



Code of Conduct Kyivstar Group



Introduction

Our strength is our people.

This Code of Conduct (“Code”) sets forth the framework and principles in key areas, including our zero tolerance for bribery or corruption, to help us achieve this together and drive our values.

Our Values

Customer-obsessed:

listen, learn and grow

Entrepreneurial:

agility to seize opportunities and turn possibilities into new realities

Innovative:

relentless pursuit of the next ultimate customer experience

Collaborative:

work as a team, learn from failures to create value with success

Truthful:

firmly uphold integrity and the highest ethical standards

To Whom Does This Code Apply?

This Code applies to all employees (including temporary employees and contractors), directors, officers and board members at Kyivstar Group Ltd. For purposes of this Code of Conduct, “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.

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OUR PEOPLE

When It Comes to Our People

Our strength is our people. **We respect the rights and dignity of everyone and believe that diversity is part of our competitive advantage.** The Company maintains, at all times, an environment of respect, mutual trust, collaboration and open communication.

Diversity and Inclusion

The Company promotes diversity, respect, inclusivity and equal employment opportunities for all. **We foster environments that are safe and professional and do not tolerate any form of abuse or harassment.**

We follow all applicable employment laws wherever we operate and make sure our decisions regarding recruitment, selection, development and advancement are based on merit, qualifications, skills, achievements and potential.

We respect fundamental human rights and do not allow factors such as race, religion, gender, age, national origin, sexual orientation, marital status or disability to influence our judgment.

Harassment

The Company does not tolerate any inappropriate conduct or behavior that is humiliating, intimidating or hostile or that unreasonably interferes with work performance.

We expect our people to treat others with respect and avoid situations that may be perceived as inappropriate. As examples, the Company prohibits conduct such as:

- offensive or abusive language;
- sexually explicit or derogatory comments or images;
- unwelcome sexual advances;
- lewd or offensive gestures or jokes;
- intimidating or threatening behavior; and
- dangerous, abusive or violent behavior or the threat of such behavior.

You may always contact Ethics & Compliance team (speakup@kyivstar.ua) or use the Ethics & Compliance SpeakUp Line www.kyivstar.ua/speakup to report a concern.

Healthy and Safe Work Environment

The Company provides a safe and secure workplace and builds awareness of potential safety risks and how they should be managed. We avoid unsafe actions and help ensure our own safety and the safety of others.

We strictly prohibit the sale, possession, distribution or use of illegal substances and the misuse of prescription medications in our workplaces. You may not work while under the influence of drugs, alcohol or other substances in a manner that impairs your ability to perform safely and effectively or in a manner that would cause embarrassment or harm to the Company.

Should you find yourself in a situation where you have a safety concern or feel that you, or a colleague, needs assistance, reach out to your line-manager or your Human Resources team. We are here to help and support you, and we respect privacy.

We follow local environmental legislation and strive to reduce environmental and health impacts of our operations through responsible use of natural resources and reducing waste and emissions.



Personal Relationships

Consistent with its respect for privacy, **the Company normally does not take an interest in personal relationships, so long as those relationships do not adversely affect job performance or the reputation or business interests of the Company.**

Romantic relationships with co-workers can be complex and may be misunderstood, so if you find yourself in a romantic relationship with a co-worker, avoid issues by seeking guidance from your line manager or Ethics & Compliance team. Being transparent and truthful is critical; make proper disclosures and seek advice.

DEALING WITH OTHERS

When It Comes to Dealing with Others

In our dealings with others – whether partners, suppliers, customers or others – the Company applies the same high standards of respect, ethics and integrity.

Our conduct can reflect on and impact our reputation and our organization; the Company continuously strives to maintain a position as a responsible, ethical and positive member of our community and our industry. You should always keep this in mind in your actions, behaviors and speech.

Compliance with Anti-Corruption Laws

The Company abides by all applicable anti-bribery and -corruption laws. The Company has zero tolerance for any form of bribery or corruption, in any setting, directly or by anyone doing business on the Company's behalf. We expect the same zero tolerance from everyone who works for or with us. No employee or third party acting on behalf of the Company may corruptly offer, promise, grant or authorize the giving of money or anything else of value to anyone, directly or indirectly, in connection with business dealings in order to obtain or retain business or to secure an improper advantage for the Company. No one will be demoted, penalized or suffer other adverse consequences for refusing to pay a bribe, even if that refusal may result in a lost business opportunity. For more information, see the Anti-Bribery and Corruption Policy.

