



Vodafone NZ Policy

Ethical Advertising

Policy Owner:	Policy Champion:	Version:	Date:
Carolyn Luey Consumer Director	Delina Shields Marketing Tribe Lead	Version 1.0	05/02/2021

Purpose: To provide our people and partners with clear guidelines on our approach to advertising, with a focus on upholding our values and behaviours, working with media organisations that reflect and align to our values, and avoiding brand association with organisations, views or incidents we strongly believe are in conflict with those values.	Scope: This Policy applies to Vodafone New Zealand Limited (Vodafone NZ) and its subsidiaries.
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1. Policy principles

Where, and with whom, we advertise our brand reflects us as an organisation - including what we say, where we say it, and who we say it with - so it is important that both our advertising and where our advertising appears aligns with our corporate values. This policy provides a set of values-based principles for our people, and expectations for our partners, about what content, topics, or issues our brand should be (or not be) associated with - based on Vodafone NZ's ethics and morals.

In such a complex, fast-moving and high information world we know we may not get it right all the time, but our promise to our people and customers is that if they think our advertising activity doesn't meet these standards, we will undertake a review and take action as appropriate.

1.1 Our approach to ethical advertising: - the values we believe in

1) Celebrate Aotearoa - our past, present and future: We want to create long-term shared value for our people, partners, customers and communities. Our corporate mission aims to create a better Aotearoa New Zealand through remarkable technology that simplifies lives and businesses. Building long-term, meaningful and mutually beneficial relationships with Māori as tangata whenua is critical to us. We will do this via our 'Honouring the Principles of Te Tiriti o Waitangi' Policy, of which the key elements include: honourable governance, agency and self-determination, equity and participation, and the protection of and adherence to Māori customs.

2) Be supportive, positive and inclusive: As a New Zealand focused business, we want to reflect Kiwi values of positivity, open-mindedness and tolerance. We aim to be respectful, kind and honest in all our communications. While we celebrate freedom of expression, and respect that some people may hold different personal opinions, we need to ensure that our advertising aligns with our values, and be willing to exercise our own freedom of choice as to where we advertise.

For Vodafone NZ, this means being welcoming to people of all countries and cultures, and supporting organisations or initiatives that celebrate diversity and foster inclusion. We don't condone racism, bigotry or sexism, and therefore we will not support, or have our brand associated with, content, activity, editorial, or advertising that, in our opinion, is:

- Indecent, vulgar, profane, or offensive.
- Hateful or violent advocating against any individual, group, race, or organisation.
- Representing a personal attack against an individual or group.
- Undermining the integrity, values or character of our brand.



3) Champion honest content: We are opposed to the proliferation of blatantly false and inflammatory content, including misinformation and fake news. We will not tolerate extremist language. We will evaluate our marketing approach regularly to ensure we are being fair and honest in our own communications, with an aim to build a trusted relationship with our customers.

4) Do the right thing: We endeavour to comply with all applicable advertising regulations and standards. We will respect and uphold intellectual property rights, confidential information, privacy considerations and the rights of third parties. We expect our agencies to obtain and pay for all necessary licenses and permissions. To champion integrity, we will ensure any advertising or sponsored content is clearly identifiable and labelled as such - this includes being transparent when we pay others to endorse our products.

2. Policy controls and consequence management

2.1 Control 1

We will work with our partners to ensure ongoing compliance with our Ethical Advertising Policy, and we will be clear and upfront when briefing external partners about our ongoing expectations.

2.2 Control 2

Our use of technology solutions via partners will help us to ensure that we advertise on channels aligned to our brand values. This includes Inclusion & Exclusion Lists of our approved /preferred partners, as well as lists of digital partners we don't advertise on due to concerns around content and potential breaches.

2.3 Control 3

Ongoing monitoring of social media posts and customer feedback channels will help us to ensure adherence to this policy. Complaints or advice of areas of concern will be escalated to our External Affairs and/or Marketing teams for investigation, consideration and action, including whether a piece of third party content or activity or platform on which Vodafone carries advertising contravenes this policy in terms of aligning to our values.

2.4 Consequence management

It is important to Vodafone NZ that our media, sponsorship and brand partners align with our values. If, in the view of the Policy Owner, a partner supports content, activity, editorial or advertising that undermines the principles of this policy, Vodafone will take appropriate action. This could include short, medium or long-term withdrawal of advertising spend, depending on the severity of the breach and the willingness of the partner to work with us to achieve mutually agreeable outcomes.

2.5 Exclusion for certain editorial content

Vodafone or its agents must not threaten to withdraw advertising from those who criticise Vodafone editorially. Similarly, advertising spending must never be used as leverage to try to influence editorial opinion on public policy matters where Vodafone's views differ from those of the media outlet in question.

3. Roles and responsibilities

The Marketing Tribes (Consumer & Business), External Affairs and Customer Operations teams are responsible for ongoing monitoring of compliance to the policy, and timely resolution where necessary.

We encourage our employees to speak up with confidence if they have any concerns that this policy is not being adhered to, or need to ask for help. If anyone observes or suspects something improper, unethical or inappropriate, all Vodafone employees have an obligation to speak up. In the first instance, concerns should be reported to a line manager. However, we do recognise there may be occasions when there is a preference for concerns to be raised in confidence. This can be done at any time via our [Speak Up](#) process. We will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.



For any questions, you can contact:

- Rich Llewellyn, Head of External Affairs
- Delina Shields, Consumer Marketing Tribe Lead
- Ben Harvey-Lovell, Business Marketing Tribe Lead

4. Exceptions

Exceptions can be approved at the discretion of the Ethical Advertising Policy Owner.

5. Other relevant policies

- [Anti-bribery Policy](#)
- [Speak Up Policy](#)
- [Honouring the Principles of Te Tiriti o Waitangi](#)
- [Diversity and Inclusion Policy](#)
- [Code of Conduct](#)

6. Document history

Version	Date	Changes	Other standards affected	Approved by
1.0	05/02/2021	Original document		