

## EPAM SYSTEMS LTD: Anti-Modern Slavery Statement for financial year 2020

### Anti-Modern Slavery Statement

#### **Modern Slavery**

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.

#### **Commitment of EPAM**

EPAM Systems Ltd has a zero-tolerance approach to modern slavery and 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.

We are also committed to transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act. This statement applies to all types of workers, including but not limited to permanent and fixed term workers and contractors. EPAM Systems Ltd recognises its responsibility to have a robust approach to slavery and human trafficking.

#### **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 25 years of experience in the information technology industry, EPAM serves our customers in more than 35 countries across Europe, North America, Asia and Australia.

This statement covers the full range of our UK business activities and supply chains used by EPAM Systems Ltd across its global network. See [here](#) for a full list of operating locations.

#### **EPAM's Actions Against Modern Slavery**

EPAM complies 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.

#### 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:

- a. respecting, valuing and supporting people;
- b. showing integrity in our communications, records, and business activities; and

- c. 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.

### Whistleblowing

EPAM encourages all its workers, 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. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our EthicsLine.

### Supplier Code of Conduct

Compliance with our Supplier Code of Conduct is mandatory for all suppliers in our supply chain. We undertake appropriate due diligence checks of our suppliers; we do business only with suppliers and business partners who pass those checks 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 to:

- a. provide a workplace free from discrimination, harassment or any type of abuse.
- b. ensure that child labor is not used in any operations.
- c. ensure that all forms of forced or compulsory labor are forbidden in any operations.
- d. provide safe working conditions for all employees and comply with all local laws with respect to wages, hours and benefits and comply with all immigration/work permissions laws.
- e. respect the rights of workers to associate freely, join or not join labor unions, or seek representation in accordance with local laws. All personnel shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

Each supplier of EPAM must ensure that all of supplier's 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. A Certification of Compliance must be provided to EPAM, and EPAM may monitor or audit for compliance from time to time.

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.

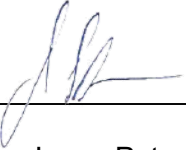
### Recruitment and Selection

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 that would be considered to be child workers.

## 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 2020, it has been approved by the board of directors of EPAM Systems Ltd, who will review it annually.



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Name: Jason Peterson, on behalf of Corporate Director EPAM Systems, Inc.

Date: 31 August 2021