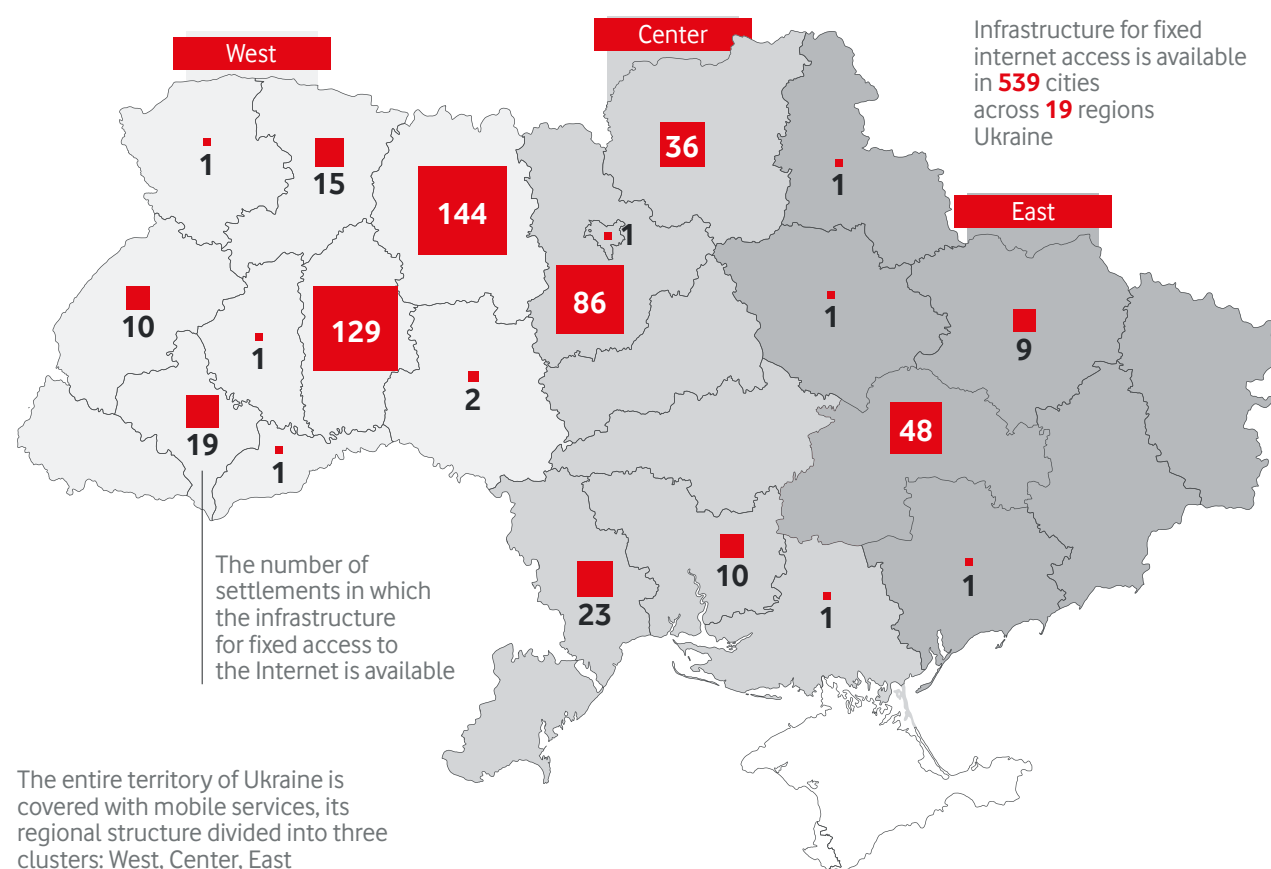
Regional Structure

The entire territory of Ukraine is covered by mobile communication services.

The Group of Companies has thousands of technical sites with base stations and other communication equipment, along with numerous regional stores and local offices. In 2024, our network operated 90 own stores, 26 of which were reformatted. Thanks to the expanded range of products and services, modernised interior designs and the introduction of cutting-edge technologies, our stores are increasingly becoming more appealing to customers. Every

year, the number of modernised stores is growing: in 2024, we renovated 14 locations, and in 2025, we plan on carrying out 15 renovations and opening 10 new stores. Vodafone Retail has observed a positive impact of the store reformatting initiative: with an overall increase in the chain's turnover of 14%, with reformatted stores showing an average growth of 33%.

In order to ensure effective management and supply chain optimization, Vodafone Ukraine operates through three regional clusters: West, Center, and East⁴.



4. This refers to the territory under the control of the Government of Ukraine.

Participation in Associations and External Initiatives

In the reporting year, Vodafone Ukraine joined the newly established Committee on Lobbying and Transparency Policies of the European Business Association, which was set up in response to the adoption of the Law of Ukraine No. 3606-IX "On Lobbying" of the 23 February 2024. This law was an important step in regulating lobbying activities and ensuring ethical interaction between business and government bodies. The main objective of the Committee is to bring together lobbying experts, GR professionals and lawyers to share experiences and develop initiatives that enhance the level of transparency and responsibility in business. Through its participation, the Group seeks to promote legislative changes, organise sectoral meetings and help companies adapt to new legislative requirements, which, in turn, will contribute to the sustainable development of business in Ukraine.



Furthermore, the Group of Companies is an active participant in the following communities:



Ukrainian Association of Telecommunications Operators "Telas", which protects the interests of Ukrainian telecommunications operators and supports their development. Vodafone Ukraine co-founded this association.



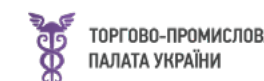
Internet Association of Ukraine "InAU", which implements projects that contribute to the development of the Ukrainian segment of the global Internet network.



American Chamber of Commerce (ACC) Representative Office, which lobbies for the interests of members of the American Chamber of Commerce Representative Office in Ukraine and attracts foreign investors to the Ukrainian market.



European Business Association (EBA), which advocates for the implementation of best advocacy and lobbying practices in Ukraine, working on relevant legislation in the fields of lobbying, regulatory matters and transparent policies.



Ukrainian Chamber of Commerce and Industry, which promotes the development of the digital economy, the introduction of modern technologies and solutions, and supports the implementation of innovations in Ukraine.



Nataliya Shevchenko,

Chief Financial Officer
of PrJSC "VF Ukraine"

Approach to Financial Statements

All entities covered in this Annual Sustainability Report are also integrated into Vodafone Ukraine's financial statements for 2024. The Group draws up its financial statements in accordance with the International Financial Reporting Standards (IFRS), as approved by the International Accounting Standards Board (IASB), as well as in accordance with the Law of Ukraine "On Accounting and Financial Reporting in Ukraine".

The consolidated financial statements of the parent company, VF Ukraine, incorporate its own financial statements and those of its controlled entities. Performance results for the controlled entities that were acquired or sold during the reporting period are reflected in the consolidated financial statements from the

date when the Group obtained control over the entity and until the date when control is lost. Where necessary, the accounting policies of controlled entities are aligned with the Group's policies.

All intra-group assets and liabilities, equity items, revenue, expenses and cash flows from transactions between Group companies are eliminated on consolidation. The Group's management is responsible for the compiling and accurate presentation of these financial statements as well as for assessing the Group's ability to continue as a going concern. The Supervisory Board and the Audit Committee oversee the process of preparing and approving the Group's financial statements.

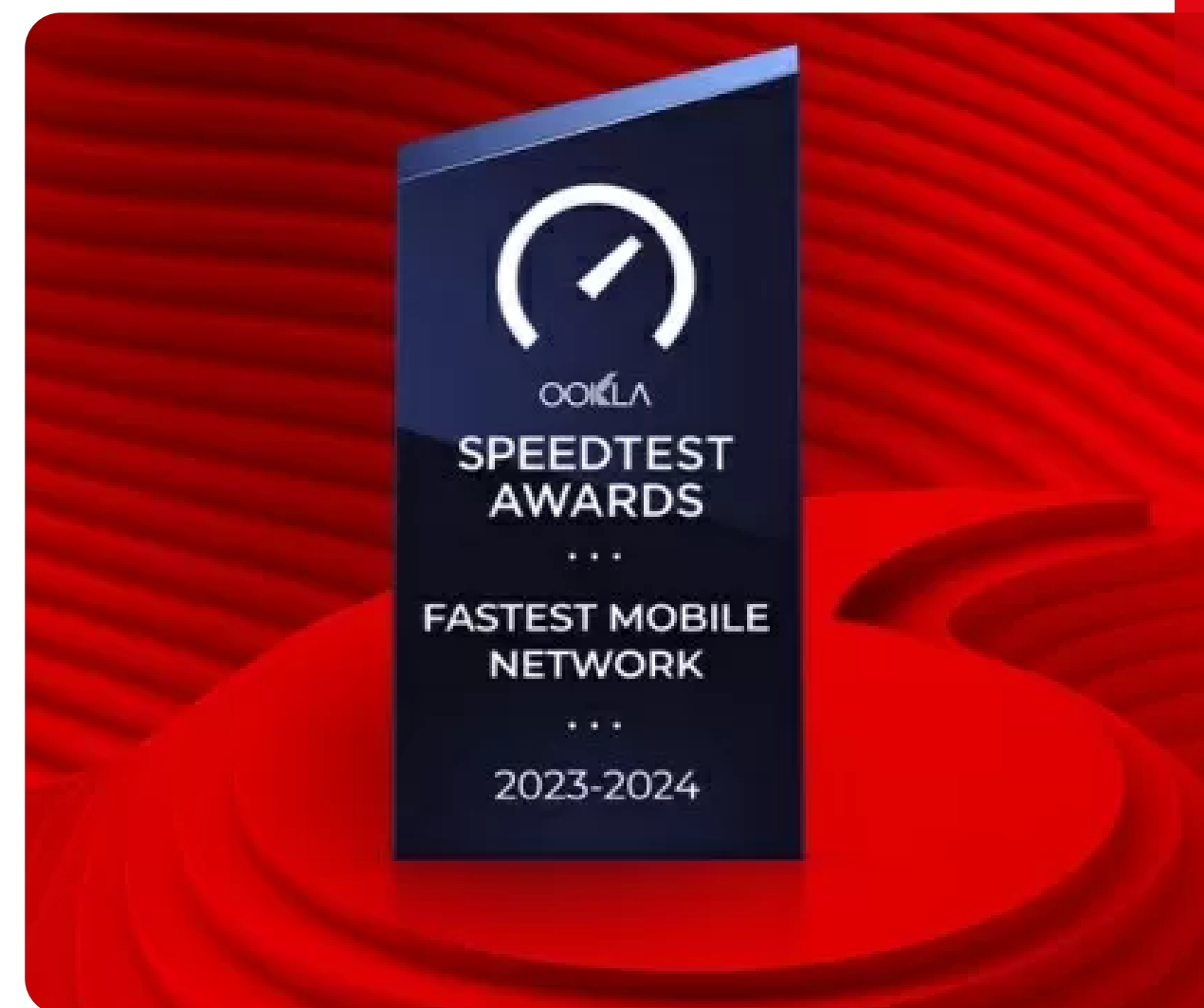
Awards

In 2024, the Group of Companies was nominated in the "HR in Business Transformation" category of the All-Ukrainian HR Pro Awards. In addition, Vodafone Ukraine was recognised as one of the 50 best employers of 2024, according to Forbes and robota.ua.

Following user tests by Ookla, Vodafone received the Speedtest Awards twice in a row as the fastest mobile Internet operator in Ukraine, in Q3-Q4 of 2023 and Q1-Q2 of 2024. The winner is determined based on the Speed Score, which reflects a weighted average speed of mobile Internet, whereby the main contributing factor is the median download speed, that is, the average speed that users get under standard network usage conditions. To earn this award,

Vodafone achieved a speed score of 31.79 Mbps, with median download speeds of 26.87 Mbps and median upload speeds of 11.35 Mbps.

The My Vodafone mobile app was among the winners of the All-Ukrainian CX Excellence customer experience award and took second place in the Best User Experience (UX) nomination, which recognises the high level of convenience and quality of interaction with users. Vodafone's charity project "League of Warmth" aimed at supporting vulnerable groups won the social initiative contest "Responsible Country 2.0". Furthermore, during the reporting period, the Group received numerous accolades from military units for the support and assistance it gave them.



Corporate governance

Corporate governance structure

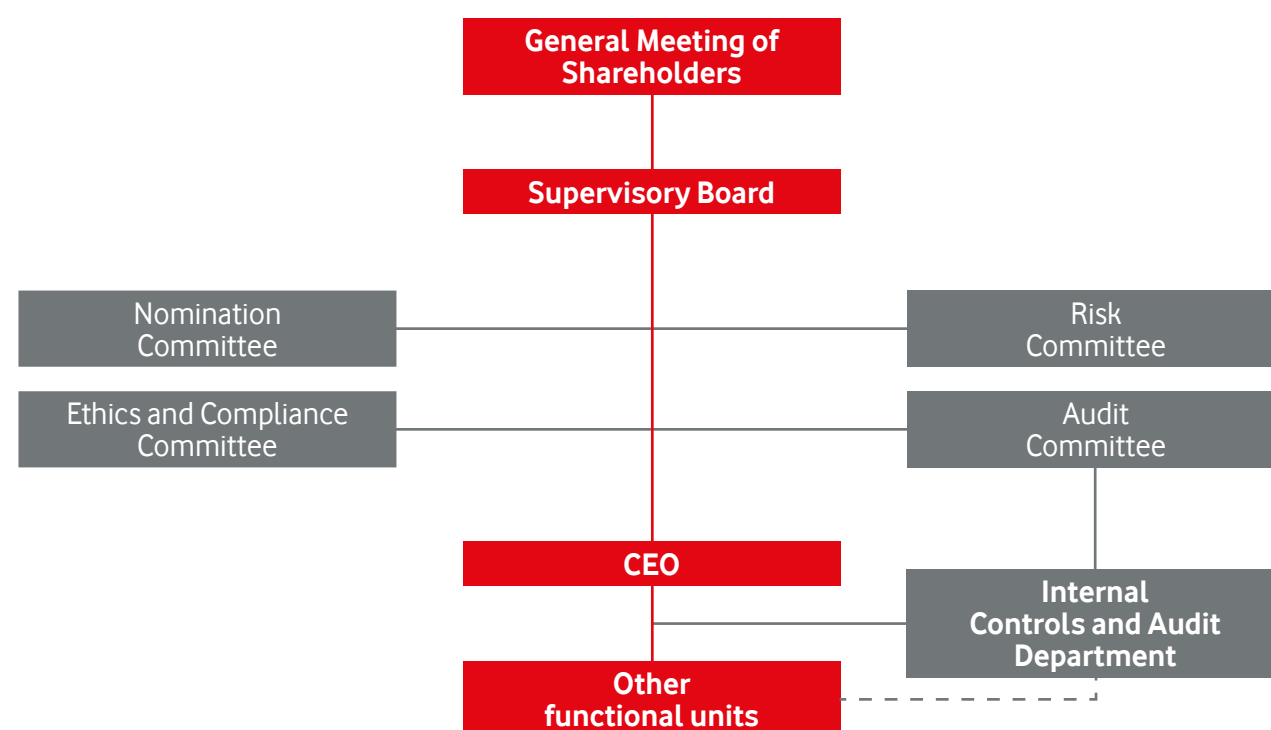
The activities of the management and control bodies of VF Ukraine PrJSC are regulated by the Law of Ukraine “On Joint-Stock Companies”, as well as the internal Charter and Regulations. Vodafone Ukraine meets the above requirements and adheres to the corporate governance standards approved by the National Securities and Stock Market Commission. The Group of companies is an integral part of NEQSOL Holding (Netherlands), the ultimate beneficial owner is Nasib Khasanov.

VF Ukraine PrJSC has a two-tier management structure in place, where the General Meeting of Shareholders, the Supervisory Board and the CEO are the main management bodies. The two-tier management structure provides for

a clear division between the direct company operations management functions, which are performed by the CEO, and the control functions over the activities of the executive management body and managers, which are performed by the Supervisory Board.

In accordance with the Charter, the CEO develops and updates the development strategy of VF Ukraine PrJSC, which includes the goal, objectives, values and functional areas of activity. The Supervisory Board of VF Ukraine PrJSC annually approves a development strategy for 3 years and considers the sustainable development strategy prepared by the Group's senior management.

VF Ukraine PrJSC corporate governance structure⁵



5. VF Ukraine PrJSC has decided to liquidate the Inspection Committee, since the Group already has an Audit Committee as a control body, and in accordance with the Law of Ukraine “On Joint-Stock Companies”, the Inspection Committee is not mandatory.



Governing bodies

The **General Meeting of Shareholders** is the highest governing body of VF Ukraine PrJSC. Its key functions include the adoption of strategic decisions by shareholders, approval of amendments to the Charter, and election of the Chair and members of the Supervisory Board.

The **Supervisory Board** is a body that represents the interests of shareholders in the period between the General Meeting of Shareholders, protects the rights of shareholders and controls the activities

of VF Ukraine PrJSC and the CEO. The Supervisory Board approves the development strategy of VF Ukraine PrJSC and ensures its implementation and compliance with the corporate governance principles.

The **CEO** is a sole executive body that manages the current activities of VF Ukraine PrJSC. The CEO is accountable to the General Meeting of Shareholders and the Supervisory Board of VF Ukraine PrJSC.

The committees under the Supervisory Board

The powers of the committees are defined by the Charter of VF Ukraine PrJSC and the Regulations on committees. Four committees operate under the Supervisory Board in the reporting period:

1 The Human Resources and Appointments Committee

is a permanent collegial advisory body of the Supervisory Board of VF Ukraine PrJSC, which preliminarily considers, analyses and prepares recommendations for the Supervisory Board on personnel appointments in management and control bodies, senior managers who are directly subordinate to the CEO, as well as on issues of the motivation system. The Committee assesses the competencies, experience and skills of candidates, and also takes into account the opinions of stakeholders, including shareholders, regarding the composition of the senior management. In addition, this Committee is responsible for determining the term of office of the Group's senior management.

2 The Audit Committee is a permanent collegial advisory body of the Supervisory Board, exercising independent control over the completeness and accuracy of VF Ukraine PrJSC's financial statements and analyzing the effectiveness of the internal control system. It is also responsible for cooperation with external auditing firms and evaluating the work of both internal and external auditors.

The Ethics and Compliance Committee and the Risk Committee were established under the Supervisory Board of VF Ukraine PrJSC in 2024.

3 The Risk Committee is a permanent collegial advisory body of the Supervisory Board, responsible for identifying, analysing and managing risks that may affect the company's operations. It develops strategies to minimize risks and ensures their implementation, contributing to sustainable development and protecting the interests of shareholders.

4 The Ethics and Compliance Committee is a permanent collegial advisory body of the Supervisory Board, responsible for approving policies and commitments on corporate ethics at the highest level. The Committee also promotes the implementation of the highest ethical standards of business conduct and compliance with applicable legislation in the activities of the Group. To achieve this objective, the Committee ensures:

- assessing the risks of bribery and corruption within the Group, and conducting reputation checks;
- auditing and monitoring in the form of regular checks carried out as part of normal operations to confirm ongoing compliance with the Corporate Ethics Policies;
- training staff in recognizing corruption risks, as well as familiarizing the Group's business partners with the law criminalizing bribery and corruption;
- internal investigations to identify misconduct or fraud;
- facilitating the development and effective application of the Compliance and Ethics Program to third parties, including affiliated organizations, agents and subcontractors.

VF Ukraine PrJSC Committees

The CEO is assisted by an advisory collegial body — the **Management Committee**, which prepares draft decisions for the CEO on VF Ukraine PrJSC management issues. The Committee examines and makes decisions on the organization of effective operational management of the Company's current activities, development of proposals on strategic and tactical issues affecting the Company as a whole, and more.

Vodafone Ukraine PrJSC also has the following committees:

- **The Business and IT Committee** is a collegial body that determines the development areas of VF Ukraine PrJSC through the implementation of products and projects that require the involvement of both external and internal IT resources of Vodafone Ukraine PrJSC.
- **The Investment Committee** is a collegial body responsible for the coordination, approval, and monitoring of the implementation of projects at the VF Ukraine PrJSC level.
- **The Products, Tariffs and Services Committee** is a collegial body that makes decisions on the launch, development or replacement of products, tariffs, and services of VF Ukraine PrJSC. The Committee is responsible for coordinating and making decisions on the operational management of VF Ukraine PrJSC's marketing and product activities.
- **The Sponsorship Committee** is a permanent advisory body, accountable to the Marketing Director, created to support sponsorship activities in accordance with the developed sponsorship strategy for the medium- and long-term development priorities of VF Ukraine PrJSC and to implement relevant changes in the sponsorship system.

■ **The Risk Committee** is a collegial body, accountable to the CEO, responsible for coordinating, collective decision-making, and controlling risk management at VF Ukraine PrJSC. The committee's activities aim to enhance risk management efficiency, implement additional measures to prevent, minimize, and neutralize significant risks to minimize unforeseen losses from risks and maximize the Company's capitalization, considering the acceptable risk-return ratio for the Company's management and shareholders.

■ **The Ethics and Discipline Committee** is a permanent advisory, collegial body established by VF Ukraine PrJSC to raise the level of labor discipline, ensure compliance with established business conduct rules and ethical standards set by the VF Ukraine PrJSC Code of Conduct and other internal regulatory documents. The committee is also responsible for the legality of applying disciplinary measures and other actions towards VF Ukraine PrJSC employees as provided by labor legislation, the Code of Conduct, and internal regulatory documents.

■ **The Charity Management Committee** is a permanent advisory body in the field of charity at VF Ukraine PrJSC. The committee is established to oversee the charitable activities of VF Ukraine PrJSC.

VF Ukraine PrJSC has established communication system that ensure that the employees, top management, and management and control bodies are promptly informed about the existing issues:

- Top-down system includes quarterly review by the Supervisory Board of a risk report with their assessment and safeguards.
- Down-top system includes review of the issues related to the management of the Company's impacts presented by top management at the Supervisory Board meeting.

Changes in the management structure

According to the Law of Ukraine “On Joint Stock Companies”, the exclusive competence of the General Meeting of Shareholders includes making a decision on changing the management structure, including the termination of powers and election of members of the Supervisory Board, approval of the terms of civil law agreements, employment agreements (contracts) concluded with the members of the Supervisory Board.

An extraordinary general meeting of shareholders of VF Ukraine PrJSC in March of the reporting year made a decision on the termination of powers of all members of the Revision Commission and on the liquidation of the Revision Commission. The functions of the control body are fully transferred to the Audit Committee. Moreover, the Law of Ukraine “On Joint Stock Companies” does not provide for such a body as the Revision Commission, therefore this decision complies with the legislation and best corporate governance practices.

The shareholders of VF Ukraine PrJSC have the right to nominate candidates for election to the Supervisory Board. If a shareholder wants to nominate a candidate, he/she shall submit his/her proposal in advance. This issue will be considered at the General Meeting of Shareholders, where the members of the Supervisory Board will be elected. The Supervisory Board, in turn, has the right to nominate candidates for election to the executive body and committees. It also determines the term of office of the CEO and members of the committees.

The main requirements for the skills, experience and competencies of members of the supreme management body are defined in the Regulations on the Supervisory Board and in the agreement concluded with a member of the Supervisory Board. When shareholders nominate candidates for the Supervisory Board, they have to provide information about the

main skills, experience and competencies of the candidates. This includes information about education and existing academic degrees. The information also should be provided about the positions held by the candidate over the past 5 years, as well as about his/her membership in the management bodies of legal entities over the same period.

The Supervisory Board has the right to nominate candidates for election to the executive body and committees. It also determines the term of office of the CEO and committee members. The criteria for the candidacy of the CEO are determined by the Human Resources and Appointments Committee, taking into account the opinions of shareholders, the independence, experience and skills of the candidate.

The exclusive competence of the Supervisory Board includes:

- election and termination of the powers of the CEO, approval of the terms of the contract with CEO, establishment of the amount and procedure for payment of remuneration;
- approval of the principles of performance assessment and the remuneration system, as well as control over the activities of the CEO and senior managers of the Company, who are directly subordinate to the CEO;
- consideration and approval of candidates to be nominated as potential members of the management and control bodies of subsidiaries.

While nominating and selecting of members of the supreme management body, executive body and committees, the Supervisory Board Human Resources and Appointments Committee adheres to the principles of diversity in corporate governance bodies, independence of candidates and relevance of candidates' competencies, experience and skills.

Changes in ownership structure

On December 16, 2024, Telco Solutions B.V. (Netherlands) merged with Telco Investments B.V. (Netherlands), the majority shareholder of VF Ukraine PrJSC. As of the end of the reporting period, the shareholders of VF Ukraine PrJSC remained unchanged, namely: Telco Investments B.V. (Netherlands) — 99.00209% of the Company's shares and PTT Telecom Kyiv (Ukraine), the Company with 100% foreign investment — 0.99791% of the shares.

Changes in the Charter

In the reporting year, the extraordinary general meeting of shareholders of VF Ukraine PrJSC adopted decisions to amend the Charter of VF Ukraine PrJSC related to the succession of the rights and obligations of Cable TV-Finance LLC and approval of the transfer deed between Cable TV-Finance LLC and VF Ukraine PrJSC. Following the decisions of the Meeting, the new version of the Charter of VF Ukraine PrJSC with the changes regarding the merger of Cable TV-Finance LLC with VF Ukraine PrJSC was officially registered within the State Register.

Preventing conflicts of interest

Vodafone Ukraine has its Conflicts of Interest Management Policy in place, which describes the processes for preventing and minimizing conflicts of interest. We ensure the transparency of our activities by providing banks and counterparties with information upon their requests. Vodafone Ukraine also conducts a survey of officials, including senior management, every six months. Based on the survey and available data, a List of Related Parties (Affiliates) of Vodafone Ukraine is compiled and posted on the intranet (in the Corporate Governance section).

Discussing important issues

The Group's senior management may raise the issues regarding the management of economic, environmental and social impacts at a Supervisory Board meeting. Also, in connection with the introduction of martial law, Vodafone Ukraine's top management has prepared the emergency action plan. The updated information on the control of the implementation of the plan is submitted to the Supervisory Board for consideration on a regular basis.

Determining remuneration

Vodafone Ukraine determines the remuneration of the members of the Supervisory Board and senior management using clear criteria set out in the Regulations on the Supervisory Board and in internal regulations. The senior management remuneration issues are also regulated by the Program of long-term material incentives for employees of VF Ukraine PrJSC and its subsidiaries. The remuneration of the members of the supreme management body is fixed, and the remuneration of senior managers depends on the net profit of the Group, individual and corporate KPIs.

The terms of the contract with the CEO, including the issues of compensation, remuneration and payments upon termination of employment, are approved by the Supervisory Board. Additional payments to the CEO are determined by regulations approved by the Supervisory Board. During 2024, no cases of return of previously paid amounts or pension benefits were recorded. The Supervisory Board Human Resources and Appointments Committee of VF Ukraine PrJSC develops recommendations on the motivation system in management and control bodies.

Stakeholder engagement and identification of material topics

Stakeholder engagement

Engaging actively with all stakeholder groups has enabled Vodafone Ukraine to foster effective communication, strengthen long-term partnerships and respond to modern challenges in a timely manner. We provide our customers with up-to-date information about our products and services, while offering seamless access both to convenient communication channels and advisory support. For this purpose, an

[online feedback form](#) is available on the Group's official website.

Shareholders have the opportunity to discuss strategic issues and key business decisions at monthly meetings, which promotes transparency of management. Our partners maintain constant contact with the Group through regular meetings aimed at discussing

prospects for cooperation and development. To engage stakeholders, the line departments develop interaction strategies on an annual basis.

Vodafone Ukraine cooperates with state bodies on drafting laws and regulations in the field of electronic communications, in order to facilitate the construction of Internet networks. Interaction with the media is also an important

element of Vodafone Ukraine's openness policy. We provide updates to the media on a regular basis through commentaries, interviews and press releases, highlighting the activities of the Group, strategic initiatives and technological solutions. In the reporting year, special attention was paid to our activities under martial law, in particular, introduction of energy-efficient GPON technology and expansion of Internet access coverage in the administrative regions of Ukraine.

Table 1.1: Stakeholder groups and approaches to engaging with them

Stakeholder group	Ways of stakeholder engagement in 2024	Frequency of engagement	Key topics
Customers (subscribers)	Advertising, call centre, website, negotiations, official correspondence, SMS notifications, etc.	On a daily basis	<ul style="list-style-type: none">■ Services and tariffs■ News of the Group■ Restoring communications in wartime■ Products and connections
Group employees and their families	Mainly through internal communication channels (meetings, corporate network, trainings, etc.)	On a daily basis	<ul style="list-style-type: none">■ News of the Group■ Corporate ethics■ Employee assistance and support programs■ Interaction with management
Shareholders and investors	Reports, presentations, shareholder meetings, meetings, sessions, website, official correspondence	On an on-going basis, quarterly reporting	<ul style="list-style-type: none">■ Vodafone Ukraine PrJSC financing■ Group's financial results■ Information on important decisions, changes, appointments in the Group, launch of new services
Partners (suppliers)	Tenders, negotiations, presentations, meetings, corporate website, official correspondence	On an on-going basis	<ul style="list-style-type: none">■ Terms of agreements and their implementation, including the construction of GPON networks and client access
Media community (journalists, bloggers, opinion leaders)	Written comments on journalistic inquiries, news distribution, press releases about the Group's activities and products, meetings, online and offline interviews, speeches at events	On an on-going basis	<ul style="list-style-type: none">■ Development of GPON and internet in the regions■ Activities and challenges during martial law: network restoration and maintenance during power outages■ Company news■ Financial results, new products and technologies
State authorities	Meetings, participation in events, responses to written inquiries	On an on-going basis	<ul style="list-style-type: none">■ Regulatory requirements■ Social and charitable programs■ Implementation of decisions of state authorities and ensuring network stability during martial law and power outages■ Development and adoption of regulatory acts in the field of electronic communications and facilitating access for the construction of the Internet network

Matrix of material topics

Vodafone Ukraine PrJSC continuously monitors and determines material sustainability topics in accordance with the Global Reporting Initiative (GRI) Standards. The Standards cover social, environmental and economic aspects, among which the most material ones are thoroughly covered in the Annual Sustainability Report of the Group. Regular dialogue with stakeholders allows the Group of Companies to effectively align its business interests with social and environmental priorities.

Since the GRI Telecommunications Standard is still under development, Vodafone Ukraine PrJSC conducted its own analysis of the top material sustainability topics. The Group's activities have various impacts — positive, negative, actual and potential. For a comprehensive assessment, the following aspects were analysed:

- Industry trends, international initiatives and standards related to sustainability disclosure.
- Sustainability reporting practices of leading telecommunications companies at the national and international levels.

