



Human Rights Principles

Principle 1: Business should support and respect the protection of internationally proclaimed human rights

Principle 2: Make sure that they are not complicit in human rights abuses

ASSESSMENT, POLICY AND GOALS

EPAM Systems is 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 Systems' supply chain to respect human rights and to avoid complicity in human rights abuses. The Code of Ethical Conduct, Anti-Harassment, Anti-Discrimination and Anti-Retaliation Policy were approved by the EPAM management and adopted across all our offices.

IMPLEMENTATION

At EPAM we:

- do not accept forced, bonded, or involuntary prison labor,
- prohibit discrimination based on race, color, national origin or ancestry, ethnicity, genetic information, sex, sexual orientation, gender, gender identity or expression, age, religion, marital status, veteran/military status, citizenship, caste, political affiliation, union membership, medical condition or medical tests, pregnancy, personal appearance (where not inconsistent with lawful EPAM or customer policy), physical or mental disability,
- comply with local minimum age laws and requirements and do not employ child labor,
- compensate our personnel with wages and benefits that meet or exceed the legally required minimum,
- prohibit illegal physical abuse, harassment, or the threat of either,
- provide time off and leisure time in accordance with local labor laws,
- provide a safe and health-promoting workplace for our personnel,
- developed and implemented health and safety risk assessment procedure that ensures systematic and sound approach for workplaces safety,
- invest in professional development and resources to maintain and enable the continued professional development of our personnel.

MEASUREMENT OF OUTCOMES

All EPAMers complete a mandatory training on our Code of Ethical Conduct awareness.

In 2021, on average each EPAMer spent more than 53 hours developing new skills.

Our Supplier Code of Conduct requires suppliers to uphold human and labor rights and to provide a safe and healthy work environment to workers. Suppliers are signing "Supplier certification & acknowledgement of compliance" as an evidence of self-declaration of compliance with EPAM Supplier Code of Conduct.

EPAM has a confidential anonymous hotline that is internet accessible to all employees and others to raise questions and concerns about conduct that may violate its Code of Ethical Conduct or policies. EPAM's Code makes clear we will not tolerate retaliation because someone raises good faith questions or concerns or participates in a misconduct investigation.

EPAM

41 University Drive, Suite 202, Newtown, PA 18940, USA | P: +1 267 759 9000

Labour Principles

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: The elimination of all forms of forced and compulsory labour

Principle 5: The effective abolition of child labour

Principle 6: The elimination of discrimination in respect of employment and occupation

ASSESSMENT, POLICY AND GOALS

Code of Ethical Conduct, Environmental and Health & Safety Policy, and Supplier Code of Conduct have been approved and adopted by EPAM.

IMPLEMENTATION

At EPAM we:

- comply with local minimum age laws and requirements and do not employ child labor,
- compensate our personnel with wages and benefits that meet or exceed the legally required minimum,
- prohibit illegal physical abuse, harassment, or the threat of either,
- provide time off and leisure time in accordance with local labor laws,
- provide a safe and health-promoting workplace for our personnel,
- invest in professional development and resources to maintain and enable the continued professional development of our personnel.

MEASUREMENT OF OUTCOMES

We pledge to empower an additional 5,000 students with high-tech skills and global opportunities by 2025. To do so, we have the honor of working with and sponsoring partner organizations on joint education and development programs.

EPAM employees have dedicated 750,000+ hours to global mentorship, training, and teaching programs.

Each year, EPAMers around the world enroll in our L&D programs. They learn new technologies, career skills, and programming languages and have access to a formalized mentoring and development program. In 2021 on average each EPAMer spent more than 53 hours developing new skills

As a response for the COVID-19 pandemic we increased awareness of existing programs that focus on enhancing our employees' mental well-being. We also developed new programs, such as a parenting resource group where peers could share tips, resources, and ideas to support each other while schools and child and elder care facilities were closed and broadcast live town hall-style forums where our senior leadership could listen to and quickly address employees' questions and concerns. Our Supplier Code of Conduct requires suppliers to uphold human and labor rights and to provide a safe and healthy work environment to workers. Suppliers are signing "Supplier certification & acknowledgement of compliance" as an evidence of self-declaration of compliance with EPAM Supplier Code of Conduct.

