

Anti-Bribery and Corruption Policy

Policy Owner: Chief Ethics and Compliance Officer
Effective Date: December 02, 2025

I. Delegation and GRC Framework

This Anti-Bribery and Corruption Policy is part of the GRC Framework. Any questions of interpretation or conflict should be referred to your supervisor, relevant department head or to the Company Policy owner.

II. Purpose, Applicability and Scope

This Policy is intended to outline the Company's risks related to bribery and corruption, to highlight the responsibilities of the Company's Personnel under the relevant anti-corruption laws and Company policies, and to provide the tools and support necessary to identify and combat those Bribery and Corruption risks. The Company is subject to laws prohibiting Bribery and Corruption, including the US Foreign Corrupt Practices Act (**FCPA**) and other laws that apply outside their own boundaries, including relevant laws in countries of operation. The Company abides by all Anti-Bribery and Corruption Laws applicable to it, and it expects anyone doing business for or on its behalf to also abide by applicable Laws.

Bribery or Corruption could subject the Company or the Company's Personnel to legal liability, including criminal penalties, and could be damaging to the Company's business and reputation. The Company does not tolerate any form of Bribery or Corruption.

This Policy is designed to ensure compliance with applicable Anti-Bribery and Corruption Laws and to establish good practices to prevent Bribery and Corruption across the business.

This Policy applies to the Company, the Company's Personnel, and to Authorized Representatives. Controlled entities and Joint Ventures must adopt this Policy as their own or establish a local policy in line with this Policy. The Company will use its best efforts to ensure compliance with this Policy in noncontrolled Joint Ventures.

Topics Covered:

1. Gifts and Hospitality
2. Social investments, Charitable Contributions, and Commercial Sponsorships
3. Facilitation Payment and Duress
4. Knowing our Authorized Representative
5. Merger and Acquisition

III. Definitions

Capitalized terms within this Policy shall have the meanings set forth in Appendix D.

IV. Minimum Requirements and Standards

This Policy sets the minimum standards and requirements that must be followed. Local laws, regulations, or rules that impose higher standards and requirements will prevail and must be adopted in local policies and procedures. The Company may adopt stricter standards than those set forth in this Policy.

1. Gifts and Hospitality (G&H)	
Summary	<p>Gifts or Hospitality may be appropriate to build relationships and goodwill in the business. At the same time, Gifts or Hospitality can be misused and create compliance risks for the Company and the Company's Personnel. The Company's and Authorised Representatives' business decisions must always be made objectively and without improper influence and conflicting personal interests.</p> <p>Some types of Gifts and Hospitality are <u>never</u> acceptable, whether given or received, by any of the Company's Personnel, including:</p> <ol style="list-style-type: none"> Cash or cash equivalents (e.g., gift certificates, gift cards or gift vouchers, checks, loans, securities, gold, cryptocurrency, etc.); Gifts or Hospitality that might be indecent, inappropriate, or would damage the Company's integrity or reputation; Gifts or Hospitality provided during a tendering process, regulatory decision, or pricing, purchasing, or other government or business decision; or Gifts or Hospitality that violate applicable laws or regulations. <p>This Policy is not applicable to Gifts and Hospitality (G&H) among the Company's Personnel (e.g. G&H offered/received by employees of the Company to each other).</p>
Objectives	<ul style="list-style-type: none"> <input type="checkbox"/> Compliance with anti-bribery and corruption laws applicable to the Company and local laws of the countries of operation. <input type="checkbox"/> Establish best practices to prevent Bribery and Corruption across the Company.
Risks	<ul style="list-style-type: none"> <input type="checkbox"/> Insufficient awareness and knowledge of Bribery and Corruption risks. <input type="checkbox"/> Offer or receive a Gift or Hospitality in order to retain a commercial relationship or transaction. <input type="checkbox"/> Offer or receive Gift or Hospitality to influence a Government Official / Third Party in return for a business advantage <input type="checkbox"/> Incorrect/no record in books of accounts.
Controls	<ul style="list-style-type: none"> <input type="checkbox"/> Recurring awareness and training. <input type="checkbox"/> G&H registration, review, and approval. <input type="checkbox"/> Financial controls to ensure all transactions are recorded accurately in the books of accounts, including reconciliation of internal G&H registration with accounting records.

<p>Minimum requirements and standards</p>	<p>Under <u>no</u> circumstances, may a Gift or Hospitality be provided or received, directly or indirectly, in order to:</p> <ul style="list-style-type: none"> • Influence or prevent a government or private action, including, but not limited to, awarding a contract, imposing a tax or fine, or granting or cancelling a contract or contractual obligation; • Obtain a license, permit, or other authorization; • Obtain confidential information;
	<ul style="list-style-type: none"> • Influence any vote, whether government or private, relevant to, or the preparation or implementation of, any law, rule, or regulation; • Obtain or retain business; or secure undue business advantage. <p>Gifts and Hospitality must:</p> <ul style="list-style-type: none"> • Be connected to business and have a legitimate business purpose. be of reasonable/modest value relative to the location and circumstances in which given; • Be provided and received openly and transparently; • Follow applicable laws and relevant Company’s policies and procedures; • Be accounted for properly in the Company’s books and records; • Be fully documented and supported by receipts and corresponding paperwork, including, where possible, the names of each recipient of a Gift or each person in attendance during Hospitality; and • Be reconciled on a regular basis with Gifts and Hospitality expenses lodged in the relevant general ledger (GL) accounts to ensure completeness of both the register and GL expense recording (Reconciliation is required only for Gifts or Hospitality that are subject to registration). <p>Gifts and Hospitality must not:</p> <ul style="list-style-type: none"> • Be lavish or extravagant; • Violate the company policies of the recipient; • Be paid for with personal funds to circumvent this Policy. <p>For Guidelines on the Company Gift and Hospitality Procedure and approval limits see Appendix A.</p>