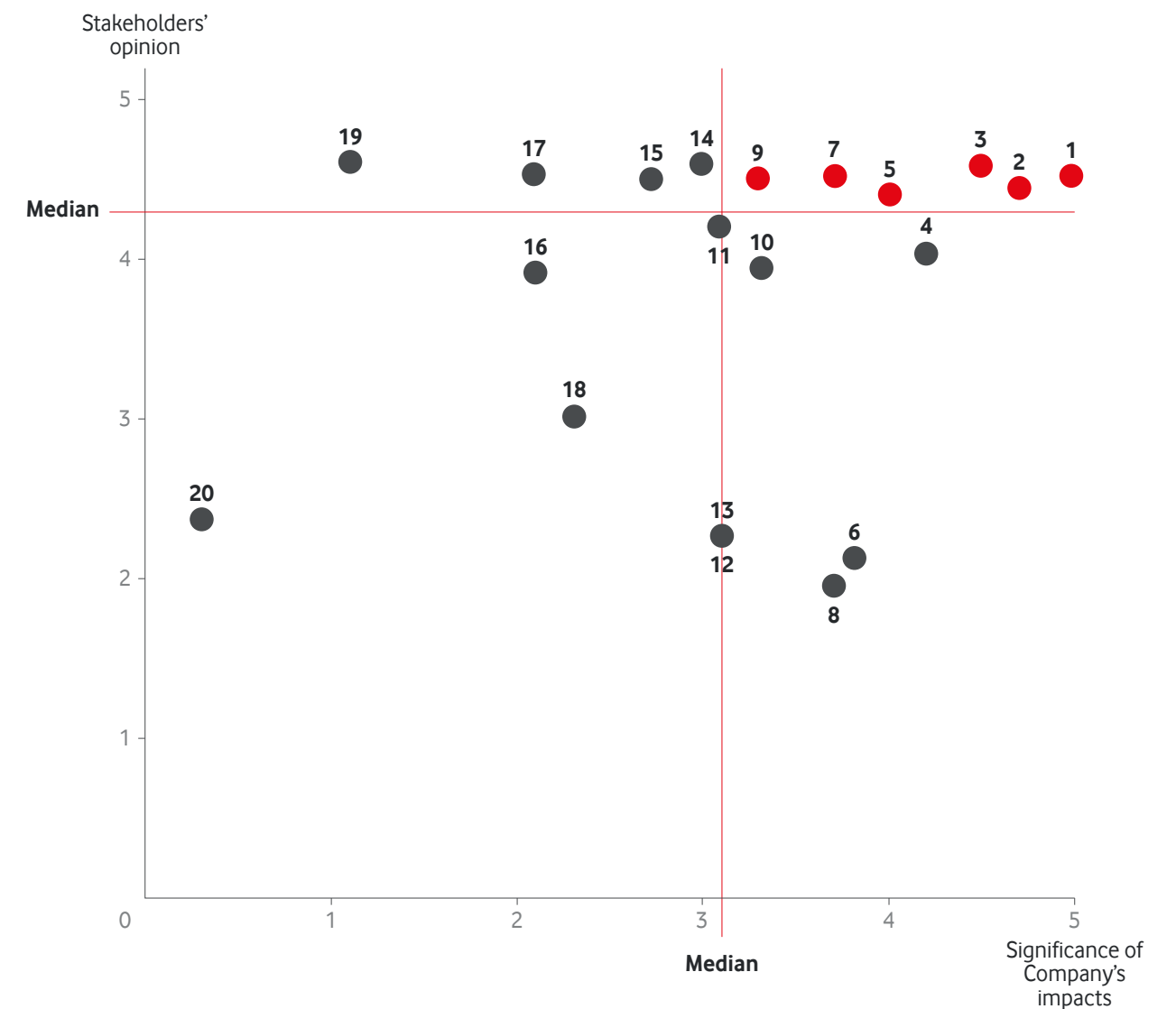
- Media communications regarding Vodafone Ukraine's activities to identify the most material social, environmental and economic impacts of the Group.

- Internal management strategies and policies used by the Group in its activities.

In addition, Vodafone Ukraine PrJSC conducted a survey of its internal and external stakeholders to assess how material they believe the Group's impact on each aspect of sustainability was in 2024. We strive to effectively manage sustainability issues, provide comprehensive information and ensure transparent reporting of the impacts of our corporate activities. Therefore, Vodafone Ukraine has also disclosed non-material topics in this report in order to provide a holistic view of the Group's activities.

Based on the results of the analysis, all reviewed topics were ranked in order of priority. Those that have a material impact on the Group's activities and are important to stakeholders in the reporting year are identified as material.

1. Indirect economic impacts
2. Employee training and development
3. Customer privacy and consumer safety
4. Energy consumption
5. Economic performance
6. Water resources
7. Employment and employee opportunities
8. Anti-competitive behaviour
9. Occupational health and safety
10. Local communities
11. Anti-corruption
12. Emissions
13. Waste
14. Anti-discrimination and equal opportunities
15. Marketing and labelling
16. Procurement and supplier evaluation
17. Taxes
18. Materials
19. Impact on human rights
20. Biodiversity



- 1 Indirect economic impacts** — Vodafone Ukraine PrJSC invests in network development, access to digital services, cybersecurity and social initiatives. In addition, we have focused our efforts on restoring damaged infrastructure and ensuring uninterrupted network operation and connectivity during power outages.
- 2 Employee training and development** — Vodafone Ukraine PrJSC invests in the development of its employees by implementing training programs, e-courses, webinars and conferences. New employees undergo mentor supported adaptation, which facilitates their speedy integration. Beyond professional development, the Company also cares for the mental and physical health of its employees.
- 3 Customer privacy and consumer security** — Vodafone Ukraine PrJSC ensures the protection of customer data by complying with legal requirements and international standards. We implement information security policies and standards, regularly assessing and improving our protection measures. The Company ensures the integrity and availability of information, and also informs customers about information security and potential cyber threats.

- 4 **Economic results** — Vodafone Ukraine PrJSC demonstrates noteworthy financial resilience with its steady development even under wartime conditions. In 2024, the Group revenue grew, and key financial and operational indicators remained stable. The Group continues to invest in digital services, 5G and IoT, thereby expanding connectivity capabilities and contributing to Ukraine's digital transformation.
- 5 **Employment and employee opportunities** — Vodafone Ukraine PrJSC cares about its employees, especially in times of war. We promote a culture of responsible attitude towards personal well being, emotional balance and relationships with colleagues. The Group of Companies promotes its ethical corporate culture and offers decent wages. We encourage employees to actively participate in the life of the organisation and create opportunities for professional growth.
- 6 **Occupational health and safety** — Vodafone Ukraine provides working conditions that minimize the impact of harmful production factors on employees by creating a safe work environment. We strive to reduce the risks of injuries, occupational diseases, accidents and fires as much as possible.



THE GROUP'S STRATEGY

- Key strategic activities
- Our Sustainable Development Strategy



Key strategic activities

Vodafone Ukraine is committed to supporting the country's economy and prioritizing customer needs, by providing uninterrupted access to telecommunication services. At a time of uncertainty and protracted war, the role of a mobile operator goes beyond traditional services. Digital infrastructure and communication technologies have become a key element in supporting defence and cybersecurity, and countering disinformation. At the same time, they serve as an effective tool for interaction between the state and its citizens, as Ukrainians receive dozens of digital services from the state through the Diia app installed on their smartphones.

Digital network development is one of the Group's strategic priorities. The Group is expanding its 4G and GPON coverage to ensure equal access to digital services. Vodafone Ukraine recognises its responsibility to restore the network and maintain uninterrupted network operation, focusing efforts on extending capacity and ensuring resilience. This approach enables us to maintain stable network operation and uninterrupted provision of digital communication services even under regular shelling, blackouts and damage to the infrastructure.

At the end of 2024 Vodafone Ukraine acquired technology-neutral licences for radio frequency resources at a government auction, for an investment of UAH 988 million, thus paving the way for achieving the Group's

strategic goals of network development and allowing us to gradually phase out 3G and introduce 4G, which will positively impact the speed and quality of our services.

The Group's strategic priorities include the introduction of modern digital technologies, such as the Internet of Things, artificial intelligence and Big Data. Big Data analytics will support government institutions in the process of planning economic and social programmes, whilst geo-analytics will help to identify the needs of local communities. The development of convergent solutions remains a key focus area — we are integrating mobile communications, fixed-line Internet and TV into single unified tariffs by investing in the expansion of our GPON network. We are also preparing for the deployment of 5G, which will drive digitalisation and meet the growing demand for next-generation technologies. Vodafone Ukraine's telecommunications and analytical solutions align with global sustainability trends by promoting responsible production, preference for renewable energy and the rational use of natural resources.

Vodafone Ukraine's strategic priorities for 2024-2026 include recovery and expansion of its network infrastructure, the introduction of new technologies, and to continue focusing on customer needs. A detailed list of our priorities can be found in the "Strategic Directions of Vodafone Ukraine Group" section of the [Vodafone Ukraine Sustainability Report 2023](#).



Dmitro Ponomarenko,

Chief Strategy Officer
Vodafone Ukraine

Our Sustainable Development Strategy

Corporate sustainability is an integral part of our business strategy, aligning ethical and environmental values with societal needs, and serving as an effective approach for achieving long-term success. We implement our Sustainable Development Goals in line with the principles set out in the Vodafone Ukraine “Corporate Social Responsibility Policy”, which is followed by all Group subsidiaries.

We are actively working on key areas of sustainable development, taking into account the interests of all stakeholders, including partners, customers and public organisations. At the same time, we promote the professional growth of our employees by providing equal opportunities for career development, training and self-fulfilment.

As the necessity for equal access to technology grows alongside the ongoing digital transformation, Vodafone Ukraine actively supports digital education and the development of professional skills. The Group also recognises its responsibility toward the environment: in 2024, we doubled our investments in energy efficiency and automated processes to allow the network to switch to a “sleep mode” during low-load periods, thus reducing energy consumption. We are also launching a programme to build solar power plants in the Poltava and Dnipro regions. We select responsible suppliers and implement a centralised procurement system, adhering to ethical and environmental standards.

Vodafone Ukraine actively contributes to the 12 UN Sustainable Development Goals, documenting progress towards the achievement of its strategic objectives in its Sustainable Development Reports.

Vodafone Ukraine’s strategic priorities in the area of sustainable development for the period 2024-2026:



Digital equality, social and community

Our goals are:

- providing access to high-speed Internet
- digital society, inclusion for all
- providing opportunities for young people to receive a digital education, skills and jobs
- social projects and charitable activities



Human capital development

Our goals are:

- to have equal opportunities for employees in career development, learning and personal growth
- to continue implementation of the diversity & inclusion principles in the working environment
- protection of employees rights, and their health and safety



Tax and economic contribution & transparency

Our goals are:

- direct and indirect taxation
- regional and infrastructure contribution in building a well-being economy
- transparency principles and disclosing financial contributions through regular public reporting (IFRS, etc.)

Strategic priorities



Responsible supply chain

Our goals are:

- centralized procurement structure (with integrated transactional activity), fully implemented strategic and operational procurement management, supply management
- to continue ensuring that every supplier complies with the Certificate of Compliance Business Ethics and Anti-Corruption Law Requirements



Strong Compliance System

Our goals are:

- to ensure sustainable compliance system and compliance with international and Ukrainian regulations
- to obtain certificates of compliance with International Standards ISO “Anti-bribery management systems” and “Compliance management systems”



Environmental impact

Our goals are:

- modernization of power supply systems
- implementation of commercial Smart Metering System
- improving energy efficiency, activation of Power Saving features, energy consumption control and optimization

GROUP'S ETHICAL STANDARDS AND COMPLIANCE

- Corporate ethics
- Anti-corruption and anti-competitive behavior
- Customer privacy and consumer safety



Corporate ethics

Vodafone Ukraine Group operates according to the principles of transparency, ethical practices and responsible business conduct. The core principles of corporate ethics are enshrined in the Do the Right Thing Code of Conduct and

the Supplier Code of Business Conduct, which are based on international standards, namely the UN Universal Declaration of Human Rights and the WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS).



the Do the Right Thing
Code of Conduct



the Supplier Code
of Business Conduct

Vodafone Ukraine adheres to high standards of corporate ethics and compliance, by defining its responsibility toward employees, partners and shareholders. All investment decisions, business relationships and strategic steps are based not only on economic criteria, but also take into account social and environmental aspects. We strive to promote a healthy lifestyle among employees, ensure the safety of customers, partners and society, be environmentally responsible and act in accordance with national and international environmental standards. Our priority is to create an inclusive environment where everyone feels respected and valued. The Group has a zero-tolerance policy for discrimination of any form.

The Group builds mutually beneficial partnerships, adhering to high standards of cooperation with its partners. In accordance with the Supplier Code of Business Conduct, we uphold the principles of fair competition, transparent selection of vendors and promotion of their sustainable development.

We expect partners to share these values, as Vodafone Ukraine's customers also count on responsible behaviour from everyone who cooperates with us.

The newly established Ethics and Compliance Committee⁶ under the Supervisory Board oversees the development and approval of corporate ethics policies at the highest level, ensuring the Group's activities align with ethical standards of business conduct and applicable legislation. The Committee is responsible for the effectiveness of ethics and integrity related policies, procedures and codes, as well as for the allocation of resources for the ethics function in accordance with strategic priorities.

The Compliance Department of Vodafone Ukraine underwent an internal audit in 2024, which has recently been completed. A report identifying deficiencies and providing recommendations for their resolution has been submitted to the Ethics and Compliance Committee under the Supervisory Board for review.

The Group operates a hotline (email: hotline@vodafone.ua) for reporting and addressing complaints. With this tool, the employees, contractors and other stakeholders can anonymously report suspected misconduct, violations of policies or procedural breaches, with the understanding that each report will be processed, if substantiated, investigated and prosecuted. The compliance hotline is an important tool for reducing risks and building trust, as it allows for the early detection and response to potential violations. At the same time, the Group does not allow retaliation, discrimination or harassment against employees, suppliers or third parties who report violations in good faith.

6. Its functions are described in more detail in the Corporate Governance section of this Report.



Olga Deinega,

Chief Corporate Governance and Control Officer
of PrJSC "VF Ukraine"

Anti-corruption and anti-competitive behavior

Countering corruption

The Vodafone Ukraine Group of Companies has a robust anti-corruption compliance system in place that ensures compliance with the requirements of current anti-corruption legislation, and regulates the identification, assessment, analysis and minimization of



the Anti-Corruption Compliance Policy

corruption risks. The key document that ensures the functioning of this system is the Anti-Corruption Compliance Policy. Each employee, as well as any third party, after signing a contract with Vodafone Ukraine, is obliged to act in accordance with the Anti-Corruption Compliance Policy.

In 2024, oversight over anti-corruption issues was transferred to the highest level in the Group, the Ethics and Compliance Committee under the Supervisory Board. The Committee reviews and approves annual reports on the assessment of corruption risks. In addition, throughout the year, the Committee receives reports on the analysis of gaps in anti-corruption management and makes appropriate decisions. The Vodafone Ukraine Group regularly conducts internal and external audits of its financial and business activities, as well as continuous monitoring of compliance with the requirements of current anti-corruption legislation and principles. In accordance with the NEQSOL Group corporate standards, Vodafone Ukraine conducts an ISO audit to verify the compliance of its anti-corruption compliance system with ISO 37001:2016 (Anti-corruption Management Systems) and ISO 19600:2014 (Compliance Management Systems).

Based on the results of the risk assessment in 2024, the Ethics and Compliance Committee recommended adjusting existing compliance controls in accordance with the updated list of risks. Significant risks of corruption (among the updated ones) are related to emergency repair processes and restoration of equipment destroyed or damaged as a result of russian shelling, such as with the purchasing of batteries and generators for base stations and server stations.

Any employee of the Group who becomes aware of instances or attempts to violate anti-corruption laws or policy is obliged to report it in one of the following ways:

- to the CEO
- to the Compliance Manager
- via the “Hotline”, whether anonymously (e.g., from an external anonymized email address) or not.

Regardless of the method of notification, the Group of Companies commits to ensure the protection of the whistle-blower.

In order to enhance the skills of employees in preventing and combating corruption, and to maintain their awareness of the requirements of anti-corruption legislation, the Group runs distance learning courses and knowledge assessments. Such courses include a Compliance with Anti-Corruption Legislation course and an electronic distance learning course on the Code of Conduct. All employees are required to complete these mandatory training courses within two months of being hired by Vodafone Ukraine, and regularly (at least every two years) refresh their knowledge.

During the reporting period, 1,210 employees, including 5 top managers, completed the course. 100% of the Group’s senior management and 43% of the members

of corporate governance bodies were familiarized with anti-corruption policies and procedures.

Share of VF Ukraine employees who were familiarised with anti-corruption policies and procedures and received relevant training in 2024⁷

Indicator		Corporate governance bodies	Employees, by category	
			Top management	Other employees
Were familiarized with anti-corruption policies and procedures	Number of persons	7	15	-
	Percentage of total number of persons in the respective category	43%	100%	-
Were trained on anti-corruption policies and procedures	Number of persons	-	5	1,210
	Percentage of total number of persons in the respective category	-	33%	27%

In 2024, there were no recorded cases of corruption related to the activities of the Group of Companies, and no legal proceedings concerning corruption were initiated against Vodafone Ukraine or its employees.

7. The seven members of the top management body are part of the Ethics and Compliance Committee. The relatively low training participation rate is due to the fact that the relevant training is conducted during onboarding and is repeated every two years.

Anti-competitive behaviour

Vodafone Ukraine builds its relationships with counterparties and customers on the basis of equality, transparency, and fairness. The primary norms governing the management of issues related to combating anti-competitive behaviour are outlined in the Group's antimonopoly policy. All employees of the Group have been familiarized with this document and have access to it on the Group's internal portal. The VF Ukraine antimonopoly policy was updated in 2024 due to the changes in the organizational structure and staffing of the Company.

The Group regularly conducts activities to identify and further update antimonopoly risks. Particular attention is paid to detecting potential violations of antimonopoly legislation through the following procedures:

- implementation of internal control measures to manage antimonopoly risks,
- review of the results of addressing the reports received through the Hotline,
- review of information received from employees or other individuals about signs of violations of antimonopoly legislation via other communication channels.

The filing of complaints regarding violations of antimonopoly legislation is regulated by the Procedure for consideration by the Antimonopoly Committee of Ukraine and its territorial branches of applications and cases on violations of the legislation on protection of economic competition, approved by the Order of the Antimonopoly Committee of Ukraine dated April 19, 1994 No. 5⁸.

If any monopoly risks are identified, we develop and implement procedures and mechanisms for their elimination or mitigation. The Group avoids negative impacts related to anticompetitive behaviour and conducts regular training courses on antimonopoly legislation for its employees.

Full compliance with antimonopoly legislation is a mandatory requirement for all departments and employees of the Group of Companies. During inspections or investigations by the Antimonopoly Committee of Ukraine (AMCU), the Group's management and employees provide their full support to the Committee. Likewise, Vodafone Ukraine strictly adheres to antimonopoly policy, regulations and other internal procedures in the course of preparing responses to AMCU inquiries. There were no complaints filed regarding the Group's anti-competitive behaviour in 2024.

Taxes

Vodafone Ukraine takes its obligations to the state seriously. Full and timely payment of taxes not only helps Ukraine to survive during these difficult times, but also contributes to the Group's image and stable operations. Our tax strategy can be described as conservative, since our focus is not on minimizing the tax burden, but on full compliance with the legislation. Vodafone Ukraine's tax policy is updated annually. In April 2024, we approved the updated Policy with modifications in accordance with legislative changes in the Tax Code of Ukraine, such as updated rates, indices, and clarifications regarding land tax and real estate tax reports. Monitoring changes in tax legislation and judicial practice is an ongoing process, and its results are published twice a month on the Vodafone internal portal.

In order to separate reporting and control responsibilities, supervision functions are assigned to the tax administration group. This unit handles the administration of tax risks and assets, communication with other departments or third parties regarding uncertain points, and reports quarterly to the CFO. This approach helps us to avoid penalties.

When necessary, Vodafone Ukraine consults with tax experts from its parent company, NEQSOL HOLDING, and maintains contact with representatives of other telecommunications companies in Ukraine in order to establish a common tax position. We regularly meet with tax auditors to discuss key and complex issues, as well as provide the necessary information upon request to the tax authorities.



8. The Procedure for consideration by the Antimonopoly Committee of Ukraine and its territorial branches of applications and cases on violations of legislation on the protection of economic competition, approved by the Order of the Antimonopoly Committee of Ukraine dated April 19, 1994 No. 5, <https://zakon.rada.gov.ua/laws/show/z0090-94#Text>

Customer privacy and consumer safety

Information security policies and management approach

Vodafone Ukraine complies with the requirements of the Ukrainian law and regulations, as well as with international ISO and NIST standards, in maintaining a high level of information security. The Group focuses on business continuity, confidentiality, integrity and availability of information assets, while its systematic approach to risk management helps to mitigate or prevent incidents, thereby strengthening the trust of customers and partners alike.

Vodafone Ukraine actively upholds its information security policies and standards, enabling the companies of the Group to methodically assess and improve the level of protection of their information assets. The key principles for managing customer privacy and security are outlined in the following Vodafone Ukraine policies: Information Security of the Group of Companies, Information Security when Using Corporate Information Systems Resources, and Ensuring Information Security, among other internal documents. Additionally, we are committed to upholding a policy on personal data processing and information security risk management in accordance with the regulatory requirements and user expectations.

Since the start of Russia's full-scale invasion of Ukraine, Vodafone Ukraine has thoroughly revised its business operations continuity and recovery models, in order to fully meet information security requirements. The Group complies with industry standards and regulatory requirements, including the Integrated Information Security System, as well as with the ISO/IEC 27001:2022 international standard, thereby ensuring a high level of information security and data protection. In order to raise security awareness internally, we provide ongoing training for the Group's employees and inform our customers on how to secure their personal information.

The Group regularly upgrades the skills and qualifications of its employees, monitors information systems and manages information security risks. By ensuring that employees are familiar with the rules, procedures and standards for protecting information assets, Vodafone Ukraine is able to provide a safe and secure environment for data processing. We have developed and organised a library of thematic materials on our corporate portal and improved the mechanisms for complying with non-disclosure agreements (NDAs) with our partners.

The Group has a mechanism for assessing the quality of its privacy and cybersecurity management system in place. In accordance with the recommendations of international information security standards (SANS, ISO/IEC, NIST, and others), a mechanism for conducting internal and external audits has been implemented. Based on the results of these audits, measures are developed and implemented in order to eliminate identified gaps and improve the protection of information within the information security management system.

Ensuring the continuous operation of the Group's information security and ICT systems in the face of Russia's armed aggression is a priority for Vodafone Ukraine, our employees and customers. We strive to provide stable services in compliance with Ukrainian legislation, regulatory requirements and customer agreements. We are constantly improving our asset management mechanisms and our round-the-clock monitoring of information security events, as well as the effectiveness of our cybersecurity incident response chain.

Cooperation in cybersecurity

The Group actively cooperates with the government agencies involved in combating cybercrime, leading international cybersecurity organisations, and participates in informing consumers about potential threats and recommended security measures. Notably, we have developed a fruitful cooperation with the government's Computer Emergency Response Team of Ukraine (CERT-UA). Due to regular communication with CERT-UA, as well as with the National Cyber Security Coordination

Centre and the Telas Association, we receive up-to-date information on the issues, needs and expectations related to data protection and privacy. This feedback helps us identify our weaknesses, improve our incident response processes, and develop a more effective information security management strategy. In this way, we ensure reliable protection of our information assets and meet the challenges of the modern cyberspace.



CREATING ECONOMIC VALUE

- Vodafone Ukraine products and services
- Digital and innovation
- Development of Infrastructure and network
- Marketing and communication
- Procurement activities




Vodafone Ukraine products and services

Vodafone Ukraine services are based on stable, fast and convenient communication. We help our customers grow, stay connected, and adopt advanced technologies. For private users, we offer a wide range of services:


- mobile communication and messaging, access to 3G and 4G networks with varying traffic volumes depending on the selected tariff plan,
- mobile Internet and extended Internet services, such as PASS services and Internet for a second device,
- international and national roaming, information services,
- Vodafone Gigabit Net — GPON-based fixed Internet,
- modern security technologies, such as Geosearch, Vodafone Guardian and other technological solutions,
- entertainment services, such as mobile TV, security solutions (including antivirus software and parental controls), special offers and promotions for new and existing subscribers.




Vodafone Ukraine also offers communication services for business customers, namely:




telephony and messaging, promotion and mailing,




Internet of Things (IoT) and IoT SIM card management (IoT Monitor),




specialized tariff plans with unlimited internet and increased minutes for calls within Ukraine and abroad,



Big Data and Vodafone Analytics,



high-speed fixed internet,



cloud solutions and data centre capacity rental.

VF Ukraine PrJSC has a number of internal regulatory documents that outline the Company’s approach to a customer-oriented service. They include:

- 1 Regulations for Conducting Quality Examination and Customer Journey Mapping, which ensures service quality control and optimization of customer experience,
- 2 Requirements for Customer Service Quality in remote service centres and when processing offline requests, which establish uniform requirements and key service quality indicators,
- 3 Quality and Customer Experience Management Policy, which defines the principles, standards and directions for improving services to increase customer satisfaction.

The Group continued supporting Ukrainians abroad in 2024. Vodafone Ukraine offers the Affordable Roaming service as a gift. With Affordable Roaming, subscribers receive 10 GB of Internet and 100 minutes for calls in 30 countries around the world every month at no additional cost. Also, from August 2024, Vodafone Ukraine launched a new national tariff plan that allows subscribers to use the Internet and minutes for calls included in their domestic tariffs in EU countries and Moldova, without additional costs or settings.



Yevgeny Bulakh,
Chief Sales and Customer Service Officer
of PrJSC “VF Ukraine”

Service convergence

The Group strives to provide the best experience for its users. We are focused on implementing convenient digital platforms, optimizing connection and service processes, as well as offering personalized solutions for our customers. Our core principles are quick response to inquiries, and high level of service and customer support at every stage of interaction. We believe that the service should be simple, efficient and transparent. Important components include integrating services into a unified interface and developing omnichannel platforms for interaction with customers (merging all customer interaction channels into a single system). The convergent approach meets the modern consumer needs by enhancing convenience, savings and access to quality communication services. In 2024,

we introduced a new 3-in-1 tariff package, GigaCombo, which combines three main services:

Mobile communication

Fixed internet

Television, in a single package

Each tariff also includes free Internet for a Second Device, which allows the customer to use unlimited Internet on an additional SIM card. This product simplifies connecting and using services, saving time and money.



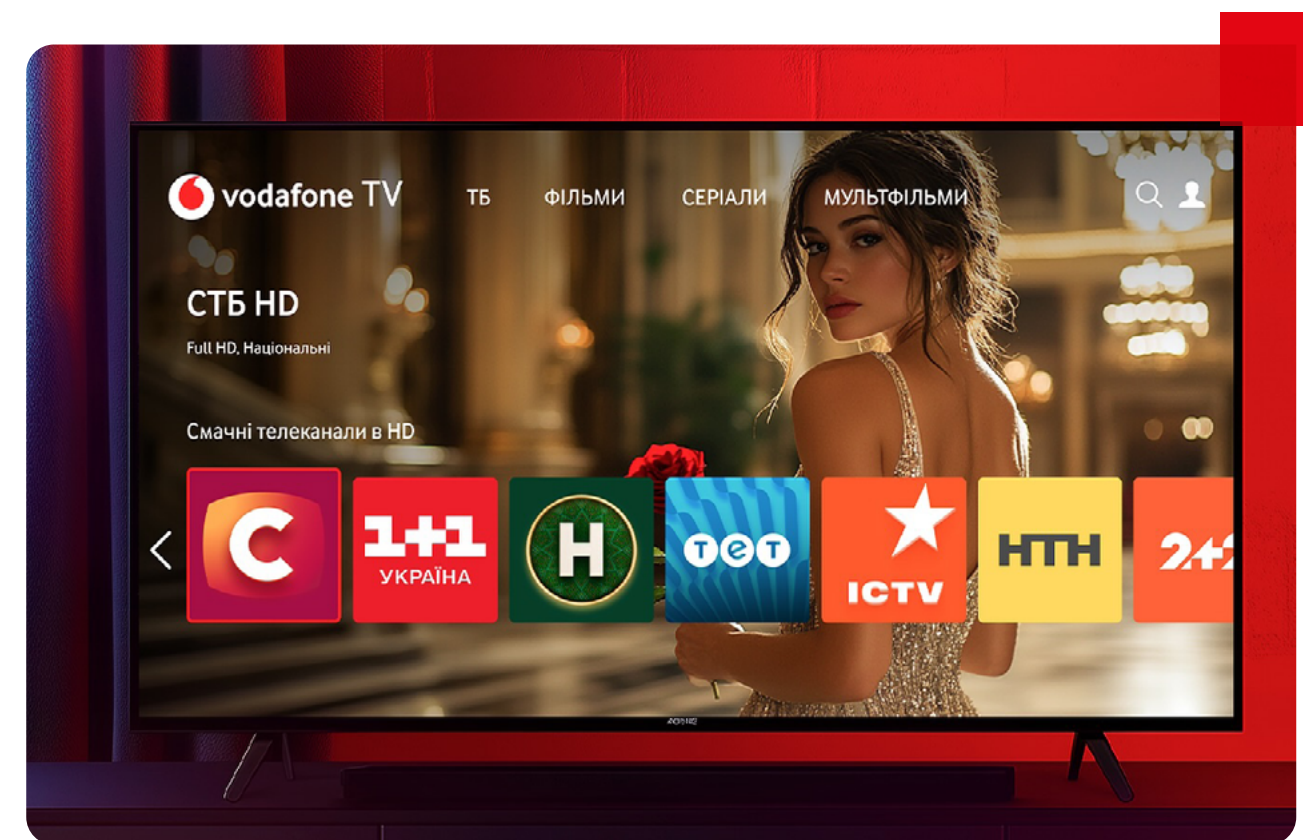
Internet communications

Vodafone Ukraine has made considerable progress in providing access to broadband fixed Internet services. The use of high-quality and energy-efficient GPON technology ensures stable Internet operation for up to 72 hours during eventual power outages. We also offer access to the Vodafone TV online platform, which provides access to over 290 TV channels and more than 10,000 films, series and cartoons. The service is available on SMART TVs, smartphones, tablets and computers. Users can greatly control their viewing experience: pause, rewind and watch recorded programs, connect 5 devices simultaneously, and use the parental control features.

In December 2024, Vodafone Ukraine launched VoLTE and VoWiFi technologies based on the technological solution IMS (IP Multimedia Subsystem) core, initiating the deployment of VoLTE coverage throughout the country. VoLTE enables 4G calls (LTE) with better sound quality and faster connections, while VoWiFi allows calls over Wi-Fi, ensuring connectivity even in areas with weak mobile coverage.

We are actively implementing digital services so that customers can quickly access information about their requests. The main tools here include a personal account integrated with interactive voice response (IVR) systems and a chatbot. In 2024, we also upgraded the personal account interface based on customer feedback and surveys. IVR was integrated with information systems, which allows users to order services and receive up-to-date information about the status of their accounts and unresolved issues.

In addition to Internet services, we offer mobile communication packages, virtual PABXs, client equipment leasing, static IP addresses, domain registration, SSL certificates and 0800 numbering lines. Clients also have access to the "Pause" service, which enables them to temporarily suspend their use of our services. We also lease routers and TV set-top boxes, with over 12 thousand devices leased in 2024, which indicates a growing demand for rented equipment.



Digital and innovation

Digital Innovation

Vodafone Ukraine's technological leadership is based on a strategic cooperation with Vodafone Global, granting it access to the latest global developments in 5G, IoT, AI/ML and cloud technologies. The Group develops technologies to meet customer needs, improve service quality and usability. The integration of cloud solutions with IoT has enabled more efficient management of digital assets and optimised infrastructure costs. We are constantly improving customer interaction processes, incorporating platforms like "Diia" for identification, with the prospect of implementing Diia-signature in the near-future.

Due to our cooperation with government agencies and industry associations, we are well informed about the regulatory requirements and market trends, which ensures the development of services in accordance with current standards and market needs. We actively support Ukrainian military units and offer free Internet in bomb shelters. Clients who are legal entities associated with the Armed Forces of Ukraine, critical infrastructure or part of the defence complex are given preferential service terms. The Group also participated in the Kyiv City Administration's programme to provide Internet connection to shelters in Kyiv.

Vodafone Ukraine cooperates with state authorities on digital projects of public importance. The following initiatives were implemented in 2024:

- providing a single SMS information channel for the State Emergency Service of Ukraine,
- cooperation with the Ministry of Health in establishing an official notification distribution system,
- sociological research via SMS surveys in areas where in-person interviews are impossible,
- use of Big Data analytics for investigating russian war crimes,
- forming targeted groups of IDP entrepreneurs to attract grant aid,
- using geo-analytics to determine optimal locations for opening new medical facilities,
- analysis of tourist flows to assess their impact on the local economy and social infrastructure.

We conduct in-depth socio-demographic analysis, covering aspects such as age, gender, education and employment, for cities and territorial communities. This information is important for crafting effective development strategies, planning social services and improving the quality of life of their residents. Our research also covers migration processes, including departures and returns from abroad. Analyzing these trends helps to better understand how changes in migration policy and economic conditions affect the population, as well as to better identify the needs and challenges faced by local communities.

