

KYIVSTAR GROUP LTD.

Business Partner Code of Conduct

Effective Date: December 2, 2025

This Business Partner Code of Conduct (the “Code”) establishes basic requirements and responsibilities for each Business Partner of the Company.

For purposes of this Code of Conduct, the “Company” refers to Kyivstar Group Ltd., the ultimate group parent company, as well as each of its majority-owned or controlled subsidiaries, joint ventures or other entities under its control. We also expect all people with whom we engage, including agents, representatives, intermediaries or other third parties authorized to act for or on behalf of the Company, as well as joint ventures where the Company does not have a controlling interest, to respect and abide by comparable standards of conduct.

The Company reserves the right to modify this Code from time to time.

The Company is committed to building a best-in-class supply chain and requires business partners (including but not limited to vendors, suppliers, agents, contractors, consultants, intermediaries, resellers, distributors, third party service providers) (“**Business Partners**”) to reduce risk to our business by following all applicable laws, observing the highest ethical standards, and meeting or exceeding the requirements established in this Code.

We know that working sustainably, respecting human rights, and operating with the highest standards of ethical conduct and professional integrity improve long-term business performance. We are committed to these principles and require our Business Partners to share our commitment and to comply with this Code, which has been developed considering best practices in the information and communications technologies sector, the Electronic Industry Citizen Coalition Code of Conduct, the Joint Audit Cooperation Supply Chain Sustainability Guidelines, International Labor Organization conventions, and legal and regulatory requirements.

1. Compliance with Law

The Company complies with applicable laws and **requires** its Business Partners to do the same, including anti-bribery and corruption laws of the United States, where the Company is listed on the Nasdaq Stock Market LLC, of Bermuda, where the Company is incorporated, and of the United Arab Emirates, where Company is headquartered. Neither we nor our Business Partners will undertake any activity or accept any risk that would result in unethical outcomes or a violation of applicable laws.

Where the applicable laws and this Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest applicable standard that complies with local laws will apply.

2. Bribery and Corruption

The Company will not tolerate any form of corruption or bribery and strictly prohibits kickbacks, fraud, theft, extortion, or embezzlement of any kind. Each Business Partner of the Company must comply with all applicable anti-bribery and corruption laws and maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Neither money nor anything of value may be given, offered, requested, promised, or accepted by any Business Partner, directly or indirectly through another party, to gain an improper advantage in relation to the Company.

Business Partners are expected to maintain their own anti-bribery and corruption compliance program to prevent and deter wrongdoing or possible violations of law within their own businesses.

3. Gifts and Hospitality

Business Partners will not, directly or indirectly, offer gifts, hospitality, or other benefits to the Company's employees or representatives with the intent to improperly influence them and will not offer to the Company's employees any gifts or hospitality, regardless of value, during contract negotiation, bidding, tender, or award.

4. Ethical Conduct

Ethical conduct requires that we do what is right, not just follow the law. The Company operates on ethical principles and expects its Business Partners to operate likewise – with us and in any way related to our business. Simply stated: integrity and honesty matter.

The specific requirements set out in the Code are the minimum standards for our Business Partners. We encourage our Business Partners to go beyond these standards, particularly where local laws and regulations are either weak or seldom enforced.

A Business Partner that fails to adhere to the standards of this Code may not be viewed favorably when awarding further work and may be terminated from some or all business relations.

5. Due Diligence Process

The Company conducts appropriate, risk-based due diligence when selecting Business Partners. Business Partners must undergo and successfully complete anti-bribery due diligence prior to engagement, and are required to cooperate with the Company's due diligence process. Business Partners must accurately complete all questionnaires, provide requested documentation and transparently disclose information related to ownership and affiliated parties.

6. Confidentiality and Data Security

Business Partners are expected to:

- keep confidential any information relating to the Company customers, business activities, contracts, projects, financial situation, or performance unless specific written permission is obtained from the Company;
- protect the reasonable privacy expectations of persons with whom they do business;
- comply with privacy and information security laws and regulatory requirements when personal information is collected, processed, and transmitted;
- ensure customer data is kept secure and customer privacy is not breached;
- maintain appropriate data protection systems; and
- supervise appropriately their employees who interact with the Company's data and customer data.

7. Anti-Competitive Behavior

Business Partners will not violate or conspire to be part of any violation of competition laws or antitrust regulations. Business Partners will uphold fair business, advertising, and competition standards.