<p>2.</p>	<p>Social investments and Charitable Contributions</p>	<p>Commercial Sponsorships</p>
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<p>Summary:</p>	<p>The Company recognizes that it has social, economic, ethical, and environmental responsibilities to the communities where it does business and may provide Social Investments or Charitable Contributions in those communities. The Company must be certain that its activities—wherever made—are not an attempt to improperly influence for the benefit of any member of the Company or for any other improper purpose.</p> <p>See Appendix B for information that may be relevant for the Company to collect when considering whether to proceed with a Social Investment/Charitable</p>	<p>Commercial Sponsorships can be used to strengthen the Company brands but must not be seen as, or linked to, seeking or obtaining an improper advantage. All Commercial Sponsorships must be transparent, justifiable, fairly, and accurately recorded in the Company’s financial administration (i.e., books and records).</p> <p>See Appendix C for information that may be relevant for the Company to collect when considering whether to proceed with a Commercial Sponsorship.</p>
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	<p>Contribution</p>	
<p>Objectives</p>	<ul style="list-style-type: none"> • Compliance with anti-bribery and corruption laws applicable to the Company, and local laws of the countries of operation. • Establish best practices to prevent Bribery and Corruption across the Company. 	
<p>Risks</p>	<ul style="list-style-type: none"> • Insufficient awareness and knowledge of Social investments and Charitable Contributions. • Misuse/diversion of funds to personally benefit a Government Official or another party, which can create legal, compliance, financial and reputational risks. • Incorrect/falsification in books of accounts. <p>See Appendix B-1 for some examples of Red Flags.</p>	
<p>Controls</p>	<ul style="list-style-type: none"> • Ethics and Compliance detailed review of proposed projects, recipients and its shareholders, UBOs and management. • Recurring awareness and training. • Board approval for projects exceeding thresholds. 	

<p>Minimum requirements and standards</p>	<p>Each activity must be transparent, justifiable, fairly and accurately recorded in the Company's financial administration (i.e., books and records).</p> <p>Maintain appropriate, documented processes to review, risk assess, and approve requests and maintain a register that tracks all Social Investments/ Charitable Contributions and Commercial Sponsorships across the Company, along with all documentation and information associated with the compliance review and approval process.</p> <p>All projects require formal engagement, and must:</p> <ul style="list-style-type: none"> • Never be paid for in cash (i.e., physical currency); • Adhere to Code of Conduct, policies and procedures, strategy, and budget; • Be undertaken only after due diligence on all parties related to, and recipients of, a Commercial Sponsorship/ Charitable Contribution/ Social Investment, is performed as required by Third Party Risk Management Policy; • Be accurately and thoroughly documented, including with regard to due diligence and commercial benefits, and approved according to relevant procedures; • Be supported by a business proposal and purpose; and • Follow local laws and other legal requirements. <p>Conflicts of interest that arise in the consideration of a proposed project must be disclosed according to the Conflicts of Interest Policy.</p> <p>All proposed projects must be reviewed, assessed, and approved as per the following approval thresholds and guidelines:</p> <ul style="list-style-type: none"> • Chief Ethics and Compliance Officer Up to US\$ 100,000 • BRC / the Company Board US\$ 100,000 and exceeding
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	<p>If a <u>Government Official</u>, a <u>Closely Related Person</u>, or a <u>Politically Exposed Person</u> is the recipient and/or direct beneficiary, review by the BRC and approval from the Company Board is always required.</p> <p>Following/similar types of support, whether financial or in-kind, directly or indirectly, are prohibited under this Policy:</p> <ul style="list-style-type: none"> • To fraternal, faith-based, or religious organizations; • To political parties, organizations, or candidates; • That would improperly influence a Government Official, customer, or any other commercial partner; • To an organization that is subject to economic, trade, or financial sanctions or has engaged in or has the reputation for engaging in corrupt or unethical conduct; or • To a public-sector program where a Government Official or a Government Official’s Closely Related Person is the direct recipient. <p>See Appendix B-2 for the principles relevant to Social Investment or Charitable Contribution.</p>
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<p>3. Facilitation Payment and Duress</p>	
<p>Summary:</p>	<p>Facilitation payments:</p> <p>Facilitation payments are small payments that are made to speed up or facilitate the performance of a routine governmental action that involves non-discretionary acts to which the payer is legally or contractually entitled (e.g., to expedite utility connection) and are illegal in most countries. The Company prohibits the Company’s Personnel and Authorised Representatives from paying facilitation payments on behalf of any member of the Company, regardless of amount, and prohibits efforts to disguise or conceal facilitation payments as something else.</p> <p>Duress:</p> <p>Bribes occasionally are demanded when the target of the demand is under duress, which is actual or immediately threatened violence, imprisonment, or significant bodily injury. For the purposes of this Policy, economic coercion or extortion (i.e., threats to harm or slow business that will result in a financial loss) does not amount to duress.</p> <p>Although duress is extremely rare, the Company does not expect the Company’s Personnel or Authorised Representatives to compromise their personal physical safety or security or that of others if under duress. However, the Company requires a person placed under duress to promptly notify Ethics and Compliance of any duress incident so that appropriate action can be taken to protect the safety of the target and other the Company’s Personnel or Authorised Representatives and prevent a recurrence.</p>
<p>Objectives</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Compliance with anti-bribery and corruption laws applicable to the Company and local laws of the countries of operation. <input type="checkbox"/> Establish best practices to prevent Bribery and Corruption across the Company.