Vodafone Ukraine provides digital services to business customers, including fraud prevention systems based on Big Data. We also offer geoanalytics services to select optimal locations for opening retail outlets. We are currently developing the Telescope platform, which opens up new opportunities for entrepreneurs to engage with customers effectively through modern communication channels like SMS and RCS.

Vodafone Ukraine has a unique instrument in place — Technology Radar: a community of employees that tracks, evaluates and implements promising technological solutions. At the same time, it is a visual tool that helps to determine innovation priorities, monitor their implementation and adapt to changes. It also helps the Group of companies to maintain its competitiveness, improve business processes and enhance customer experience. Community members analyse technological trends, share expertise, organize training courses and publish useful materials in their own blog. With this instrument, the Group timely integrates new technologies, unlocking growth opportunities and improving the efficiency of its services.



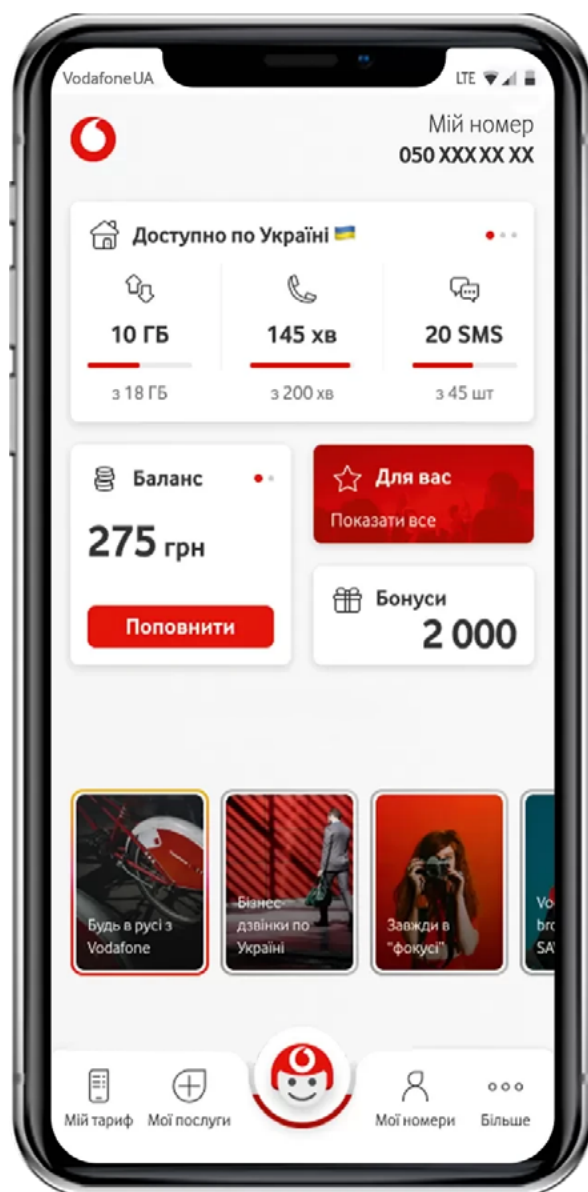
MyVodafone application

In 2024, the development team considerably enhanced its mobile application and web version for private clients and businesses. The MyVodafone app rating increased to 4.7 on Google Play (+0.1 compared to 2023) and enjoyed 4.5 in the App Store and Huawei Market. The app attained second place in the all-Ukrainian CX EXCELLENCE award in the “Best User Experience” category. The number of active MyVodafone users grew by 23%, and the app’s share in service operation channels by the end of 2024 reached 71%. The new features we have implemented have

significantly improved the user experience. Any user can now become a new Vodafone subscriber in just a few minutes, easily activating a new number under a pre-paid or contract option, with the ability to choose the phone number, tariff plan and SIM card type (eSIM or physical SIM).

The MyVodafone app includes a live chat feature with the operator, where customers can get answers to their queries directly from the Group’s employees. Voice BOT is also used for voice service, which autonomously helps subscribers resolve basic issues, including balance control and tariff changes.

We have introduced gamified personalized offers that make interactions with the app more engaging and convenient. In order to improve user experience, we have added automatic account replenishment and payment via Apple Pay, which simplifies and speeds up the process. In addition, users receive personalised birthday greetings, adding a human touch to the interaction. These upgrades reflect the Group’s desire to enhance user experience and comfort.



Using AI

In the summer of 2024, Vodafone Ukraine implemented an innovative solution based on generative AI in its telemarketing department. The system combined the team’s in-house developments with advanced AI models and became the first application of generative AI in the Group’s processes, which significantly improved operator efficiency. The new platform automates service quality control, replacing the traditional approach where less than 1% of calls were reviewed. It is capable of listening and analysing 30% of calls, transcribing audio into text, evaluating the politeness, engagement and quality of operators’ work, and providing them with detailed feedback. The implementation of the new platform resulted in an increase in operators’ efficiency by 7% and an increase in their average generated by the operator income by 12%. Plans include expanding the system to all departments that process incoming calls, as well as launching an AI chat feature to automatically process subscribers’ requests in text channels.

As for servicing subscribers on the main Vodafone Ukraine voice channel (111), we use

a robotic solution — the Bots platform — which is the first to answer calls and provide initial guidance to subscribers.

The Company is actively working to expand its digital service ecosystem for a wide range of users. One of the key areas was the integration of leading streaming services into Vodafone TV. The use of AI algorithms for personalized recommendations and content creation noticeably improved the level of user experience.

In 2024, Vodafone Ukraine introduced AI platforms across various departments, including the contact centre and HR service, resulting in savings of up to 1,000 hours of expert work annually. Another large-scale project was the upgrade of the billing system, which opens up new opportunities for the development of modern digital products and services. The next stage will be the introduction of AI agents into accounting, legal department and other functions, which will significantly relieve the Group’s employees from routine tasks.



Development of Infrastructure and network

Management Approach to Network and Infrastructure Development

Vodafone Ukraine focuses on energy independence and energy efficiency as key areas in infrastructure and network development, which allows to optimise energy consumption and reduce its environmental footprint. In 2024, the Company continued to expand its GPON-based fixed Internet network across Ukrainian cities.

Vodafone Ukraine develops its infrastructure in compliance with legislative requirements and ensures high-quality communication with rational use of investments. The Group creates conditions for uninterrupted network operation, even during power outages. Vodafone Ukraine's team makes significant efforts to support operation of the network and its rapid recovery in the event of interruptions, ensuring that millions of citizens remain connected and have access to information.

Recovery of Destroyed Infrastructure

Among Ukrainian telecommunication operators, Vodafone's network suffered the most extensive damage following the full-scale invasion. Nonetheless, in 2024, 54 communication facilities damaged as a result of military hostilities were fully restored. More than 130 sites were repaired even without involving external contractors. In total, more than 1,150 communication facilities have been recovered over the full-scale invasion.

Furthermore, Vodafone Ukraine successfully handled over 660 cases of damage to fibre-optic communication lines. With part of Ukraine being occupied, Vega Telecom has lost 245 km of its network and 148 sites in the city of Mariupol as well as 170 km of its network and 67 sites in the city of Kherson. Freenet LLC

lost 134 km of its infrastructure in the city of Melitopol and in the greater Melitopol district. Repairs were carried out on approximately 2,347 km of fibre-optic cables and 1,698 fibre-optic joint boxes. In addition, we laid down more than a thousand kilometres of new fibre-optic lines during the reporting year.

Achievements in Network Development

The main achievement of Vodafone Ukraine is the creation of a modern and extensive infrastructure that provides reliable, high-quality communication across the country using 4G, 3G and 2G technologies. According to Ookla, in the second half of 2023 and the first half of 2024, Vodafone Ukraine's network was recognized as the best in Ukraine in terms of mobile internet speed. Recognizing the importance of mobile communications, Vodafone Ukraine invests diligently in expanding coverage and increasing network capacity to meet the needs of the population. As of late 2024, despite martial law, the number of 4G base stations increased by 57% compared to 2021 and by 12% compared to 2023.

By the end of 2024, more than 16,000 settlements had 4G coverage, representing 93% of the population of Ukraine in 20 regions (excluding partially or fully occupied). Part of our network remains lost due to military hostilities. Thus, if taking into account the temporarily occupied areas, the Group's infrastructure covers 85% of Ukraine's population across its 24 regions. As soon as it becomes possible to get to facilities safely, Vodafone Ukraine professionals do their best to restore and maintain damaged sites in front-line regions.



Yevhenii Frunza,

Chief Technical Officer
of PrJSC "VF Ukraine"

GPON Network

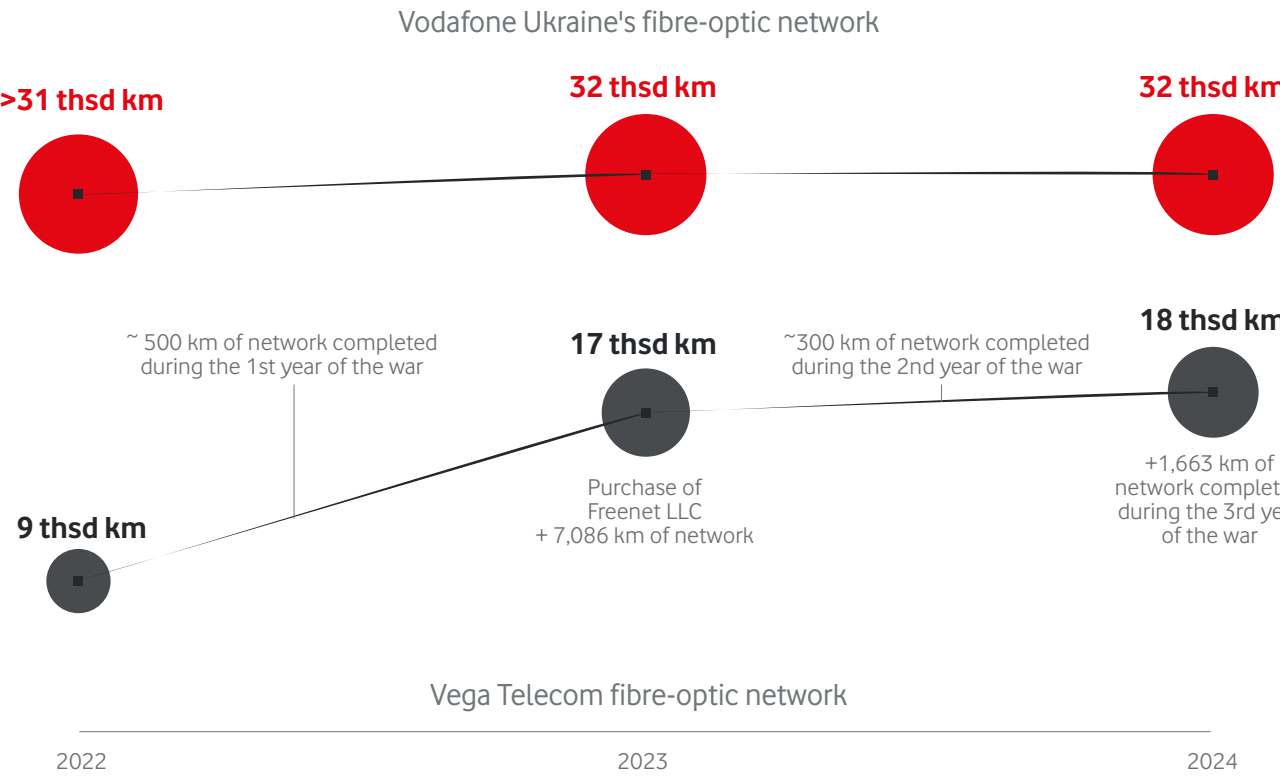
Throughout 2024, we actively expanded our home internet network using GPON technology, providing the Vodafone Gigabit Net service to new users in the cities of Kyiv, Kharkiv, Dnipro, Odesa, Chornomorsk, Vyshneve, Zaporizhzhia, Lviv, Ivano-Frankivsk, and Mykolaiv. As of December 31, 2024, the total number of households covered by internet service (including GPON) reached 1.84 million, and the number of subscribers grew to 289,000 clients.

In 2024, we built 1,817 km of fibre-optic communication lines, including 1,663 km of

lines for fixed-line Internet. This infrastructure is equipped with the necessary components to connect new users, in particular, 24,661 new GPON optical boxes with a total capacity of 209,239 optical ports.

Despite the challenges of war, our network keeps growing through effective integration and ambitious coverage expansion plans. Overall, the Group's aggregated fibre-optic network assets in 2024 reached 50,517 km, including networks for fixed (18,280 km) and mobile Internet (32,237 km).

Total assets of the Group's fibre-optic networks:

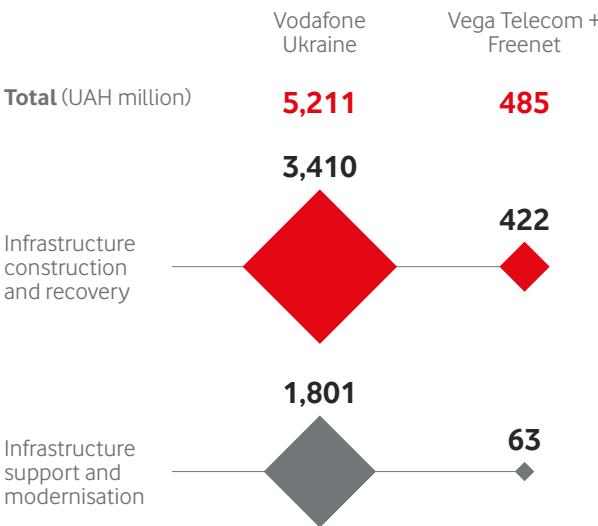


Investment in Network and Infrastructure

In 2024, the Group made investments in several core areas related to network development. We focused on improving LTE coverage and maintaining the quality of key network performance indicators, such as data transfer speed, latency, connection reliability, etc. In addition, we invested in the network's energy independence, as well as in upgrading software and hardware to support modern technologies and network security.

Overall, during 2024, Vodafone Ukraine Group invested over UAH 5.7 billion⁹ in infrastructure. More than two-thirds of these investments were directed toward construction and recovery. The Group's total capital investments in the reporting year amounted to UAH 6.2 billion, of which 15% was invested in the purchase of radio frequency licenses.

Breakdown of infrastructure investments in 2024, UAH million¹⁰:



Energy Independence

Following devastating attacks on Ukraine's energy infrastructure in the spring of 2024, Vodafone Ukraine has made a strategic decision to double its planned investments in energy independence. This decision was a direct response to the challenges posed by frequent and prolonged power outages, which negatively affected the operational stability of the telecommunications network. Given the critical importance of ensuring uninterrupted communication for the population and businesses, the Group plans to allocate substantial funds for the purchase of additional generating capacities and autonomous power supply systems.

We have purchased new lithium iron phosphate (LiFePO4) batteries, known for their high reliability under extreme operating conditions. These batteries allow us to significantly extend the duration of backup power supply to base stations, which is a vital feature during power outages.

In addition, we are actively expanding our generating capacity by purchasing equipment to ensure power supply to base stations. This year, we installed 347 generators of various types, which greatly increases our ability to ensure continuous operation of the network and flexibility in our use of resources. By the end of 2024, the total number of generator units used to support the operation of the network exceeded 2,000, and continues to grow.

To ensure a reliable supply of fuel for generators, we continue to increase the number of wholesale suppliers and conclude new contracts, enabling us to create sufficient fuel reserves for sustained energy resilience.

9. In 2022, this indicator amounted to UAH 3.0 billion, and in 2023 — UAH 4.1 billion.
10. Vodafone Ukraine's infrastructure investment volumes include data from Vodafone Ukraine and UNS LLC. Vega Telecom's infrastructure investment volumes include data from Farlep-Invest PrJSC, and additionally this indicator includes data from Freenet LLC.

Increasing Mobile Internet Speed

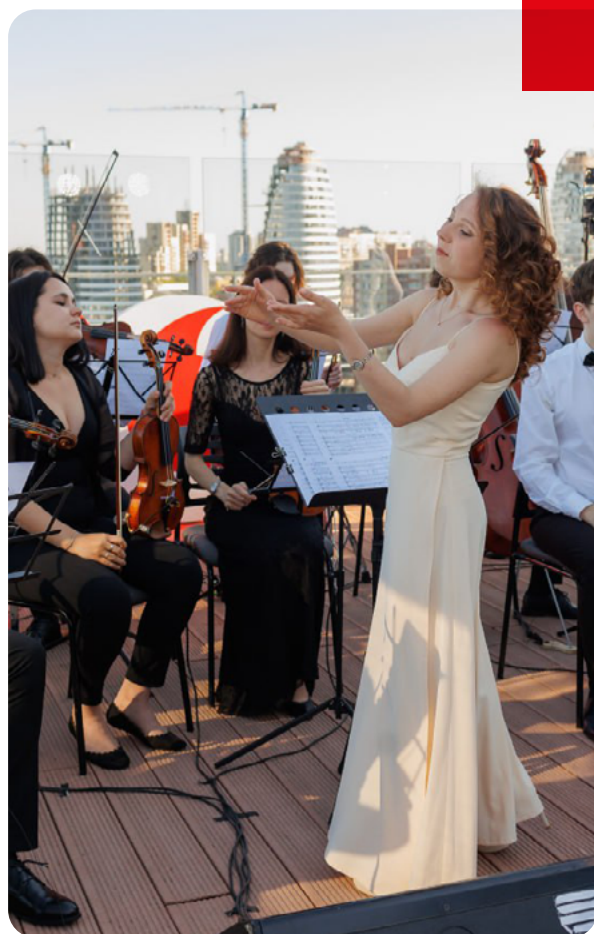
In 2024, following the tender, Vodafone Ukraine became the owner of the first and fifth lots of the 4G frequency allocation auction. The Group acquired licences for radio frequencies in the 1,945-1,950/2,135-2,140 MHz and 2,575-2,610 MHz bands for a total cost of UAH 988 million. These technology-neutral licences open up opportunities for the implementation of diverse solutions aimed at providing high-quality 4G services.

The use of 2,100 MHz frequencies will help increase network capacity. This will create conditions for the gradual reallocation of radio frequency resources and expansion of the LTE network capacity. To support this process, the Company introduced VoLTE technology in 2024, which will not only significantly improve the quality of voice calls but also facilitate the gradual phasing out of the 3G network. Integrating the newly acquired radio frequency resources will reduce network load and increase connection speeds by at least 1.5 times. These changes will help improve customer experience and further develop Ukraine's telecommunications infrastructure.

5G Telebridge

In May, Vodafone Ukraine, in partnership with Nokia, implemented the first 5G telebridge in Ukraine, connecting Kyiv, Ivano-Frankivsk and Helsinki. The event took place as part of the Action Forum 2024 organised by the Aspen Institute Kyiv at Promprylad, an innovation centre in Ivano-Frankivsk.

The connection was provided by 5G indoor testing solutions built by Vodafone and Nokia: at the Vodafone office in Kyiv and at Promprylad in Ivano-Frankivsk. Event participants had a chance to experience the benefits of 5G without any special demonstration equipment, using regular smartphones and tablets that support this technology. The innovative nature of the event was highlighted by a technological-artistic performance, as musicians located 600 km apart performed together live synchronously.



Establishment of UNS LLC

In 2023, we began implementing a project to separate the tower infrastructure into a distinct legal entity. In Q2 of 2024, a new subsidiary, Ukrainian Network Solutions LLC (UNS), commenced operations. UNS is engaged in the construction of new towers (antenna and mast structures). The infrastructure of UNS

is leased to Vodafone Ukraine's companies, telecommunications operators and anyone interested in installing equipment. In addition, UNS is responsible for the maintenance, technical supervision and repair of the existing mobile communications infrastructure.



"Our strategic goal is to develop and increase the commercial potential of Vodafone Ukraine's infrastructure. We aim to become the leading infrastructure operator in the market based on key performance indicators.

The team is currently working on developing an infrastructure maintenance model that will allow to reduce operating costs. We are also focusing on implementing alternative power sources for the network".

Maksym Topolnyk

Director
of LLC "UNS"

Plans for the Future

The Group continues to increase investments in the development of its digital infrastructure and networks, focusing on higher data transmission speeds and improving broadband access in order to deliver high-quality mobile internet to more of the population, in particular thanks to the additional radio frequency resources acquired in 2024. The Company has begun the gradual modernization of the network in preparation for the introduction of new technologies, including 5G, which will be implemented over the coming years. These efforts will lay a solid foundation for the development of the country's digital economy, especially during the post-war recovery period.

In the fixed-line business, the Group plans to modernise regional urban networks in the cities of Kharkiv, Zaporizhzhia, Mykolaiv and

Ivano-Frankivsk by enhancing ring connections from 10-20 Gigabit links to 100 Gigabit ones. The goal is to enhance network capacity to improve the quality of services for active customers and also to ensure the ability to effectively connect new customers. In the GPON-based modernisation of FTTx (Fibre to the x) networks, we foresee an opportunity to switch subscribers over to energy independent Internet. These measures will foster higher reliability and speed of communication, which is crucial for meeting the needs of our users.

In the long run, Vodafone Ukraine aims to provide fixed Internet services to 1,000,000 subscribers. In 2025, we plan to double the speed of fibre-optic network construction, covering an additional 6,828 new apartment buildings.

Marketing and communication

Our approach to marketing

In 2024, despite the challenges faced by the country, Vodafone Ukraine continued to implement its marketing strategy by focusing on delivering the highest quality services to our customers and actively adapting our offerings to meet evolving consumer needs and expectations, whilst taking into account changes in customer behaviour. Our team works diligently to ensure that customers receive clear and reliable information about tariffs and services, with convenient access and support through various communication channels. We also strive to build long-term relationships with our customers.

PJSC VF Ukraine has an internal Process Regulation, named “Development, Approval, and Endorsement of Advertising and Marketing Materials”, which establishes the processes and procedures for creating advertising materials to high quality standards, and which was updated in 2024 in order to reflect the current structure of the Company’s departments. All advertising materials are created in accordance with Ukrainian legislation. When developing them, we always involve legal support in order to ensure compliance with the requirements. We regularly evaluate the effectiveness of our campaigns through research and feedback

analysis, which allows us to adapt our approach to the changes in the market. In addition, we proactively implement new technologies and innovations in our marketing campaigns, in particular through the use of digital platforms and social media in order to better interact with customers.

Vodafone Ukraine employs a consistent approach to create sought-after products and offers. We analyse past experience, our competitors’ actions, performance indicators, customer feedback and suggestions. In 2024, Vodafone Ukraine provided customers with energy-efficient internet during the widespread power outages. We actively communicated the advantages of our product during blackouts, which had a very positive impact on generating demand for our services.

In 2024, we achieved an increase in customer satisfaction. One of the main feedback channels for submitting complaints and suggestions is Vodafone Ukraine’s official website — <https://www.vodafone.ua/en/support/call>. In addition, our customers can contact us via social media, phone, My Vodafone app, customer service centres and points of sale.



Andrii Otroschenko,

Chief Marketing Officer
of PJSC “VF Ukraine”

Marketing Studies of the Group

In 2024, Vodafone Ukraine continued to utilize market research. A key tool is the “Brand Health Track” study conducted by VF Ukraine, which allows us to regularly assess brand perception and the effectiveness of advertising communications. The study uses more than 50 quantitative and qualitative indicators, such as brand awareness, willingness to recommend our services, and overall customer satisfaction. The data obtained is critical to understanding the impact of our campaigns on consumers, and identifying areas for improvement.

In 2024, the results of the survey showed positive trends in customer satisfaction, indicating the success of our marketing

initiatives and the formation of a positive brand image. In addition, we regularly evaluate the effectiveness of TV campaigns and outdoor advertising of mobile operators through the “Ad Track TVC and OOH” study. This approach allows us to measure the effectiveness of advertising campaigns, which can be used by the operator in the future. For example, TV commercials and outdoor advertising of the “Vodafone — the fastest mobile Internet in Ukraine” campaign were recognized as the best in its category in terms of “like the ad”, “brand awareness” and “was the ad clear?”. This data indicates that Vodafone’s advertising campaign was the most highly rated compared to competitors’ ads which ran at the same time.

Labelling standards: quality and compliance

All Vodafone Ukraine products and services comply with the state labelling requirements. In accordance with the requirements of the Law of Ukraine “On Consumer Protection”¹¹,

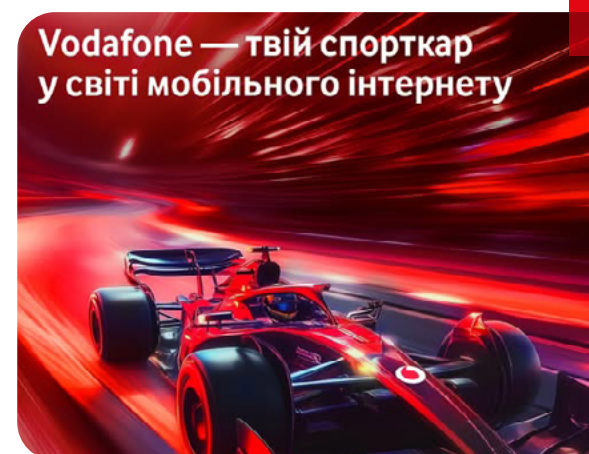
we inform our customers about the name, validity period and geographical coverage of our tariffs, services and promotions. The following products are subject to mandatory labelling:

1 advertising on television, radio and on the Internet

2 information and advertising materials at points of sale



3 outdoor advertising



4 sim starter kits



In 2024, there were no registered cases of non-compliance with marketing communications standards or with the requirements for informing customers about services and product labelling.

Marketing initiatives

For several years, Vodafone Ukraine has been engaging celebrities and media personalities in its advertising campaigns with whom we share common values, such as social responsibility, faith in a better future and a willingness to help towards the victory and well-being of our country.

Throughout 2024, we collaborated with film director and influencer Antonio Lukic, who shot a series of commercials called “Roles change, but the cell numbers stay”. In these commercials, he emphasises the value of keeping your number when switching to Vodafone, underscoring the importance of friendship and support. Antonio Lukic, winner of several film awards, has created compelling stories that resonate with our consumers, showing that despite changes in life, the connection with loved ones remains unchanged.

We also implemented a special project called the “I’m fine challenge” — an installation made up of war-damaged mobile phone equipment on Konraktova Square in Kyiv. This initiative symbolises the resilience of Ukrainian telecoms and supports Ukrainians in difficult times, emphasising the importance of connectivity and mutual support.



11. Law of Ukraine “On Protection of Consumer Rights” No. 1023-XII of May 12, 1991 <https://zakon.rada.gov.ua/laws/show/1023-12#Text>.

Vodafone Ukraine continues to actively support and sponsor major social and cultural projects, including:

- a partnership with the youth contest “Together Against Corruption”, organised by the Defence University of Ukraine, aimed at fostering integrity among students, motivating them towards honest learning, and engaging youth in corruption prevention;
- cooperation with the Dobrobut medical network as part of the “Good Deed as a Gift” charity programme, which provides funding for surgeries for children with congenital heart condition;
- support for the “Come Back Alive” charity fund in re-equipping a blood transfusion centre.



Several advertising campaigns were also launched in 2024:

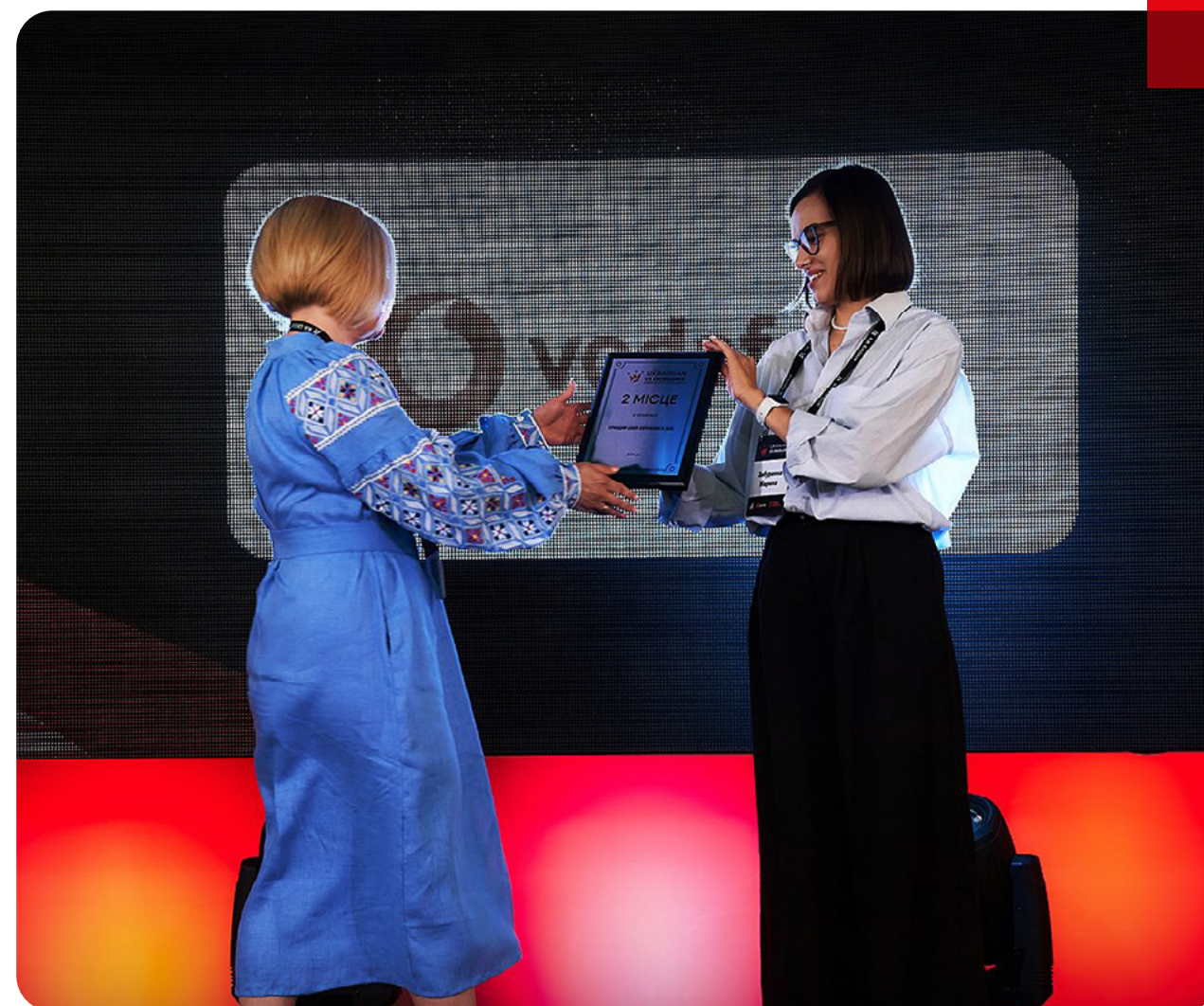
- A campaign aimed at informing Ukrainians that Vodafone has won the award of “The fastest mobile internet in Ukraine” (according to a study by the American company Ookla). We engaged one of the best sprinters in Ukraine, Erik Kostrytsia, who became the hero of the Vodafone Ukraine commercial. In the video, he embodies the country's fastest man running in a race with high-speed Internet, which highlights the benefits of our services.
- Initiatives aimed at promoting additional products, such as the My Vodafone app and eSIM technology.



Marketing goals

For 2025, our priorities will include further growth of the operator's subscriber base. We plan to continue introducing innovative services, improving customer service and

launching new advertising campaigns that highlight Vodafone Ukraine's values and social responsibility.



Thanks to these events, we were able to not only attract new customers, but also to strengthen the trust of existing customers in our brand, which is an important aspect of our marketing strategy.

Procurement activities

Group's procurement management

Throughout its operations, Vodafone Ukraine has built a comprehensive system of cooperation with suppliers based on clear principles and standards. Our approach is based on the Group's internal regulations and policies, detailed information about which can be found on the official procurement website <https://tenders.vodafone.ua/ua/tenders/docs/>.

