

**<epam>**

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# C O D E O F E T H I C A L C O N D U C T

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# Message from our CEO and our Chief Compliance Officer

## EPAM TRANSFORMS AND IMPROVES THE WAY OUR CUSTOMERS DO BUSINESS.

At EPAM we use our creative minds and talents to invent, develop and deliver technologically advanced, intelligent solutions. Just as important as what we achieve is how we get there. Simply put, at EPAM we personally 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 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*

This sounds logical and simple, but EPAM's global presence can make routine business questions complex. As a result, we all benefit when we know and understand the rules and best practices that apply to us. No matter how quickly things change, how fast we move, or how much we grow, our Code of Ethical Conduct is our educational guide to ethical and lawful action.

Think of our Code not just as a collection of words, but a set of foundational principles and a learning tool that drives proper behavior. Use it when you don't know the answers. Use it when something seems wrong. And use it even when the answers seem obvious.

For matters that may violate our Code, we encourage you to use our official guidance and reporting channels. They are there because EPAM is better and stronger when we help fix small challenges before they become larger.

At EPAM, we can achieve excellence and maintain our unparalleled reputation by turning the Code's principles into action every day. We can't do it without you.

## THANK YOU,



Arkadiy **DOBKIN**  
*Chairman & CEO*



Philip **STORM**  
*Chief Compliance Officer*

# EPAM's Code of Ethical Conduct - Guiding Principles

Understand and Follow the Fundamentals in Our Code,  
Our Core Values, and the Law



Respect, Value and Support People



Behave with Integrity



Protect and Enhance EPAM's Information  
and Assets



Comply with Laws

## EPAM'S CORE VALUES

VALUE THE INDIVIDUAL

ACT AS A TEAM

STRIVE FOR EXCELLENCE

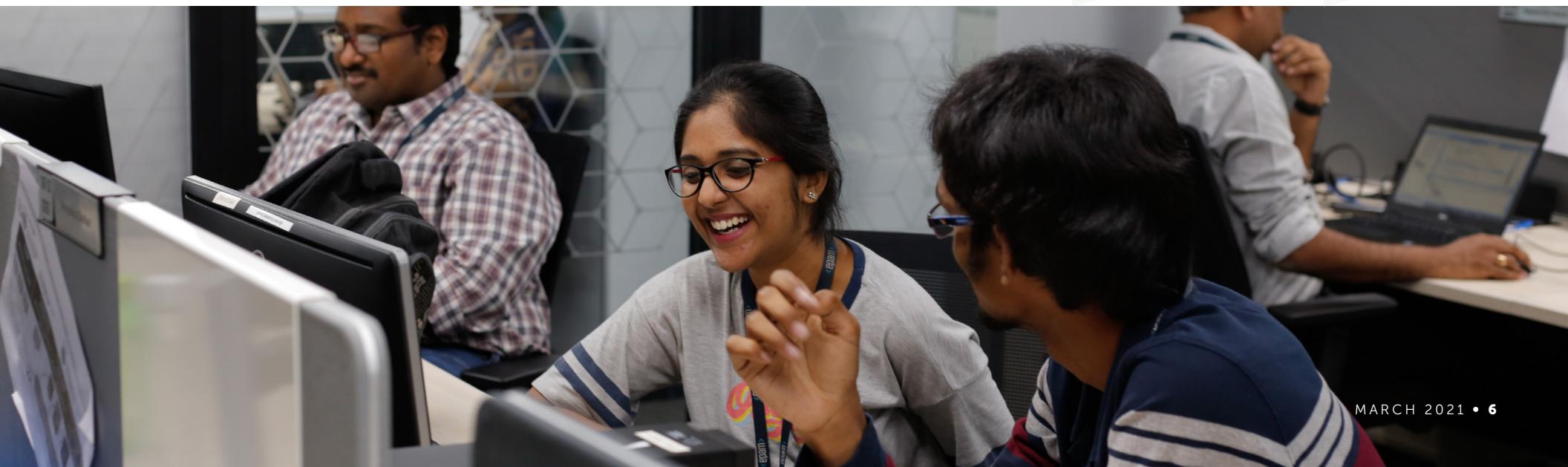
FOCUS ON THE CUSTOMER

ACT WITH INTEGRITY

# QUESTIONS AND CONCERNS

# What Is The Code of Ethical Conduct?

**THE CODE IS A STATEMENT OF CONCISE PRINCIPLES OF PROPER BUSINESS CONDUCT TO FOLLOW AND TURN INTO ACTION.**



# Asking Questions and Raising Concerns

## Why Does EPAM Have A Code of Ethical Conduct?

**EDUCATION** - Educates us about ethical, lawful and professional conduct

**GUIDANCE** - Guides us to live our core values

**EXCELLENCE** - Maintains EPAM's reputation for excellence

## Who Must Follow It?

**EACH OF US** - All employees, officers, and board members

### **OUR BUSINESS PARTNERS** -

Anyone we do business with (contractors, suppliers, customers)

## How Should I Use It?

**READ IT** - Understand EPAM's Code of Ethical Conduct

**USE IT** - To guide your decisions

**RAISE IT** - Raise good faith questions and concerns when needed

**COMPLY WITH IT** - Take annual mandatory certification training on Onboarding Portal



# Asking Questions and Raising Concerns

## Where Do I Ask Questions Or Report Concerns?

EPAM encourages you to ask questions and report concerns about proper conduct, so we can maintain our reputation and improve where needed.