Risks	<ul style="list-style-type: none"> ☐ Insufficient awareness on facilitation payment or duress guidelines
	<ul style="list-style-type: none"> ☐ Offering facilitation payment to influence a Government Official or private party in return for a business advantage ☐ Expenses are not recorded in books of accounts accurately
Controls	<ul style="list-style-type: none"> ☐ Duress payments are classified “High Risk” in the books of accounts and relevant controls must be developed at the Company’s level ☐ Training/guidelines for the relevant stakeholders by the Company
Minimum requirements and standards	<ul style="list-style-type: none"> ☐ Facilitation or Duress payments are strictly prohibited unless employees’ safety is at risk which must be reviewed/approved by Ethics and Compliance ☐ Payments made under duress must be accurately recorded in the Company’s financial administration (i.e., books and records)

4. Knowing our Authorized Representative	
Summary:	<p>Because the Company can be held legally responsible, including criminally liable, for their acts, the Company needs to know and trust its Authorised Representatives. The Company requires its Authorised Representatives to comply with this Policy, other Company policies and procedures, and the Business Partner Code of Conduct. Before engaging an Authorised Representative, the Company’s Personnel must follow the Third Party Risk Management Policy.</p> <p>The Company’s Personnel who reasonably suspect that an Authorised Representative may violate or may have violated this Policy must promptly notify Ethics and Compliance. Refer to the “Where to go for help” section of this Policy for further information.</p>
Objectives	<ul style="list-style-type: none"> ☐ Compliance with anti-bribery and corruption laws applicable to the Company and local laws of the countries of operation. ☐ Establish best practices to prevent Bribery and Corruption across the Company.
Risks	<ul style="list-style-type: none"> ☐ Bribery or facilitation payment to influence a Government Official or private party in return for a business advantage for the Company. ☐ Authorized Representative is involved in corrupt practices or is on Red Flag Vendor/sanctions/restricted parties list. ☐ Expenses are not recorded in books of accounts accurately.
Controls	<ul style="list-style-type: none"> ☐ Delegation of authority, as applicable. ☐ Due diligence of third parties, authorized representatives or consultants as per the Third Party Risk Management Policy. ☐ Review of Conflict of interest disclosure forms. ☐ Periodic compliance risk assessment of targeted business partners, identifying and remediation gaps. ☐ Periodic training of High Risk business partners on Anti-Bribery and Corruption risks.

Minimum requirements and standards	<ul style="list-style-type: none"> □ Before engaging or signing the contract with the Authorised Representative or Business Partner, screening must be completed as per the Third Party Risk Management Policy. □ Please refer to the Company Contracting Framework, including the Procurement Process and Third Party Risk Management Policy for further details.
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5. Merger and Acquisition (M&A)
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Summary:	<p>In pursuing an acquisition, joint venture, or minority investment opportunities, the Company must follow relevant policies and procedures. In particular, review the target or potential partner to limit exposure to and liability for any historical misconduct, by conducting reasonable and appropriate pre-transaction due diligence and post-acquisition integration, as applicable.</p>
Objectives	<ul style="list-style-type: none"> □ Compliance with anti-bribery and corruption laws applicable to the Company and local laws of the countries of operation. □ Establish best practices to prevent Bribery and Corruption across the Company.
Risks	<ul style="list-style-type: none"> □ Engaging Advisors or consultants for M&A transaction without Compliance assessment. □ Targeted entity or its shareholders are involved in corrupt practices or are on sanctions/restricted parties lists. □ Red flags/adverse media information.
Controls	<p>Pre-Acquisition:</p> <ul style="list-style-type: none"> • Initial compliance assessment/ desktop search; • Legal and financial due diligence; • Enhanced/full scope compliance due diligence of targeted entity and its shareholders; • Transactions testing to identify any compliance and FCPA risks. <p>Post-Acquisition Integration:</p> <ul style="list-style-type: none"> • Establishment of a compliance management structure; • Implementation of compliance program and training of all employees (including management) of a newly acquired entity; • Periodic compliance risk assessment to identify any anti-bribery and corruption related risk.