Environment Principles

Principle 7: Businesses should support a precautionary approach to environmental changes

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and diffusion of environmentally friendly Technologies

ASSESSMENT, POLICY AND GOALS

As a preeminent technology services and consulting business with worldwide operations, EPAM is committed to protecting and positively impacting the environment and health & safety of our employees, customers, workplaces, and every global community we touch. Environmental and Health & Safety Policy, Corporate Social Responsibility Policy that contains main Environmental commitments were approved and adopted at EPAM.

IMPLEMENTATION

At EPAM we:

- encourage personnel to be mindful of the effect of their actions on the environment and seek to minimize the adverse environmental effects of our personnel travelling between facilities,
- encourage the use of sustainable practices in the maintenance of company facilities,
- implement sustainability considerations as a factor within our relevant procurement activities,
- developed and implemented environmental risk assessment procedure to identify our environmental aspects and impacts and treat them properly.

MEASUREMENT OF OUTCOMES

EPAM has a comprehensive QMS Guideline which provides guidelines across locations for methodology of Power Usage Effectiveness (PUE) and the Data Centre Infrastructure Efficiency (DCIE).

EPAM partner with Simms Recycling who is one of the global leaders in IT asset disposition (ITAD) and electronics recycling services.

EPAM is championing environmental responsibility in its operations, committing to build all new offices according to the conservation standards of the most widely used green building rating system in the world, Leadership in Energy and Environmental Design (LEED).

Given the specialization of the information technology industry and software development in the context of the global mobility of the labor market, the transition to a remote work mode minimizes the potential climatic risks of the organization's operational activities. At the same time, potential risks affecting the workforce are calculated by management as part of the organization's human capital management strategy. While we are focused on reducing the impact long-term we are also focused on mitigating our impact today and starting in 2020, we have fully offset our scope 1, scope 2 and scope 3 emissions.

With EPAM's Carbon Footprint Calculator, we make it easy for people to understand what their current personal carbon contributions are—and how to make simple lifestyle changes to reduce them.

Anti-Corruption Principle

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

ASSESSMENT, POLICY AND GOALS

EPAM regularly reviews and maintains Anti-Corruption and Antibribery Compliance Policy (was updated at 2019) and Anti-Corruption Talent Acquisition and Recruiting Policy. We ensure our suppliers, and third parties are committed to anti-corruption statement by providing them our Supplier Code of Conduct which they signing as a confirmation of their commitments.

IMPLEMENTATION

At EPAM no one may give, offer, promise, or authorize the giving of anything of value to a government official or any person or organization, directly or indirectly, in order to obtain or retain business or secure any other favorable action.

No EPAM Person may give anything of value to a government official or any person or organization if they know or believe that it would be improper for such person or entity to accept it.

These prohibitions cover “anything of value” including:

- cash,
- commissions,
- services,
- employment (jobs or job offers),
- gifts or gratuities (other than “nominal” value),
- charitable or political contributions (e.g., any contribution that results in a personal advantage to a government official or their relative),
 - meals (e.g., meals that are extravagant, too frequent, done during abid or negotiation),
 - entertainment expenses,
 - travel expenses,
 - educational benefits,
 - business opportunities.

MEASUREMENT OF OUTCOMES

All EPAMers complete a mandatory training on Anti-Corruption and Antibribery Compliance Policy. EPAM has a confidential anonymous hotline that is internet accessible to all employees and others to raise questions and concerns about conduct that may violate its Code of Ethical Conduct or policies. EPAM’s Code makes clear it will not tolerate retaliation because someone raises good faith questions or concerns or participates in a misconduct investigation.

All transactions related to charity and CSR follow a systematic audit trail before approval.