**TO ASK QUESTIONS OR REPORT CONCERNS UNDER OUR CODE, EPAM OFFERS MANY CHANNELS:**

### IN PERSON

- Your manager
- EPAM's Compliance Sponsors and Compliance Managers  
(see <https://info.epam.com/ethics.html>)
- HR
- Legal
- EPAM Leadership  
(see <http://investors.epam.com/investors/leadership-and-governance>)
- EPAM'S Chief Compliance Officer

### EPAM'S ETHICSLINE

*EPAM provides a confidential hotline to report concerns, which allows you to report anonymously if you prefer where law permits.*

*Our EthicsLine allows you to report online through a dedicated web portal or by calling a toll-free phone number at any time.*

- EthicsLine Webpage — Submit a written question or concern online at [ethics.epam.com](https://ethics.epam.com)
- Find our toll free phone number [here](#) or at [ethics.epam.com](https://ethics.epam.com)



# Asking Questions and Raising Concerns

## What will the company do in response?

### WHEN YOU REPORT A CONCERN, EPAM WILL:

- Promptly and carefully review your concern
- Conduct a proper investigation
- Treat your report and its investigations as confidentially as it can, consistent with relevant laws and EPAM's need to conduct a fair, complete and compliant review
- Never tolerate retaliation because someone raises good faith questions or concerns or participates in an investigation
- Take appropriate corrective and/or disciplinary action

## Managers have expanded responsibility

### IF YOU MANAGE EMPLOYEES, EPAM EXPECTS YOU WILL:

- Set the right tone and model best behavior for those you manage
- Welcome questions and concerns, take them seriously, and escalate them when needed
- Recognize and reward ethical behavior
- Support our investigation process
- Help EPAM implement necessary remedial actions

### PROVIDING DETAILS ABOUT REPORTED CONCERNS

Whether you identify yourself or raise concerns anonymously, it helps EPAM if you can provide sufficient details, such as relevant background, names, dates, places, people with knowledge, and why the situation is cause for concern.

RESPECT, VALUE AND  
SUPPORT PEOPLE

# EPAM People are Professional, Supportive and Fair

## Respect and Support People

Our people maintain a culture where we respect and support our work colleagues, build productive relationships, and value inclusion and diversity.

### NO DISCRIMINATION

We do not treat people less favorably because of “protected characteristics,” which include\*:

RACE	GENDER	AGE	MEDICAL CONDITION
COLOR	SEX	RELIGION	MEDICAL TESTS
NATIONAL ORIGIN OR ANCESTRY	SEXUAL ORIENTATION	MARITAL STATUS	PREGNANCY
ETHNICITY	GENDER IDENTITY OR EXPRESSION	VETERAN/ MILITARY STATUS	PHYSICAL OR MENTAL DISABILITY
GENETIC INFORMATION	PERSONAL APPEARANCE**	CITIZENSHIP STATUS	POLITICAL OR UNION AFFILIATION
		CASTE	

\* and any other legally protected basis

\*\* where not inconsistent with lawful EPAM or customer policy

### NO DISCRIMINATION

I am hiring for a new project and know that EPAM strongly values diversity. Should I select candidates based solely on the fact that they exhibit “protected characteristics,” even if they lack important skills to perform the job in question?



*EPAM values diversity and we are made stronger by employees with different backgrounds, perspectives and ideas. We conduct searches that help us identify talented individuals who continue to build our diverse profile. And we do not treat candidates less favorably because of protected characteristics. That does not mean, however, that we compromise on quality or job effectiveness in hiring decisions. At EPAM, our hiring decisions are always based on our fair assessment of who best meets our job qualifications for the role.*

# EPAM People are Professional, Supportive and Fair

## NO HARASSMENT

We do not participate in offensive comments, offensive actions or harassment.

Harassment is unwelcome conduct based on protected characteristics, whether in words or in actions, that unreasonably interferes with work performance or job benefits or produces an intimidating, hostile or offensive work environment.

Harassment may take many forms, such as:

- offensive or disparaging remarks
- jokes
- slurs
- gestures
- negative stereotypes
- intimidating acts

as well as other verbal, non-verbal, visual, audio, electronic or physical conduct.

## NO HARASSMENT

My manager sometimes makes sexual comments to me and suggests we should try to start a relationship. The remarks make me uncomfortable, I don't like them, and I've asked him to stop several times but he has not. I don't want him to learn I reported him, but I want it to stop. What should I do?



*EPAM does not expect anyone to tolerate unwelcome sexual remarks or propositions as part of the workplace environment, and there are alternative reporting channels outside of your manager. You should promptly raise your concerns through one of the reporting channels in our Code, and we will treat the matter with appropriate confidentiality and discretion.*

# EPAM People are Professional, Supportive and Fair

## NO RETALIATION OR DELIBERATE HARM

EPAM does not tolerate retaliation, which is conduct that punishes someone for or is likely to discourage or prevent someone from raising concerns, reporting misconduct, or participating in an investigation.

At no time does EPAM tolerate intimidation, bullying, threats of violence, or deliberate mental or physical harm.