<p>Minimum requirements and standards</p>	<ul style="list-style-type: none"> • Valuation, preliminary interaction, and analysis. • All counterparties (including the target entity, shareholders and senior management) are vetted through an appropriate third-party sanctions /restricted parties screening tool. • Conduct initial high-level due diligence to identify past or ongoing anti-corruption issues. To the extent possible, given the risk profile of the M&A Transaction. • Screening of target and its shareholders against sanctions/restricted parties lists and Company's Red Flag Vendor List. • Based on findings of initial due diligence, deal structure and risk profile, provide the M&A Lead with a summary of the preliminary compliance findings and related risks so that they can be considered appropriately by M&A Lead and the Transaction Sponsor before any decision is taken to proceed to the next phase. • After assessment of the preliminary findings, the M&A Lead, in alignment with the Compliance Lead, may determine that additional pre-term sheet due diligence be conducted to obtain more information on any high-risk areas prior to proceeding with a nonbinding term sheet. • Enhanced due diligence by independent due diligence provider. • Tailored “Compliance Due Diligence Questionnaire for Acquisitions” with respect to target and its shareholders and related document/information requests. • Interviews with shareholders and beneficial owners, if required.
	<ul style="list-style-type: none"> • M&A Transaction review by BRC and approval by the Company Board, Supervisory Board. <p>For complete details, please refer to Mergers, Acquisitions, Investment and Divestitures Policy.</p>

To promote adherence to this Policy and to provide assurance regarding the Policy requirements, each the Company will maintain controls appropriate and relevant to its business and operations. The Company regularly will review, test, and modify related controls to ensure continued effectiveness and report testing results and deficiencies to its BRC. Periodic self-assessment for compliance of this Policy will be ensured through the Company’s Monitoring and Testing Framework.

Accurate books and records

The Company is required by applicable laws, including the FCPA, to keep accurate books and records that correctly reflect all transactions and do not contain any false or misleading entries.

All transactions must be recorded completely and accurately so that the purpose and amount of a payment is clear. Undisclosed or unrecorded funds or assets of the company may not be established for any purpose. False, misleading, or artificial entries must never be made in the books and records of the Company for any reason.

V. Assurance

- Management self-assessment and management certification;
- Ethics and Compliance work plan activities, including annual compliance risk assessment, Monitoring and Testing, and ad-hoc Business Partner audits; □ Internal Audits.

VI. Management certification

As part of the Management Certification process, certain representations will be required from the Company’s management. Representations with respect to compliance with the requirements of this Policy will be included in the Management Certification.

VII. Where to go for help

Any questions about this Policy or about a conflict of interest should be referred, in the first instance, to your supervisor, relevant department head or the Ethics and Compliance team or the Policy owner.

If you believe that someone may have violated this Policy, please contact your Ethics and Compliance team at speakup@kyivstar.ua, or submit a report about the violation at www.kyivstar.ua/speakup . For more information about reporting violations please refer to Speak Up: Raising Concerns and Non-Retaliation Policy. The Company does not tolerate any form of retaliation, harassment, or intimidation of any person who has reported an alleged violation in good faith.

The Company will investigate the alleged misconduct in relation to this Policy in accordance with Investigations Management Policy and Investigations Procedures. Any member of the Company’s Personnel who violates this Policy may be subject to disciplinary measures, up to and including termination of employment.

VIII. Reference Documents

The following related documents provide additional rules, guidance and procedures:

Title	
Business Partner Code of Conduct	Sets out rules of ethical conduct the Company requires of its Business Partners and their affiliates.
Government Relations Policy	Contains rules and guidance for the Company’s Personnel interactions with Government Entities or Government Officials.
Code of Conduct	Provides the foundation for all policies and is “a statement of legal and ethical standards that define what the Company expects of its operations and people regardless of location or background and that we live by wherever we operate.”

This Policy and other policies, procedures and guidelines can be found on the Company’s intranet.

IX. Document History

Effective Date	Revision	Reason/Description
December 02, 2025	1.0	New

APPENDIX A: Gift and Hospitality Procedure and Guidelines

Company must maintain a local G&H Procedure that sets forth a process to fulfil the requirements of this Policy. The procedure will establish the minimum information necessary to assess and process each request. The sample approval request form is attached in **Appendix A-2**. The Company's G&H procedure(s) will include:

- Maximum value of a Gift or Hospitality that may be provided to or received from a Government Official without (prior) approval from the Ethics and Compliance team may not exceed the local equivalent of US\$50 per recipient.
- Maximum value of a Gift or Hospitality that may be provided to or received from a non-Government Official (e.g., commercial partner, supplier, customer, etc.) without (prior) approval from the Ethics and Compliance team may not exceed the local equivalent of US\$150 per recipient.
- Maximum number of times (i.e., frequency) that a Gift or Hospitality may be given to or received from the same individual, whether or not a Government Official, without first obtaining approval from the Ethics and Compliance team. The frequency threshold may not exceed 10 occurrences in one calendar year. (Not applicable to those G&H for which registration is not required. The Company to have local guidelines for such G&H i.e. up to USD\$50 for Government and up to USD\$150 for nongovernment.)

For all Gifts or Hospitality where approval is required, it is expected to be obtained **before** the Gift/Hospitality exchange, whenever possible. Failure to obtain prior approval does not relieve the Gift/Hospitality giver/receiver of responsibility for obtaining approval after-the-fact.