8. Conflicts of Interest

A "Conflict of Interest" occurs when a personal interest of a Business Partner (or someone closely related to a Business Partner) conflicts with an interest of the Company. Conflicts of interest can be

actual (the conflict exists), potential (a situation exists or is foreseeable in which a Conflict of Interest might arise), or apparent (there is no actual conflict, but a reasonable observer might believe one exists). Business Partners should avoid conflicts of interest that may affect the Company's business relationship. When a conflict of interest cannot be avoided, the Business Partner must report it to the Company employee sponsor or to the Company's Ethics and Compliance team.

9. Intellectual Property

Business Partners will respect the Company's intellectual property rights and will transfer technology in a manner that protects intellectual property rights.

10. Money Laundering

Business Partners will firmly oppose all forms of money laundering and take steps to prevent financial transactions from being used to launder money.

11. Prohibition on Oral Contracts

The Company prohibits oral contracts with Business Partners. Prior to commencing work, the Company and its Business Partners must agree in writing on the terms and conditions of each transaction or engagement.

12. International Trade and Economic Sanctions

Business Partners will abide by applicable international trade (including import and export/reexport controls) and economic sanctions laws and regulations. Business Partners will not do business with parties or in jurisdictions where applicable laws or regulations prohibit it.

13. Human and Labor Rights

Business Partners will respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. Business Partners will

- treat people with dignity and respect, without mental or physical cruelty or any form of harassment or intimidation;
- not use any form of forced labor, debt bondage, or involuntary or compulsory labour;
- not require employees to surrender any government-issued identification, passports, or work permits as a condition of employment;
- ensure the work relationship between the worker and Business Partners is freely chosen and free from threats, intimidation, or coercion;
- not use child labor¹;
- promote open and honest engagement between employees and management without fear of retaliation or reprisal and recognize, as far as legally possible, the right of free association of employees;
- refrain from acquiring any products or services that, within the supply chain, involve human trafficking or slavery or human rights violations.

14. Non-Discrimination

In hiring or employment practices, Business Partners will not discriminate against any legally protected class, for instance, on the basis of age, race, color, ethnicity, indigenous status, nationality, gender,

¹ Where the applicable laws do not establish the minimum legal age for employment, "child" means anyone younger than 15 years of age.

gender identity or expression, sexual orientation, disability, pregnancy, medical condition, religion, social origin or status, political affiliation, trade or union membership, or marital or veteran status.

15. Employment Conditions

Business Partners will clearly and fairly define the terms and conditions of staff employment and provide fair remuneration at the applicable national statutory minimum wage and comply with the maximum number of working hours, following applicable laws.

16. Health and Safety

Business Partners will provide on their premises a healthy and safe working environment following international best practices and applicable law and regulation, including sanitation and hygiene facilities for workers. All work-related fatalities and incidents resulting in near fatal injury that occur on the Company premises or in relation to activities being carried out specifically for the Company must be reported.

17. Accident and Emergency Readiness

Business Partners will prepare for and respond to accidents, health problems, and foreseeable emergencies. Business Partners will also record, investigate, and learn from past accidents and emergencies.

18. Environment and Pollution Prevention

Business Partners will act in accordance with applicable standards regarding environmental protection and will adhere to applicable environmental laws to ensure responsible practices. In countries where legislation is less developed or unenforced, Business Partners will strive to minimize environmental impact. Innovative developments in products and services that offer environmental and social benefits and the use of environmentally friendly technologies should be supported. Business Partners will work to remedy any activity that adversely affects human life, wildlife, and the environment.

19. Annual Corporate Responsibility

The Company reserves the right to report publicly on the implementation of this Code through its annual Corporate Responsibility Report. Reporting will not identify individual Business Partners, and any case studies will be anonymized so that the identities of Business Partners cannot be determined unless previously agreed upon.

20. Reporting

Business Partners are required to promptly report any suspected or known violations to this Code. If you have questions about this Code or believe that someone may have violated it, please contact the Company's Ethics and Compliance department at speakup@kyivstar.ua. Alternatively, you may submit a concern at www.kyivstar.ua/speakup. All reports are duly reviewed and, if appropriate, investigated. The Company will not tolerate retaliation against any person who is trying to do the right thing by raising a concern. A person who makes a good faith report about potential misconduct and experiences retaliation or other adverse action for raising a concern should report this immediately via the channels identified above.