In 2024, the Group continued to improve its procurement processes by introducing uniform standards and enhancing the efficiency of coordination between its subsidiaries. An important step was the alignment of Farlep-Invest's procurement practices with the Group's Procurement Policy, which promotes transparency and optimisation of all stages of the process. The policy provides for the possibility of purchasing from NEQSOL Holding's subsidiaries as suppliers through a simplified procedure for conducting tenders. This helps to optimise costs, improve the quality of goods and services, and ensures uniform procurement management principles. Such approach allows the Group to improve the efficiency of the supply chain, strengthen internal coordination and standardise procurement activities.

All Vodafone Ukraine suppliers confirm their compliance with the key requirements by completing the Counterparty Questionnaire, which includes a Certificate of Compliance

with the requirements of VF Ukraine PrJSC. By signing this document, the supplier certifies its compliance with anti-corruption legislation, the Code of Conduct and the Supplier Code of Business Conduct. In particular, suppliers guarantee compliance with health and safety standards, environmental protection, non-use of child labour and refusal to use raw materials extracted from conflict zones. All of the Group's contractors involved in the procurement and disposal of decommissioned equipment must also comply with the requirements of the law and regulations on the handling of scrap metal, hold licences for hazardous waste management and possess the necessary equipment for its disposal.

In 2024, the Group continued updating its procurement regulations. In 2025, the Group plans to introduce a systematic approach to evaluating and categorising suppliers by the level of interaction with them. This will optimise the procurement process and enhance the efficiency of cooperation with suppliers.

The Group interacts with its suppliers through its tender platform, by e-mail, telephone, as well as online and offline meetings. During the tender, the procurement officer is responsible for communicating with participants, and after the results are approved, the initiator also gains the right to communicate with the supplier independently.

The participants in procurement activities, including suppliers and other stakeholders, can e-mail their complaints and suggestions to hotline@vodafone.ua, procurement@vodafone.ua or procurement@vegatele.com.

Received appeals are processed within 10 working days. If a complaint is received before the tender winner is determined, the procurement is temporarily suspended and resumes only after the complaint is addressed.

If a complaint is received after the results are announced, the contract may be suspended. If there are violations, the management decides to review the procurement results.

The Group's supply chain

Vodafone Ukraine promotes healthy competition in the market by ensuring transparency and efficiency of its procurement processes. The Group's centralised tender procurement system covers the full cycle, from sourcing suppliers to analysing the results. This approach enables us to optimise cost and quality control and ensure compliance with established standards. The Group focuses on cooperation with qualified suppliers, which guarantees high quality in goods, works and services. Due to the Group's tender practice, the list of potential partners includes key market players and successful local businesses.

The main procurement categories in 2024 included equipment and services for radio and transport networks, auxiliary equipment, infrastructure services, software, switching solutions and platforms. Procurement is carried out with both local and foreign suppliers. We cooperate with domestic suppliers from Kyiv, Kharkiv, Dnipro, Lviv and Odesa, on key categories such as GPON and FTTX equipment, switches, routers, subscriber equipment, IT services, network maintenance, transport services, construction and installation works, fuel and lubricants, and backup power systems.



96%

of the Group's suppliers contracted under tender procurement in 2024 were **local suppliers**¹². Over the past five years, this figure has been consistently above 90%.



75%

of the Group's total tender procurement budget was spent on goods, works and services provided by **local suppliers**¹³.

Foreign suppliers, including companies from China, the USA, Ireland, the UK and Azerbaijan, provide radio network equipment, auxiliary equipment, switching solutions, GPON and FTTX, SFP modules, batteries and backup power systems. The Group cooperates

with foreign manufacturers, distributors, importers and service providers in the fields of telecommunications equipment, IT, network maintenance, advertising, logistics, construction and installation works, and backup power supply.

12. For the purposes of this report, the term "local suppliers" refers to Vodafone Ukraine's suppliers who are residents of Ukraine.

13. In 2022, local suppliers accounted for 94% of all suppliers, with 66% of the total tender budget spent on them. In 2023, the corresponding figures were 97% and 74%, respectively.

Supplier and procurement quality assessment

Supplier compliance with the principles of business ethics, anti-corruption legislation, as well as health and environmental protection is fundamentally important for Vodafone Ukraine. All suppliers are assessed in accordance with the requirements of the VF Ukraine Compliance Certificate, which is a prerequisite for cooperation. Supplier assessment and classification is based on a set of criteria, including their compliance with the Code of Conduct and the Business Supplier Code of Conduct. In case of non-compliance, the supplier may receive a downgrade in its rating, refusal to conclude a contract, or termination of existing contractual relations.

Special attention is given to the selection of companies for the buyback and disposal of decommissioned equipment. They must confirm that their activities comply with the Law of Ukraine “On Scrap Metal”, possess a licence for the relevant type of activity in their Charter and meet the requirements¹⁴ or the necessary equipment.

In addition, the Group performs and discloses Scope 3 calculations, which includes the impact of our suppliers’ activities on the Group’s indirect greenhouse gas emissions. This approach ensures compliance with environmental standards and enhances the transparency of corporate reporting.

In 2024, the Group cooperated with 160 new suppliers. 100% of the Group’s new suppliers in 2024 were assessed according to social and environmental criteria¹⁵



Vodafone Ukraine sets targets for cost savings and timeliness of procurement procedures. To this end, the procurement team has access to a special **live wall** dashboard that displays key performance indicators (KPIs) in real time. This instrument allows the team to analyse results, promptly improve approaches and increase productivity. This approach to procurement by Vodafone Ukraine is unique in the Ukrainian market. In 2024, the overall cost savings rate was 10% and the timeliness rate was 71%¹⁶.

Vodafone Ukraine Group consistently improves the process of comprehensive assessment and classification of its counterparties, thereby strengthening control and increasing procurement efficiency.

14. The main legal requirement is the Order of the Ministry of Economic Development and Trade of Ukraine No. 524.

15. The indicator excludes the suppliers of Farlep-Invest PrJSC and Freenet LLC, since the accounting for supplier assessment in these companies is still being adjusted. At the beginning of 2025, some counterparties were surveyed, and for new suppliers starting in 2025, the survey on social and environmental criteria is carried out during the tender procedure.

16. The indicator excludes the suppliers of Farlep-Invest PrJSC and Freenet LLC, since the accounting for supplier assessment has not yet been established in these companies.



Goshgar Hasanov,

Chief Procurement and Logistics Officer
of PrJSC “VF Ukraine”

CONTRIBUTION TO SOCIAL WELFARE

- Human capital management and talent acquisition
- Inclusion and Human Rights
- Career development
- Occupational health and safety
- Contribution to the development of local communities



Human capital management and talent acquisition

Vodafone Ukraine's approach to staff recruitment and management is based on the principles of fairness and transparency. We have implemented a reward system that incentivises business performance, and we conduct annual salary reviews in line with market trends. The Group provides flexible working conditions, timely payment and an extensive benefits package. We pay special attention to employee well-being and a positive team environment, offering programmes to support physical and mental health, as well as initiatives to promote a proper work-life balance.

Vodafone Ukraine adheres to labour law and to its internal policies and standards for human resources management. These include policies on compensation and benefits, health insurance, remote work, business trips, recruitment and adaptation, internal labour regulations and others. An individual employment contract is concluded with each employee, which contains provisions on the rights and obligations of the parties, confidentiality, job description and responsibilities, working conditions, remuneration, dismissal procedure and other important aspects of employment relations.



In 2024, we updated the list of Our Strength Values, the corporate values shared across the entire Group. This initiative has further strengthened the unity of employees from different Vodafone Ukraine business lines into a cohesive and well-coordinated team. The updated Group Values have become an integral part of various corporate projects and events, including:

- a series of “In Touch” online podcasts;
- a series of “IQ Battle” intellectual games;
- a set of wellbeing activities called “The Power of Values”;
- a motivational project which expresses gratitude to the employees who embody the corporate values called “People of Our Strength”;

- updates to office screensavers and stickers, and Teams backgrounds, to reinforce corporate communication principles to our colleagues daily;
- Corporate Business Forum “Our Identity Code” — the first offline opportunity since the beginning of the pandemic to thank our professional teams for their resilience, courage and strength. Similar forums were also held for VF Retail and the contact centres.

In 2024, the Vodafone Career Calling program was launched with the aim of helping our contact center talents discover their professional calling and unlock broad development opportunities within the Vodafone Group of companies.



For the fourth consecutive year, Vodafone Ukraine has been named one of the 50 best employers by Forbes. The survey of participants and market experts in 2024 particularly highlighted the following indicators: “Feeling of Protection”, “Contribution to Victory”, “Openness”, and “Social Package”.

Recruitment of new staff

Our Vodafone Ukraine Career Website is a key resource for potential candidates to explore the Company's values and employment opportunities. It provides insights into the Company's corporate culture, specifics of work in different business areas and achievements in HC, whilst letting candidates browse and apply for current vacancies. In addition, we post job openings on the leading national job search platforms and other relevant resources. The Group also has a referral programme that encourages our employees to recommend candidates in exchange for a reward.

In addition to our career website, we actively develop career pages on social media, which serve as an important platform for

communicating with candidates. Our official pages on Instagram, Facebook, and LinkedIn provide information about current job openings and career growth opportunities, as well as insights into our corporate culture and success stories of our colleagues.

In 2024, Vodafone began working with the recruitment automation system CleverStaff to enhance the transparency of the talent search and selection process. By doing so, we have increased the number of resources where our vacancies are published, and have introduced a probationary period tracking process, thus improving the onboarding process for new employees.



The six-month paid Vodafone Career Way program for young talents has been running since 2015. It is designed to provide participants with hands-on experience in the field of technology under the guidance of experienced mentors. Over the course of 10 years, 138 participants have taken their first professional steps through the program and

are now building careers in various areas of business. Each year, more than 50% of program graduates continue their career journey at Vodafone Ukraine. In 2024, the program was transformed into a continuous initiative. That same year, it expanded to regional centers across Ukraine with the goal of fostering young talent in the telecommunications sector.



Nadiia Sirenko,

Chief People and Culture Officer
of PrJSC "VF Ukraine"

Remuneration and motivation of employers

Vodafone Ukraine values every employee, so it implements a comprehensive incentive system that includes recognition of achievements, open channels for sharing ideas, and mental health support programmes. The Group provides a favourable working environment and supports the well-being of its employees by providing them with benefits such as:

- competitive salaries,
- flexible working hours,
- accident and health insurance, as well as financial support in difficult life circumstances,
- medical care, use of sports and recreational facilities, including coverage of COVID-19 diagnosis and treatment,
- disability and incapacity benefits, along with other social guarantees in accordance with the law,
- reimbursement of transport costs in accordance with the adopted policies,
- corporate mobile communication and preferential tariffs for internet connections,
- various training and career development opportunities.

Vodafone Ukraine also provides financial assistance in the event of child birth, loss of a close relative, critical illness not covered by insurance, as well as financial support to the relatives of a deceased employee. Additionally, there is a special support available in case of losses caused by military actions and russian aggression.

Vodafone Ukraine has a system of non-financial incentives that includes a digital employee profile in the PROSTOR corporate network featuring a personal achievement stand which displays virtual badges awarded for participation in projects, programmes and initiatives. These badges motivate employees, recognize their involvement and contributions,

and are visible to colleagues. In 2024, we continued enhancing the system by adding new badges and expanding the opportunities for participation.

Vodafone Ukraine values every employee and supports a culture of gratitude, partly reflected in its laudable tradition of giving OVATIONS — digital tokens of appreciation that colleagues use to recognise the manifestation of corporate values. In return, you can send a “Thank you” message, thereby reinforcing a culture of mutual appreciation.

The Golden OVATION is a special recognition available to the Group’s top managers to reward employees for significant business decisions, projects and achievements. Additionally, the Council of the Strong, i.e. employees who have received double awards from top managers, is also granted the right to award Golden OVATIONS. This highlights their contribution and motivates them towards new achievements. All OVATIONS and Golden OVATIONS are accumulated in the employee profiles on the PROSTOR corporate network, serving as a symbol of pride and engagement. In 2024, the Group’s employees gifted 100,914 OVATIONS, of which 604 were Golden.

Vodafone Ukraine supports both the mental and physical health of its employees through various initiatives. A dedicated Wellbeing program plays a key role in fostering a culture of mental health care and emotional well-being among employees. The format of its events includes open online lectures, webinars, practical workshops, psychological clubs, and comprehensive modular training programmes for managers. At the time of war, personnel development programmes are focused on recovery tools and practices, on maintaining emotional well-being, on dealing with stress and anxiety, on handling fatigue and uncertainty, trauma-informed approach in management, and the specifics of supportive communication in both office and remote settings. In 2024, comprehensive leadership programmes were held in person, led by professional psychologists and mental health consultants in teams and organisations. Additionally, all employees of the Group have

access to a corporate online psychological counselling service, which provides them with the opportunity to get professional help from a psychologist. Beyond counselling, employees have constant access to videos related to mental health programmes on the corporate network PROSTOR, available 24/7. This allows them to watch the materials at their convenience and share them with family and friends.

A financial motivation system has been implemented in the Group’s companies, where bonuses are based on the achievement of key performance indicators (KPIs). The Group has also implemented Regulations on performance appraisal and bonuses for employees and

the Commercial staff motivation policy. Each employee can freely review the salary structure for their position and, if necessary, seek additional guidance. In order to actively expand our fixed-line business segment, we have introduced financial incentives for employees selling routers. In the reporting year, we also expanded and increased the amount of bonuses under the Sell All programme, which rewards non-commercial staff for selling the Company’s services. In order to accelerate installations amid high demand for the Company’s services, we introduced the Connect Everyone programme, motivating administrative staff to perform technical work to connect Internet services, which saved the Company both time and resources.

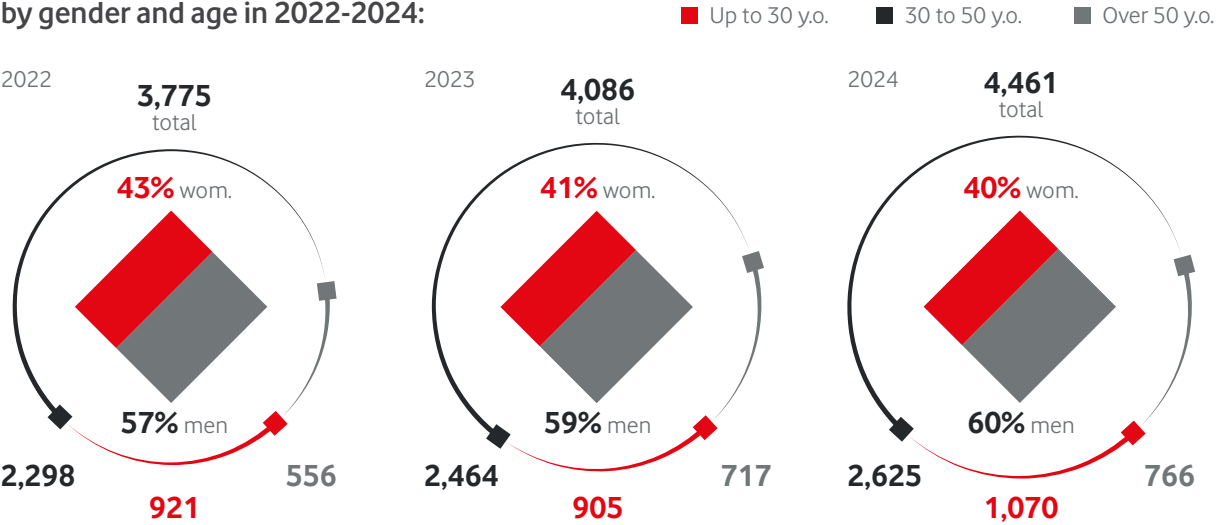


Workforce size and structure

The number of employees at Vodafone Ukraine increased by 9% in 2024 compared to the previous reporting period. In 2024, the Group made efforts to restore the pace of recruitment, which had slowed down over the past two years, in particular due to the impact of military-related factors. The overall increase in headcount was driven by the development

of the Group, particularly in the IT and fixed-line internet business segments, which required the recruitment of specialists in critical areas to ensure the sustainability and expansion of our operations. Therefore, as of the end of 2024, the total number of employees at Vodafone Ukraine was 4,461.

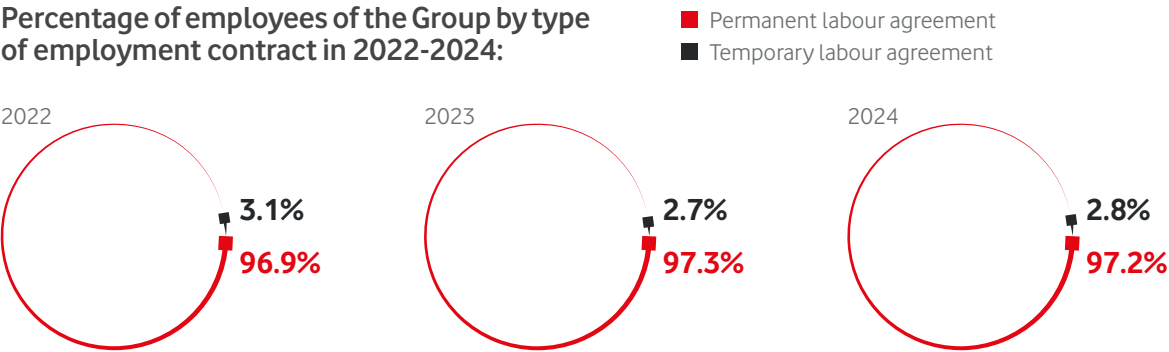
Vodafone Ukraine workforce structure by gender and age in 2022-2024:



The vast majority of employees work under permanent labour contracts and in full-time regimes. In 2024, 97.2%, of employees held

permanent employment contracts, whilst only 2.8% held temporary ones.

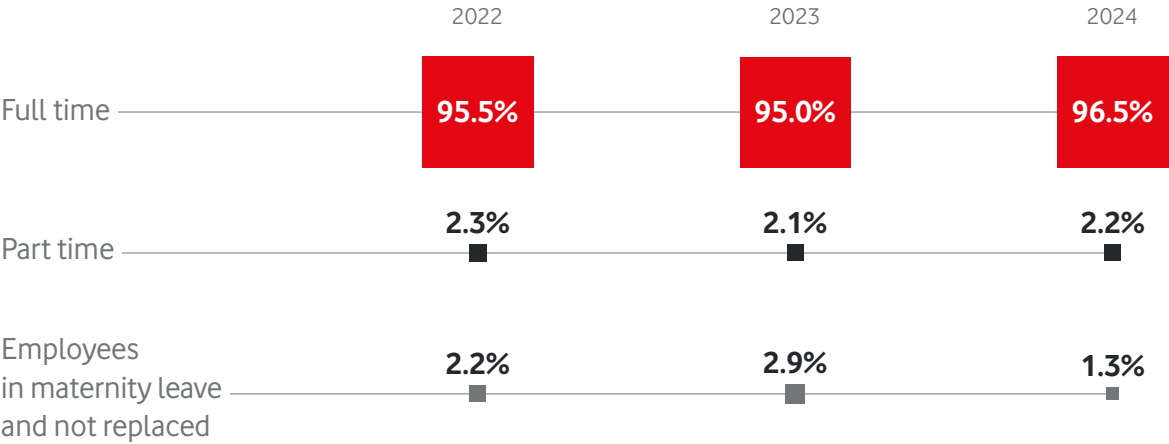
Percentage of employees of the Group by type of employment contract in 2022-2024:



Parental leave at Vodafone Ukraine is provided in full compliance with the current legislation of Ukraine. In 2024, 34 employees of the Group took parental leave, all of whom were women. In the reporting year, 29 out of the 89 employees who were expected to return to work after the

end of their parental leave, actually did so. All of the 17 employees who returned to work after their parental leave in the previous reporting year remained with the Group for at least the next 12 months.

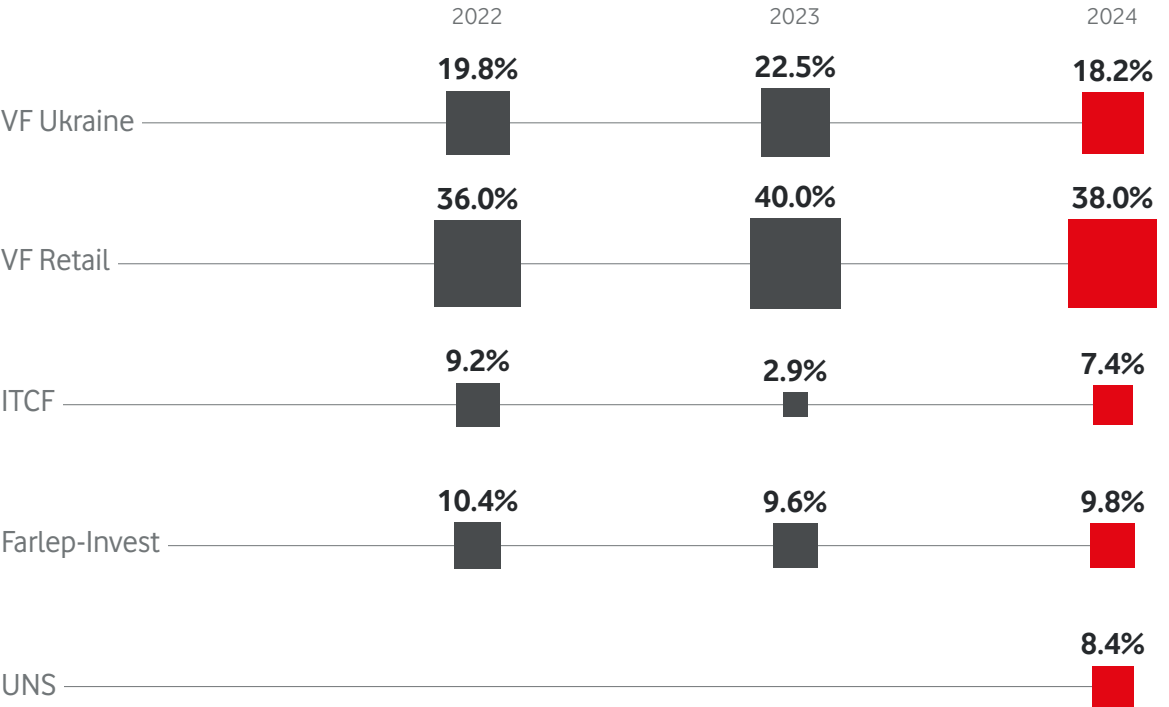
Percentage of employees of the Group by type of employment contract in 2022-2024



In 2024, 1,417 new employees were hired across the Group, whilst 761 left the company. The staff turnover rate has been calculated separately for each company in the Group

as the ratio of the number of resignations to the average number of employees during the reporting period.

Staff turnover rate in 2022-2024¹⁷:



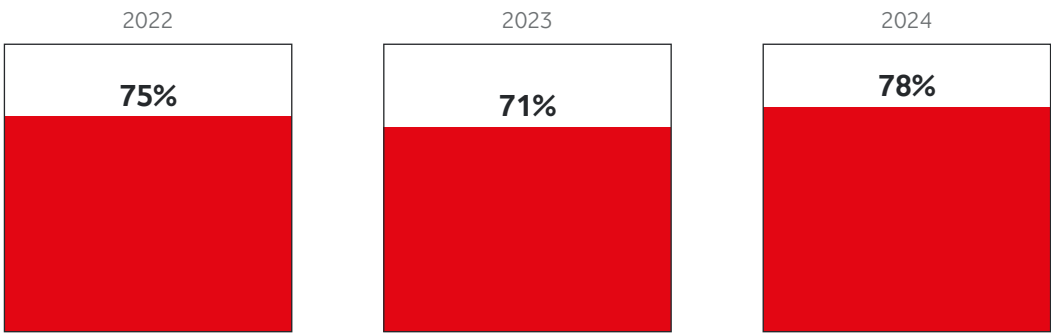
17. For UNS LLC, 2024 marks its first year of operating activity. As for Freenet LLC, the rate was not calculated, as the data is not representative due to the integration of Freenet LLC into Farlep-Invest PrJSC, which involves the migration of employees between the companies.

Communication with employees

A platform for daily communication. For 10 years, PROSTOR has been the main information hub of Vodafone Ukraine. This corporate network combines the functionalities of YouTube, Facebook and Instagram, while embodying the Group’s values. Each employee can create their own personal digital profile, and the total number of active licences in 2024 was 3,650. PROSTOR serves not only as a workplace communication tool but also as a platform for learning, development, exchange of ideas, motivation and feedback. In the reporting year, we paid special attention to security — access to the platform is possible only via the corporate network.

The Group’s companies also hold online meetings of the Group of companies’ employees, which serve as a platform for direct communication with all employees simultaneously, to discuss important corporate issues or present strategic initiatives, Vodafone Ukraine’s results and future development directions. It also provides employees with the opportunity to ask questions directly to management.

Index of readiness to recommend the Group as an employer (eNPS index)¹⁸:



We also conduct surveys among participants of corporate events and programmes. After each event, regardless of the format (online/offline business forum, webinar or business game), we regularly send participants a feedback form where they can share their impressions and suggestions.

Employee surveys. Vodafone Group conducts an annual eNPS (Employee Net Promoter Score) study as a key employee feedback tool. The survey asks the central question: “Would you recommend Vodafone Ukraine as an employer?”, as well as additional questions for detailed comments. Survey feedback anonymity and confidentiality is guaranteed, ensuring honest responses. The questionnaire covers various aspects of work, including interaction with managers, team atmosphere, efficiency of business processes, level of awareness and training programmes, trust in the Company and in its leadership, and a sense of involvement in the corporate culture. If they wish, employees can choose to include their names in the survey for an open discussion of their answers. In 2024, 3,328 Group employees took part in the survey, representing 74.6% of the workforce. Of these, 1,248 people, or 27.9% of the workforce, opted to identify themselves with their responses.

All complaints received from either the surveys, the PROSTOR platform or from All Employee Meetings are reviewed by the employee’s immediate supervisor and, if necessary, escalated to senior management to resolve the problem and prevent its recurrence in the future.

Employee engagement activities and projects

In 2024, the Group implemented the Skills Evaluation programme, aimed at the assessment of communication and technical skills of managers from the R&D department. Based on the results of the assessment, managers received feedback and personalised leadership development plans. Additionally, a series of facilitated meetings and brainstorming sessions were organised to help managers achieve the Group’s strategic goals and effectively lead their teams.

In 2024, the Vodafone Career Calling program was launched with the aim of helping our contact center talents discover their professional calling and unlock broad development opportunities within the Vodafone Group of companies.

Vodafone Ukraine has been successfully implementing the **Vodafone Bloggers HUB** programme for several years by now. The programme is aimed at supporting corporate bloggers to become brand ambassadors. Programme participants are actively involved in both digital and offline projects, acting as correspondents at business forums, corporate, sports and cultural events.

In 2024, we launched a series of corporate online podcasts dedicated to the updated **Our Strength Values**. The project aims to informally introduce colleagues to the diversity of corporate life through the lens of the Our Strength Values. Participants include the creative team behind the 2021 “Stay in TOUCH” project, active members of the Bloggers HUB project and other employees from the Group of Companies eager to contribute. The project was broadcast live on the MS Teams platform with recordings later available in PROSTOR. Thanks to the podcast and publications in PROSTOR, the information about fundraising efforts to support Vodafone Ukraine employees who are fighting in the Armed Forces of

Ukraine is being spread effectively, thereby further encouraging colleagues to contribute financially, and fostering a strong corporate culture of charity.

In October 2024, a **Vodafone Bookworms Book Club** was launched, bringing together like-minded individuals in an informal setting. The initiative started with the Readventure reading programme by Tatiana Orlyk, which lasted for 7 weeks. Reading helps to reduce stress and strengthen interpersonal relationships with colleagues, so the programme evolved into a full-fledged book club. Club members choose a book to read over the next month and then discuss it at online or offline meetings.

Vodafone Ukraine places great emphasis on national identity, and has been implementing the **Ukrainian DNA** project for several years. The project is aimed at promoting Ukrainian language, culture and history among employees with a core focus on fostering mutual support and unity among Ukrainians in the time of war.

Since 2022, we have been running the **“For Ours”** charity project to support colleagues fighting in the Armed Forces of Ukraine. We have already conducted 10 rounds of fundraising and sent 1500 so-called care boxes. The total amount raised is over UAH 3 million. The fundraising is promoted through all available communication channels: online meetings with directors, the online podcast “In Touch”, publications on the PROSTOR internal portal, SMS newsletters, etc.

The initiative also included five **Vodafone IQ Battle** sessions, where around 150 employees took part in an online team quiz. These events contribute towards employee education, team cohesion and emotional relaxation.

18. The data for 2022 takes into account the results of a survey among employees of VF Ukraine PrJSC — 80%, VF Retail LLC — 76%, ITSF LLC — 60% and Farlep-Invest PrJSC — 51%, and the data for 2023: VF Ukraine PrJSC — 78%, VF Retail LLC — 55%, ITSF LLC — 64% and Farlep-Invest PrJSC — 57%, and the data for 2024 include the results for VF Ukraine PrJSC — 84%, VF Retail LLC — 71%, ITSF LLC — 69% and Farlep-Invest PrJSC — 62%.

In 2024, we continued implementing the **STRUM** course on civilian personal safety in urban environments, based on Israeli protocols. The programme was completed by 132 Group employees, who gained skills in mental and

physical health, first aid, safe actions in critical situations, mine safety, as well as the basics of self-defence and the use of short-barreled firearms.



In the reporting year, the Group organised a series of sports events as part of the preparation for the Vodafone Ukraine Team 2024 corporate running team. Participants planned their own activities and received points in the corporate PROSTOR network, which were converted into donations on behalf of

the team. This initiative helped to develop our running community, promote volunteering and charity, and support our employees' physical and mental well-being. Thanks to the combined efforts of Vodafone Ukraine Team athletes and fans, over UAH 720,000 was raised.



Our **#BloodGoodDay** corporate donor community was established back in 2020. In response to military realities, we transformed our corporate donations format. In 2023, we invited donors to join external blood donation

events organized by DonorUA, and in 2024 we managed to resume holding Corporate Donor Days in the format of on-site donation events in Kyiv in June and October.



Inclusion and Human Rights

Vodafone Ukraine operates within the framework of statutory standards for labour relations. Internal policies on remuneration, employee evaluation, selection and onboarding of employees are based on respect for human rights and accommodate the interests of employees with diverse abilities, ensuring inclusivity and equal opportunities for everyone.

Decisions regarding employees, customers and business partners do not depend on their race, religion, gender, age, nationality, self-identification or family status, as we resolutely condemn any form of discrimination, and believe that biased actions should be challenged. Indeed, Vodafone Ukraine

Principles of Diversity and Respect for Human Rights

Governed by international human rights standards, Vodafone Ukraine upholds the principles of equality, inclusion and non-discrimination. All employees are required to comply with these norms, which are enshrined in the Group's Code of Conduct:

- 1 Ensuring equality of opportunities for all employees
- 2 Mutual respect and adherence to human rights
- 3 Prevention of any manifestations of discrimination
- 4 Providing an inclusive environment for all employees
- 5 Promoting open discussions in cases of human rights violations and discrimination

supports anyone who is willing to raise these issues. In order to assess the level of engagement of the staff with this approach, the Group conducts regular surveys, on the basis of which we take measures for further improvement.

Vodafone Ukraine strictly adheres to the principles of ethical employment, condemning child labour or forced labour. Labour relations are strictly aligned with current Ukrainian labour legislation. The Company ensures official employment in compliance with the requirements of Article 188 of the Labour Code of Ukraine, which allows hiring individuals aged 16 and over.

We believe that adherence to these principles is fundamental to the Group's successful operation and towards creating a positive work experience for our employees.

Respect and trust are the cornerstone values on which interaction is based both within the Group and in communication with external stakeholders. The Group has a feedback mechanism that provides for the consideration of complaints, their impartial resolution and improvement of communication processes.

Communication channels for submitting complaints and suggestions regarding human rights violations:

- Report to your line manager directly
- Email hotline: hotline@vodafone.ua or vodafone@vodafone.ua

Mental Support

Vodafone Ukraine creates a comfortable work environment, providing employees with access to qualified psychological support and regular training on mental health and self-help. The programmes are finetuned annually in line with external challenges and the needs of the team.