## LIKE HARASSMENT, RETALIATION MAY TAKE MANY FORMS, IN WORDS, WRITTEN OR SPOKEN, OR IN ACTIONS, AND INCLUDES:

- actual or implied threats or intimidating acts
- adverse employment action affecting an employee's compensation, job assignment, opportunities for advancement or other features of employment
- demotion, suspension or termination of employment
- deliberately rude or hostile behaviors or speech
- creating or permitting a work atmosphere hostile to an employee who reports a concern
- deliberate exclusionary behaviors
- harassing behaviors

## ENCOURAGE RAISING QUESTIONS AND CONCERN

What should I do if I think my colleague may have violated our Code, but I'm not sure?



*It is always easier to ignore things that seem wrong, but to build a better company, we must all take affirmative steps to get there. So in this case, take action. Because we always respect our co-workers, a first step may be speaking directly with him/her to see if you can resolve the issue informally. But for matters that do violate our Code and can't be solved informally, escalate the question. EPAM welcomes good faith questions and concerns, will act on them, and does not tolerate retaliation for raising them.*

# EPAM People are Professional, Supportive and Fair

## **FAIRLY, OBJECTIVELY AND REGULARLY RECOGNIZE EMPLOYMENT CONTRIBUTIONS**

At EPAM, we make employment decisions fairly and objectively based on capabilities and performance.

We also foster a satisfying and productive work experience by regularly recognizing our individual and collective contributions.

## **IMPROVE OUR PERSONAL WELL-BEING - BE SAFE, HEALTHY AND SECURE**

Always behave in ways that keep EPAM's working environment safe, healthy and secure and that promote environmental sustainability.

Dangerous practices, hazards, violence, threats, aggression or substance-related impairment are unacceptable.

## **REQUIRED HEALTH AND SAFETY BEHAVIORS**

PRIORITIZE HEALTH  
AND SAFETY

KEEP WORKSPACES  
SECURE

DON'T USE ALCOHOL  
OR UNLAWFUL DRUGS  
AT WORK

BE MINDFUL OF  
THOSE AROUND YOU

NEVER ENGAGE  
IN THREATENING  
OR AGGRESSIVE ACTS

NEVER BRING WEAPONS  
INTO ANY EPAM OR  
CLIENT WORKPLACE

REPORT UNSAFE OR  
UNHEALTHY SITUATIONS

NEVER RETALIATE  
AGAINST SOMEONE  
WHO RAISES A CONCERN

# EPAM People are Professional, Supportive and Fair

## Use Social Media Communications Responsibly

Social media is a powerful tool for communicating about many things, both personal and professional.

If you use it to communicate about EPAM, make it clear you are speaking personally and not on behalf of EPAM (unless you are specifically authorized), and be responsible, professional, and abide by our Code.

### NEVER USE COMMUNICATIONS TO:

LIE ABOUT OTHERS

REVEAL CONFIDENTIAL  
OR "MATERIAL"  
INFORMATION

HARASS OR  
DISCRIMINATE  
AGAINST OTHERS

VIOLATE THE PRIVACY  
RIGHTS OF OTHERS

VIOLATE TRADEMARKS,  
COPYRIGHTS, TRADE  
SECRETS OR PATENTS

VIOLATE THE LAW OR  
EPAM'S CONTRACTUAL  
PROMISES

### SOCIAL MEDIA COMMUNICATIONS – RESPONSIBLE USE

I use social media to blog about software development and coding approaches, just as a way to educate others, and not for pay. Is that okay?



*It depends on the content that you are posting and sharing, but there are certainly "best practices." First, always be clear that you are speaking personally and not for or on behalf of EPAM. Second, never disclose EPAM's, a customer's, or another company's software code or confidential information. Third, if there is any doubt whether your activities may conflict with EPAM's legitimate business interests, check with your manager first and get specific approval. And fourth, never allow your communications to violate any of the standards in EPAM's Code of Ethical Conduct.*

# EPAM People are Professional, Supportive and Fair

## Personal Relationships That Cause Business Conflicts Must Be Resolved

When business conflicts arise from our close, personal relationships, we address and resolve them so that our duties to EPAM, our business judgment, and our decision-making are not improperly influenced.

### PERSONAL RELATIONSHIPS THAT MAY REQUIRE SUCH ACTION INCLUDE:

MARITAL

FAMILY

ROMANTIC

SIMILARLY CLOSE  
PERSONAL RELATIONSHIPS

### YOU HAVE AN OBLIGATION TO RAISE, ADDRESS, AND REMOVE YOURSELF FROM BUSINESS CONFLICTS WHERE:

- You exercise managerial influence over a person with whom you have a close, personal relationship, or you are in a direct managerial or reporting relationship with such a person.
- You make business decisions about a company where a decision-maker and you have a close, personal relationship.

### PERSONAL RELATIONSHIPS THAT CAUSE BUSINESS CONFLICTS

I am going to be promoted to a managerial position on the Java Solutions team. My cousin will be reporting to me in that new role. Do I need to take any action?

A

*Yes. Many potential conflicts of interest can be resolved if we act on them promptly and with transparency. You need to disclose your relationship to management in advance of the decision, so EPAM can implement a solution to eliminate the personal conflict. We resolve personal conflicts of interest that could improperly influence key aspects of our business decisions with other companies or our hiring and performance review processes.*

# EPAM People are Professional, Supportive and Fair

## Respect the Company in your Own Actions

You represent our company, every day, wherever you are. For that reason, your behavior is one of the best ways to build and enhance EPAM's positive reputation.

