



MODERN SLAVERY TAKES VARIOUS FORMS, SUCH AS SLAVERY, SERVITUDE, FORCED AND COMPULSORY LABOUR AND HUMAN TRAFFICKING, ALL OF WHICH HAVE IN COMMON THE DEPRIVATION OF A PERSON'S LIBERTY BY ANOTHER IN ORDER TO EXPLOIT THEM FOR PERSONAL OR COMMERCIAL GAIN.

EPAM SYSTEMS LTD

MODERN SLAVERY STATEMENT 2025

1 COMMITMENT OF EPAM

The EPAM Group (EPAM Systems, Inc. and subsidiaries, hereafter "EPAM") takes a zero-tolerance approach to all forms of modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains across the globe.

While EPAM's workforce is over 61 thousand people globally, the nature of the industry in which we operate means the risk of slavery, servitude, forced or compulsory labour is considered low risk. EPAM does not manufacture goods, and our employees are highly skilled professionals. However, we do procure hardware and marketing materials and retain professional vendors to support our internal business operations.

EPAM recognises its responsibility to have a robust approach to all forms of slavery and human trafficking across its business. We are committed to transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act.

2 EPAM'S BUSINESS

EPAM Systems Ltd is part of the EPAM Group and our ultimate parent company is EPAM Systems, Inc. which has its head office in the United States. EPAM Systems, Inc. is a leading global provider of software product development and digital platform engineering solutions. With over 30 years of experience in the information technology industry, EPAM serves our customers in more than 55 countries across Europe, North and South America, Asia and Australia.

3 EPAM'S ACTIONS AGAINST MODERN SLAVERY

EPAM continues to comply with all laws prohibiting forced labour and slavery in our own, integral workforce and is committed to upholding the human rights of workers as understood by the international community.

EPAM operates several policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations. These policies are regularly reviewed and updated in line with best practice to ensure their continued effectiveness.

3.1 CODE OF ETHICAL CONDUCT

At EPAM we hold ourselves to the highest ethical and legal standards in all our business activities. This means we do the right things in the right way, including by:

- respecting, valuing and supporting people;



- behaving with integrity in our communications, records, and business activities; and
- complying with laws.

Our Code of Ethical Conduct (available on our website: <https://epam.com>) applies to all EPAM employees and our business partners around the world and highlights our respect for human dignity and human rights, as understood by the international community.

3.2 SUPPLIER CODE OF CONDUCT

Compliance with our [Supplier Code of Conduct](#) and EPAM'S Code of Ethical Conduct is mandatory for all suppliers in our supply chain. We undertake appropriate due diligence checks and certification requirements on suppliers; we do business only with suppliers and business partners who pass those checks, respect human rights and uphold the principles outlined in our Code of Ethical Conduct, as updated from time to time.

Our Supplier Code of Conduct includes a commitment from suppliers to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community by:

- providing a workplace free from discrimination, harassment or any type of abuse;
- ensuring that child labor is not used in any operations;
- ensuring that all forms of forced or compulsory labor are forbidden in any operations;
- providing safe and healthy working conditions for all employees, complying with all applicable local laws with respect to wages, hours, and employee benefits, and further complying with all applicable immigration/work authorization laws and regulations; and
- respecting the rights of workers to associate freely, join or not join labor unions, or seek representation in accordance with local laws. All employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

In accordance with the Supplier Code of Conduct, EPAM suppliers must ensure that all of their personnel and agents associated with EPAM strictly comply with it in its dealings with EPAM and others in the course of its relationship with EPAM, and EPAM may monitor or audit for compliance from time to time. Additionally, a Certification of Compliance must be provided to EPAM for suppliers who reach a minimum spend threshold.

Failure to comply with EPAM's Supplier Code of Conduct may result in termination as an EPAM supplier and referral of the matter to local authorities.

3.3 RECRUITMENT AND SELECTION

EPAM uses only specified, reputable employment agencies to source labour. All entities in the EPAM Group have appropriate controls in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas, and passports.

EPAM and its subsidiaries do not employ individuals who would be considered to be child workers.

3.4 ETHICS LINE

EPAM encourages all its workers, suppliers, customers and other business partners to [report](#) any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. All questions or concerns are reviewed promptly and carefully by our compliance team. Where appropriate, investigations will take place and corrective and/or disciplinary action taken. EPAM does not tolerate retaliation because someone raises honest and good faith questions or concerns or participates in an investigation.



4 TRAINING

EPAM continues to train all employees when they join the organisation and annually thereafter, on our Code of Ethical Conduct, which includes ensuring that our employees understand:

- we will only do business with suppliers and business partners who meet our ethical standards and respect human rights;
- we have a confidential [EthicsLine](#) where anyone can raise questions or report concerns; and
- as employees of EPAM we should hold ourselves to the highest ethical and legal standards in all our business activities.

5 LOOKING FORWARD

EPAM has not previously experienced any issues in respect of slavery within its business. We will continue to monitor the effectiveness of our actions and associated policies in ensuring appropriate steps are taken against modern slavery within our business. This may include:

- continued education of our employees on the risks of modern slavery;
- continued assessment of steps that may be taken in our supply chain; and
- continued review of our policies in line with best practices in the marketplace.

6 BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025; it has been approved by the board of directors of EPAM Systems Ltd, who will review it annually.

Signed by:

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Name: Eran Eisenberg

Date: 20th April 2026