Gifts and Hospitality

Giving or receiving modest gifts and hospitality (like a coffee or branded pen) is often normal and polite. But some gifts and hospitality, particularly those that are lavish or disproportionate, may result in improper influence and may be viewed as bribes. **Improper gifts and hospitality can harm the**

Company's reputation and may subject the Company to fines, penalties or other punishment.

We do not offer gifts or hospitality when the recipient's business rules or laws prohibit their acceptance. Stricter rules apply in dealing with government officials, governments, government agencies or government-owned or -controlled businesses. For more information on handling gifts and hospitality, see the specific rules and examples provided in the Gifts and Hospitality Procedure.

Commitment to Fair Dealing

We deal fairly with our customers, business partners and competitors. We do not take unfair advantage of anyone through any misrepresentation, manipulation, concealment, misuse of confidential information, fraud or other unfair business practice. We are truthful in our business dealings, treat our customers, competitors and business partners fairly and respect their rights.

The Company complies with applicable competition laws (also known as antitrust or antimonopoly laws). Competition laws across the world prohibit anti-competitive agreements, abuses of dominance and certain other practices. Collusion, and agreements or discussions that give rise to competition concerns, such as price-fixing, market sharing and bid rigging, are always improper and can never be justified. You should never participate in these types of agreements or discussions, as they could result in legal liability and potentially large penalties. If you have any concerns or questions, contact your Legal team.

The Company respects intellectual property rights. We use only those items, including printed materials, videos, computer software, music, artwork, photographs and other intellectual property that we have created ourselves or obtained legally from authorized parties.

Preventing Money Laundering and Related Activities

The Company does not tolerate any form of money laundering or terrorist financing. Money laundering is when individuals or entities try to make funds raised from criminal activity look legitimate.

To prevent the Company products or services from being used to further money laundering or terrorist financing, you must know the anti-money laundering and terrorist financing requirements applicable in your location

and follow all procedures and instructions from your Anti-Money Laundering Officer. You must follow appropriate due diligence procedures to understand the business and background of prospective business partners and to determine the origin and destination of funds. You must report any suspicious transactions or incidents to Anti-Money Laundering Officer.

For more information, see the Anti-Money Laundering and Counter Terrorist Financing Policy.

Relationships with Business Partners

We form relationships with reputable, competent business partners that will comply with the Business Partner Code of Conduct. To protect the Company from corruption and other significant risks, we ensure that appropriate due diligence is undertaken before engaging business partners. For more information, see the Third Party Risk Management Policy.



Social Responsibility and Social Investments

We are responsible members of and promote the sustainable growth in the communities in which we operate by making social investments and charitable donations in line with our Corporate Citizenship Strategy. We do not make donations of any type, either in cash or in kind, to political parties, organizations, factions or movements of public or private nature, whose activity is clearly

linked with political or religious activities. In adherence with the principles of transparency we publish our corporate citizenship strategy, performance and programs in our annual sustainability report.

The Company is committed to the elimination of all forms of forced and compulsory labor and to the effective abolition of child labor.

Procurement

In procuring goods and services for the Company, **we make decisions based on merit, avoid conflicts of interest, improper gifts and entertainment (especially during a pending tender process) or any other kind of favoritism** and follow guidance from your Procurement team. We do business only with suppliers and vendors that comply with legal requirements and act in a manner consistent with the Company's commitment to compliance and ethics as outlined in the Company's Business Partner Code of Conduct.

Avoiding Conflicts of Interest

You must avoid situations where personal (including family members') interests and relationships conflict, or may appear to conflict, with your professional duties or the interests of the Company. For more information, see Company's Conflict of Interest Policy.

You should not use your position at the Company to advance your personal interests or those of a friend or relative at the expense of the Company's interests. Following local procedures, you should disclose close personal relationships with any supplier, dealer or business partner with whom the Company does business, or any government official with a connection to the Company. You must not let personal interests or relationships unfairly or improperly affect decisions on hiring, selecting or dealing with government officials, suppliers, dealers or business partners on behalf of the Company.

Compliance with Sanctions and Import / Export Laws

As we innovate and serve our customers, **the Company complies with all applicable sanctions, export, import and trade controls.** When engaging vendors or entering commercial relationships, or moving goods, technologies or services across international borders (whether physical movements or digital ones), you must know what sanctions or trade rules apply and follow them. For more information, see the Sanctions and Export Controls Policy.

DEALING WITH GOVERNMENTS AND PUBLIC OFFICIALS

When It Comes to Dealing with Governments and Government Officials

The Company is committed to dealing openly and honestly with governments and public officials and avoiding corruption in any form. The Company prohibits facilitation payments (i.e., non-legal payments to expedite routine government actions). We observe strict limitations when paying for or reimbursing public officials' travel or hospitality expenses, e.g., airfares, meals (other than modest refreshments) or hotel bills, gifts of greater than nominal value or charitable contributions on their behalf or for their benefit. For more information, see Government Relations Policy and Anti Bribery and Corruption Policy.