By behaving in ways consistent with our Code, you show respect for your colleagues and EPAM as a company.

## Respect the Company's Right to Speak for Itself

EPAM only speaks about its business and financial plans and activities through official and authorized communications and communication channels. Only specifically authorized personnel may speak on behalf of EPAM. And only authorized personnel with specialized knowledge speak on behalf of EPAM to the news media and to securities professionals, such as analysts, investors, broker dealers, investment advisors and investment companies (direct all such questions to Investor Relations and Legal).

### SOCIAL MEDIA COMMUNICATIONS – RESPONSIBLE USE

I have a personal blog that only my close friends follow. Tonight, after work, I was planning to post a short cartoon poking fun at one of my teammates who would rather complain about the customer than come up with effective software solutions. It's just a joke and I doubt the teammate would ever know about it, and anyway it's my personal blog. Is this a problem?



*Yes. The conduct you describe would conflict with our Social Media policy. Remember, your social media activity, even on a personal blog, may affect EPAM's legitimate business interests, especially if you were to mention EPAM employees or customers. Such activities require the same care you use in all your EPAM communications. Things on the internet last forever, and you have no way of knowing who may read your blog, including our customers. Take a moment to read what our **Code** and our **social media policy** say about proper use of social media, and follow those rules.*

BEHAVE WITH  
INTEGRITY

# Act with Integrity in EPAM Communications, Records and Business Activities

## Be Honest and Professional in Company Communications

NEVER LIE IN ANY  
WRITTEN OR ORAL  
COMMUNICATIONS

USE PROFESSIONAL  
LANGUAGE

THINK OF HOW YOUR  
WORDS WOULD LOOK IF  
PUBLISHED IN A NEWS  
ARTICLE OR TO  
AN ATTORNEY

## Integrity during Audits and Investigations

Cooperate fully with EPAM reviews by providing complete and honest information and documents.

EPAM may review, access, preserve or delete any information stored on EPAM-owned or supplied equipment and networks.

## Integrity in Company Financial and Business Records

Whether large or small, fraud harms our Company, our employees, our customers and our business partners.

Always be truthful and accurate in EPAM's financial and business records.

### INTEGRITY IN COMPANY FINANCIAL AND BUSINESS RECORDS

My team manager adjusted some numbers in our financial software so certain transactions that won't occur until next month were recorded in this month. This is good for our project financials, but it overstates company revenue for this month. What should I do?

A

*Each of us has a duty to make sure our company financial records are accurate and do not violate accounting rules. Regardless of how this may help your current project, you must raise or report the conduct promptly to leadership, or through our various Code channels, so EPAM may review it and take necessary corrective action. We simply do not create false or misleading financial documentation of any kind, as inaccurate entries in our books and records jeopardize the accuracy of EPAM's overall financials and may violate law.*

# Act with Integrity in EPAM Communications, Records and Business Activities

## Expenses and Reimbursement

In all business you conduct for EPAM, always:

- Submit only legitimate business expenses
- Request only proper reimbursements

## Maintain Business Records Properly

Always create, retain, modify and discard business records lawfully and under the guidelines for our business.

## Special Preservation Obligations - Hold Notices

At times you must follow additional EPAM instructions to preserve data:

- Important to an investigation (internal or external)
- Required in or related to legal proceedings
- Requested by a government authority

## Company Transactions Are Written and Authorized

Only commit EPAM to a business transaction if you have the authority to do so, if you are authorized to sign on EPAM's behalf, and using a proper, written agreement.

### EXPENSES AND REIMBURSEMENT ARE LEGITIMATE

A colleague told me she submitted receipts for some personal expenses to compensate her for business expenses she forgot to submit on time. She says the value she submitted for personal expenses equaled what she was owed for the missing business expenses. Is that okay?



*No. Submitting false or misleading receipts for ANY reason or secretly causing our company to pay for personal expenses is never okay. You might first try to address the situation directly with your colleague, but if she refuses to correct the error, we ask that you promptly raise it through one of EPAM's reporting channels.*

## Financial Conflicts of Interest - Raise and Address Promptly

A financial conflict of interest exists when our private interests influence — or even appear to influence —our ability to act in EPAM's best financial interests when carrying out our job responsibilities



## Act with Integrity in EPAM Communications, Records and Business Activities

It is not possible to identify every potential financial conflict of interest, but the following situations provide examples.

- Taking EPAM's opportunities for your personal advantage or benefit
- Directing EPAM business to companies owned or managed by related parties or close friends
- Holding a significant financial interest in an entity that does business with or seeks to do business with EPAM
- Serving on the board of an entity that has a current or anticipated business relationship with EPAM
- Performing any outside work related to EPAM's business activities
- Any activities that directly compete with EPAM or oppose EPAM's business interests

You are required to disclose any outside activity, financial interest or relationship that poses a real, potential or perceived conflict of interest.

### DON'T LET CONFLICTS OF INTEREST DAMAGE OUR BUSINESS

I am in the process of purchasing office supplies and services from an outside vendor for EPAM. My brother-in-law is a co-owner of the vendor, and I believe they will give us the best price. May I proceed?



