



22 February 2011

Vodafone Group Plc – Response on Issues Relating to Mobile Network Operations in Egypt

Engagement with Non-Governmental Organisations

The events in Egypt have raised questions with regard to the role and responsibilities of network operators during the recent period of unrest across Egypt. Throughout the crisis Vodafone has aimed to provide as much information on our decision making process and subsequent action as possible.

Our website (www.vodafone.com) provides information on our general approach to human rights. It was also used to publish statements detailing our actions as events unfolded. In addition we have participated in discussions with a number of non-governmental organisations such as Amnesty International, the Global Network Initiative ("GNI"), Access and Human Rights First in order to explain the rationale for our actions. .

We set out below further information which summarises the conversations referred to above.

On network closure:

In common with all other telecoms operators, Vodafone was formally instructed on the morning of Friday 28 January to shut down the mobile network in specified areas. Vodafone had legal advice to the effect that the Egyptian authorities had the legal power to require compliance. The sanctions for non-compliance with such an instruction are imprisonment and/or suspension of Vodafone's operating license. In addition, the Egyptian authorities had the technological capability to close down the network themselves in the event of non-compliance. Had they done so, re-establishment of communications would have relied technically on the Egyptian authorities, and the technical procedures required would have taken much longer - possibly days - to restore communications.

On this basis, Vodafone therefore judged that the interests of our employees in Egypt, and our customers and others wanting to use our network, would be least badly served by complying as by doing so we were able to retain a legal position from which to negotiate with the authorities and importantly, retain technical control of the network. In the event, Vodafone was able to re-establish voice communications on the morning of Saturday 29 January (the first network to do so), data services on Tuesday 1 February, and sms services later that week.

We would like to highlight the fact that Vodafone sought to be transparent as to the sequence of events and that the statements issued gave clarity to many observers as to what was happening in Egypt.

On sms messages:

In common with all other mobile network operators, Vodafone was instructed to send sms messages by the Egyptian authorities, starting with one message on 29 January, and then a series of three on 1 February. Vodafone had legal advice that the Egyptian authorities had the legal power to require compliance, with sanctions of imprisonment and/or suspension of Vodafone's operating license for failure to comply. Vodafone, as other mobile operators, judged that we had no option but to comply. In the case of the last message so transmitted, on 1 February, which provided information on a pro-Mubarak march, Vodafone declined to let the message be sent in Vodafone's name, and limited its circulation.

Vodafone then formally informed the Egyptian authorities in Cairo and London that any future instructions to send sms messages must clearly show the authority requiring the message to be sent, and the text of the message must make this clear. Vodafone notified the Egyptian authorities that we would not necessarily comply with such instructions. While taking this position undoubtedly increased risk to our employees, it also stopped short of actual non-compliance, which Vodafone hoped would mitigate that risk to some extent. In order further to protect our employees, Vodafone also contacted the UK Foreign and Commonwealth Office and the US State Department to secure their support.

In common with other mobile operators, Vodafone received further instructions to send sms messages on 9 and 10 February. These gave elements of public information and were fully attributed to the Ministry of the Interior (9 February) and Ministry of Defence (10 February). Vodafone judged that there was no reason to withhold sending these messages, based on their content and clear originator attribution.

At all times during the crisis situation Vodafone's decisions were based on how it could best balance the needs and safety of its employees on the ground in Egypt, its customers and the broader population of Egypt