For purposes of the above thresholds, the local procedure may omit (i.e., not require registration of) Gifts or Hospitality valued at US\$50 or less.¹

Ethics and Compliance team has the authority to approve a G&H up to a maximum value of US\$5,000 per recipient, exceeding which the same must first be presented to the local Business Risk Committee (BRC) and subsequently approved by the Company's Board.

In the event that Chief Ethics and Compliance Officer rejects a request, the requesting party must follow the instructions, which may include returning a Gift received. **Appendix A-3** is a sample letter that may be used to return a Gift or decline to accept Hospitality. Chief Ethics and Compliance Officer will retain a copy of each letter or other communication accompanying a Gift return.

If Chief Ethics and Compliance Officer observes that the Company's Personnel is receiving or giving frequent Gifts or Hospitality involving the same party, it is within the discretion of that Chief Ethics and Compliance Officer to refuse to approve giving or receiving further Gifts or Hospitality involving that party.

Each the Company must maintain a Gifts and Hospitality register to include the following:

¹ It is not intended that this Policy prohibit or create an unnecessary administrative burden for low-value, low-risk exchanges, e.g., a meeting over a cup of coffee, swag received from a (prospective) vendor, etc.

- Information about the Company's Personnel (name, contact information) who will give or receive the Gift or Hospitality.
- Information about the recipient or giver (name, employer, contact information), including whether the recipient or giver is a Government Official.
- Description of the nature of the Gift or Hospitality, including:
 - full description of Gift or Hospitality;
 - value per person, in USD (or local equivalent);
 - whether it is a Gift or Hospitality;
 - whether it is given or received.
- Whether the Gift or Hospitality was approved or rejected.

See **Appendix A-4** for exemptions from related reporting, approval, and registration requirements to this Policy.

APPENDIX A-1: SAMPLE LETTER TO AUTHORISED REPRESENTATIVE OUTLINING THE COMPANY’S GIFTS ANF HOSPITALITY PRINCIPLES

Dear [Authorized Representative’s name],

We would like to extend our warmest appreciation for your support for, and cooperation with, the Company.

As a valued member of the Company’s Community, we expect you to be part of our efforts to promote transparency and integrity and as such, to follow the Company's Gifts and Hospitality principles:

The giving or receiving of any Gift or Hospitality must comply with **each** of the following principles:

<p>1. Improper influence</p>	<p>Under <u>no</u> circumstances may a Gift or Hospitality be provided or received, directly or indirectly, in order to:</p> <ul style="list-style-type: none"> • Influence or prevent a governmental or private action, such as awarding a contract, imposing a tax or fine, or granting or cancelling a contract or contractual obligation; • Obtain a license, permit, or other authorization; • Obtain confidential information; • Influence any vote, whether government or private, relevant to, or the preparation or implementation of, any law, rule, or regulation; • Obtain or retain business; or • Secure any other business advantage.
<p>2. Legitimate business purpose</p>	<p>Gifts and Hospitality must</p> <ul style="list-style-type: none"> • Be connected to business and have a legitimate business purpose. If you are expecting something in return, it may not be legitimate.
<p>3. Reasonable in value</p>	<p>Gifts and Hospitality must</p> <ul style="list-style-type: none"> • Not be lavish or extravagant; • Be of reasonable/modest value relative to the location and circumstances in which given; and • If a Gift is given, to the extent reasonable and practical, be branded to reflect a brand within the Company.
<p>4. On an infrequent basis</p>	<p>Gifts and Hospitality must not be</p> <ul style="list-style-type: none"> • Provided or received on a frequent basis.
<p>5. Respectful and in good faith</p>	<p>Gifts and Hospitality must not</p> <ul style="list-style-type: none"> • Reflect negatively on the Company’s reputation or otherwise be inconsistent with the Company's values.

6. Transparent, open, and compliant	Gifts and Hospitality must <ul style="list-style-type: none"> • Be provided and received openly and transparently; • Follow applicable laws and relevant Company’s policies and procedures; • Not violate the company policies of the recipient; • Never include cash or a cash equivalent; and • Not be paid for with personal funds to circumvent this Policy.
7. Accounted for properly	Gifts and Hospitality must be <ul style="list-style-type: none"> • Accounted for properly in the Company’s books and records; • Fully documented and supported by receipts and corresponding paperwork, including—where possible—the names of each recipient of a Gift or each person in attendance during Hospitality; and • Reconciled on a regular basis with Gifts and Hospitality expenses lodged in the relevant general ledger (GL) accounts to ensure completeness of both the register and GL expense recording.

If you have any inquiries regarding the scope and applicability of these principles, we ask that you contact the Company’s Ethics and Compliance Office speakup@kyivstar.ua .