*Before we can determine which vendor is best, you need to remove yourself from any conflict of interest. Your family relationship to an owner of a potential vendor creates a potential conflict of interest with EPAM. You need to disclose to EPAM any relationship you have to a vendor we plan to use, and remove yourself from the approval process to avoid improper influence. Each of us has a duty not to let our private interests conflict with or harm EPAM's financial and business interests.*

# Act with Integrity in EPAM Communications, Records and Business Activities

## Gifts and Entertainment Must Not Improperly Influence Decisions

Gifts and entertainment -- whether offered, promised, given or received -- must not improperly influence our business decisions, our standard processes, or the decisions or processes *of those with whom we do business*.

They may never be made to: (a) influence official or government acts or decisions; (b) influence someone to violate a lawful duty; or (c) influence someone to provide EPAM an improper or unfair business advantage.



### GIFTS AND ENTERTAINMENT MUST NOT IMPROPERLY INFLUENCE DECISIONS

An outside vendor who helped remodel our office space recently sent me two tickets to a professional sporting event as a thank you. They are great seats, and I know the total face value for both tickets is high. But I don't want to offend the vendor because we will want to use them again. May I keep these?

A

No. What you describe is a single gift above "modest and reasonable value." Accepting these tickets would give the appearance that our decision to select a vendor is based on favoritism or influenced by gifts, not based on merit and our standard procurement process. You should explain to the vendor that our Code does not permit you to accept such gifts, and politely decline and return the tickets.

# Act with Integrity in EPAM Communications, Records and Business Activities

## Important Rules for Gifts and Entertainment Expenses

### GIFTS AND ENTERTAINMENT MUST:

- be lawful
- be of modest and reasonable value
- be infrequent
- not violate the recipient's policies
- not violate EPAM's Code or values
- not harm EPAM's reputation
- not appear to be or actually be done to improperly influence a business decision
- be properly approved
- be properly recorded in EPAM's records with accurate supporting documentation

**GIFTS AND ENTERTAINMENT MUST NOT  
IMPROPERLY INFLUENCE DECISIONS**

My team has just completed a large implementation for a customer. The customer's CIO invited me and the other members of our team to a restaurant to celebrate and will pay for the dinner. Can we accept the invite?

A

*The dinner is related directly to your work for the customer, so as long as the customer is not a government authority (where stricter rules apply) it is okay for you to accept the invite and attend the dinner.*

# Act with Integrity in EPAM Communications, Records and Business Activities

## Respect the Legal Rights of Competitors and Third Parties

We respect and abide by the laws that protect the rights of our competitors and others.

We do not take others' confidential information, violate their rights with their employees or customers, or violate the lawful rights of any others with whom we interact.

## Engage Responsible Suppliers and Business Partners

We do business only with suppliers and business partners who pass our due diligence checks, uphold the principles outlined in our Code of Ethical Conduct and our Supplier Code of Ethical Conduct, and respect human rights.

### RESPECT THE LEGAL RIGHTS OF COMPETITORS AND THIRD PARTIES

A new employee brought documents with pricing data from his prior employer, an EPAM competitor.. Is it okay to use that information to help us refine our own pricing assumptions?



*No. Incoming employees have postemployment restrictions on the information they were given or had access to at their prior employer. We simply don't use another company's confidential pricing information to get ahead. We compete fairly.*

# PROTECT & ENHANCE ASSETS

# Safeguard And Develop EPAM's Company Assets

Each of us shares responsibility to protect and enhance the value of company assets and to use them properly and as authorized —the same way you would treat your own property.

EPAM's Company assets include our facilities, equipment, materials, technology, money, information, physical property and intellectual property. They bring value to EPAM when used for EPAM's legitimate business purposes.

## HOW TO SAFEGUARD AND DEVELOP EPAM'S ASSETS

PROTECT THEM TO AVOID  
WASTE, LOSS, OR THEFT

USE THEM TO ENHANCE THE  
VALUE OF OUR BUSINESS

NEVER USE THEM FOR  
PERSONAL FINANCIAL GAIN

NEVER MISUSE  
OR STEAL THEM

NEVER USE THEM TO  
VIOLATE LAW

REPORT LOST OR STOLEN ASSETS  
TO SUPPORT.EPAM.COM

# Company Property Requires Special Care

## EPAM Retains Rights to Monitor, Access and Review Its Assets

Although EPAM permits occasional personal use of its equipment, networks, and other assets, you should have no expectation of privacy for any information, personal or otherwise, that is transmitted, received or stored using EPAM assets.

EPAM retains the right in accordance with law to access, monitor and/or intercept such information at any time either with or without your or any third party's knowledge, consent or approval.

By using EPAM assets you are deemed to consent to such rights.



EPAM RETAINS RIGHTS TO MONITOR,  
ACCESS AND REVIEW ITS ASSETS

One of my colleagues often works in the office after hours, and uses his work computer to access sites with sexually explicit videos and sends sexually improper emails from his personal email account to his colleagues. Is there a problem?