The Group cultivates a culture of conscious responsibility for health, emotional well-being and relationships in the team. Special attention is given to the training of leaders, helping managers learn how to support their teams, work in different conditions and diverse cultural environments. Their abilities are enhanced through programmes for the development of managerial competencies, which include the topic of mental health.

In 2024, Vodafone Ukraine implemented a number of comprehensive initiatives aimed at strengthening a culture of mental health and well-being among employees, namely:

- Webinars addressing topics such as adapting to a new reality, chronic stress, anxiety, accumulated fatigue, loss, recovery, self-help and support through relationships and social ties, couples' relations, children support, burnout, self-care practices, physical and breathing exercises, mindfulness, etc.
- Webinars on DEI (diversity, equity and inclusion): fostering a culture of diversity, equality and inclusion in the workplace.
- A "Leader's and Team's Mental Health during Wartime" programme for managers: offering methods and tools for caring for one's own mental health and improving it among their teams, with a combination of theory (40%) and practice (60%).
- A "Trauma-Informed Approach in Management Processes" workshop.
- Online Mental Health Counselling Service.
- Self-help group: offline meetings of a group of employees to look into cases, reflect together and master self-support skills and tools.



In 2024, no cases of human rights violations or discrimination were recorded within the Group.

Adaptation of War Veterans

Vodafone Ukraine guarantees job retention for mobilised employees, providing them with the opportunity to return to work after their military service. The Group actively implements initiatives to support war veterans, military personnel and their families during wartime. One of the key initiatives is a hotline for colleagues serving in the military, war veterans and their respective families, which ensures prompt contact with a coordinator to assist and respond to pressing needs. The hotline facilitates constant communication on support measures, including psychological support, financial assistance as well as coordination of the delivery of holiday gifts for children and families and packages for the military. We support mobilised employees and their families through:

- Payment of financial aid,
- Provision of psychological support services for military personnel and their families,
- Covering ad hoc needs (where possible),
- Sending quarterly care boxes,
- Holiday greetings and gifts for families and children on holidays such as Easter, Children's Day, the Start of the School Year Day, St Nicholas and Christmas.

Furthermore, Vodafone Ukraine has been implementing the charity project “Fundraiser for Ours” to raise funds from among the Group’s employees and purchase handy and necessary items for colleagues serving in the Armed Forces of Ukraine. Since the project was launched in Q3 of 2022, there have been 10 waves of fundraising, resulting in the delivery of 1,500 care boxes and over UAH 3 million in total funds raised. The fundraising has been actively promoted through all available communication channels, including online meetings with directors, the Stay Tuned podcast, publications on the internal corporate network PROSTOR, SMS mailings, etc.

To reintegrate war veterans, we organise educational events dedicated to inclusion and accessibility, which help with the acceptance of new realities, overcoming stereotypes in communication with veterans and finding ways to maintain relationships, even at a distance or in special conditions.



War Veteran's Path in Vodafone Ukraine

Start of civilian life

- Message from a Veteran about his/her return
- Acquaintance with the case manager who accompanies the Veteran (identification of needs)
- Joint meeting: case manager/HR Business Partner, manager
- Assistance with the preparation of documents and benefits (outsourced)

Taking care of the veteran

- Medical examination (planned)
- Sanatorium treatment (planned)
- Psychologist counselling
- Special working conditions during the adaptation period
- Flexible work schedule

Reinventing oneself

- Career guidance
- Vocational and non-formal education
- The possibility of changing job duties or functionality
- Career development in the Vodafone Ukraine Group of Companies

Business adaptation

- A program to support the manager and the team during the return of the veteran colleague
- Consultations with a Company psychologist for the manager and the subordinate
- Support of the decision on the implementation of job instructions
- Functional Mentoring Program

Rooting

- Invitation to the community (Vodafone Veteran Community)
- Regular meetings with the case manager to discuss the veteran's needs
- The Company cares about the veteran's family
- Defenders honoring Programs

War Veteran's Path

From the early days of the full-scale invasion, the Head of the Network Capital Construction Department, Vitalii Lytvynenko, volunteered to join the ranks of the Armed Forces of Ukraine, where he directly participated in combat on the Eastern Front, including in the battles for Bakhmut. During this time, he went from a soldier to a sergeant major and received state awards, in particular the Cross of Valour. This once again exemplifies how true leadership qualities are manifested both in civilian and military life.

In the summer of 2024, after being transferred into the reserve, Vitalii managed to fulfil the promise he had made to the General Director in the spring of 2022: to return and contribute to building the Company's network, which faced an ambitious goal of launching 700 new sites. By the end of 2024, 704 had been built. Vitalii exceeded expectations, and the goal was achieved!



Training in Human Rights and Inclusion

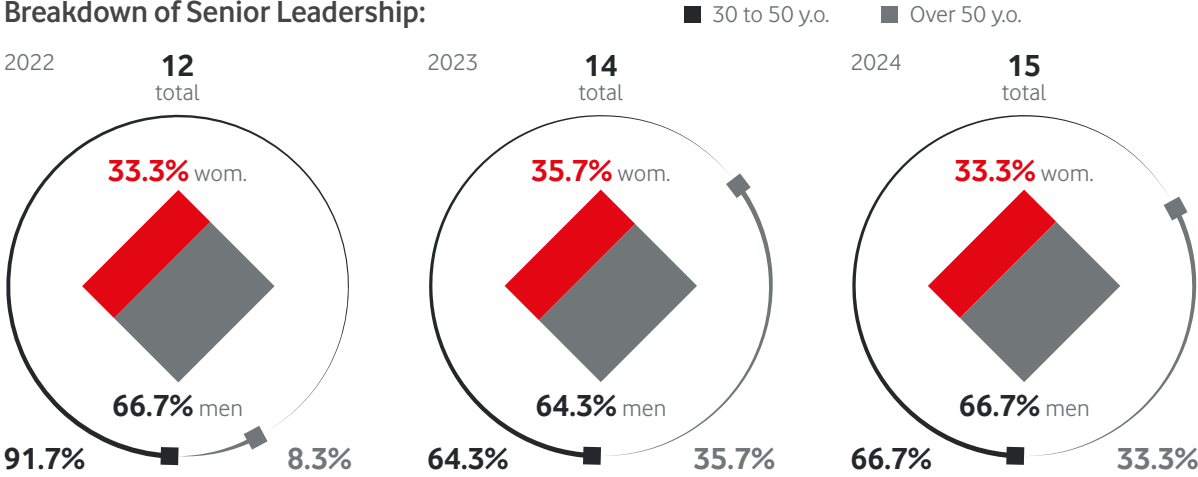
We realise that raising awareness among employees is fundamental for a strict observance of human rights and inclusion in the Group of companies. This is why we have designed a comprehensive training framework, involving regular events for all employees of the Group, during which employees are introduced to the basic principles of the Code of Conduct, including the agenda of inclusion and diversity. According to the training plan, each employee must attend these trainings once every two years. Vodafone Ukraine updates training programmes and holds seminars that contribute to a better understanding of inclusion and diversity in the team.

Gender and Age Diversity of Our Employees

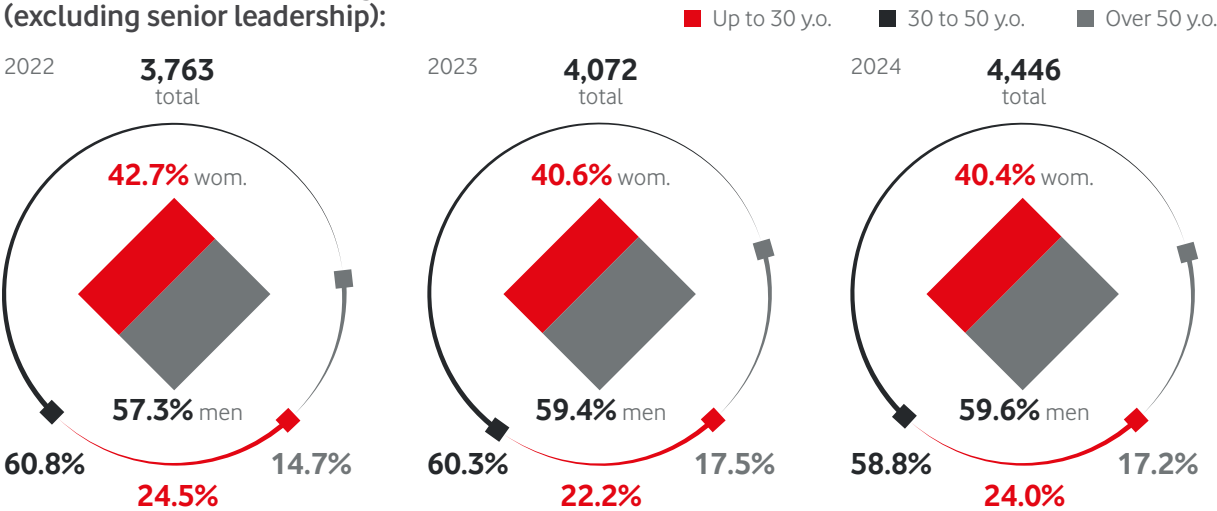
In 2024, the top management of Vodafone Ukraine Group consisted of 15 people, while all other personnel numbered 4,446 people¹⁹. The share of women in senior leadership constituted 33.3%, while among all other personnel it was 40.4%. In corporate governance bodies, there were 5 women and 10 men, mostly aged 30-50.

19. Data on the number of employees is provided as the actual number of people as of the end of the calendar year.

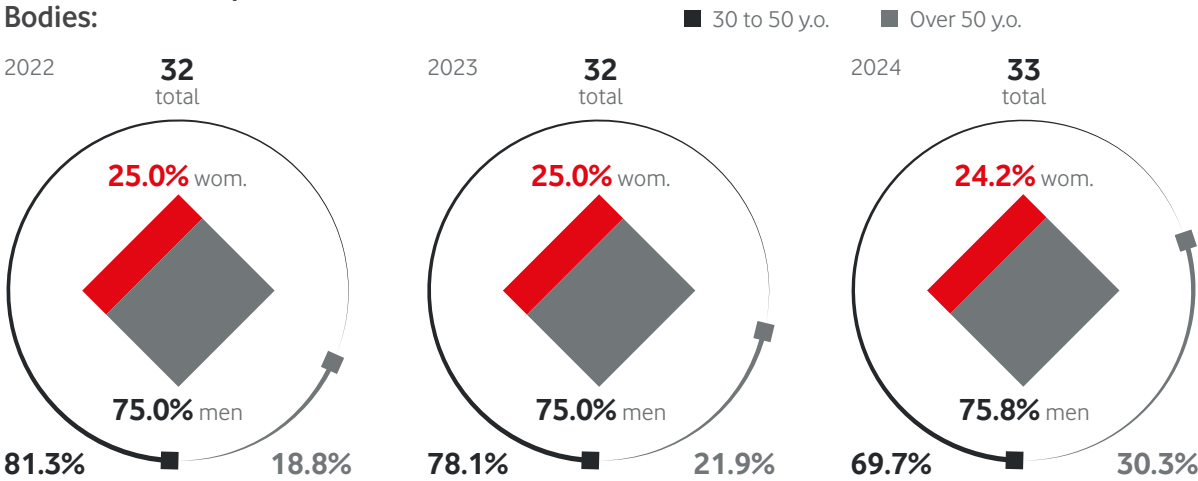
Breakdown of Senior Leadership:



Breakdown of the Remaining Personnel (excluding senior leadership):



Breakdown of Corporate Governance Bodies:



Gender Pay Ratio

In 2024, the Group of Companies' ratio of the average total remuneration (sum of base salary²⁰ and additional remuneration²¹) of women to the total remuneration of men was 107.5%, i.e., 13.8% higher compared to 2023. For other employees, namely, all employees

excluding senior leadership, this ratio stood at 86.8% (which is 3.7% more than in 2023). For VF Ukraine PrJSC, the overall ratio for all employees increased by 19.3% compared to 2023. More detailed information is provided in the Appendices to this report.



20. Base salary refers to the actually paid fixed, minimum amount of remuneration for an employee, excluding possible additional payments.
21. Additional remuneration refers to actually paid additional payments, such as payments for length of service, overtime payments, bonuses, etc.

Career development

Approach to staff development and training

Vodafone Ukraine Group is committed to creating favourable conditions for the continuous professional and personal development of its employees. The application of knowledge and skills and the exchange of expertise among employees are important for achieving strategic goals. The main objectives of Vodafone Ukraine's approach to training are:

- 1 **improving employee productivity** by providing quick access to relevant knowledge;
- 2 **fostering innovation** by stimulating the exchange of ideas and the creation of new products or services;
- 3 **improving quality of decision-making** by providing employees with up-to-date information to make informed decisions and enhancing the efficiency of internal communication;
- 4 **preserving corporate culture** by mitigating the loss of important knowledge in the event of staff turnover through the seamless transfer of expertise in an online format;
- 5 **fostering comprehensive employee development** by improving skills through a combination of external and internal training courses, while ensuring access to corporate resources at any time, regardless of location.

The employee training process is governed by the Corporate Training Policy. The Group has set a number of objectives in the field of employee training, including:

- improving existing tools and introducing new ones in the distance learning system;
- the automation of reporting, to enable team leaders to independently analyse team results (for managers) and personal results (for individual employees);
- creating a culture of knowledge-sharing among employees, and developing knowledge base management skills;
- provisions for a centralised transfer of information about new processes, products, and services through the corporate portal in the form of newsletters and active news feeds;
- provisions for data protection and confidentiality of information;
- collecting and organising the knowledge base, as well as monitoring, updating and ensuring its relevance;
- promoting the integration of knowledge into business processes to maximise impact on results, and the creation of training materials on request in B2C, B2B and other areas.



Vodafone Ukraine invests in the professional development of its staff by funding training programmes and through participation in professional conferences. Additionally, the Group encourages an innovative and creative approach to problem-solving, including the use of artificial intelligence. The Group pays special attention to the assessment of training effectiveness through an automated monitoring system that tracks the impact the training has on employee productivity and career development.

We provide our employees with opportunities for both training and self-improvement. The Group offers internal training in customer service and sales, professional courses, external events, lectures, and support for new hires. The Group also encourages qualified employees to participate in cross-functional projects and promotes a culture of knowledge sharing, contributing to the professional growth of the team overall.

In order to further enhance the skills of employees and managers, Vega Telecom expanded its knowledge base catalogue in 2024 with new courses, instructions and rules, and updated mandatory training for new employees. We have also developed a distance learning programme on occupational health and safety in the areas of electrical safety, fire safety, first aid, etc. In addition, in 2024, the Group created an electronic corporate library offering summaries of business books. The Group employs IT systems such as MOCO, SAP HR and the PROSTOR platform to record information and manage career development and staff training. The PROSTOR platform is used to send out automated newsletters on educational innovations via a news feed.

The shortage of qualified personnel in key areas and high cost of introducing new technologies posed the main challenges for Vodafone Ukraine in the field of professional development in 2024. Nonetheless, the Company optimised its training processes and significantly raised employees' awareness of cyber risks during the reporting period.

In order to manage risks related to career development and training, the HR department holds regular meetings with the leadership team to provide regular feedback. The HR department is also responsible for initiatives supporting the emotional well-being of employees and assessing the level of staff adaptation, thereby determining the needs for

further development, self-study and re-testing of employees.

Vodafone Ukraine places great importance on feedback, which serves as a key tool for improving the effectiveness of training programmes. To this end, the Group has implemented a complaints and suggestions mechanism, which includes open meetings, Q&A sessions and joint discussions. This approach promotes employee engagement and a better understanding of the Group's goals. We pay special attention to the results of eNPS surveys, in particular comments related to corporate training. Overall, they are instrumental for preparing an action plan aimed at enhancing professional development programmes.

Plans for 2025

- 1 Developing the Expert Bridge project to enrich the knowledge base with up-to-date information.
- 2 Launch of the Leader Workroom, a development programme for young managers.
- 3 Focus on inclusion and diversity initiatives.
- 4 Introducing gamification on our learning portal to enhance engagement.

Training programmes for employees

Vodafone Ukraine fosters a culture of continuous learning among its employees — lifelong learning. Throughout their careers, employees gain specialised knowledge, develop the skills required for their positions, and constantly update their knowledge of new services and conditions for customers. The main forms of education include trainings, workshops, webinars, recorded and live online training, and training marathons. Internal training programmes are conducted during working hours, while external ones could be attended during one's study leave, as envisaged by the law.

Each employee, according to his or her position, is provided with a list of mandatory courses to be taken during working hours. Employees can also voluntarily choose courses and trainings for personal growth that develop their personal skills, improve their knowledge in the IT field, establish intra-office collaboration, etc. Special

attention is dedicated to the development of leadership skills, as managers are expected to set an example in time management, effective communication and well-coordinated teamwork. A special modular programme for new managers is dedicated to the development of management skills.

As part of the comprehensive training and development plan, in 2024, a leadership course "Crisis vs. Strategic Leadership" was held in partnership with the UCU Business School for participants of the corporate succession programme. This initiative made it possible not only to systematize knowledge but also to develop new approaches and improve the level of leadership skills within the Group. Managers with some management experience were offered training to develop their skills in change management and team performance management in unstable environments.

We create training solutions that not only help our teams work with the most advanced technologies, but also enable them to stay ahead of changes in the industry. In the current environment, it is important that our employees have the opportunity to acquire new knowledge in real time and participate in the development of the competencies of the future.

In the context of the rapid evolution of artificial intelligence, the development of digital skills is also coming to the forefront. Vodafone Ukraine engages experts and conducts specialised trainings and workshops on how to use AI to increase personal productivity, optimize processes, and create innovative business solutions. During the training, participants explore the limits of AI applications, evaluate its advantages and disadvantages, discuss ethical aspects, and analyse the challenges of integrating AI solutions into the Company's business processes.

In 2024, the Company launched a new training platform, Pro.Vodafone, for distance learning and testing of sales and service teams. Thanks to this platform, more than 1,000 colleagues from the Mass Market and VF Retail sales divisions across Ukraine can quickly and

conveniently familiarize themselves with new products and undergo tests on a monthly basis. In particular, the e-courses "IMS, VoLTE and VoWiFi technologies" and "GigaCombo 3-in-1 tariff line" were completed by 1,300 users each.

The Company also develops and improves the training system for Contact Centre operators. This allows new hires to master the profession of a Contact Centre operator more successfully, acquiring product expertise, and learning skills to handle complex dialogues and techniques for maintaining emotional resilience during customer interactions.

The Group supports the practice of knowledge sharing. The Lecture Hall is a platform for transferring and preserving unique professional knowledge within the organization. In 2024, Lecture Hall meetings were held 10 times, during which employees shared their practical experiences and best practices. The process of adaptation and mentoring is provided not only for new employees, but also for employees who have transferred to another structural unit, returned from maternity leave or resumed work after military service. We strive to support the retention and transfer of knowledge and skills and ensure continuity of experience in the workplace.



Training programmes and courses completed by Vodafone Ukraine employees in 2024

Training for new employees

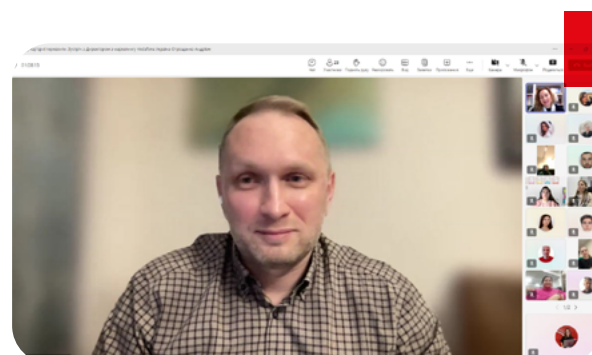
- Initial training for operators
- Training programme for contact centre trade marketing specialists
- Orientation programme for new B2B experts
- Vega professional training

Innovation-related programmes

- Mandatory gamification training for contact centres
- Artificial intelligence training
- Vodafone Big Data products and VOLTE VoWifi technologies
- Web3: How to succeed in the New Digital Era?

Regular training courses

- Mandatory webinars “Basic Information Security Requirements”
- “Understanding” project, which covers topics on business analysis, time management, advanced use of Excel and Power Point tools
- The Lecture Hall is a series of lectures delivered by employees for their colleagues on various topics: ESG principles, Wastes in Lean software development, etc.
- Professional development in various areas (audit and related services, web analytics, contract management for procurement, corporate governance, macroeconomics)
- English language training



In 2024, 3,909²² Vodafone Ukraine employees (or 91% of the total number of employees) took part in training programs, including 14 senior managers. The average number of training hours per employee was 33.4 hours. The increase in the indicator is due to the inclusion

of VF Retail in the coverage, where the high number of training hours per employee is driven by the constant interaction of staff with customers and our commitment to providing an excellent communication experience with representatives of the Vodafone brand.

Average number of training hours per employee in 2022-2024

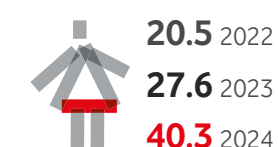
All employees



including

Men

Women



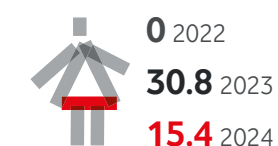
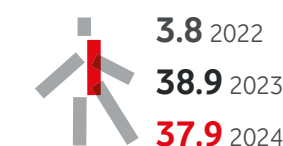
Senior management



including

Men

Women



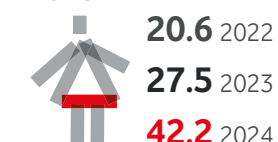
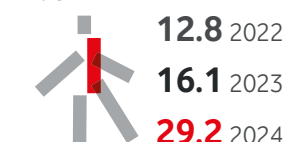
Other employees



including

Men

Women



22. This indicator covers all employees of the Group of companies, except for LLC “Freenet” and LLC “UNS”, where training was not conducted in 2024.

Vodafone Ukraine employees actively participated in professional conferences and forums, sharing experiences and implementing best practices. The HR department represented Vodafone Ukraine at the HR Pro Conference, People Management Conference and Resource Forum 2024 with the topic of empathetic leadership. The Corporate Governance Department took part in the Compliance & Anti-Fraud Forum, Internal Audit Forum 2024 and ESG Day. Quality management and customer experience specialists attended and shared their knowledge at the Customer Experience Conference and at the Global Leadership Forum. Representatives of all functional areas of the Group continue to expand their expertise

Assessment of employee performance and career development

Employee performance appraisal within the Group is carried out twice a year and comprises three components: an assessment of key performance indicators (KPIs), feedback from managers and colleagues, and results of individual task completion. The procedure and principles for assessing employee performance within the Group are governed by the Performance Appraisal and Bonus Policy.

and implement best practices, contributing to the development of professional standards in the Ukrainian market.

Vodafone Ukraine encourages employees to take the initiative in gaining experience in a different area of work within the Group. In 2024, we launched the B2C Installers retraining programme, which allowed any employee to try out the role of a network installer for 10 working days. Such programmes help colleagues find their vocation, while for the Group, it creates an opportunity to build a talent pool out of those who are interested or willing, whilst promoting a diverse range of experiences for our employees.

In 2024, the total share of employees who underwent performance appraisal and career development review was 74.4%. For senior management, this figure was 61.9%.



Share of Group employees receiving regular performance reviews and career development reviews in 2022-2024



In addition, the Group has implemented a Bonus Standard that is used to assess the performance of customer service and sales

employees. In accordance with this standard, performance indicators are set and professional knowledge is tested on a monthly basis.

Occupational health and safety

Occupational health and safety policies and standards

Vodafone Ukraine maintains a working environment where the impact of harmful occupational factors on employees is minimised or fully eliminated. Our goal is to create an optimal working environment that meets the best health and safety standards and the needs of our employees. We strive to reduce the risks of injuries, occupational diseases, accidents and fires at our facilities as much as possible.

To achieve these goals, we are guided by the Occupational Health and Safety Management System (hereinafter referred to as the OHS Management System), which establishes a number of requirements and principles that help us identify risks and take preventive measures promptly. The OHS Management System complies with the Ukrainian national standard DSTU ISO 45001:2019. According to the requirements of the Standard, the system is scheduled to be updated for the fixed-line Internet business segment in 2025. The system covers all areas of the Group's activity, all categories of employees as well as its contractors.

The following Group standards were revised in 2024: "Regulations on the Procedure for Conducting Training and Testing of Knowledge on Occupational Health and Safety", "Planning of Occupational Health and Safety Work" and "Provision, Accounting and Write-off of Overalls, Special Footwear and Other Personal Protective Equipment". No changes were made to the "Occupational Health and Safety Management System" Policy in the reporting period, as the document is scheduled to be revised by the end of 2026. Moreover, the Group has a set of policies and standards governing the organisation of hazardous work, employee training and knowledge testing, and medical examinations. Every employee of the Group has access to these policies and standards on the Group's intranet, PROSTOR.

For all types of work, responsible persons have been appointed to organise and coordinate occupational health and safety activities. Oversight is carried out by the heads of departments and through inspections by occupational health and safety and fire safety engineers. The identified deficiencies are promptly addressed.



Number of employees of the Group covered by the OHS Management System:

Occupational Health and Safety Management System ²³	Number of employees covered by the system	% of the total number of employees	Number of employees covered by the system	% of the total number of employees	Number of employees covered by the system	% of the total number of employees
Year:	2022		2023		2024	
VF Ukraine	2,711	94	2,616	95	2,689	95
including internally audited system	2,711	94	2,616	95	2,689	95
including externally audited system	2,711	94	-	-	2,689	95
VF Retail	810	95	595	95	585	95
UNS ²⁴	-	-	-	-	25	93
Farlep-Invest	561	100	569	100	878	100
including externally audited system	143	25.5	-	-	-	-
Freenet	-	-	405	100	151	100

23. ITSF does not have its own occupational health and safety department. Internal and external audits of the OHS Management System were conducted only at VF Ukraine PJSC and UNS LLC.

24. UNS LLC was established on 09.11.2023 and started operating in May 2024, so this year is the first year when the indicators for the OHS Management System were collected.

Identifying hazards and preventing workplace accidents

Interaction with electrical equipment, loading and unloading operations using machinery and equipment, working at height and in cable conduit manholes are potential sources of danger for our employees. Vodafone Ukraine identifies hazards associated with work processes and assesses their risks on a regular basis. It is done under the supervision of departmental managers and as part of inspections carried out by occupational health and safety and fire engineers. Laboratory measurements are also carried out on a regular basis to identify hazardous and harmful production factors. If any deficiencies are identified, they are reported to top management, which then makes decisions on their elimination at operational meetings.

At every level of occupational health and safety management, we address the safety of buildings and structures, normalisation of sanitary and hygienic conditions and providing training about safe working practices. Our employees are provided with special clothing, footwear and personal and collective protective equipment. Preliminary medical examinations are also carried out for certain categories of employees when they are hired. If employees have visual or hearing impairments, as indicated in the Medical Examination Report, they are allowed to perform the relevant work only with restrictions and specially adjusted environments appropriate to their condition.

Our internal safety inspections are intended to:

- verify whether the working conditions comply with the state requirements;
- ensure compliance with occupational health and safety requirements by managers and specialists;
- identify hazards and assess the safety of equipment and materials;
- address identified problems and prevent violations of laws and standards.



The department heads carry out monthly inspections of workplace safety requirements, and work supervisors conduct daily inspections.

With a convenient mechanism for submitting complaints, every employee of the Group can voice their opinions on working conditions and suggest ways to improve them. Moreover, employees can also raise issues related to protection against hazards related to work processes. In accordance with the requirements of the Law of Ukraine “On Occupational Safety and Health”, employees have the right to refuse to perform their assigned work in case of a threat to life or health.

In 2024, no accidents or occupational injuries were recorded among the Group's employees.

Additionally, there were no cases of work-related diseases. Furthermore, no violations related to discrimination against employees on the basis of their medical data were recorded.

Vodafone Ukraine also implements measures to prevent adverse impacts on the health and safety of its contractors' employees. When entering into contracts, the Group compels contractors to ensure that their employees comply with health and safety, environmental, electrical, fire and industrial safety requirements in accordance with the standard contract.



Occupational safety training and testing

Vodafone Ukraine’s occupational safety training and testing system ensures a high level of qualification among personnel responsible for internal controls, identification, minimisation and elimination of risks in the workplace. The training is conducted in accordance with the Law of Ukraine “On Occupational Safety and Health” and the Group’s Standard “Regulations on the Procedure for Conducting Training and Testing of Knowledge on Occupational Safety and Health”.

Trainings for managerial personnel are held once every 3 years, and for operational staff, once a year. Employees undergo training on occupational health and safety, special training on high-risk tasks and receive relevant fire safety briefings. A specialist with a university degree and at least 3 years of work experience in the field of occupational health and safety is appointed to the position of occupational health and safety and fire safety engineer.

The trainings are developed by the provider — the educational institution — and the topics are determined by the occupational health and safety department in accordance with regulatory requirements and requests from the managers. They are aimed at providing employees with the necessary theoretical knowledge and developing practical skills for safe work performance. The competence of trainers is assessed based on the feedback from participants, and the effectiveness of trainings is evaluated through a survey of participants and analysis of the level of occupational injuries and accidents.

Training is divided into general and specialised. In 2024, the employees of the Group’s companies completed a general course that included briefings on emergency procedures, alarm response, and, optionally, first aid basics. Specialised training is provided to employees working in hazardous, difficult or dangerous

conditions, as well as those who are subject to professional selection. In 2024, the Group organised trainings on the following topics as part of special training:

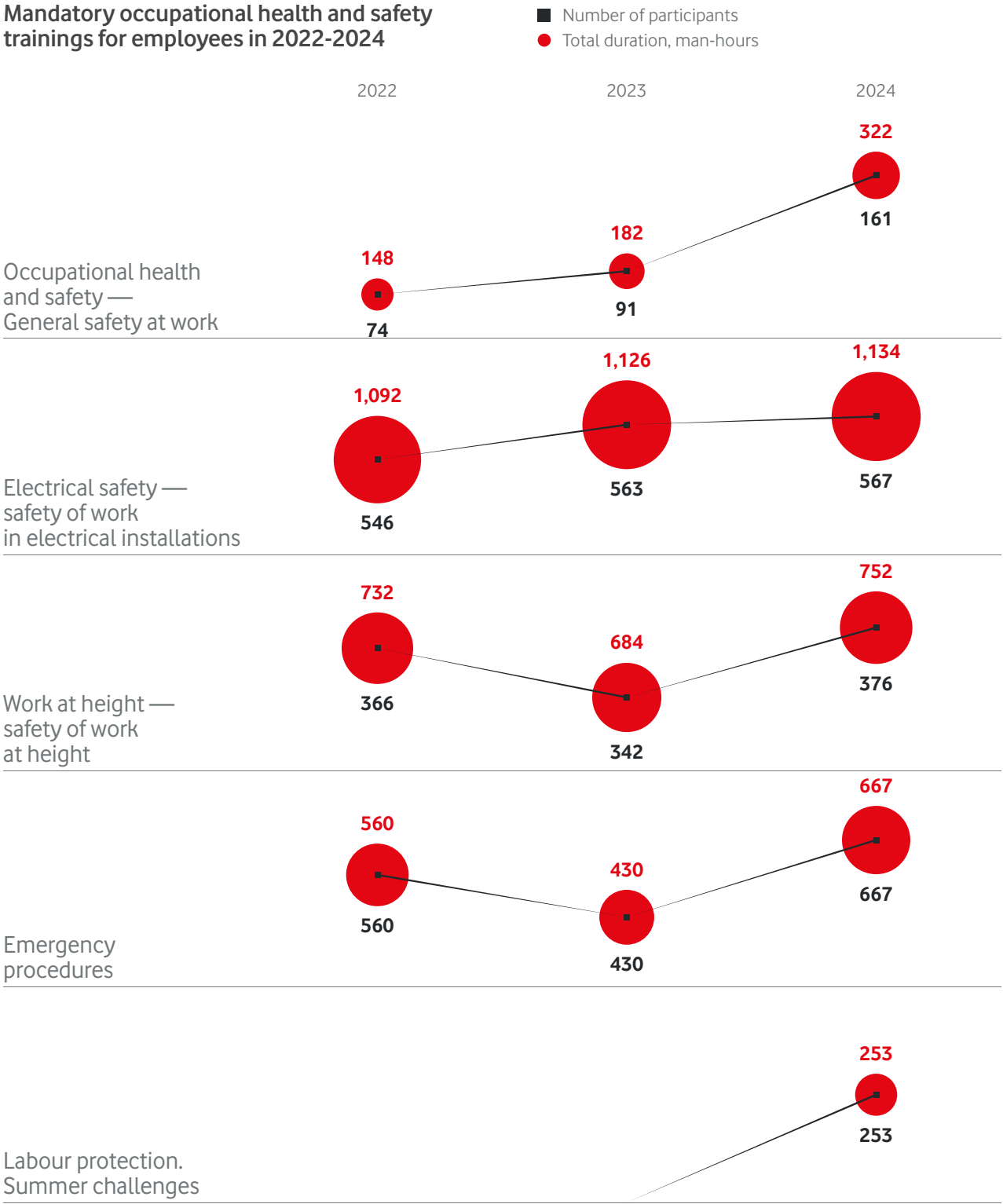
- safe work in electrical installations,
- safe work at heights,
- labour protection rules when operating forklifts.

