

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

February 11, 2025

Luka Mucic Chief Financial Officer Vodafone Group Public Limited Company Vodafone House, The Connection Newbury, Berkshire RG14 2FN England

Re: Vodafone Group Public Limited Company Form 20-F for the Fiscal Year Ended March 31, 2024 File No. 001-10086

Dear Luka Mucic:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Technology