*Yes. It's never okay to use EPAM computers, electronic equipment, applications, or network systems to store, view or distribute pornographic, sexually explicit or any other improper material in violation of our Code. Our Code and policies prohibit the misuse of our systems and assets, and you are agreeing that you understand and will abide by those principles whenever you use them. Employees that become aware of such conduct should report it.*

# Company Property Requires Special Care

## Confidential Information is Private and Valuable

Our confidential and proprietary information is a special kind of company asset

It is the non-public information that brings EPAM value. If such information is disclosed, it might harm our business or benefit our competitors.

Keep it private, only share it with authorized people and safeguard it from loss or disclosure.

We protect our customers' and business partners' confidential information the same way.

### STANDARD PROTECTIVE MEASURES WHEN HANDLING CONFIDENTIAL INFORMATION

**PROTECT IT FROM LOSS,  
DISCLOSURE OR  
UNAUTHORIZED ACCESS**

**USE IT ONLY  
IF AUTHORIZED**

**USE IT ONLY  
AS AUTHORIZED**

**FOLLOW  
"NON-DISCLOSURE  
AGREEMENTS"**

**SHARE IT SECURELY  
WITH PERMITTED  
RECIPIENTS**

**DO NOT OBTAIN  
INFORMATION YOU DON'T  
NEED OR SHOULDN'T HAVE**

### CONFIDENTIAL INFORMATION IS PRIVATE AND VALUABLE

To get some better ideas about how to solve a difficult coding issue on my current project, I posted some of the customer's code on an internet developer's site, and I asked the developer community a few simple questions about how to improve it. Is that okay?



No. The customer's code, whether existing or code we develop, is confidential information. We have non-disclosure agreements in place with our customers that limit when and how we may share information that may be confidential. Confidential information, like source code, is one of EPAM's most important assets, and it brings value and a competitive advantage to our business and our customers. We must protect it carefully. If you are uncertain of the best coding solution, you should raise your question internally.

## Company Property Requires Special Care

### Examples of EPAM Confidential Information

BUSINESS OPERATING STRATEGIES AND PLANS	TECHNICAL INFORMATION	PRICING INFORMATION	COMPANY FINANCIAL DATA
INTERNAL LEGAL INFORMATION	CUSTOMER AND CLIENT LISTS	PRIVATE EMPLOYEE INFORMATION	RESEARCH AND DEVELOPMENT ACTIVITIES



# Company Property Requires Special Care

## Data Moves and Vanishes Instantly – So We Are Careful With It

When you “handle” company and personal employee data —in electronic or hard-copy form — always take steps to properly protect its privacy and security.

“Handling” data is collecting, storing, accessing, processing, using, transmitting, communicating or discarding.

## Simple Steps to Safeguard Our Data

**TRANSMIT DATA CAREFULLY AND SECURELY TO AUTHORIZED PEOPLE**

**DO NOT USE UNENCRYPTED STORAGE DEVICES (E.G. UNENCRYPTED USB STICKS)**

**DON'T SEND BUSINESS DATA THROUGH PERSONAL EMAILS OR PERSONAL SKYPE**

**DON'T SHARE PASSWORDS**

**ACCESS BUSINESS DATA AND SYSTEMS VIA SECURE NETWORKS**

**USE OUR SECURITY SOFTWARE**

**PASSWORD PROTECT AND SAFEGUARD YOUR MOBILE DEVICES**

**SHIELD AND LOCK DEVICE SCREENS**

**DISPOSE OF DATA SECURELY**

**PROMPTLY REPORT ANY DATA LOSS OR DISCLOSURE**

# Company Property Requires Special Care

## Personal Data - Personally Identifiable Information (PII) Requires Additional Precautions

Personally identifiable information (personal information and sensitive personal information) presents heightened risks to EPAM, as many countries have strict laws about protecting, handling, transferring and processing such data.

Review and consult EPAM's data privacy policy to be sure you are handling PII and any other data properly.

### **SOME EXAMPLES OF PII – DATA THAT ON ITS OWN OR WITH OTHER INFORMATION IDENTIFIES AN INDIVIDUAL.**

NAME

NATIONAL IDENTIFICATION  
NUMBER OR PASSPORT NUMBER

EMPLOYMENT INFORMATION  
SUCH AS EMPLOYER'S NAME,  
POSITION, SALARY

IMAGE (E.G., PHOTOGRAPH)

PERSONAL ADDRESS

IP ADDRESS

# COMPLY WITH LAWS

# Special Government Laws and Rules

## Anti-Bribery Laws

We never offer, promise, provide (or receive) bribes or engage in corrupt business activities with anyone, especially government or public officials.



Bribery may be thought of as gaining a business benefit by:

1. Paying, offering, giving, or promising “anything of value” to a recipient
2. Intending that the recipient will do something improper, like violating official obligations, violating the law, or granting any unfair or improper advantage

## Pay Close Attention to Government Laws and Rules

“Anything of value” includes cash but is a broad term that may encompass anything that has value.