Our training consists of a theoretical part, a practical part with tasks and a final certification.

Additionally, in 2024, some Vodafone Ukraine employees participated in a training session at Zaporizhstal on the use of gas-insulating apparatuses. The event was held to prevent specific workplace hazards when servicing the telephone and public address network in the immediate vicinity of blast furnaces.

The mandatory trainings are mostly held annually to familiarise new employees with the rules for the safe performance of their duties. In 2024, 697 employees of Farlep-Invest PrJSC (600 in 2023) and 218 employees of Freenet LLC (30 in 2023) completed the mandatory “Emergency Procedures” training. Employees were briefed on evacuation procedures, rules of fire extinguisher operation and use, and first aid guidelines. In addition, the employees of the fixed-line internet service business segment underwent additional training on “Occupational Health and Safety. Summer Challenges”.

Mandatory occupational health and safety trainings for employees in 2022-2024

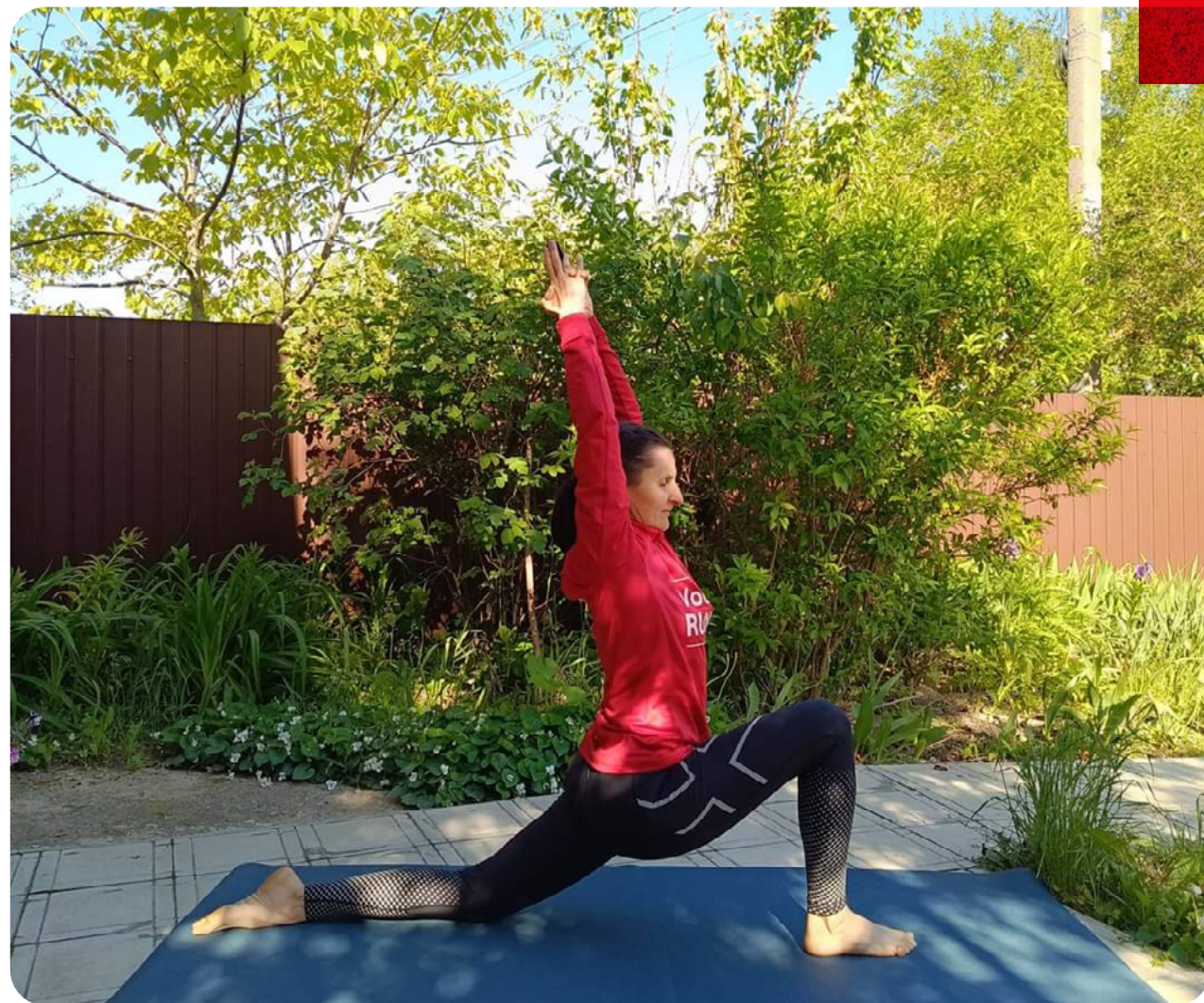


Healthy lifestyles of our employees

Vodafone Ukraine provides employees with access to medical services and offers voluntary programmes aimed at supporting healthy lifestyles and reducing health risks not necessarily related to the workplace. Employees can take advantage of voluntary medical and accident insurance, which includes a range of medical services and reimbursement for gym and swimming pool visits.

To balance the fact that employees spend long hours at the computer, technical breaks are provided to preserve eyesight and prevent eye diseases. To reduce stress levels, we have set up psychological relief zones in our

offices. In addition, employees can participate in voluntary programmes both in their workspaces and through the PROSTOR intranet. These programmes are designed to improve the overall well-being, raise awareness about physical and mental health issues, prevent diseases, and teach first aid skills.



Achievements in occupational health and safety

The companies of the Group provide working conditions that eliminate or limit exposure to harmful and dangerous factors to acceptable standard levels. The expert and technical centre of METC Neoprom LLC and the Kyiv Expert and Technical Centre of the State Labour Service of Ukraine have confirmed the safety of our working environment based on the results of routine studies of the level of difficulty and intensity of work, microclimate, noise, lighting and electromagnetic field at workplaces. For the new subsidiary, UNS LLC, we have developed documentation on occupational health and safety, conducted an external audit and performed laboratory

measurements to assess work intensity and difficulty.

Martial law has introduced additional requirements for employees on how to act in case of danger. All employees are familiar with the Emergency Action Plan, the Civil Protection Plan and the Air Alert Action Plan. The occupational health and safety orders approved in 2024 regulate the operation of equipment and work under emergencies.

Despite the difficulties caused by the hostilities, the Group has fully funded all planned occupational health and safety measures planned for 2024.



Contribution to the development of local communities

One of Vodafone Ukraine's top priorities is to create value for society by providing high-quality and reliable communication services nationwide. The Group is actively involved in the development and implementation of plans for the restoration and development of territories. It also participates in large-scale infrastructure, social and charitable projects, and our team is constantly working to develop a comprehensive approach to interacting with local communities. The Group of Companies updates its customer service policies on a regular basis, and develops new policies in the field of corporate social responsibility, charity

and providing information about Vodafone Ukraine's activities for the media and the analytical community.

Even in wartime, Vodafone Ukraine continues to build digital infrastructure, which is often a key element in providing access to information, healthcare, education and digital services. The Group also offers free Wi-Fi coverage in bomb shelters. In 2022-2024, the Group's social investments amounted to UAH 1.8 billion, including UAH 220 million in direct cash contributions.



Collaboration and feedback from local communities

Our cooperation with local communities since the onset of the full-scale invasion is primarily focused on maintaining the network throughout emergencies — blackouts, shelling and destruction. Vodafone Ukraine supports local communities during crisis situations by ensuring connectivity, providing prompt information about emergencies and organizing humanitarian aid.

We also support local businesses with our services and develop solutions that help reduce costs while increasing efficiency. In 2024, significant efforts were made to develop GPON fixed Internet technology, which allows users to have access to fixed Internet even during power outages. As of 31 December 2024, GPON services were already available to 1.28 million households across 14 regions of Ukraine. In 2025, it is planned to expand this coverage to over 2 million households.

Vodafone Ukraine actively participates in social and charitable initiatives. The Group's charitable, humanitarian and direct financial assistance in 2024 amounted to approximately UAH 66 million. As in previous years, the priority areas of our charitable assistance were healthcare, assistance to children who have lost one or both parents, and education.

Vodafone Ukraine follows a structured and reliable methodology for handling appeals from local communities: receiving, registering, and considering the appeal with a prompt response within the established timeframe. We involve the relevant regional experts in meetings with community representatives where the issues are addressed and the solutions are formulated. Also, for issues related to the condition or quality of the network, Vodafone Ukraine involves responsible units and analytical teams to perform diagnostics, analysis, and formulation of network development or restoration plans. Vodafone Ukraine employees analyse, develop proposals, and form working groups for regional projects, interacting with communities through meetings, calls, and correspondence.

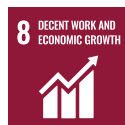
Due to some territories being under occupation, the Group lacks physical access to some of its infrastructure, part of which was destroyed during the hostilities. Despite this, Vodafone Ukraine continues to assist those who have suffered the most from the war: displaced persons, war veterans, and children who have lost their parents. This assistance includes direct financial support, free and preferential services, devices, and psychological support. Furthermore, the Group supports the operation of the free [Lifeline Ukraine](#) hotline, accessible at 7333.

Social initiatives



Roaming like at home. In 2024, as part of our continuous support to Ukrainians during martial law, Vodafone expanded the list of countries where Ukrainian tariffs apply. Cyprus and Malta were added

to the countries covered by the Roaming Like at Home concept. These tariffs include mobile Internet and minutes of talk time usable across all EU countries and Moldova.



“Brave”. In 2024, Vodafone Ukraine joined the Brave social project, which helps war veterans and members of military families who have decided to start or develop their own business. Vodafone Ukraine’s support gave a larger number of projects the chance to receive grants to develop and scale their business. The winners of the project have already received the equipment they need to grow their business and have begun to actively use it. Vodafone also conducts technology reskilling for Brave Businesses, providing consultations

on how to increase business efficiency with modern technologies.

The project has been ongoing since the beginning of the full-scale war and actively helps to develop small Ukrainian businesses with the support of our corporate clients Astarta-Kyiv and Raiffeisen Bank. The implementation partners are the Believe in Yourself Charitable Foundation and Light of Hope Charitable Organization. The project budget in 2024 amounted to UAH 4 million.

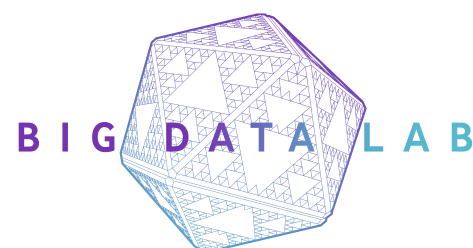


School Vodafone Big Data Lab. In 2024, the Group continued training future Data Science specialists at the Vodafone Big Data Lab school, announcing its sixth intake of students. This intensive, comprehensive course involves the study of fundamental mathematical disciplines, subject matter expertise, and practice with real Vodafone Big Data. The program allows students to acquire all the necessary knowledge and skills to start a career in Data Science. At the end of the training, participants develop a full-fledged project to analyse the data provided by Vodafone Ukraine’s data science division

and present their solutions to mentors, resulting in a ready-made example of work for their portfolio.

The project has been running since 2020. Vodafone Big Data Lab partners include the following leading universities: Taras Shevchenko National University of Kyiv, Igor Sikorsky Kyiv Polytechnic Institute, Kharkiv Polytechnic Institute, VU University Amsterdam, and the University of Toronto.

More information at the link: <https://www.bigdatalab.com.ua/>



I’m fine. Vodafone Ukraine opened the I’m Fine installation on Kontraktova Square in Kyiv, created from war-damaged telecom equipment. It is an extension of the artistic and social initiative previously showcased at the Burning Man festival by Ukrainian artist Oleksiy Sai and Vitaliy Deynega, the founder of the Ukrainian Witness media

project. The sculpture symbolizes the resilience of Ukraine’s telecom sector and is part of the #I’mFineChallenge initiative, which many companies have joined in order to support the country’s recovery. Vodafone, despite having suffered over UAH 2 billion in losses from the partial destruction of its network, continues to rebuild and develop its infrastructure.



Engineering School of the Kyiv School of Economics. Vodafone Ukraine has been investing in the development of the Engineering School at the Kyiv School of Economics since 2022. In the reporting year, the Group invested an additional 20 million UAH in the KSE in Kyiv, which trains specialists in electrical engineering, mechanical engineering, materials science, software engineering and biotechnology. In September 2024, thanks to Vodafone Ukraine’s investment in KSE, master’s programs in Micro- and Nanoelectronics and engineering were launched with 100 students enrolled. The courses are developed in cooperation with the leading universities in the world, including ETH Zurich, which supports the training of electrical engineers.

and professional software. This is the only laboratory in Ukraine certified by Europractice as Full-IC Membership, which allows students not only to access advanced software but also to manufacture their own chips as part of international MPW programs, develop test radio communication algorithms, as well as model and optimize systems for operation on FPGA platforms.

Through its partnership with the KSE Foundation, Vodafone Ukraine is helping to shape a new educational ecosystem that provides students with access to the most advanced knowledge and technologies and aims to build a strong scientific and technological potential in Ukraine.

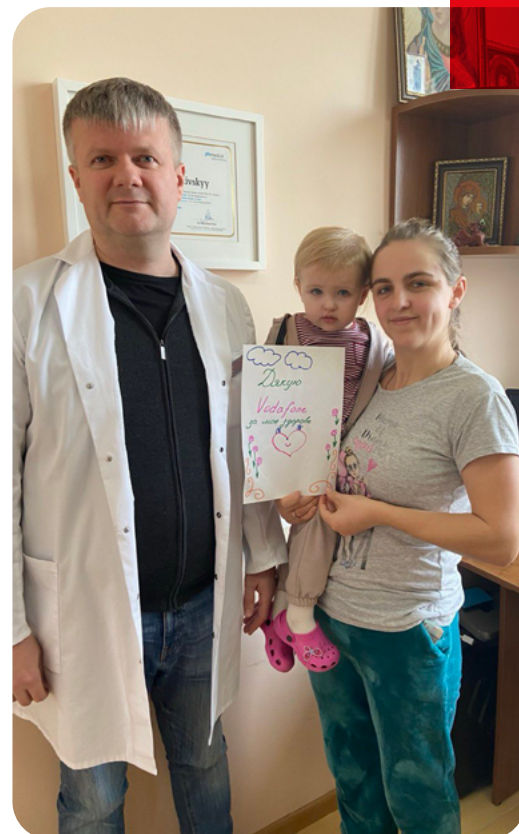
The studies are held in a hybrid format: on a modern Kyiv campus and online. The KSE Micro- and Nanoelectronics Laboratory already operates on the campus, equipped with Zybo Z7, SDR ADALM-PLUTO, ASLK PRO boards

UNITED 24. Vodafone Ukraine has supported the state program to develop high-tech solutions for the Armed Forces through the UNITED 24 platform. The project budget amounted to UAH 30 million.

Charity



A good deed as a gift. This project redirected the funds previously intended for holiday gifts to clients towards helping children who need urgent surgery to eliminate congenital heart defects. Since 2011, this charity project has been providing children with the opportunity to live a healthy and fulfilling life. In 2024, the partners of the initiative, which already included the Ukrainian Charity Exchange, the Come Back Alive ICF, and the Heart Institute of the Ministry of Health of Ukraine, were joined by the Dobrobut medical network. This allowed expanding the network of medical institutions where children could receive the needed medical assistance. Since the program's inception, 268 children have received the vital treatment, with 27 surgeries performed in 2024. Throughout the year, the Group invested UAH 2 million and provided its customers with the opportunity to join the program by donating their accumulated Vodafone Bonus loyalty program bonuses to charity.



Support for the Come Back Alive Foundation. Vodafone Ukraine has been supporting this charity since 2015. In the course of this cooperation, many important initiatives have been implemented to help save the lives of our military. We have trained 87 instructors to teach the military first aid skills. 25 classrooms have been organized to provide tactical medical training on a regular basis. 130 metal detectors were purchased for the Ukrainian Armed Forces' sapper units to perform demining tasks.

Since February 2022, Vodafone customers have also been able to support the Come Back Alive Charitable Foundation by exchanging their mobile bonuses to help the Ukrainian army.

In 2024, Vodafone Ukraine donated UAH 3.5 million to the Come Back Alive Foundation to purchase modern equipment for the Blood Transfusion Center at the Kyiv Military Hospital and UAH 3.2 million to purchase an evacuation vehicle fully equipped with communication and medical equipment to evacuate the wounded from the battlefield.



Equipping frontline stabilization points — is one of the Group's key charitable projects, focusing on introducing innovations in military medicine, by funding equipment for the storage, transportation, and transfusion of blood. As blood loss is the leading cause of death among the wounded, early transfusion, combined with proper bleeding control and rapid evacuation, significantly increases the survival rate and can save up to 50% of the seriously injured. Since May 2024, in partnership with the PULSE Charitable Foundation and the Ukrainian Transplant Coordination Centre, four brigades of the Marine Corps were trained in blood transfusion practices and provided with the necessary medical equipment. The project's budget amounted to UAH 12 million.



League of Warmth Charity project, which was launched by Vodafone Ukraine back in 2022, continues to provide alternative heating to maternity hospitals in Ukraine. In 2024, thanks to Vodafone Ukraine's contribution of UAH 4.5 million, the maternity and intensive care unit of the Regional Medical Centre for Family Health in the city of Dnipro was heated. There are a lot of medical institutions that need such support, so the League

of Warmth is an open initiative that any company can join. The project has already raised UAH 8.6 million, which has helped more than 1,000 babies to be born in comfortable conditions. Vodafone's contribution amounted to UAH 5.3 million.

More information at the link <https://www.ligatepla.com.ua/>





Supporting children who lost their parents due to war. Since 2021, the Group of Companies has helped and supported children who lost their parents due to the war, by providing material

assistance, free education, devices, and more. The project partners are the Alfa ATO Veterans Association and the Children of Heroes Foundation. In 2024 the project budget was UAH 6 million.



Rehabilitation equipment for the recovery of wounded soldiers. Vodafone Ukraine helps with the purchase of equipment for the rehabilitation of wounded soldiers. In 2024, the Halychyna Rehabilitation Centre received a stationary lift for performing exercises in the pool, a

defibrillator, infusion and syringe pumps, a rehabilitation board and stairs for gait retraining, and a passive rehabilitation device. The project was implemented in partnership with the Center for Social Projects of the Future and the Unbreakable Foundation, with a budget of UAH 1.8 million.



Rehabilitation of children of deceased soldiers of the Armed Forces of Ukraine and children of IDPs in summer camps. In 2024, together with the partner charitable foundations Vidchuy and Soborna, Vodafone Ukraine organized a summer camp in recreational areas of the western regions of Ukraine for children

who lost one of their parents as a result of the military conflict and for children of IDPs. The goal of the project was the physical and psychological rehabilitation of such children, and its budget in 2024 amounted to UAH 1.3 million.



Helping doctors working on the front line. In partnership with the “How are you, bro?” volunteer project, Vodafone Ukraine has released a “Tactical Communication for Medics” manual. It was developed by

mental health specialists and contains practical techniques to help both military and civilian medics offer psychological support to patients in difficult situations. The project budget was UAH 150,000.



Helping Okhmatdyt. Vodafone Ukraine participated in the restoration of Okhmatdyt's operating rooms, which were destroyed as a result of a Russian missile attack in the summer of 2024. The project budget was UAH 5 million, with the money used to purchase equipment for the Cardiology centre.

5,000,000 UAH for the restoration of Okhmatdyt



St. Nicholas' Helpers. The St. Nicholas' Helpers charity project was launched on December 1, 2024. It is aimed at supporting the children of fallen Heroes. Children write letters with their dreams and wishes, and volunteers help them come true. The initiative was implemented in cooperation with the Mriya foundation, which takes care of

children who lost their parents due to the war. The ITSF LLC team developed a chat bot to coordinate requests efficiently. In less than a month, a system was created that guarantees that each child will receive their desired gift. 40 volunteers joined the project, some of them fulfilling multiple wishes.



Vodafone Ukraine continues to support Ukrainian soldiers through charity collections in the PROSTOR corporate network. As part of the winter campaigns implemented to support the 25th Sicheslav Brigade of the Ukrainian Armed Forces and the 12th Brigade of the Azov National Guard, the Group provided the military with winter tires, sleeping bags,

chainsaws, detonators, medicine, and generators. The employees in Poltava also joined the DrukArmia initiative by purchasing a 3D printer to produce useful items for the Armed Forces of Ukraine. Vodafone combines the resources and efforts of its employees to support the defenders of Ukraine.

ENVIRONMENTAL RESPONSIBILITY

- Energy consumption
- Impact on Climate Change and Air Emissions
- Water resources usage
- Waste management



Energy consumption

Vodafone Ukraine diligently implements best practices in energy management, improves its internal regulations and adapts effective solutions available on the Ukrainian energy market. Its energy consumption is managed in accordance with the relevant governing policies and standards. The key documents that define our approaches to energy management are the “Regulations on the Chief Energy Officer’s Department” and the “Regulations on the Energy Service”.

We continuously improve our procedure for collecting information on electricity consumption using the Automated System for Commercial Electricity Metering (ASKOE). This commercial electricity metering system is designed to automatically collect, process and transmit data on energy consumption. It has already been put into commercial operation for 10 distribution system operators, which has contributed to the optimization of commercial terms of electricity supply. We continued the implementation of the system in the reporting year. In addition, our power engineers have developed the Energy Manager software package, which has enabled us to automate and centralize the accounting and control of data for the energy department.

The Group of Companies is also actively implementing energy-saving technologies. For example, in the reporting period, a decision was made to invest UAH 10 billion over two years in order to transition to energy-saving GPON technology and increase energy independence. Vodafone Ukraine aims to reduce energy consumption, optimize its electricity costs and introduce innovative technologies to improve the management of energy resources. To achieve these goals, the Group is undertaking a number of measures, including:

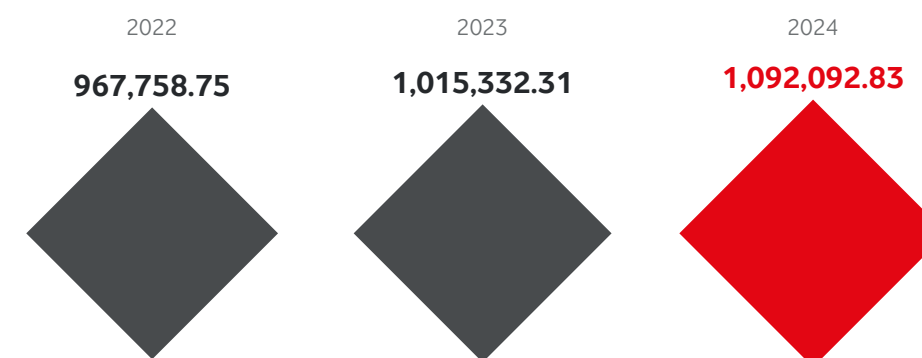
- replacing the outdated with modern energy-efficient equipment;
- implementing automated processes for managing equipment capacity;
- automating processes such as electricity metering, consumption control and regular reporting;
- optimizing contractual relations with electricity suppliers by reducing the number of contracts and improving the terms of commercial offers;
- implementing electronic document management to increase the efficiency of management processes.

This comprehensive approach allows us to reduce our negative environmental impact.

Vodafone Ukraine has a mechanism in place for assessing the quality of its energy management system. The assessment is carried out on a monthly and quarterly basis based on the reporting data for the relevant periods. We also analyse the effectiveness of the implemented measures to save electricity and costs. Furthermore, the assessment is conducted as part of internal and external audits, which allows for a detailed evaluation of the results. The effectiveness of energy-related approaches and measures is assessed monthly at the Technical Committee meetings. In 2024, the energy personnel were highly praised for their efforts in this area.

The total energy consumption of the Group of Companies in 2024 amounted to 1,092 thousand GJ, which is 7.5% higher than in the previous year.

Group’s energy consumption, GJ



Vodafone Ukraine energy purchases in 2022-2024²⁵:

Energy type	2022	2023	2024
Total electricity consumption within the organization, GJ ²⁶	919,407.87	966,015.32	1,025,011.37
Total electricity consumption within the organization, thousand kWh	255,391.08	268,337.59	284,725.38
Total purchased thermal energy, GJ ²⁷	557.84	516.93	1,976.64
Total purchased thermal energy, Gcal ²⁸	133.24	123.32	472.11

25. Energy consumption data for 2023 includes Freenet LLC, which Vodafone Ukraine acquired in 2023, for the fiscal year period during which operational control was exercised. The data for 2024 includes Freenet's consumption for the whole year. Also, the list of facilities included in the thermal energy consumption reporting expanded in 2024. In addition, electricity consumption in 2024 includes additional suppliers of Farlep-Invest PrJSC and the accounted consumption of VF Retail LLC.

26. 1 kWh = 0.0036 GJ.

27. 1 GCal= 4.1868 GJ.

28. The volume of purchased thermal energy increased significantly, since a broader list of premises across 12 Ukrainian cities (which had not been reported previously) was included in the reports in 2024. The total energy consumption of all the reported locations is 472.11 Gcal. Meanwhile, the calculations for the locations in Kyiv city alone, which were included in the 2023 report, show a 11.5% reduction in thermal energy consumption.

Vodafone Ukraine fuel consumption in 2022-2024²⁹:

Energy type	2022	2023	2024
Total Vodafone Ukraine (GJ)³⁰, including:	47,793.04	48,800.06	65,104.82
Diesel fuel (thousand litres), including:	1,146.24	1,105.21	1,540.53
■ diesel for generators	514.69	375.45	722.60
■ diesel for vehicles	631.55	729.76	817.93
Gasoline (thousand litres), of which:	150.96	211.19	225.51
■ gasoline for generators	19.89	35.45	40.05
■ gasoline for vehicles	131.07	175.74	185.45
Propane, butane for vehicles (thousand litres)	-	7.36	25.36
Natural gas for boilers (thousand m³)	47.28	55.33	48.40

29. Fuel consumption data for 2023 includes Freenet LLC, which Vodafone Ukraine acquired in 2023, for the fiscal year period during which operational control was exercised. The data for 2024 includes Freenet LLC consumption for the whole year.

30. To convert fuel units from liters to joules, standard coefficients from open sources and the IPCC (Intergovernmental Panel on Climate Change) were used, namely: density of diesel fuel — 834 kg/thousand l, gasoline — 756 kg/thousand l, liquefied petroleum gas (propane, butane) — 530 kg/thousand l; coefficient of lower calorific value of diesel fuel — 43 MJ/kg, gasoline — 44.3 MJ/kg, liquefied petroleum gas (propane, butane) — 47.3.

Also, the coefficients from the National Inventory Report of Ukraine (2022) were used, namely: density of natural gas — 0.719 kg/m³; coefficient of lower calorific value of natural gas — 48.0 MJ/kg value of natural gas — 48.0 MJ/kg.



Electricity consumption increased by 5% in 2023 compared to 2022. The change was due to the addition of the new subsidiary Freenet LLC to the Group of Companies. Electricity consumption increased by 6% in 2024, primarily due to the expansion of the mobile communications network. Additionally, this increase was influenced by the inclusion of the full fiscal year of consumption data for Freenet LLC, the addition of the full list of suppliers of Farlep-Invest PrJSC in the reporting, and the inclusion of VF Retail LLC in the consumption reporting. We are also working on expanding our fixed Internet network, which has led to an increase in the volume of purchased electricity by Vega Telecom.

The volume of energy obtained from fuel combustion increased by 33.42% compared to the previous reporting year. Diesel fuel is currently the main energy source — its consumption for generating electricity increased by 92.46% compared to 2023. This growth was due to regular russian attacks on Ukraine's civilian electricity infrastructure, which forced the use of electricity generators. In the context of instability in the country's energy system, generators are an important source of electricity to ensure the vital activities of the population and the operations of enterprises.

Impact on climate change and air emissions

As a telecommunications Group, Vodafone Ukraine does not have a significant impact on climate change. Due to the nature of our operations, the main sources of greenhouse gas emissions into the atmosphere are the carbon footprint from the purchase of electricity (Scope 2) and indirect emissions in the supply chain (Scope 3). Compared to 2023, the increase in Vodafone Ukraine's general carbon footprint was primarily due to a comprehensive Scope 3 calculation, which we conducted for the first time in this reporting year. When defining our approach and calculating indirect emissions in the supply chain, we followed GHG Protocol Standards and Guidelines, as well as sector-specific guidance from GSMA, GeSI and ITU for telecommunications companies.

Direct greenhouse gas emissions (Scope 1) from fuel consumption amounted to 5 thousand tons of CO₂ equivalent, which is 35% higher than in 2023. This increase is due to the need to maintain the network during frequent and prolonged power outages.

Scope 2 greenhouse gas emissions were calculated in accordance with the GHG Protocol methodology using two methods:

- **Location-based method** — the calculation of emissions using this method was based on the average coefficient of emissions from electricity consumption from the Ukrainian grid. The coefficients used for the calculations in this report were sourced from the IEA database (2024 edition)³¹. Since more recent data was unavailable, we applied the forecast coefficient for 2023 to calculate emissions for the reporting period.
- **Market-based method** — the calculation was based on the computational emission factor for each electricity supplier from which the Group of companies purchased electricity³². At the same time, the proportion of different energy sources published on the official websites of suppliers was used, and data from the IEA (2024) was applied to calculate the carbon intensity of each energy source.

Scope 2 emissions also included greenhouse gases generated by thermal energy consumption³³ at all the locations specified in the Energy consumption section. Total indirect Scope 2 emissions calculated using the location-based method in the reporting year amounted to 77.24 thousand tons of CO₂ equivalent. Curiously, emissions calculated using the market-based method amounted to just 42.77 thousand tons of CO₂ equivalent, which indicates a significant share of carbon-free electricity sources in the Group's supplier portfolio.

Vodafone Ukraine's Group of companies pay considerable attention to the carbon footprint that occurs along the value chain. For this reason, for the second consecutive year, we have been analysing indirect emissions related to our operations. To determine the materiality threshold for our Scope 3 indirect emissions, in 2024 the Group's companies conducted a full inventory of all categories of emissions applicable to the specifics of our activities.

Following a review of recommendations for the telecommunications sector and the structure of our business, we discarded those that are irrelevant to our business model from among the 15 categories (economic activities that are potential sources of indirect emissions), namely: 5. Waste Generated in Operations, 8. Upstream leased assets, 9 and 10. Transport and processing of sold products, 14. Franchises, 15. Investments.

The calculation focused on the categories recommended by the GSMA's guidelines as the most significant for telecommunications companies. Therefore, at the calculation stage, special attention was given to the following key operations:

- **1&2. Purchased goods and services & Capital goods**
- **3. Fuel and energy related activities**
- **11. Use of products sold**
- **13. Downstream leased assets**

31. International Energy Agency, emissions factors 2024, <https://www.iea.org/data-and-statistics/data-product/emissions-factors-2024>

32. The companies in the Group do not have contractual instruments that meet the Quality Criteria of the GHG Protocol Scope 2 Standard, therefore the best available information on emission factors was used for the calculations.