Thank you for your help.
Yours sincerely,

[Name of the manager sending the letter]

APPENDIX A-2: SAMPLE GIFTS AND HOSPITALITY REQUEST FORM

To be completed by requesting the Company's Personnel

1.	Requestor's Name, Title, and Contact Information:	
2.	Requestor's Manager Name and Contact Information:	
3.	A detailed description of proposed or received Gift or Hospitality, including the date when the Gift or Hospitality is to be received or provided:	
4.	Name, title/position, company/organization of all individuals to receive Gift and Hospitality. Include the names of all who will be attending from the Company and the other side if Hospitality:	
5.	Is the proposed recipient or provider a Government Official or closely related to a Government Official or the Company's Personnel? If so, explain title, role, and any connection to the Company's business:	
6.	Location of requesting person and of proposed Gift or Hospitality, if different:	
7.	Value (specific per person expense(s) to be incurred):	
8.	Business purpose for proposed Gift or Hospitality:	
9.	List any pending or upcoming bid, tender or procurement activity associated with recipient that you are aware of:	
10.	The Company's relationship with the proposed recipients, including any pending business (e.g., pending license application before a government agency, current agent, prospective customer, etc.) or existing contractual obligations (e.g., required site visit) that you are aware of:	
11.	Anticipated method of payment of Gift or Hospitality to be provided (e.g., credit card, wire transfer, etc.):	

12	If a proposed recipient received Gift or Hospitality from the requesting Company Personnel over the last 12 months, describe that	
	Gift or Hospitality, including dates, locations, and costs:	
13	If the Gift or Hospitality has been proposed or requested by an outside party, state how and by whom (i.e., name, title/position, and company/organization):	
14	State any other relevant facts and attach any relevant documentation, event agenda, image (of Gifts), etc.	
Requested by (information about the Company's Personnel):		
Name:	Job Title:	Signature:
To be completed by relevant Ethics and Compliance Department / manager:		
	Approved <input type="checkbox"/>	Not approved <input type="checkbox"/>
Reason:		
Name:	Job Title:	Signature:

APPENDIX A-3: SAMPLE LETTERS FOR DECLINING HOSPITALITY / RETURNING GIFTS**A. Declining an Invitation**

Dear [recipient's name here]

Thank you for your kind invitation to [insert event name here]. We very much appreciate working with you. You are a valued [customer, client, contact, supplier etc.]. However, the Company has a policy on gifts and hospitality which does not allow me to accept your kind hospitality in this instance so [I]/[we] cannot accept your invitation.

[I]/[We] trust you will understand our position and I look forward to working with you in the future.

Sincerely,
[your name]

B. Returning a Gift

Dear [recipient's name here]

Thank you for your kind gift. [I]/[we] very much appreciate working with you. You are a valued [customer, client, contact, supplier etc.]. However, the Company has a policy on gifts and hospitality which does not allow me to accept gifts of this value/under these circumstances. [I]/[we] must therefore return your kind gift, which is enclosed.

[I]/[We] trust you will understand our position and I look forward to working with you in the future.

Sincerely,
[your name]

APPENDIX A-4: Exemptions from Reporting, Approval, and Registration

The following are exempted from reporting, approval, and registration requirements of this Policy:

- Offerings that are properly documented, approved (by relevant function), and implemented in accordance with Free or Discounted Services procedures and processes. However, this must be accurately recorded in the Company's financial administration (i.e., books and records) as applicable.
- Free services provided under an arm's length written contract, provided for a limited trial period in preparation for a possible contract under a local product policy or commercialization plan, or provided

to any external party as required by law or regulation for technical testing purposes, provided they have proper commercial justification.

- Legitimate promotion, demonstration, marketing, and brand-building campaigns that include giving Gifts or Hospitality to customers, suppliers, or others (collectively promotional Gifts or Hospitality). Bulk approvals are permitted. The Company should reflect in their local processes how to manage when promotional Gifts and Hospitality may be given to a mix of Government Officials and nongovernment persons.
- Anything of Value explicitly provided for in a written contract, that complies with the principles of this Policy, including published and approved loyalty programs, push activation campaigns, commercial programs, and incentive programs with distributors and other commercial partners to reward individual performance against sales targets.
- Anything of Value provided under a written agreement that complies with this Policy to provide reasonable compensation to customers for interruptions of service, mistakes, or other service issues.

APPENDIX B: Sample set of data that may be relevant for the Company to collect when considering whether to proceed with a Commercial Sponsorship

To be completed by requesting party:

Commercial Sponsorship

1	A detailed description of the Project, including the date and location of the event, the nature of the support.	
2	Project budget (UAH)	
3	Full name of the Recipient, registration number.	
4	Is the Recipient in any way connected or affiliated with a person/company with which any VEON company does business?	
5	Is the Project repetitive in nature? What Projects have been implemented with this Recipient in the last 3 years?	
6	How did the request for the Project originate? Did someone request or suggest the Project or Recipient? Is there a written request or proposal for this Project from the Recipient?	
7	Does the legislation allow the implementation of the proposed Project?	
8	Is the Project in line with the Company's predefined strategy and has an allocated budget?	
9.A	Provide business justification for the Commercial Sponsorship. Describe how this project fits into the Company's operating model, how the Company will benefit from the Commercial Sponsorship, and how such benefits can be measured.	
10	Will support and payments under the Project be provided directly to the Recipient?	
11	List all additional parties (e.g. intermediaries, suppliers, end-users etc.) that will be involved in the Project, indicate their role, services to be provided by such parties.	

12	Who from the Company plans to attend the event? Who from the Company's employees will be involved in the Project implementation?	
13	Indicate the Recipient's representative who can be contacted regarding this Project (name, position, phone number and email).	
14	Is the Company negotiating any other transaction, contract, etc. with any person or organization related to the Project?	
15	Is the Recipient (or the beneficiary) related to a Government Official or his/her close relative?	
16	Will the Government Official or his/her close relative personally benefit from the Project?	
17	Please provide any additional information related to this Project.	
18	Are you subject to any pressure from any persons to persuade you to support or implement this Project?	
19	Is this Project and its implementation a part of any side-agreement or arrangement with central or local authorities or any other third parties, whether individual or legal entities?	