THE FOLLOWING IS AN ILLUSTRATIVE LIST:

CASH

COMMISSIONS

SERVICES

EMPLOYMENT (JOBS  
OR JOB OFFERS)

CHARITABLE OR POLITICAL  
CONTRIBUTIONS

MEALS THAT ARE  
TOO EXTRAVAGANT,  
TOO FREQUENT OR  
OCCUR DURING A BID  
OR NEGOTIATION

ENTERTAINMENT AND  
TRAVEL EXPENSES

EDUCATIONAL BENEFITS

BUSINESS  
OPPORTUNITIES

Any business advantage produced through bribery is forbidden. This includes any of the following potential business benefits:

- Obtaining or keeping any customer, project, contract or work
- Circumventing or avoiding government rules
- Avoiding duties, taxes or penalties
- Influencing the procurement process
- Influencing lawsuits or enforcement actions
- Obtaining tax benefits
- Obtaining licensing benefits
- Obtaining contract or bidding approvals or extensions
- Obtaining any other financial or business benefit

# Pay Close Attention to Government Laws and Rules

Additional due diligence, caution and approvals may be necessary in transactions when red flags are apparent

## EXAMPLES OF RED FLAGS INCLUDE REQUESTING:

PAYMENTS IN CASH (OR CASH EQUIVALENTS, SUCH AS GIFT CARDS, BANK CARDS)

PAYMENTS "IN KIND" (PAYMENTS IN GOODS AND SERVICES FOR OTHER GOODS AND SERVICES)

PAYMENTS BE MADE TO OFFSHORE ACCOUNTS

PAYMENTS BE MADE TO THIRD PARTIES NOT PERFORMING THE SERVICES

THAT EPAM AGREE TO EMPLOY A GOVERNMENT OFFICIAL OR RELATIVE OR THAT EPAM CONSENT TO A GOVERNMENT OFFICIAL'S REQUEST TO EMPLOY A SPECIFIC PERSON

TO PAY FOR ENTERTAINMENT, TRAVEL, OR LODGING OF GOVERNMENT OFFICIALS

TO CONTRIBUTE TO A PARTICULAR CHARITY OR POLITICAL PARTY

PAYMENTS TO THIRD PARTIES FOR VAGUELY DESCRIBED SERVICES

UNUSUAL OR EXCESSIVE PAYMENT OR EXCESSIVE OR NON-MARKET COMMISSIONS OR DISCOUNTS TO ANYONE, ESPECIALLY TO THIRD PARTIES

THAT A CONSULTANT, SUPPLIER OR A THIRD PARTY BECOMES PART OF A TRANSACTION

TO NOT INCLUDE ANTI-BRIBERY COMMITMENTS OR OTHER DUE DILIGENCE MEASURES IN A WRITTEN CONTRACT

# Pay Close Attention to Government Laws and Rules

## Securities Laws

Buying or selling stock (“trading”), or telling others to buy or sell stock (“tipping”), on the basis of “material,” “non-public” information is called “insider trading” and is illegal.

### INSIDER TRADING – BUYING OR SELLING

No EPAM personnel may buy or sell any stock or securities of EPAM (or of any other company) when he or she has “material” and “non-public” information about that company.

### INSIDER TRADING – TIPPING

No EPAM personnel may “tip” others. “Tipping” is providing material, nonpublic information that you possess to other individuals or companies, who use the information to buy, hold or sell securities.



**SECURITIES LAWS**

Is it okay to tell my sister some internal information about a company where she owns stock? I learned the information while doing a recent project with that company.



*No. Information from one of our business partners is covered by confidentiality agreements, and sharing information with your sister would violate those rules.*

*In addition, if the information is something a reasonable investor would consider important, by sharing the information you could be “tipping” your sister to inside information, which violates insider trading laws. Tipping someone to material, inside information that they use to trade securities is as improper as trading on that information yourself. Remember, insider trading is a crime.*

## Pay Close Attention to Government Laws and Rules

Material information is information a reasonable investor would consider important before deciding whether to buy, sell or hold a company's securities.