33. The carbon intensity coefficient of thermal energy of 295.5 kgCO₂/Gcal was used in the calculation.

Greenhouse gas emissions in 2022-2024³⁴:

Scope of emissions	2022	2023	2024
Total (tons of CO₂-eq.)³⁵, specifically:			
■ when including Scope 2 emissions using the location-based method	85,414.57	118,535.37	175,132.92
■ when including Scope 2 emissions using the market-based method	n/a	104,739.88	140,656.92
Direct Scope 1 emissions:	3,615.91	3,692.89	5,001.83
■ stationary sources of emissions ³⁶	1,454.4	1,296.2	2,314.9
■ mobile sources of emissions ³⁷	2,161.5	2,396.7	2,686.9
Indirect Scope 2 emissions³⁸:			
■ Location-based ³⁹	81,798.66	77,481.18	77,244.14
■ Market-based		63,685.69	42,768.14
Indirect Scope 3 emissions:		37,361.30	92,886.95
■ from Cat. 1&2. Purchased goods and services&Capital goods		30,271.97	35,863.35
■ from Cat. 3. Fuel and energy related activities		7,089.33	4,536.33
■ from Cat. 4. Upstream Transport and Distribution			***
■ from Cat. 6. Business travels			***
■ from Cat. 7 Commuting			3,040.62
■ from Cat.11 Use of sold products			48,703.05
■ from Cat. 12 End-of-Life Treatment of Sold Products			***
■ from Cat. 13 Downstream leased assets			***

*** The indicator for certain categories of indirect emissions was found to be below the materiality threshold (500 tons of CO₂-eq.), determined in accordance with the approach of the Vodafone Ukraine Group.

34. The calculations included emissions of greenhouse gases in terms of CO₂ equivalents and used a data consolidation approach based on operational control.

35. The total greenhouse gas emissions figure includes Scope 3 emissions for material categories in 2024 and categories 1-3 in 2023, while the 2022 figure includes only Scope 1 and Scope 2 emissions, as Scope 3 was not calculated.

36. For the calculation of direct greenhouse gas emissions from stationary sources, data on fuel consumption by generators and natural gas for boilers was used, along with data from open sources and standard coefficients of the IPCC (Intergovernmental Panel on Climate Change).

37. For the calculation of direct greenhouse gas emissions from mobile sources, data on fuel consumption by vehicles was used, along with open source data and standard coefficients of the IPCC (Intergovernmental Panel on climate change).

38. The calculation of Scope 2 for 2023, both location-based and market-based, takes into account the volumes of heat consumption mentioned in the Energy Consumption section.

39. The indicator of emissions from purchased electricity was recalculated for 2022 were calculated on the basis of emission factors per unit of electricity in general for the energy system of Ukraine for 2021. For 2023, due to the lack of current data the IEA 2021 factor was used. For 2024, the most current and accurate emission factors available in the 2024 edition of the IEA was used.

Indirect emissions related to purchases and capital expenditures are calculated using a unified methodology. Whenever possible, we rely on supplier-specific emission levels. If there is no reporting on the supplier's environmental impact, we use cost-based carbon footprint calculations by product category. For each type of product or service, we select the appropriate industry factor from the UK national database⁴⁰. The increase in this indicator is associated with the active expansion of the network, which lead to additional purchases of equipment.

The amount of emissions from fuel and energy related activities in our Group includes emissions caused by electricity losses during its transmission and distribution. Calculations for this category are based on electricity consumption and corresponding Scope 2 emissions calculated using the market method. To estimate emissions related to the distribution of electricity, we used the loss coefficients of each operator of the distribution system, according to data from the National Commission for State Regulation of Energy and Public Utilities⁴¹. For emissions related to the transmission of electricity, we use the loss coefficients calculated based on publicly available data⁴². The reduction in emissions in this category is explained by a decrease in the average carbon intensity of the Ukrainian grid.

Indirect emissions from employee commuting arise from our staff traveling to and from work. The calculation was based on a survey of employees of the Group of companies,

which took into account the distance, mode of transport and the number of remote workdays per week. Category 3 also includes work-from-home emissions resulting from maintaining a “Home Office”. For these calculations, publicly available emission coefficients from the UK national database were used.

The category of indirect emissions associated with the use of goods and services sold is significant for the telecommunications sector. Since mobile and fixed internet services are the main products of the Vodafone Ukraine Group of companies, we based our calculations on the energy consumption of devices that provide access to our network. We also took into account emissions from all devices sold in the reporting year, while applying the approach according to which all devices sold are accounted for within one year from the date of purchase. Meanwhile, the carbon footprint for category 13, which is typical and relevant for the sector, turned out to be insignificant for the Group, since we lease only routers and set-top boxes in quantities of up to 15 thousand units.

To ensure a sustainable approach to reporting Scope 3 indirect emissions, all Scope 3 categories that were found to be insignificant in 2024 will be analysed at the primary data level. If the volume of activity does not experience a significant increase, the Group will consider the category insignificant in subsequent reporting periods. In the event of a dynamic increase in the volume of activity, we will reassess the materiality of the category by conducting a full recalculation.

40. UK Government GHG Conversion Factors for Company Reporting, <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024>

41. NERCEP Resolution No. 2154 of November 20, 2020 (as amended by NERCEP Resolution No. 2275 of 05.12.2023). <https://www.nerc.gov.ua/storage/app/uploads/public/657/1d2/513/6571d2513cf1c176458620.pdf>

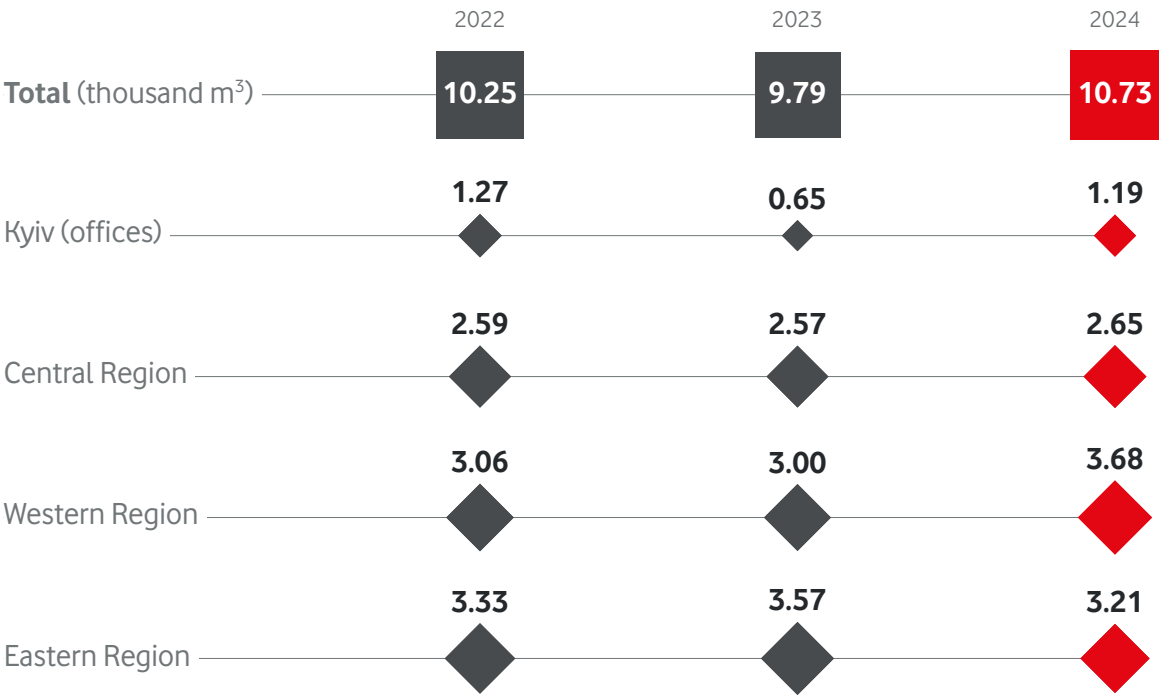
42. Energy Map. Power losses in the transmission system (temporarily not updated since 24.02.22) <https://map.ua-energy.org/uk/resources/16ddcd9d-c704-493d-90e2-12a4bedb0b28/>

Water resources usage

Vodafone Ukraine complies with all Ukrainian laws and regulations governing the use of water and wastewater. The Group’s production processes involve the use of water and discharge of wastewater exclusively for sanitary (domestic) needs. Among other things, the Group complies with the Rules for acceptance of wastewater from subscribers into the municipal sewerage system of the City of Kyiv approved by the executive body of the Kyiv City Council dated 12.10.2011 No. 1879.

The Group’s water supply system is based on centralised municipal water supply, and water use in offices is limited to household needs only. Water is discharged through central sewerage networks. The Group’s water consumption increased by 9.6% due to the full integration of data collection systems from all subsidiaries.

Water consumption by Vodafone Ukraine Group in 2022-2024, thousand cubic metres



The Group collects general data on domestic water consumption and keeps records of water usage and wastewater discharge on a monthly basis. The reports based on household water meters are sent to local water distribution organisations. Wastewater quality is monitored quarterly under the terms of a chemical analysis contract performed by

service providers, including the environmental supervision departments of water utilities in cities.

The Group promptly responds to complaints from stakeholders regarding its water use activities and installs water treatment systems for domestic use, where necessary.

Waste management

Vodafone Ukraine is committed to responsible waste management and minimising waste. We follow the national waste management legislation and regulations, as well as the Company’s internal rules on waste management and selection of waste disposal service providers. The Group takes measures to reduce the amount of waste and its environmental footprint.

Disposal of waste and its subsequent transfer to a recycling company is governed by the “Disposal of Property, Plant and Equipment, Intangible Assets and Inventories” Policy. Vodafone Ukraine cooperates with a reliable licensed contractor that handles the disposal of waste of all hazard classes, including used batteries to a recycling plant.

We have introduced an electronic document management system to help us conserve natural resources. In the reporting year, the Group did not receive any complaints or suggestions on waste management from stakeholders. The successful removal and disposal of waste is confirmed by an act of services rendered.

Vodafone Ukraine promotes environmentally friendly habits among its employees and supports green initiatives in its offices. We collect batteries in special containers and minimise the amount of plastic and paper used in our offices. Throughout 2024, we continued to raise awareness among our employees about waste management and waste sorting, including through various campaigns and themed events. We also have a “Go green” website on our intranet, which includes theoretical information on waste management.

When collecting batteries and other hazardous waste, we use special boxes for their disposal. The waste is stored in a separate compartment in the warehouse, which eliminates the risk of electrolyte leakage and other hazards.

In 2024, the Group collected and recycled of approximately 98.14 tonnes of waste, namely:

- **0.039 tonnes** of Class 1 hazardous waste, mainly including halogen and fluorescent lamps replaced by the contractor during minor repair work.
- **67.263 tonnes** of Class 2 hazardous waste, which includes batteries (rechargeable and non-rechargeable), household and office equipment.
- **0.11 tonnes** of Class 3 hazardous waste, namely expired first aid kits in cars and used (defective) GPS trackers.
- **30,727 tonnes** of Class 4 hazardous waste, which includes, among others, worn-out car tyres and other rubber waste, as well as polymer and solid household waste.

In addition, in the reporting year, the Group collected and handed over 104 worn-out tyres, 68 car batteries, 324 first aid car kits and 50 GPS trackers to a contractor for recycling. The slight increase in the amount of waste was due to the full integration of information collection systems across all of the Group’s subsidiaries, including Freenet LLC.

ABOUT THIS REPORT AND BACKGROUND INFORMATION

- About this report
- GRI content index
- Appendix: numerical indicators
- Independent practitioner's limited assurance report



About this report

Vodafone Ukraine strives to ensure openness and transparency in its activities by providing stakeholders with reliable and structured information. We adhere to the principles of responsible data disclosure, while maintaining data confidentiality and protecting customer information.

This Annual Sustainability Report for 2024 (hereinafter referred to as the Report) is the fourth report of Vodafone Ukraine prepared in accordance with the Global Reporting Initiative (GRI) Standards. The document covers the period from 01.01.2024 to 31.12.2024 and reflects the key environmental, social and economic aspects of Vodafone Ukraine's activities⁴³.

The report highlights our efforts in the field of sustainable development, including energy management, responsible human resources management, contributions to the development of local communities, occupational health and safety, approaches to customer interaction, as well as Vodafone Ukraine's activities and investments in supporting sustainability, recovery and development of digital infrastructure. The Report enables the stakeholders to assess both the Group's achievements and the challenges we faced during the year. The readers of the Report can also track the dynamics of Vodafone Ukraine's key performance results over time.

This document is based on eight principles of the GRI Standards, which define the key requirements for corporate reporting. The application of these principles ensures high quality and proper presentation of the

information, enabling users to make informed decisions about the Group's impact on sustainable development. The list of these principles includes:



Accuracy

The information in the Report is correct, detailed and reliable, allowing for an objective assessment of the Group's impact. All indicators are based on reliable sources and clearly defined methods of data collection, processing and analysis.



Completeness

The Report contains sufficient information for a comprehensive understanding of the Group's impacts, covering all key aspects of its activities during the reporting period.



Balance

We adhere to the principle of impartiality, highlighting both the positive aspects of the Group's activities and potential challenges, which provides a realistic view of its performance.



Sustainability context

The Report highlights the relation between the Group's activities and global sustainability goals and discloses information on Vodafone Ukraine's contribution to sustainable development, which enables an assessment of its contribution to long-term positive changes.



Accessibility

The information provided in the Report is clear, structured and accessible to all stakeholders, which ensures ease of perception without the need for specialised knowledge.



Timeliness

The Report reflects the Group's performance in 2024 and was prepared and published in 2025, which ensures timely access to the relevant information for its users.



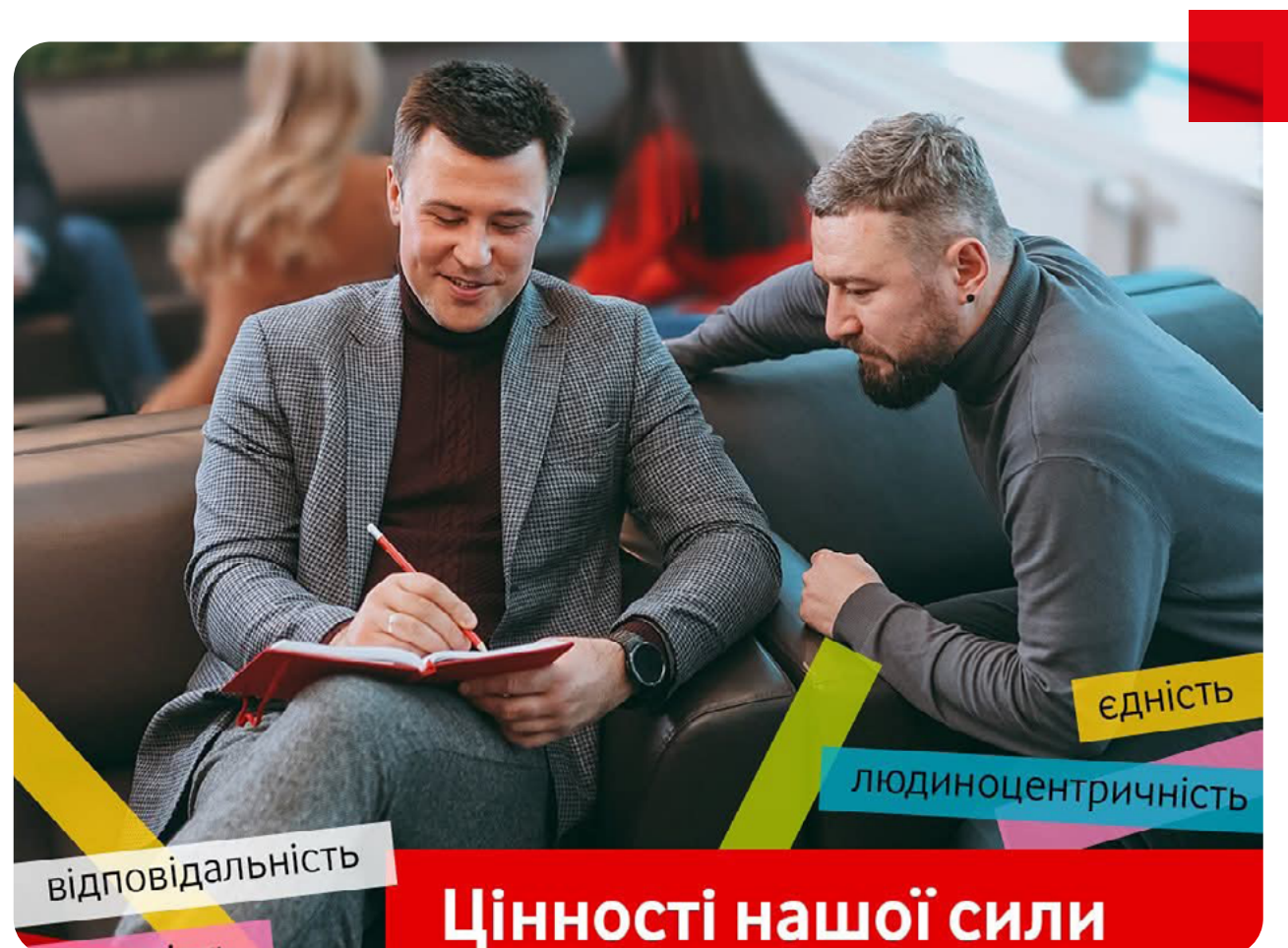
Comparability

The use of consistent approaches to collecting and presenting information allows analysing the trends of indicators over time and comparing them with the results of other organisations.



Reliability

The reporting process is based on proven methods and sources to ensure the accuracy and reliability of the information presented. We provided all the necessary details in the Report with references to the primary sources.



43. For the purposes of this Report, Vodafone Ukraine (or the Group of companies, the Group) includes the operations of VF Ukraine PJSC and its subsidiaries: VF Retail LLC (with VF Ukraine as sole shareholder), ITSF LLC (99% of the share capital is owned by VF Ukraine, 1% — by VF Retail LLC), Farlep-Invest PJSC (99.9929% of its shares are owned by VF Ukraine) and Freenet LLC (90.60% of its share capital is owned by VF Ukraine) and UNS LLC (100% of its share capital is owned by VF Ukraine). In addition, Vodafone Ukraine also includes the following subsidiaries of PJSC VF Ukraine that do not have separate staff and do not conduct active operating activities but perform special support functions: Cable TV Finance LLC (a provider of fixed-line Internet access services, 100% of whose share capital is owned by VF Ukraine, is in the process of termination as of 31.12.2024) and VFU Funding PLC (a special purpose vehicle incorporated in England and Wales for the purpose of issuing bonds, 100% of its share capital is owned by VF Ukraine).

Providing limited assurance on selected consolidated sustainability information

The Group engaged an independent third party, LLC AF PricewaterhouseCoopers (Audit), to provide limited assurance on the selected consolidated sustainability information included in the Annual Sustainability Report Vodafone Ukraine 2024. Section “Independent practitioner’s limited assurance report” of this Report contains the limited assurance report of LLC AF PricewaterhouseCoopers (Audit) in respect of selected consolidated sustainability information.

The Independent practitioner’s limited assurance report regarding selected consolidated sustainability information contains the list of indicators in respect of which limited assurance conclusion is issued as well as procedures performed by the independent practitioner and a description of inherent limitations. Vodafone Ukraine in course of cooperation provided LLC AF PricewaterhouseCoopers (Audit) with access to internal data necessary to perform the procedures over the selected consolidated sustainability information in the Annual Sustainability Report Vodafone Ukraine 2024.

Limited assurance engagement was planned and performed in accordance with the

requirements of the International Standard on Assurance Engagements 3000 (Revised) “Assurance Engagements other than Audits or Reviews of Historical Financial Information”, issued by the International Auditing and Assurance Standards Board.

Vodafone Ukraine’s management is responsible for the completeness and accuracy of the information in the Report and for communication and exchange of information with the independent third party.

The Supervisory Board is responsible for overseeing the process of preparing and approving the Annual Sustainability Report Vodafone Ukraine 2024.

Engaging an independent third party to perform limited assurance regarding selected consolidated sustainability information included in this Report is important for Vodafone Ukraine as it provides respective level of assurance to management that the selected consolidated sustainability information is not prepared, in all material respects, in accordance with GRI Sustainability Reporting Standards published by the Global Reporting Initiative (GRI).



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GRI content index

Statement of use	Vodafone Ukraine has reported in accordance with the GRI Standards for the period from January 1, 2024 — December 31, 2024.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	The applicable GRI Sector Standards has not been prepared by the date of issue the Report

Material topic	Nº	Disclosure title	Page number	References and comments
General disclosures				
GRI 2: General Disclosures 2021	2-1	Organizational details	12-32	About Vodafone Ukraine Group The Group of companies is primarily active in Ukraine. Headquarters addresses by Company: <ul style="list-style-type: none">■ VF Ukraine PrJSC 15 Leiptsyzka St., Kyiv, 01601■ VF Retail LLC 15 Leiptsyzka St., Kyiv, 01601■ ITSF LLC 49/2 Beresteysky Avenue, Kyiv, 03057■ Farlep-Invest PrJSC 3 Yevhen Hutsal Lane, Kyiv, 01011■ Cable TV-Finance LLC 20 Verkhovna Rada Boulevard, Kyiv, 02100■ Freenet LLC 17 Drahomanova Street, Kyiv, 02068■ UNS LLC 6 Vaclav Havel Boulevard, building 3, letter “У”, Kyiv, 03124
	2-2	Entities included in the organization’s sustainability reporting	12-32	About Vodafone Ukraine Group All entities covered by this Sustainability Annual Report are also included in Vodafone Ukraine’s financial reporting for 2024.
	2-3	Reporting period, frequency and contact point	135-138, 167	About this report Contacts The cycle of financial reporting, as well as the cycle of preparing Sustainability Report — one calendar year.

Material topic	Nº	Disclosure title	Page number	References and comments
General disclosures				
	2-4	Restatements of information	—	Certain data for 2022 and 2023 have been revised compared to those published in the previous Annual Sustainability Report 2023. These changes are not material and are related to the correction of accounting or technical inaccuracies. Such data include: <ul style="list-style-type: none">■ number of employees by type of employment and employment contract,■ number of hired and dismissed employees,■ staff turnover rate,■ breakdown of the Remaining Personnel (excluding senior leadership),■ number of representatives of corporate governance bodies by gender and age,■ number of employees of the Group covered by the OHS Management System,■ water consumption,■ created economic value.
GRI 2: General Disclosures 2021	2-5	External assurance	135-138	About this report This Annual Sustainability Report 2024 has been audited by an independent third party of PricewaterhouseCoopers (Audit) LLC. The limited assurance report issued by the independent third party is presented in this Report (Independent Limited Assurance Report). The Group publishes its financial statements on its official website: https://www.vodafone.ua/company/investors/zvity-ta-rezultaty .
	2-6	Activities, value chain and other business relationships	13-20, 51-54, 71-74	About Vodafone Ukraine Group Vodafone Ukraine products and services Procurement activities There were no significant changes in the Group’s business activities, relations with partners for the sale of products and services, and in other business relationships.
	2-7	Employees	83-84, 155-162	HR management and talent capture: Number and structure of staff Appendix: numerical indicators
	2-8	Workers who are not employees	—	Not applicable The Group of companies engages third parties to perform certain work.
	2-9	Governance structure and composition	21-26, 158-159	Corporate governance Appendix: numerical indicators: Tables 8, 9 Detailed information on the experience and competencies of the members of the supreme management body is provided in the <u>Annual Reports of the issuer of securities</u> . The main skills and competencies of the members of the supreme management body are described in the Regulation on the Supervisory Board.

Material topic	Nº	Disclosure title	Page number	References and comments
General disclosures				
GRI 2: General Disclosures 2021	2-10	Nomination and selection of the highest governance body	21-26	Corporate governance
	2-11	Chair of the highest governance body	21-26	Corporate governance The head of the highest management body is not the executive director/manager of the Group. Since the Group has implemented a two-level management structure, the highest management bodies are the General Meeting of Shareholders, the Supervisory Board and the CEO (single). The functions of the Chairman of the Supervisory Board are determined by the Statute of VF Ukraine PrJSC and the Regulation on the Supervisory Board of the Company.
	2-12	Role of the highest governance body in overseeing the management of impacts	21-26	Corporate governance The management of the Group is developing a Sustainability strategy, which is approved by the Supervisory Board of PrJSC “VF Ukraine”. The Supervisory Board approves the development strategy of PrJSC “VF Ukraine”, appoints and monitors the work of CEO. PrJSC “VF Ukraine” has established communications that ensure informing employees, top management and management and control bodies about existing problems.
	2-13	Delegation of responsibility for managing impacts	21-26	Corporate governance The right to delegation can be exercised in accordance with the Charter of PrJSC “VF Ukraine” and in accordance with the order of the CEO. The Supervisory Board of PrJSC “VF Ukraine” annually reviews the sustainable development strategy prepared by the Company’s top management.
	2-14	Role of the highest governance body in sustainability reporting	—	The Annual Sustainability Report, including the list of identified material topics, is reviewed and approved by the Supervisory Board of PrJSC “VF Ukraine” before its publication.
	2-15	Conflicts of interest	21-26	Corporate governance: Preventing conflicts of interest
	2-16	Communication of critical concerns	21-26	Corporate governance: Discussing important issues The information is incomplete Information on the total number of critical issues reported to senior management was not collected during the reporting period. Vodafone Ukraine works to ensure proper data collection for their coverage in future reporting periods.

Material topic	Nº	Disclosure title	Page number	References and comments
General disclosures				
GRI 2: General Disclosures 2021	2-17	Collective knowledge of the highest governance body	—	Not applicable Vodafone Ukraine does not organize events aimed at developing the collective knowledge, skills, and experience of the highest governance body on sustainable development.
	2-18	Evaluation of the performance of the highest governance body	—	Not applicable , since the Group has not implemented the process of evaluating the activities of the higher management body.
	2-19	Remuneration policies	21-26	Corporate governance: Determining remuneration
	2-20	Process to determine remuneration	21-26	Corporate governance: Determining remuneration Details of the reward determination process are confidential and not publicly disclosed.
	2-21	Annual total compensation ratio	—	Privacy restrictions Information regarding the total annual compensation ratio is confidential and not publicly disclosed.
	2-22	Statement on sustainable development strategy	5-8	CEO Statement
	2-23	Policy commitments	41-42, 89-96	Corporate governance Inclusiveness and human rights Policies/standards for ethical and responsible business conduct are approved by the Ethics and Compliance Committee of the Supervisory Board.
	2-24	Embedding policy commitments	41-42, 89-96	Corporate governance Inclusiveness and human rights The Ethics and Compliance Committee is responsible for implementing policies/standards for ethical and responsible business conduct.
	2-25	Processes to remediate negative impacts	41-42, 89-96	Corporate governance Inclusiveness and human rights Incomplete information , as data on the processes of elimination of negative consequences are not collected. Vodafone Ukraine works to ensure proper data collection for their coverage in future reporting periods. The Ethics and Compliance Committee has been responsible for the efficiency of the mechanism since 2024.

Material topic	Nº	Disclosure title	Page number	References and comments
General disclosures				
GRI 2: General Disclosures 2021	2-26	Mechanisms for seeking advice and raising concerns	27-32, 39-48, 47-48, 51-54, 65-70, 71-73, 77-88, 89-96, 97-104, 113-120	Stakeholder engagement and identification of material topics Group's ethical standards and compliance Customer privacy and consumer safety Vodafone Ukraine products and services Marketing and communication Procurement activities HR management and talent capture Inclusiveness and human rights Career development Contribution to the development of local communities
	2-27	Compliance with laws and regulations	—	During 2024, there were no cases of non-compliance with legislation or regulatory requirements, including those for which fines were imposed or non-monetary sanctions were applied.
	2-28	Membership associations	12-32	About Vodafone Ukraine Group: Participation in Associations and External Initiatives
	2-29	Approach to stakeholder engagement	27-32	Stakeholder engagement and identification of material topics
	2-30	Collective bargaining agreements	—	During 2024, the Group had no practice of concluding collective agreements.
Topics disclosures				
GRI 3: Material Topics 2021	3-1	Process to determine material topics	27-32	Stakeholder engagement and identification of material topics
	3-2	List of material topics	27-32	Stakeholder engagement and identification of material topics <p>In the reporting period, the list of material topics included the topics “Occupational health and safety” and “Employment and employee opportunities”, which were not included in the list in the previous year. On the other hand, the topics “Anti-competitive behaviour” and “Anti-corruption”, which were identified as material in the 2023 Report, were not included in the list of material topics in 2024. This is mainly due to a change in the opinions of the Group's stakeholders.</p>
Economical disclosures				
Economic performance				
GRI 3: Material Topics 2021	3-3	Management of material topics	49-74, 33-38, 27-32	Creating economic value The Group's Strategy Stakeholder engagement and identification of material topics

Material topic	Nº	Disclosure title	Page number	References and comments
Economic performance				
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	162	Appendix: numerical indicators: Table 14
	201-2	Financial implications and other existing risks and opportunities caused by climate change	—	The Group of Companies did not assess the risks associated with climate change and their impact on the Group's operational activities and financial results during the reporting period.
	201-3	Defined benefit plan obligations and other retirement plans	—	The group pays contributions from the wages of employees, in accordance with the Law of Ukraine “On the collection and accounting of a single contribution to mandatory state social insurance”. The single contribution for the payers specified in Article 4 of this Law is set at the rate of 22 percent of the single contribution calculation base specified in Article 7 of this Law, which includes wages, other incentive and compensatory payments.
	201-4	Financial assistance received from the government	—	The Group received no financial assistance from the government during 2024.
Market Presence				
GRI 3: Material Topics 2021	3-3	Management of material topics	81-82	HR management and talent capture: Remuneration and motivation of employees
GRI 202: Market Presence 2016	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	81-82, 161	HR management and talent capture: Remuneration and motivation of employees Appendix: numerical indicators: Table 12
	202-2	Proportion of senior management hired from the local community	—	During 2024, 93% of the representatives of the Group's top management were citizens of Ukraine.
Indirect Economic Impacts				
GRI 3: Material Topics 2021	3-3	Management of material topics	59-64	Development of Infrastructure and network Digital and innovation
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	62-63	Development of Infrastructure and network: Investment in Network and Infrastructure

Material topic	Nº	Disclosure title	Page number	References and comments
Indirect Economic Impacts				
GRI 203: Indirect Economic Impacts 2016	203-2	Significant indirect economic impacts	27-32, 113-120	Stakeholder engagement and identification of material topics Contribution to the development of local communities
Procurement Practices				
GRI 3: Material Topics 2021	3-3	Management of material topics	71	Procurement activities: Group's procurement management
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	72	Procurement activities: The Group's supply chain
Anti-corruption				
GRI 3: Material Topics 2021	3-3	Management of material topics	43-44, 29-30	Anti-corruption and anti-competitive behavior: Countering corruption Stakeholder engagement and identification of material topics: Matrix of material topics
GRI 205: Anticorruption 2016	205-1	Operations assessed for risks related to corruption	43-44	Anti-corruption and anti-competitive behavior: Countering corruption The information is incomplete The assessment was conducted for specific types of operations, and the report from this assessment was submitted for consideration to the Ethics and Compliance Committee of the Supervisory Board in December 2024.
	205-2	Communications and training on anti-corruption policies and procedures	43-44	Anti-corruption and anti-competitive behavior: Countering corruption The information is incomplete The group of companies does not collect data on the number of employees and business partners who have been trained and familiarized with anti-corruption policies and procedures by region. Members of governing bodies are not employees and do not have accounts in corporate systems (e-mail, SAP HR, etc.), so online training tools are not available to them.
	205-3	Confirmed incidents of corruption and actions taken	43-44	Anti-corruption and anti-competitive behavior: Countering corruption
Anti-competitive behaviour				
GRI 3: Material Topics 2021	3-3	Management of material topics	45, 29-30	Anti-corruption and anti-competitive behavior: Anti-competitive behaviour Stakeholder engagement: Matrix of material topics

Material topic	Nº	Disclosure title	Page number	References and comments
Anti-competitive behaviour				
GRI 206: Anticompetitive Behavior 2016	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	45	Anti-corruption and anti-competitive behavior: Anti-competitive behaviour In 2024, there were no court cases regarding Vodafone Ukraine's anti-competitive behavior pending or completed during the reporting period.
Tax				
GRI 3: Material Topics 2021	3-3	Management of material topics	46	Anti-corruption and anti-competitive behavior: Taxes
GRI 207: Tax 2019	207-1	Approach to tax	46	Anti-corruption and anti-competitive behavior: Taxes Vodafone Ukraine does not have an approved tax strategy. The Group pays taxes in accordance with current legislation.
	207-2	Tax governance, control, and risk management	46	Anti-corruption and anti-competitive behavior: Taxes Tax risks are part of the Company's overall risks, which are considered by the Risk Committee.
	207-3	Stakeholder engagement and management of concerns related to tax	46	Anti-corruption and anti-competitive behavior: Taxes
	207-4	Country-by-country reporting	—	Vodafone Ukraine carries out operational activities on the territory of Ukraine. All business entities are included in the audited consolidated financial statements published on the Group's website: https://www.vodafone.ua/en/company/investors/zvity-ta-rezultaty/finansovi-rezultaty
Environmental disclosures				
Energy				
GRI 3: Material Topics 2021	3-3	Management of material topics	123-126	Energy consumption
GRI 302: Energy 2016	302-1	Energy consumption within the organization	123-126	Energy consumption Vodafone Ukraine procures from licensed suppliers who purchase products across various market segments and have information about their origin. In 2024, testing of solar power plants was initiated to provide autonomous power supply for mobile communication base stations.

