



EPAM SUPPLIER CODE OF CONDUCT

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The relationship between EPAM Systems, Inc. and its subsidiaries (“EPAM Systems”) and each of its suppliers, vendors, and subcontractors and all other third-party companies that comprise EPAM Systems’ supply chain (“Supplier”) is important and plays an integral part of achieving and maintaining high performance in our business.

All work performed for EPAM must be in full compliance with EPAM Code of Ethical Conduct, available on our website at <http://investors.epam.com/code-ethical-conduct-0>, and the principles contained herein (collectively “Supplier Code of Conduct”). This Supplier Code of Conduct applies to all Suppliers and their parent, subsidiary and affiliated entities.

Each Supplier should carefully review this Supplier Code of Conduct and ensure that all of Supplier’s personnel and agents associated with EPAM Systems strictly comply with it in its dealings with EPAM Systems and others in the course of its relationship with EPAM Systems. Certification of Compliance must be provided to EPAM Systems, and EPAM Systems may monitor or audit for compliance from time to time. Compliance with this Supplier Code of Conduct, as may be updated or amended from time to time, is mandatory for all Suppliers in our supply chain.

We expect our Suppliers to adhere to the following standards, which are based on internationally recognized standards:

I. Compliance with all Applicable Laws, Rules, and Regulations: As a Supplier, you agree that all business conducted on behalf of EPAM shall be accomplished in full compliance with applicable laws, rules, regulations, and policies. If local laws are less restrictive than the principles set forth in this Supplier Code of Conduct, you are expected to, at a minimum, comply with this Supplier Code of Conduct. If local laws are more restrictive than the Supplier Code of Conduct, you are expected to, at a minimum, comply with applicable local laws.

- a. **Anti-Bribery/Corruption Laws.** Supplier shall not make, authorize, or offer any bribes, kickbacks, or payments of money or anything of value to anyone, including officials, employees, or representatives of any government or public or international organization, or to any other third party (public or private sector) for the purpose of obtaining or retaining business, or influencing any other favorable business decision, that is related in any way to EPAM Systems. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act and all applicable other foreign anti-bribery laws, including without limitation the UK Bribery Act 2010.
- b. **Anti-Money Laundering Laws.** Supplier shall comply with all laws, regulations and orders regarding doing business with, maintaining accounts for or handling transactions or monetary transfers for foreign countries or foreign nationals listed on the United States OFAC list of Specially Designated Nationals and Block Entities and any similar requirements of other countries in which EPAM Systems or Supplier conducts business (collectively, “Anti-Money Laundering Laws”). Supplier shall implement appropriate procedures, processes and internal controls to ensure compliance with the Anti-Money Laundering Laws. Supplier must take immediate appropriate action to block or reject any pending transaction, and comply with any governmental reporting and mitigation actions.
- c. **Antitrust and Competition Laws.** Because Antitrust and competition laws are designed to protect consumers and competitors against unfair business practices and promote and protect healthy competition, EPAM Systems expects its Supplier to observe and comply all antitrust or competition laws of all nations or organizations.
- d. **Securities and Insider Trading Laws.** Supplier is expected to comply with applicable insider trading and securities laws governing transactions in the securities of EPAM Systems. Supplier is expected to comply with applicable insider trading and securities laws governing transactions in the securities of EPAM Systems or of EPAM Systems’ business partners. Securities include common stocks, bonds, options, futures, and other financial instruments. Suppliers that possess or have access to material, nonpublic information gained through their work with EPAM Systems may not use that information to trade in EPAM Systems’ securities or the securities of another company to which the information pertains.
- e. **Confidential Information, Data Privacy and Intellectual Property.** Supplier must protect the intangible and tangible assets of EPAM Systems and its business partners entrusted to Supplier in the course of Supplier’s work with EPAM Systems, such as confidential information, personal

information protected by data privacy laws, and intellectual property (“Confidential Information”). Unauthorized release or use of Confidential Information can cause a loss of competitive advantage or create other financial and legal exposures. If personally identifiable information protected by data privacy laws is related to Supplier’s work with EPAM Systems, Supplier must comply with the data privacy laws and EPAM Systems’ policies and special handling requirements. Intellectual property rights, such as code, processes, procedures, copyrighted works, ideas, trade secrets, patents and know-how are core to EPAM Systems’ and its business partners’ business. Supplier must not misuse, or fail to secure the needed IP ownership rights for EPAM Systems and its business partners. Supplier must respect the intellectual property rights of third parties.

II. Labor Standards: Supplier is committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community by:

- a. Providing a workplace free from discrimination, harassment or any type of abuse.
- b. Ensuring that child labor is not used in any operations.
- c. Ensuring 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. Respecting 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.

III. Environmental Laws, Regulations and Standards: Supplier recognizes that environmental responsibility is integral to producing world-class products and services.

IV. Financial Books and Records: Accurate and reliable financial and business records are important for EPAM Systems to meet its financial, legal, and business obligations as a publicly traded company. Supplier must not have any false or inaccurate entries in the accounting books or records related to EPAM Systems and Supplier’s business records must be retained in accordance with record retention policies and all applicable laws and regulations. Supplier agrees to support any audit as reasonably requested by EPAM Systems.

V. Conflicts of Interest: A conflict of interest may exist when a circumstance that could cast doubt on Supplier’s ability to act with total objectivity with regard to the supply of products and services to EPAM Systems. While engaged by EPAM Systems, Supplier must exercise reasonable care and diligence to avoid any actions or situations that could result in a conflict of interest. EPAM Systems expects Supplier to prevent or immediately disclose a conflict of interest or the appearance of a conflict of interest as soon as possible to EPAM Systems.

VI. Whistleblower Protection. Supplier shall encourage its personnel and agents to bring their concerns regarding compliance with this Supplier Code of Conduct to the attention of Supplier and EPAM Systems so that issues can be prevented or resolved in a timely manner. Supplier is responsible for creating a safe and confidential environment and legally compliant method for such reports and a policy to not retaliate against those who make reports.

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