APPENDIX B-1: Sample Social Investment, Charitable Contribution, and Commercial Sponsorship Red Flags

With any Social Investment, Charitable Contribution, or Commercial Sponsorship, there is a risk that funds may be misused or diverted improperly to personally benefit a Government Official or another party, which can create reputational, legal, and financial harm to the Company. There are certain situations that can suggest a risk of diversion, for which greater scrutiny of the Social Investment, Charitable Contribution, or Commercial Sponsorship request is warranted. Any risks associated with identified red flags must be eliminated or sufficiently mitigated before proceeding with a Social Investment, Charitable Contribution, or Commercial Sponsorship. **Red flags must be considered “material” for purposes of the Group Authority Matrix, and the associated request, therefore, presented to the BRC.** Examples of red flags include, but are not limited to:

- The Company currently has a business relationship or negotiations or applications pending with the entity (or a principal thereof) that requests the Social Investment, Charitable Contribution, or Commercial Sponsorship or that will be the beneficiary of the Social Investment, Charitable Contribution, or Commercial Sponsorship.
- Requests are made by a Government Official whose responsibilities may affect the Company
- Requests are made by a Government Official or a Closely-Related Person who has business relationships with the Company, such as joint venture arrangements or partnerships.
- The request is on an unjustifiably expedited basis.
- It is suggested that Social Investment, Charitable Contribution, or Commercial Sponsorship is necessary to win or retain business or receive any other business benefit (such as regulatory approval or change).

- A specific third party is suggested or required to participate in Social Investment, Charitable Contribution, or Commercial Sponsorship.
- The request is made orally, and the recipient does not want to issue a written request.
- There is no paper trail for Social Investment, Charitable Contribution, or Commercial Sponsorship.
- There is no, or limited, transparency into how the Social Investment, Charitable Contribution, or Commercial Sponsorship will be used.
- Cash (actual currency) contributions are requested.
- Payment is requested to be made to two or more accounts or any off-shore accounts (especially if unrelated to the apparent beneficiary).
- Social Investment, Charitable Contribution, or Commercial Sponsorship seems unrelated to the Company’s business or corporate citizenship or marketing strategies.
- Social Investment, Charitable Contribution, or Commercial Sponsorship is poorly defined or unduly vague (e.g., "improve lives of children").
- The recipient is unwilling to enter a formal agreement when required by this Policy or a local process.
- There is a conflict of interest.

APPENDIX B-2: Principles relevant to Social Investment or Charitable Contribution

To be permitted, an activity must satisfy the following principles relevant to its type — Social Investment or Charitable Contribution criteria/requirements:

Type	Criteria	Additional Requirements
Social Investment	Any Social Investment by or on behalf of a Company must be for a business cause/justification. The Company to devise their local strategy keeping in view their respective corporate citizenship program.	<ol style="list-style-type: none"> 1. Made directly to the ultimate beneficiary and not through a third party; 2. Whenever possible and appropriate, delivered through in-kind services (e.g., free airtime or devices), rather than financial contributions); 3. Winners of competitions or giveaways must be objective, open, and transparent and must not create the perception of impropriety; 4. Must have a signed contract setting forth measurable outcomes; and 5. Subjected to due diligence and screening in conjunction with relevant policies and procedures.

<p>Charitable Contribution</p>	<p>Charitable Contributions are determined on a case-by-case basis following applicable governance processes, approved by the Company, and must:</p> <ul style="list-style-type: none"> • Be to a legally established non- or inter-governmental (e.g., United Nations) or not-for-profit organization or institution; and • Be in response to a significant emergency, such as a natural disaster, humanitarian crisis, or other largescale event. 	<ol style="list-style-type: none"> 1. Made in favor of organizations with legitimate humanitarian, charitable, or disaster-relief status with a reputation for honesty and fair dealing; and 2. Subjected to due diligence in conjunction with relevant policies and procedures.
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Ethics and Compliance Department / manager should also consider close personal relationships a Government Official may have with a recipient and mitigate or eliminate any red flags those relationships may present. Effective due diligence and good judgment are required.

APPENDIX C: Sample set of data that may be relevant for the Company to collect when considering whether to proceed with a Social Investment/Charitable Contribution

To be completed by requesting party:

Social Investment/Charitable Contribution

1	A detailed description of the Project, including the date and location of the event, the nature of the support.	
2	Project budget (UAH)	
3	Full name of the Recipient, registration number.	
4	Is the Recipient in any way connected or affiliated with a person/company with which any VEON company does business?	
5	Is the Project repetitive in nature? What Projects have been implemented with this Recipient in the last 3 years?	
6	How did the request for the Project originate? Did someone request or suggest the Project or Recipient? Is there a written request or proposal for this Project from the Recipient?	
7	Does the legislation allow the implementation of the proposed Project?	
8	Is the Project in line with the Company's predefined strategy and has an allocated budget?	
9	Please describe how the CSR Project or Charity Project is in line with the Company's corporate responsibility strategy. Describe what long-term benefits the Company will receive from the CSR Project or Charity Project, including how such benefits can be measured.	
10	Will support and payments under the Project be provided directly to the Recipient?	

