

Corporate Social Responsibility Policy

EPAM's Corporate Social Responsibility policy reflects EPAM's ongoing commitment to integrate positive social, environmental and ethical practices into our business operations and strategy. This commitment is key to our continual development as a business and drives value for our employees, clients, business partners, shareholders and the community.

CODE OF ETHICAL CONDUCT AND CORE VALUES

At EPAM, we personally hold ourselves to the highest ethical and legal standards. The foundational principles in our Code of Ethical Conduct and our Core Values mean that we strive for excellence and do the right things in the right way by:

- Respecting, valuing and supporting people
- Showing integrity in our communications, records and business activities
- Protecting and enhancing EPAM's information and assets
- Complying with laws

One important way we live out these principles is our commitment to making positive contributions in the communities in which we operate and championing corporate social responsibility efforts.

BUSINESS CONDUCT AND COMPLIANCE

EPAM's robust Code of Ethical Conduct and related policies and procedures serve as an educational guide to ethical and lawful business actions in a complex and dynamic environment. Our compliance guidance and reporting channels provide our personnel with effective connections to drive ethical business decisions.

We comply with relevant laws where we do business, including those concerning bribery, money laundering, securities, trade, fair competition, confidentiality and data privacy, intellectual property, employment rights, and immigration, among others.

SOCIAL AND COMMUNITY CONTRIBUTIONS

Through our focused efforts in the areas of Education, Environment and Community, EPAM is committed to sharing the expertise and attributes of our highly skilled global workforce to effectively support the needs of, and positively add to the world at large and the communities where we work and live. By understanding our impact on local, regional and global communities, we strive to create positive change and opportunities in areas where it is needed most.

Such efforts include our global technology education initiatives, through which we provide cutting-edge and industry-relevant technology training and mentorship programs to tens of thousands of students globally, as well as other technology conferences, seminars, and hackathon events where we encourage social innovation and jumpstart collaboration among our local tech communities.

Through these community engagements and our various partnerships with universities, labs and others in the technology industry, we bring together creative professionals and push ourselves to find innovative solutions for pressing social challenges.

ENVIRONMENT AND SUSTAINABILITY

We believe responsible stewardship of the environment is critical, and we take this responsibility seriously. We continually strive to improve our environmental performance through the implementation of sustainable development and environmental practices.

- We encourage our personnel to be mindful of the effect of their actions on the environment and seek to minimize the adverse environmental effects of our personnel traveling between facilities.
- We encourage the use of sustainable practices in the maintenance of company facilities.
- We consider sustainability factors in relevant procurement activities.
- We invest in local green initiatives that result in energy-saving and carbon-footprint reductions practices, including the development of an internal carbon-footprint calculator.
- We participate in the responsible reuse and recycling of end-of-life electronics.

HUMAN RIGHTS AND OUR COMMITMENT TO OUR EMPLOYEES

As an innovation-driven business, EPAM's success depends on hiring the most talented employees in the industry. We are committed to respecting our employees' fundamental human rights at work. We similarly expect our suppliers, vendors, and subcontractors and all other third-party companies that comprise EPAM's supply chain to respect human rights and to avoid complicity in human rights abuses. Our Supplier Code of Conduct requires suppliers to uphold human and labor rights, provide a safe and healthy work environment, and honor EPAM's principles in our Code of Ethical Conduct.

At EPAM,

- We do not accept forced, bonded or involuntary prison labor.
- We prohibit discrimination based on race, national origin or ancestry, color, genetic information, age, sex, pregnancy, sexual orientation, gender identity or expression, religion, physical or mental disability, medical condition, veteran or military status, or any other characteristics protected by law.
- We prohibit illegal physical abuse, harassment or the threat of either.
- We comply with local minimum age laws and requirements and do not employ child labor.
- We compensate our personnel with wages and benefits that meet or exceed the legally required minimum.
- We provide time off and leisure time in accordance with local labor laws.
- We provide a safe and healthy workplace for our personnel.
- We invest in professional development and resources to maintain and enable the continued professional development of our personnel.

DIVERSITY AND INCLUSION

EPAM seeks to provide our customers and clients with exceptional personnel, which includes EPAMers with varied and diverse characteristics, to drive the innovation and thought diversity we are known for. We aim to continuously retain and supply a pipeline of qualified, diverse candidates to foster this goal. We promote this effort through partnerships with diversity-centric organizations, trainings, attention and reporting. Our focus on ensuring a diverse and inclusive model environment spurs thought diversity and innovation in our workforce.