COMMUNICATIONS, INFORMATION SHARING AND PRIVACY

When it Comes to Communications, Information Sharing and Privacy

How we present the Company publicly is essential and often presents complex considerations.

Only designated persons may discuss the Company with the news media, financial analysts and investors. All external inquiries regarding financial, strategic or other business information about the Company, or any of its business units or operations, must be referred to the Investor Relations department.

You must be careful in your use of social media, especially when mentioning work or work-related matters.

You must protect privacy and not mention any specific the Company business partners, colleagues or other stakeholders without their permission or disclose the Company confidential or proprietary information.

For more information on handling external inquiries or using social media, see the External Communication Policy.

Ensuring Accuracy of the Company Information

All information you record or report on the Company's behalf must be accurate and complete. All records, including accounts and financial statements, must be timely, maintained in appropriate detail and accurately reflect transactions.

You must follow all legal requirements and the Company internal procedures for reporting information. You are expected to ensure that no undisclosed or unrecorded agreement, account, fund or asset is established or maintained. You must ensure that all commitments or commercial arrangements on behalf of the Company are in writing and contain the entirety of the material terms representing the understanding or agreement between the parties.

You are expected to cooperate fully with internal and external auditors and provide them with accurate information. Concealing information from management or from internal or external auditors can cause serious damage to the financial integrity of the Company and is strictly prohibited.

Sharing the Company's Information

You must seek advice and follow instructions from the Legal team before sharing any confidential information outside of the Company. On occasion, we may need to share confidential information with persons outside of the Company so that a business partner (e.g., a service provider or an external auditor) can work effectively with us. We use non-disclosure or confidentiality agreements to protect the information that we share.

Privacy and Personal Information

We ensure the privacy of our customers' personal data and communications.

Our customers and other third parties trust us with their personal information, and we value this trust. We follow applicable regulations governing information security and keep confidential information safe from loss, theft or accidental disclosure. You may not access, view, use, modify, share or distribute customer information without a valid business reason and without proper authorization.

The Company is committed to respecting the confidentiality of your personal information. We will only acquire and retain personal data that is required for the effective operation of the Company or required by law. Access to personal records is limited to authorized persons who have a clear business need for that information. Your personal information will not be provided to anyone outside of the Company without a valid legal basis and only by means that ensure adequate protection.

For more information, see the **Privacy Policy**.

Insider Trading

You, members of your household, and any other person or entity whose transactions are directed by you or are subject to your influence or control may not trade in securities of any kind using nonpublic information disclosed or provided by you. As set out in the Insider Trading Policy, window periods for trading the Company securities may be opened from time to time by the Company's Head of Legal. Trades in the Company's securities within window periods must be pre-cleared by the Company's Head of Legal.

PROTECTING ASSETS

When it Comes to Protecting the Company's Assets

We have a duty to the Company and its shareholders to protect and **make the best use of the Company assets, resources and property, including the Company's intellectual property.**

Avoiding Waste or Misuse of the Company Assets

We are responsible for using good judgment to ensure that the Company's assets are not misused or wasted. The Company's assets include property and equipment, time, proprietary information and the Company's funds. Limited incidental personal use of the Company equipment (for example, mobile phones, copy machines, computers, e-mail, etc.) is generally allowed if occasional, adds no significant cost to the Company, does not interfere with work responsibilities and is not related to an illegal or inappropriate activity.

You must know and follow the travel policy and rules that apply to you. You are responsible for getting the approvals you need. The Company will reimburse only legitimate business expenses. When choosing a hotel or ticket or meal, you should always look for the lowest-cost, reasonable option.

Protecting the Company's Assets from Fraud or Theft

Behave always with honesty. **We must protect the Company's funds and other assets as we would our own, guarding against misuse, loss, fraud or theft.** This includes the Company's monies advanced to you and any procurement or payment cards you may hold. We must make sure that all expenses, claims, vouchers, bills, and invoices are accurate, comply with relevant the Company's policies, procedures and rules and are submitted in a timely manner. We do not sell, transfer or dispose of the Company's assets without proper documentation and authorization.

Protecting Intellectual Property

As the Company innovates, we regularly produce valuable, non-public ideas (intellectual property). Our intellectual property is one of our most valuable assets, and **we must protect it as we do other kinds of property or assets. This includes taking adequate steps to protect our logo and brand from being used inappropriately by our business partners.**

Your obligation to protect the Company's intellectual property applies throughout your employment and continues after your employment ends. If you have any questions regarding the use or treatment of the Company's intellectual property, please speak with your Legal team.