Material topic	No	Disclosure title	Page number	References and comments
Energy				
GRI 302: Energy 2016	302-4	Reduction of energy consumption	123-126	Energy consumption The base year for tracking the dynamics of energy consumption as of the end of 2024 has not been established. The process of its installation is complicated by external circumstances, such as massive power outages in the country. In this report, the dynamics of the indicator were monitored using the chain method (relative to each previous year). Vodafone Ukraine is working on establishing a base year for tracking the dynamics of the indicator in future reporting periods.
Water and Effluents				
GRI 3: Material Topics 2021	3-3	Management of material topics	131	Water resources usage
GRI 303: Water and Effluents 2018	303-1	Interactions with water as a shared resource	131	Water resources usage
	303-2	Management of water discharge-related impacts	131	Water resources usage
	303-3	Water withdrawal	—	Water intake is carried out from central water supply systems and is equated to the volume of water use (consumption).
	303-4	Water discharge	131	Water resources usage The total volume of water discharge in 2024 amounted to 10.73 thousand cubic meters, of which: ■ Kyiv (offices) — 1.19 ■ Center region — 2.65 ■ Region West— 3.68 ■ East region — 3.21
	303-5	Water consumption	131	Water resources usage
Emissions				
GRI 3: Material Topics 2021	3-3	Management of material topics	127-130	Impact on Climate Change and Air Emissions

Material topic	Nº	Disclosure title	Page number	References and comments
Emissions				
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	127-130	Impact on Climate Change and Air Emissions The base year for tracking the dynamics of Scope 1 greenhouse gas emissions as of the end of 2024 has not been established. In this report, the dynamics of the indicator were monitored using the chain method (relative to each previous year). Vodafone Ukraine is working on establishing a base year for tracking the dynamics of the indicator in future reporting periods. Scope 1 greenhouse gas emissions include gases such as CO ₂ , CH ₄ , N ₂ O.
	305-2	Energy indirect (Scope 2) GHG emissions	127-130	Impact on Climate Change and Air Emissions The base year for tracking the dynamics of Scope 2 greenhouse gas emissions as of the end of 2024 has not been established. In this report, the dynamics of the indicator were monitored using the chain method (relative to each previous year). Vodafone Ukraine is working on establishing a base year for tracking the dynamics of the indicator in future reporting periods. Scope 2 greenhouse gas emissions include gases such as CO ₂ , CH ₄ , N ₂ O.
	305-3	Other indirect (Scope 3) GHG emissions	127-130	Impact on Climate Change and Air Emissions The base year for tracking the dynamics of Scope 3 greenhouse gas emissions as of the end of 2024 has not been established, since the exhaustive calculation was carried out for the first time in the reporting year. Scope 3 greenhouse gas emissions include gases such as CO ₂ , CH ₄ , N ₂ O.
	305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	127-130	Impact on Climate Change and Air Emissions
Waste				
GRI 3: Material Topics 2021	3-3	Management of material topics	132	Waste management
	306-2	Management of significant waste-related impacts	132	Waste management
	306-3	Waste generated	132	Waste management Vodafone Ukraine does not generate significant amounts of waste.
	306-5	Waste directed to disposal	132	Waste management

Material topic	Nº	Disclosure title	Page number	References and comments
Supplier Environmental Assessment				
GRI 3: Material Topics 2021	3-3	Management of material topics	71	Procurement activities: Group's procurement management
GRI 308: Supplier Environmental Assessment 2016	308-1	New suppliers that were screened using environmental criteria	73	Procurement activities: Supplier and procurement quality assessment
Social disclosures				
Employment				
GRI 3: Material Topics 2021	3-3	Management of material topics	77-88	HR management and talent acquisition
GR 401: Employment 2016	401-1	New employee hires and employee turnover	79-80, 156-157	HR management and talent acquisition: Recruitment of new staff Appendix: numerical indicators: Table 4, Table 5
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	81-82	HR management and talent acquisition: Remuneration and motivation of employees
	401-3	Parental leave	159	Appendix: numerical indicators: Table 10
Labor/Management Relations				
GRI 3: Material Topics 2021	3-3	Management of material topics	77-88	HR management and talent acquisition
GRI 402: Labor/Management Relations 2016	402-1	Minimum notice periods regarding operational changes	—	Notification of employees regarding the implementation of significant operational changes that may significantly affect them is carried out in 2 months, in accordance with the legislation of Ukraine.
Occupational Health and Safety				
GRI 3: Material Topics 2021	3-3	Management of material topics	105	Occupational health and safety: Occupational health and safety policies and standards
GRI,403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	105	Occupational health and safety: Occupational health and safety policies and standards

Material topic	Nº	Disclosure title	Page number	References and comments
Occupational Health and Safety				
GRI 403: Occupational Health and Safety 2018	403-2	Hazard identification, risk assessment, and incident investigation	107-108	Occupational health and safety: Identifying hazards and preventing workplace accidents The Group operates in accordance with the Law of Ukraine “On Personal Data Protection”. All medical information of employees is confidential.
	403-3	Occupational health services	107-108	Occupational health and safety: Identifying hazards and preventing workplace accidents
	403-4	Worker participation, consultation, and communication on occupational health and safety	105, 107-108	Occupational health and safety: Occupational health and safety policies and standards, identifying hazards and preventing workplace accidents
	403-5	Worker training on occupational health and safety	109	Occupational health and safety: Occupational safety training and testing Trainers' competences and the effectiveness of training are determined by the results of a questionnaire survey of trainees.
	403-6	Promotion of worker health	111	Occupational health and safety: Healthy lifestyles of our employees
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	107-108	Occupational health and safety: Identifying hazards and preventing workplace accidents
	403-8	Workers covered by an occupational health and safety management system	105, 107-108	Occupational health and safety: Occupational health and safety policies and standards, identifying hazards and preventing workplace accidents
	403-9	Work-related injuries	107-108	Occupational health and safety: Identifying hazards and preventing workplace accidents All groups of employees are considered in the accounting of accidents, in accordance with the requirements of the current legislation. There were no recorded industrial injuries among contractors.
	403-10	Work-related ill health	107-108	Occupational health and safety: Identifying hazards and preventing workplace accidents Workers whose workplaces were found to contain chemical factors (dust) as a result of workplace attestation for working conditions may be at risk of developing occupational diseases.

Material topic	Nº	Disclosure title	Page number	References and comments
Training and Education				
GRI 3: Material Topics 2021	3-3	Management of material topics	97-99	Career development: Approach to staff development and training
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	102-103	Career development: Average number of training hours per employee
	404-2	Programs for upgrading employee skills and transition assistance programs	99-100	Career development: Training programs for staff At the end of a career, the Group can provide letters of recommendation, post information about candidates in specialized sources, provide consulting support and facilitate future employment.
	404-3	Percentage of employees receiving regular performance and career development reviews	103	Career development: Assessment of staff performance and career development
Diversity and Equal Opportunity				
GRI 3: Material Topics 2021	3-3	Management of material topics	89	Inclusiveness and human rights: Diversity and human rights principles
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	155-162, 94	Appendix: numerical indicators: Tables 3, 6, 7, 8, 9 Inclusiveness and human rights: Gender and age diversity of our employees
	405-2	Ratio of basic salary and remuneration of women to men	96, 160	Inclusiveness and human rights: Gender pay ratio Appendix: numerical indicators: Tables 11 The Group applies the principle of equal pay regardless of gender. That is, the basic salary and remuneration are the same for men and women. Confidentiality constraints Information on the ratio of basic wages and remuneration of women to men in the category of “senior management” employees due to the requirements of internal policies on ensuring information security and protecting personal data is confidential, and its disclosure may violate the personal data of persons included in this category. Accordingly, such information is not publicly disclosed.

Material topic	Nº	Disclosure title	Page number	References and comments
Non-discrimination				
GRI 3: Material Topics 2021	3-3	Management of material topics	89-96	Inclusiveness and human rights
GRI 406: Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	89-96	Inclusiveness and human rights
Freedom of Association and Collective Bargaining				
GRI 3: Material Topics 2021	3-3	Management of material topics	89-96	Inclusiveness and human rights
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	–	In 2024, no Group divisions and suppliers were identified, for which there was a significant risk of violation of employees’ rights to freedom of association and collective bargaining.
Child Labor				
GRI 3: Material Topics 2021	3-3	Management of material topics	89-96	Inclusiveness and human rights
GRI 408: Child Labor 2016	408-1	Operations and suppliers at significant risk for incidents of child labor	89-96	Inclusiveness and human rights During 2024, no Group divisions and suppliers were identified, in relation to which there was a significant risk of using child labor.
Forced or Compulsory Labor				
GRI 3: Material Topics 2021	3-3	Management of material topics	89-96	Inclusiveness and human rights
GRI 409: Forced or Compulsory Labor 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	89-96	Inclusiveness and human rights During 2024, no Group units and suppliers were identified that were at significant risk of using forced labor.
Security Practices				
GRI 3: Material Topics 2021	3-3	Management of material topics	94	Inclusiveness and human rights: Human rights and inclusion training
GRI 410: Security Practices 2016	410-1	Security personnel trained in human rights policies or procedures	94	Inclusiveness and human rights: Human rights and inclusion training The security of the Group’s offices is provided by employees of contracted organizations. During the reporting year, no training on policies and procedures related to various aspects of human rights compliance was conducted for these employees.

Material topic	Nº	Disclosure title	Page number	References and comments
Local Communities				
GRI 3: Material Topics 2021	3-3	Management of material topics	113-120	Contribution to the development of local communities
GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	113-120, 55-58	Contribution to the development of local communities Digital and innovation An assessment of the social and environmental impacts of the Group of Companies' activities on local communities in 2024 was not carried out.
	413-2	Operations with significant actual and potential negative impacts on local communities	–	In 2024, there were no activities of the Group of Companies that created a potential threat of negative impact or caused a significant actual negative impact on local communities.
Supplier Social Assessment				
GRI 3: Material Topics 2021	3-3	Management of material topics	71	Procurement activities: Group's procurement management
GRI 414: Supplier Social Assessment 2016	414-1	New suppliers that were screened using social criteria	73	Procurement activities: Supplier and procurement quality assessment
Public Policy				
GRI 3: Material Topics 2021	3-3	Management of material topics	41-42	Corporate ethics
GRI 415: Public Policy 2016	415-1	Political contributions	–	According to the Code of Conduct, Vodafone Ukraine does not make gifts or donations to political parties and does not interfere in party-political matters.
Customer Health and Safety				
GRI 3: Material Topics 2021	3-3	Management of material topics	47-48, 59-64, 29-30	Customer privacy and consumer safety Development of Infrastructure and network Stakeholder engagement: Matrix of material topics
GRI 416: Customer Health and Safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	47-48	Customer privacy and consumer safety: Cooperation in cybersecurity In the field of communication services, there are legislative norms regulating the level of radiation. Compliance with such norms is checked by regulatory authorities during the start-up and operation of the base stations.

Material topic	Nº	Disclosure title	Page number	References and comments
Customer Health and Safety				
GRI 416: Customer Health and Safety 2016	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	–	In 2024, there were no cases of non-compliance of products or services with safety requirements and impact on customer health. At the same time, we identified some vulnerabilities on Vodafone Ukraine's websites that could pose a threat to information security. The Group analyzes these cases, strengthens protection, monitors the security of our applications and implements measures to prevent data leakage.
Marketing and Labeling				
GRI 3: Material Topics 2021	3-3	Management of material topics	65	Marketing and communication: Our approach to marketing
GRI 417: Marketing and Labeling 2016	417-1	Requirements for product and service information and labeling	67	Marketing and communication: Labelling standards: quality and compliance
	417-2	Incidents of non-compliance concerning product and service information and labeling	67	Marketing and communication: Labelling standards: quality and compliance
	417-3	Incidents of non-compliance concerning marketing communications	67	Marketing and communication: Labelling standards: quality and compliance
Customer Privacy				
GRI 3: Material Topics 2021	3-3	Management of material topics	47-48, 29-30	Customer privacy and consumer safety: Information security policies and management approach Stakeholder engagement and identification of material topics: Matrix of material topics
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	–	In case of complaints or suggestions regarding information security or data privacy, subscribers can contact us by e-mail (vodafone@vodafone.ua), postal address (15 Leipzigska St., Kyiv, 01601), contact center (111 or 0 800 400 111), online chat on the website or in the MyVodafone application. Vodafone Ukraine employees can also contact their management or the Information Security Department's corporate email. Information is unavailable Data on the total number of complaints received in 2024 regarding violations of customer confidentiality from external parties and regulatory bodies was not collected in the reporting year. Vodafone Ukraine works to ensure proper data collection for their coverage in future reporting periods.

Appendix: numerical indicators

In the tables below, data for 2024 covers the entire Vodafone Ukraine Group, including UNS LLC, which was founded in 2023.

Table 1. Number of employees by type of employment contract in 2022-2024 (as of year-end), persons⁴⁴

Type of employment contract	Gender	2022	2023	2024
Total, including:		3,775	4,086	4,461
Permanent employment contract	Male	2,128	2,389	2,616
	Female	1,531	1,588	1,721
	Total	3,659	3,977	4,337
Temporary employment contract	Male	38	40	44
	Female	78	69	80
	Total	116	109	124

Table 2. Number of employees by type of employment in 2022-2024 (as of year-end), persons⁴⁵

Type of employment	Gender	2022	2023	2024
Total, including:		3,775	4,086	4,461
Full-time	Male	2,134	2,383	2,606
	Female	1,551	1,578	1,694
	Total	3,685	3,961	4,300
Part-time	Male	32	44	52
	Female	58	44	46
	Total	90	88	98
Employees on parental leave and unreplaced	Male	0	2	1
	Female	85	117	57
	Total	85	119	58

44. The number of employees is reported here in the actual number of persons as of the end of the calendar year. The indicator includes all actually staff units, including mobilized persons, employees on maternity leave and those who replace employees on maternity leave and mobilized persons. In case of replacement of jobs of persons on maternity leave by other employees and replacement of mobilized persons by other employees, double calculation was not carried out (in this case, the full-time position is counted as "one occupied").

45. The total number of employees by type of employment does not match the sum of employees by category, since the category "Employees on parental leave" includes employees who were on parental leave and were unreplaced.

Table 3. Number of employees by regions in 2022-2024 (as of year-end), persons

Indicator	2022	2023	2024
Total, including:	3,775	4,086	4,461
By gender			
Male	2,166	2,429	2,660
Female	1,609	1,657	1,801
By age			
Up to 30 years	921	905	1,070
30-50 years	2,298	2,464	2,625
More than 50 years	556	717	766
By region			
Headquarters (Kyiv)	2,099	2,383	2,474
Centre	752	699	713
West	348	351	402
East	410	389	421
North	104	193	374
South	62	71	77

Table 4. Number of hired and dismissed employees in 2022-2024, persons

Indicator		Number of hired employees			Number of dismissed employees		
		2022	2023	2024	2022	2023	2024
Total, including:		714	848	1,417	909	967	761
By gender	Male	359	440	816	382	449	367
	Female	355	408	601	527	518	394
By age	Up to 30 years	499	596	783	534	603	477
	30-50 years	198	230	548	331	325	247
	More than 50 years	17	22	86	44	39	37
By regions	Headquarters (Kyiv)	428	493	768	501	559	452
	Centre	142	168	221	188	194	158
	West	57	72	123	63	85	51
	East	60	80	98	122	103	72
	North	19	19	196	30	20	24
	South	8	16	11	5	6	4

Table 5. Staff turnover rate by gender, age and regions in 2022-2024, %⁴⁶

Indicator	VF Ukraine PrJSC			VF Retail LLC			ITSF LLC			FarlepInvest PrJSC			UNS LLC ⁴⁷	
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2023	2024
Total, including:	19.8%	22.5%	18.2%	36.1%	40.0%	37.8%	9.2%	2.9%	7.4%	10.4%	9.6%	9.8%	0.0%	8.4%
By gender														
Male	7.5%	9.1%	8.2%	16.0%	42.0%	41.3%	6.2%	0.0%	3.7%	9.2%	10.5%	11.2%	0.0%	0.0%
Female	12.3%	13.4%	10.0%	20.1%	38.0%	34.7%	3.1%	2.9%	3.7%	12.4%	8.1%	8.9%	0.0%	20.0%
By age														
Up to 30 years	13.0%	15.2%	11.7%	22.8%	58.0%	37.8%	1.5%	1.4%	2.5%	34.4%	17.9%	24.0%	0.0%	0.0%
30-50 years	6.2%	6.8%	5.8%	12.5%	22.0%	37.8%	6.2%	1.4%	4.3%	8.7%	11.5%	8.4%	0.0%	11.1%
More than 50 years	0.5%	0.5%	0.6%	0.8%	29.0%	37.8%	1.5%	0.0%	0.6%	7.6%	5.3%	7.4%	0.0%	0.0%
By regions														
Head-quarters (Kyiv)	17.2%	20.6%	16.3%	1.8%	16.0%	33.6%	-	-	7.4%	11.2%	11.0%	7.8%	0.0%	0.0%
Centre	1.4%	0.6%	0.9%	15.2%	64.0%	40.2%	-	2.9%	-	9.4%	8.1%	9.2%	0.0%	0.0%
West	0.4%	0.5%	0.4%	5.7%	48.0%	34.5%	-	-	-	12.4%	14.1%	9.6%	0.0%	0.0%
East	0.7%	0.8%	0.6%	13.4%	32.0%	37.3%	-	-	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
North	-	0.0%	0.0%	0.0%	0.0%	0.0%	-	-	-	14.8%	11.8%	15.0%	0.0%	0.0%
South	-	0.0%	0.0%	0.0%	0.0%	0.0%	-	-	-	3.3%	5.9%	5.4%	0.0%	0.0%

Table 6. Number of employees by gender and position categories in 2022-2024, persons

Category of employees	Gender	2022	2023	2024
Total, including:		3,775	4,086	4,461
Senior management	Male	8	9	10
	Female	4	5	5
	Total	12	14	15
Other employees	Male	2,158	2,420	2,650
	Female	1,605	1,652	1,796
	Total	3,763	4,072	4,446

46. The staff turnover rate is calculated as the ratio of the number of employees fired by their own initiative during the year to the average number of employees.

47. For UNS LLC, 2024 is the first year of operations.

Table 7. Number of employees by age and position categories in 2022-2024, persons

Category of employees	Age	2022	2023	2024
Total, including:		3,775	4,086	4,461
Senior management	Up to 30 years	0	0	0
	30-50 years	11	9	10
	More than 50 years	1	5	5
	Total	12	14	15
Other employees	Up to 30 years	921	905	1,070
	30-50 years	2,287	2,455	2,615
	More than 50 years	555	712	761
	Total	3,763	4,072	4,446

Table 8. Number of representatives of corporate governance bodies by gender in 2022-2024, persons

Indicator	2022			2023			2024		
	Total, including:	Male	Female	Total, including:	Male	Female	Total, including:	Male	Female
VF Ukraine PrJSC									
Supervisory Board	6	6	0	6	6	0	6	6	0
Members of the Inspection Committee ⁴⁸	3	2	1	3	2	1	0	0	0
Audit Committee	3	3	0	3	3	0	3	3	0
VF Retail LLC									
Supervisory Board	4	3	1	4	3	1	4	3	1
Members of the Inspection Committee	3	2	1	3	2	1	3	2	1
Audit Committee	-	-	-	-	-	-	-	-	-
ITSF LLC									
Supervisory Board	5	3	2	5	3	2	5	3	2
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	-	-	-	-	-	-	-	-	-
Farlep-Invest PrJSC									
Supervisory Board	5	3	2	5	3	2	5	3	2
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	3	2	1	3	2	1	3	2	1
UNS LLC									
Supervisory Board	-	-	-	-	-	-	4	3	1
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	-	-	-	-	-	-	-	-	-

48. On 22.03.2024, VF Ukraine PrJSC has decided to liquidate the Inspection Committee.

Table 9. Number of representatives of corporate governance bodies by age in 2022-2024, persons

Indicator	2022			2023			2024		
	Up to 30 y.o.	30 to 50 y.o.	Over 50 y.o.	Up to 30 y.o.	30 to 50 y.o.	Over 50 y.o.	Up to 30 y.o.	30 to 50 y.o.	Over 50 y.o.
VF Ukraine PrJSC									
Supervisory Board	0	3	3	0	2	4	0	2	4
Members of the Inspection Committee ⁴⁹	0	3	0	0	3	0	0	0	0
Audit Committee	0	1	2	0	1	2	0	0	3
VF Retail LLC									
Supervisory Board	-	-	-	-	-	-	-	4	-
Members of the Inspection Committee	-	-	-	-	-	-	-	3	-
Audit Committee	-	-	-	-	-	-	-	-	-
ITSF LLC									
Supervisory Board	-	-	-	-	5	-	-	4	1
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	-	-	-	-	-	-	-	-	-
Farlep-Invest PrJSC									
Supervisory Board	-	4	1	-	4	1	-	3	2
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	-	3	-	-	3	-	-	3	-
UNS LLC									
Supervisory Board	-	-	-	-	-	-	-	2	2
Members of the Inspection Committee	-	-	-	-	-	-	-	-	-
Audit Committee	-	-	-	-	-	-	-	-	-

Table 10. Number of employees who took parental leave and returned to work in 2022-2024, persons

Indicator	2022		2023		2024	
	Male	Female	Male	Female	Male	Female
Number of employees entitled to parental leave in the reporting year	64	115	38	68	65	114
Number of employees who took parental leave in the reporting year	0	94	1	34	0	34
Number of employees who had to return to work after the end of parental leave in the reporting year	79		95		89	
Of these, in the reporting year, who actually returned to work after the end of parental leave ⁵⁰	39		38		29	
Number of employees who returned to work after the end of parental leave in the previous reporting year	46		33		17	
Of them, those who during the next 12 months (i.e. as of any period in the reporting year) did not leave the Group and remained to work in the Group ⁵¹	38		28		17	

49. On 22.03.2024, VF Ukraine PrJSC has decided to liquidate the Inspection Committee.

50. The share of employees who returned to work in 2024 is 33%, 2023 p. — 40%, y 2022 p. — 46%.

51. The retention rate for employees in the workplace for 12 months after returning from parental leave in 2024 is 100%, in 2023 — 85%, in 2022 — 83%.

Table 11. The ratio of the average basic wage and additional remuneration of women to the average basic wage and remuneration of men in 2022-2024, %

	Employee category	Total for a base salary and additional remuneration
Vodafone Ukraine		
2023	All employees, including:	93.7%
	Other employees	83.1%
2024	All employees, including:	107.5%
	Other employees	86.8%
VF Ukraine PrJS		
2022	All employees, including:	91.2%
	Other employees	81.5%
2023	All employees, including:	97.8%
	Other employees	83.4%
2024	All employees, including:	117.2%
	Other employees	87.8%
VF Retail LLC		
2022	All employees, including:	92.9%
	Other employees	86.4%
2023	All employees, including:	105.8%
	Other employees	92.4%
2024	All employees, including:	115.2%
	Other employees	101.6%
ITSF LLC		
2022	All employees, including:	88.7%
	Other employees	97.5%
2023	All employees, including:	76.9%
	Other employees	90.3%
2024	All employees, including:	71.9%
	Other employees	78.7%
Farlep-Invest PrJSC⁵²		
2022	All employees, including:	82.2%
	Other employees	84.0%
2023	All employees, including:	75.5%
	Other employees	81.3%
2024	All employees, including:	86.4%
	Other employees	93.9%
UNS LLC		
2024	All employees, including:	90.7%
	Other employees	129.4%

52. Freenet LLC data on the average base salary and remuneration are included in the calculation of the indicator for Farlep-Invest PrJSC.

Table 12. The ratio of the standard starting salary of employees to the minimum salary established by law in 2022-2024, %

Indicator	VF Ukraine PrJSC			VF Retail LLC			ITSF LLC			Farlep-Invest PrJSC			UNS LLC
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2024
All employees	184%	214%	260%	200%	200%	220%	641%	665%	811%	119%	152%	169%	441%
By gender													
Male	184%	214%	260%	200%	200%	220%	641%	665%	811%	119%	152%	169%	441%
Female	184%	214%	260%	200%	200%	220%	641%	665%	811%	119%	152%	169%	441%
By region													
Headquarters (Kyiv)	184%	214%	260%	-	-	-	-	-	-	119%	152%	169%	-
Centre	452%	419%	386%	-	-	-	-	-	-	119%	152%	169%	-
West	349%	368%	385%	-	-	-	-	-	-	119%	152%	169%	-
East	422%	422%	418%	-	-	-	-	-	-	119%	152%	169%	-
North	-	-	-	-	-	-	-	-	-	119%	152%	169%	-
South	-	-	-	-	-	-	-	-	-	119%	152%	169%	-

Table 13. The average number of traininghours per employee in 2022-2024

Category of employees	The average number of hours of training per employee ⁵³		
	2022	2023	2024 ⁵⁴
All employees, including:	15.9	20.9	33.4
Male	12.7	16.5	28.6
Female	20.5	27.6	40.3
Senior management, including:	2.5	36.4	29.9
Male	3.8	38.9	37.9
Female	0	30.8	15.4
Other employees, including:	16	20.6	34.6
Male	12.8	16.1	29.2
Female	20.6	27.5	42.2

53. The calculation of the average number of hours of training per employee includes compulsory training, advanced training and new skills development.
54. The indicator covers all employees of the Group of Companies, except for Freenet LLC and UNS LLC, where training was not provided in 2024.

Table 14. Created economic value in 2022-2024^{55, 56}

Indicator	2022 Thousand UAH	2023 Thousand UAH	2024 Thousand UAH
1. Direct economic value created:	19,824,428	21,610,372	24,441,982
Revenue from the sale of services and products	19,824,428	21,610,372	24,441,982
2. Direct economic value distributed:	18,724,073	16,537,431	20,897,668
Operating costs (except wages and bonuses) ⁵⁷	10,790,966	10,802,697	13,752,462
Employee salaries and bonuses, etc ⁵⁸	2,517,254	2,718,309	3,585,995
Payments to capital owners (dividends to shareholders and payments to lenders)	26,300	1,828,430	-
Other expenses	5,415,853	3,016,425	3,559,221
3. Economic value preserved ⁵⁹ : (direct economic value created (point 1)) — (direct economic value distributed (point 2))	1,100,355	5,072,941	3,544,314

55. Information on the created economic value is collected in accordance with the data of the audited financial statements.
56. Some values for 2022-2024 differ from the data of the Annual Report on Sustainable Development of Vodafone Ukraine 2023, since a different calculation methodology was used in 2024.
57. Revised in connection with the introduction of a unified approach to the Group's financial and non-financial reporting.
58. Revised to align the Group's financial and non-financial reporting to a common approach. Adjusted salaries and wages include the amount of commercial staff costs, including capitalization of connection fees.
59. When calculating the direct economic value distributed, the amount of payments to capital owners was not deducted, since the transaction on the distribution of capital between owners does not increase the amount of expenses and does not affect the financial result of the current period. The indicator "Economic value preserved" corresponds to the indicator "Total income for the year" reflected in the financial statements of the Consolidated statement of profit.



Independent practitioner's limited assurance report on Private Joint Stock Company "VF Ukraine"'s selected consolidated sustainability information

To the management of Private Joint Stock Company "VF Ukraine"

Limited assurance conclusion

We have conducted a limited assurance engagement on the selected consolidated sustainability information of Private Joint Stock Company "VF Ukraine" (the "Company") and its subsidiaries (the "Group") included in Contribution to Society, Environmental Responsibility, and Creating Economic Value sections of the Annual Sustainability Report Vodafone Ukraine 2024 (the "Sustainability Report"), namely disclosures 203-1 Infrastructure investments and services supported, 204-1 Proportion of spending on local suppliers, 302-1 Energy consumption within the organization, 305-1 Direct (Scope 1) GHG emissions, 305-2 Energy indirect (Scope 2) location-based GHG emissions, 404-1 Average hours of training per year per employee, 405-2 Ratio of basic salary and remuneration of women to men (together the "selected consolidated sustainability information") as at 31 December 2024 and for the year then ended.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the selected consolidated sustainability information is not prepared, in all material respects, in accordance with GRI Sustainability Reporting Standards published by the Global Reporting Initiative (GRI) (hereinafter – the "GRI Standards").

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Limited Liability Company Audit Firm "PricewaterhouseCoopers (Audit)"
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Responsibilities for the selected consolidated sustainability information

Management of the Company is responsible for:

- The preparation of the selected consolidated sustainability information in accordance with the GRI Standards;
- Designing, implementing and maintaining such internal control as management determines is necessary to enable the preparation of the selected consolidated sustainability information, in accordance with GRI Standards, that is free from material misstatement, whether due to fraud or error; and
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the selected consolidated sustainability information is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the selected consolidated sustainability information.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Determine the suitability in the circumstances of the Group's use of GRI Standards as the basis for the preparation of the selected consolidated sustainability information.
- Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Design and perform procedures responsive to where material misstatements are likely to arise in the selected consolidated sustainability information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the selected consolidated sustainability information. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of where material misstatements are likely to arise in the selected consolidated sustainability information, whether due to fraud or error.

In conducting our limited assurance engagement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its selected consolidated sustainability information by:
 - performing inquiries of personnel responsible for the preparation of the selected consolidated sustainability information and collection of underlying data;

- performing analysis of the relevant internal methodology and guidelines;
- gaining an understanding of the design of the key systems, processes and controls for managing, recording, preparing and reporting the selected consolidated sustainability information;
- Performed inquiries of the management of the Company, including the Strategy Planning and Special Projects and analytical procedures on the selected consolidated sustainability information;
- Performed limited substantive testing on a selective basis of the selected consolidated sustainability information to check that data had been appropriately measured, recorded, collated and reported.

Restrictions of use

Our report has been prepared solely for the management of the Company to assist the management of the Company in reporting on the Group's sustainability performance and activities. The selected consolidated sustainability information therefore may not be suitable, and is not to be used, for any other purpose.

We permit this report to be disclosed in the Sustainability Report, which will be published on the Company's website¹, to assist the management of the Company in responding to their governance responsibilities by obtaining an independent limited assurance report in connection with the selected consolidated sustainability information. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work or this report except where the respective terms are expressly agreed in writing and our prior consent in writing is obtained.

LLC AF "PricewaterhouseCoopers (Audit)"

Kyiv,

22 April 2025

¹ The maintenance and integrity of the Company's website is the responsibility of management; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported selected consolidated sustainability information when presented on the Company's website.

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