11	List all additional parties (e.g. intermediaries, suppliers, end-users etc.) that will be involved in the Project, indicate their role, services to be provided by such parties.	
12	Who from the Company plans to attend the event? Who from the Company's employees will be involved in the Project implementation?	
13	Indicate the Recipient's representative who can be contacted regarding this Project (name, position, phone number and email).	
14	Is the Company negotiating any other transaction, contract, etc. with any person or organization related to the Project?	
15	Is the Recipient (or the beneficiary) related to a Government Official or his/her close relative?	
16	Will the Government Official or his/her close relative personally benefit from the Project?	
17	Please provide any additional information related to this Project.	
18	Are you subject to any pressure from any persons to persuade you to support or implement this Project?	
19	Is this Project and its implementation a part of any side-agreement or arrangement with central or local authorities or any other third parties, whether individual or legal entities?	

APPENDIX D: Definitions

Anything of Value	Anything (whether tangible or intangible) that has value to the recipient and may include, but is not limited to: money; transfers of stock, bonds or any other property; payment of expenses; provision of services of any type; Gifts; travel (for parties who are not the Company’s Personnel); Hospitality; employment; the forgiveness of debt; use of desirable telephone numbers (so-called “Golden Numbers”); job offers and internships, including those for family members; donations to designated charities; any other transfer of goods, services, or tangibles or intangibles that benefit the recipient. There is no minimum amount that must be exceeded before a thing of value can be illegal under the applicable anti-bribery laws, and offers and promises are treated as if delivered, whether or not successful.
Authorised Representative	Any agent who is not an employee of or the Company or any other third party properly authorized, instructed, or contracted to act for or on behalf of or the Company, whether for the Company as a whole or for one or more businesses in the Company. Where the Company’s Personnel have an obligation in this Policy, that obligation applies equally to an Authorized Representative.
Bribery	Giving, promising, authorising, or accepting Anything of Value for the purpose of improperly influencing the recipient to act or fail to act or where it would be improper for the recipient to accept the benefit.

Charitable Contribution	Donation (whether monetary or in-kind) for humanitarian or disaster relief purposes without expectation of return under circumstances set forth in this Policy.
Closely Related Person	A parent, spouse, romantic partner, sibling, or child (whether by blood, marriage, or adoption).
Commercial Sponsorship	Financial or in-kind backing of high-profile events, activities, or organizations in return for corporate promotion, advertising space, or other publicity or commercial exchange to market or promote the Company brands, products, services, or reputation, to increase sales, or to encourage customer loyalty (e.g., trade shows, conferences, sporting or charity events, etc.).
Corruption	Dishonesty, lack of integrity, or abuse of power or position for personal gain or a company's business advantage.
Free or Discounted Devices	Equipment and devices which price and/or discount are beyond established pricing policy, provided free of charge or at non-market price without appropriate business justification.
Free or Discounted Services	Services which price and/or discount are beyond established pricing policy, provided free of charge or at non-market price without appropriate business justification (includes unique, rare or desirable (e.g., numbers that are easy to remember, the equivalent of a brand name, repeated digits, or in sequence.; also referred to as " <i>Golden Numbers</i> " or " <i>Beautiful Numbers</i> ").).
Gift	Any tangible thing of value given or received for free or at a reduced (nonmarket) cost.
Government Entity	Any agency, instrumentality, subdivision, department, or other body of any federal, regional, or municipal government or regulatory body; any commercial or similar entity that the government majority-owns, has a material interest in, or otherwise controls, including any state-owned or state-operated companies or enterprises, including state hospitals, orphanages, universities and schools; public international organizations such as the United Nations or the World Bank; and any political party.
Government Official	An employee or any other person acting in an official capacity or exercising a government or regulatory function, or candidate for such position, regardless of rank, of any Government Entity.
Government-Related Entity	Any company or organisation owned or controlled by a Government Official or by an individual who is the Closely Related Person of a Government Official.

Hospitality	<p>Any intangible thing of value given or received for free or at a reduced (nonmarket) cost, including:</p> <ul style="list-style-type: none"> • Meals, including receptions, lunches, dinners, and refreshments; • All forms of entertainment, such as invitations to sporting events, theatre, cultural events, or Company-sponsored events (when given outside the Company), including those for which physical/tangible tickets are provided; and • Externally paid for attendance to professional events, such as conferences, tradeshows, training, etc., including any related travel and accommodation expenses.
Politically Exposed Person	<p>A politically exposed person is one who has been entrusted with a prominent public function, generally presents a higher risk for potential involvement in bribery and corruption by virtue of their position and the influence that they may hold.</p>
Social Investment	<p>An investment (whether monetary or in-kind) made by the Company that seeks to promote social good in line with the relevant Company's strategy.</p>
Company	<p>The Company includes the Kyivstar Group Limited and any operating company or joint venture that is directly or indirectly majority-owned (more than 50 % stake) or otherwise fully controlled by the Kyivstar Group Limited.</p>
Company's Personnel	<p>Any director, officer, employee, contractor/consultant, temporary employee, or secondee of any the Company.</p>