Protecting the Company's Information Technology Systems

Computer systems, and the information processed and stored on them, are critical to our business. **Everyone who uses the Company's systems must ensure that these resources are used appropriately and in line with the Privacy Policy and Cyber Security Policy.** Computer hardware, software and all information on the Company's systems are the Company's property. You are expected to use the Company's systems responsibly and for business purposes. You may not access, store, or send sexually explicit material (whether images or text), material promoting violence or the intolerance of others, or material that is harassing or obscene. You must protect and not share with others your access credentials (e.g., your user ID or passwords) or allow others to use the Company's equipment or resources.

Ensuring Documents Are Properly Retained

All documents and other records created or received in connection with your work must be retained in accordance with applicable laws and regulations, as well as the Company policies and instructions from the Legal team.

Ensuring All Transactions Are Properly Authorized

Making commitments on behalf of the Company that are beyond your delegated authority is a serious breach of the Company's policies and can threaten the Company's financial integrity. At a minimum, agreements must be in writing and contain the entirety of the understanding between the parties. Before signing any corporate or transaction documents, you must follow your authority limits. For more information regarding the Company authority limits, see the **Group Authority Matrix**.

USING THIS CODE

When it Comes to Using This Code

There is a lot of information in this Code, but it cannot cover every situation that may arise. You will also need to consider specific local laws and regulations, as well as the Company policies referred and linked to in this Code and local policies and procedures. If there is a difference between this Code and local law, regulation or other the Company policies, you must apply the rule that sets the higher, stricter standard of behavior. It is your responsibility to know the laws and rules that apply to you and to seek advice if you are in doubt. If you encounter a situation that seems unclear, seek advice from your line manager, your Ethics & Compliance team.

How Do You Decide What to Do?

You may encounter circumstances where the Company does not have a policy or standard, or you may not be certain that a policy is applicable to the facts in front of you. If so, ask yourself these questions to help you make the right choice and do the right thing.

- Does this violate the law or professional ethics?
- Is this inconsistent with the letter and spirit of this Code?
- Could this cause harm to the Company or damage to its reputation?
- Could this cause physical, emotional or other harm to someone?
- Would I be embarrassed if friends or family knew I did this?
- Would I be embarrassed if this were reported in a blog or news story?

If you can answer “no” to all of these questions, you are likely to be on safe ground. If you say “yes” or “I’m not sure” to any of these questions, seek guidance from your line manager, Ethics & Compliance team.

Use good judgment and common sense, so that your actions do not violate law, damage the Company’s reputation, or put yourself or the Company at risk.

If you supervise others, you have more responsibility. You must promote compliance and ethics by example:

- Make sure that those who report to you understand this Code’s requirements and comply with them.
- Uphold the Company’s zero tolerance for bribery and corruption in all business dealings.
- Maintain an environment where people feel comfortable raising concerns.
- Follow the Code consistently and support those who in good faith raise questions or concerns and ensure confidentiality and non-retaliation. Consider conduct in relation to this Code when evaluating performance.
- Never encourage or allow someone to achieve business results at the expense of ethical conduct or compliance with this Code or applicable law.

Where Do You Go to Report an Issue?

You may raise a concern or speak up by:

- talking directly to your line manager, or Chief Ethics & Compliance Officer, or Ethics & Compliance team
- emailing speakup@kyivstar.ua
- reporting online at www.kyivstar.ua/speakup

The Company takes reports of potential violations of this Code seriously and is committed to preserving confidentiality and reviewing allegations of misconduct promptly and professionally. You must cooperate with internal investigations.

For more information, please refer to the Speak Up: Raising Concerns and Non-Retaliation Policy.

Can You Report Issues Anonymously?

Knowing your identity will help the Company conduct the most thorough investigation into your concerns, so we encourage you to identify yourself when reporting a known or suspected violation. If you are uncomfortable identifying yourself, you may report anonymously in most jurisdictions. No matter how you choose to report, the Company will review your concerns and take appropriate action.

What Are the Consequences for Violations of the Code?

A violation of the Code is a serious matter. Consequences for violations of the Code may include:

- disciplinary measures up to loss or reduction of merit increase, short or long-term incentives, eligibility for promotion;
- suspension without pay; or
- termination of employment.

Where warranted, the Company may initiate legal proceedings and/or notify relevant authorities.

Are You Protected from Retaliation?

Anyone who in good faith seeks advice, raises a concern or reports misconduct is following this Code – and is doing the right thing. The Company will not tolerate any reprisal or adverse action against anyone who raises a concern in good faith.