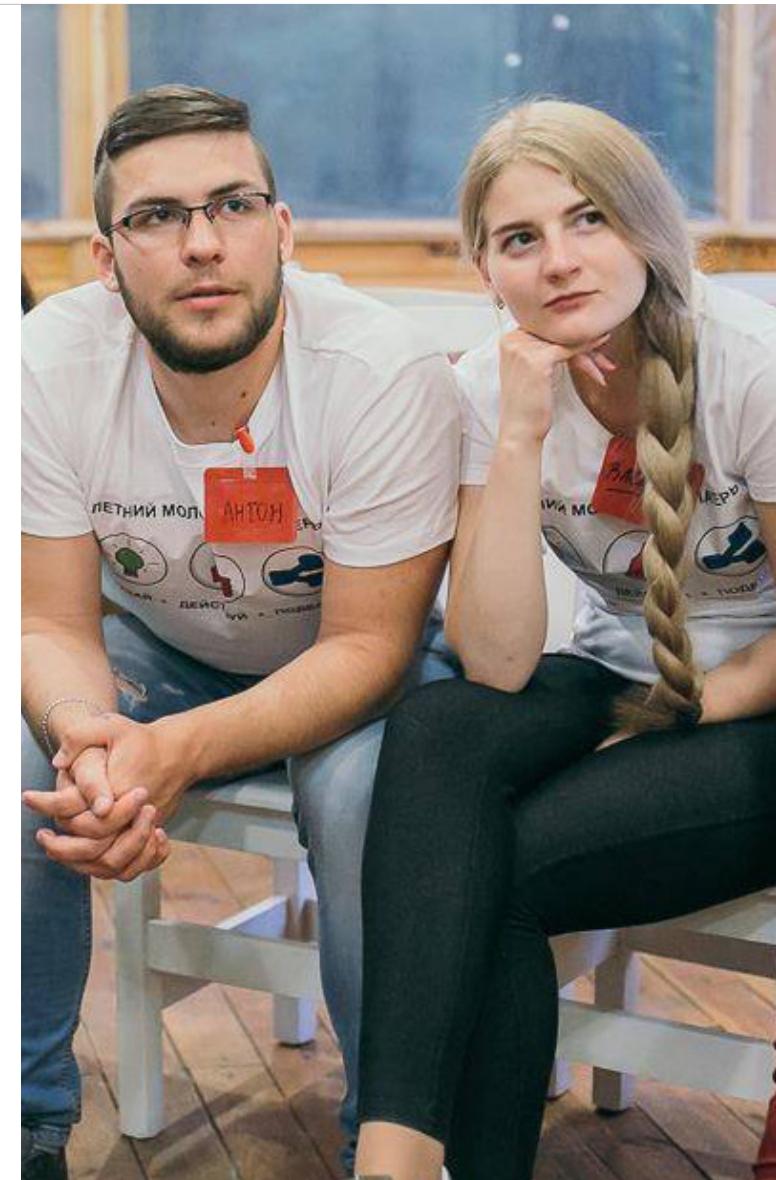
### Examples of Material Information

#### **INFORMATION ABOUT:**

- financial results
- new products
- actual or threatened litigation
- senior leadership changes
- acquisition plans or strategies
- other significant confidential corporate developments not yet made public

### Non-public information is:

- Information not generally known or available to the general public
- Information that has been publicly disclosed but has not had adequate time to be absorbed by the marketplace.



# Pay Close Attention to Government Laws and Rules

## Trade Compliance

Import, export and trade laws govern the worldwide transfer of goods, technology and services, and restrict where and with whom we do business. How they apply depends on the nature of the activities, the countries and the parties involved.

## Important Trade Compliance Steps

- Follow our standard procurement process so that third parties are screened against watch lists (contractors and vendors)
- Comply with economic sanctions and embargoes adopted by countries where we do business
- Report requests to participate in restrictive trade practices like boycotts to Legal or the Compliance Officer
- Obtain an export control license or other required government authorizations where needed
- Use accurate and complete trade documentation.



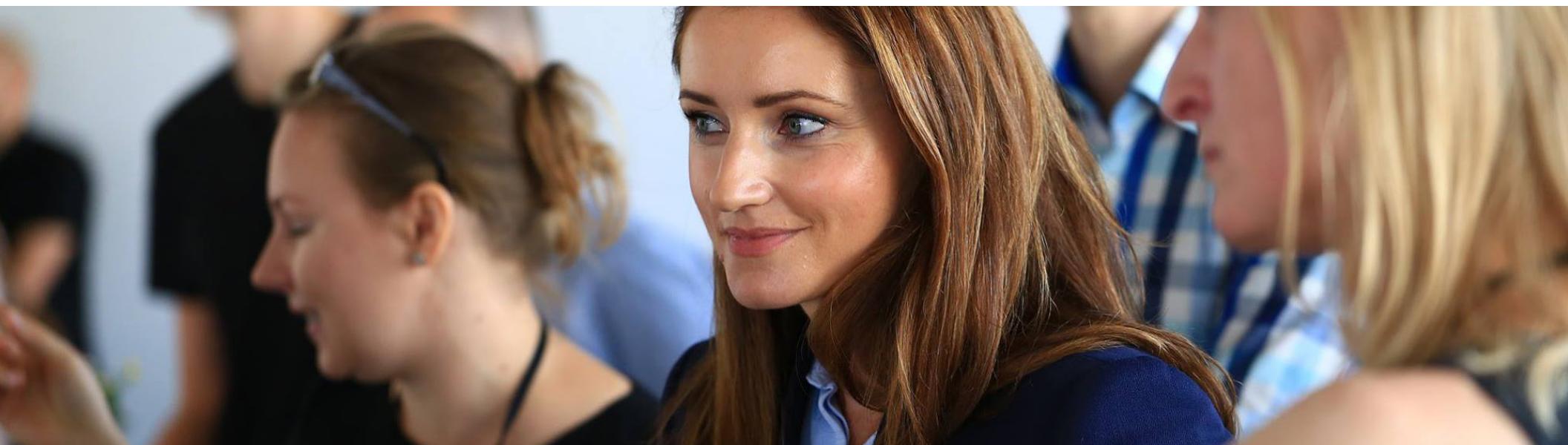
# Pay Close Attention to Government Laws and Rules

## Anti-“Money Laundering” Compliance

Money laundering is concealment by criminals of the true origin and ownership of money obtained from their criminal activities by passing it through legitimate businesses. If successful, it allows them to maintain control over such money and ultimately to provide a legitimate cover for it.

EPAM does business only with reputable clients and third parties engaged in legitimate business activities with funds derived from legitimate sources.

Questions about the legitimacy of funds or sources of funds should be raised to Legal or the Chief Compliance Officer.



# Pay Close Attention to Government Laws and Rules

## Antitrust and Fair Competition Laws

Antitrust and competition laws encourage fair and free competition and protect consumers from unfair business practices or agreements that unreasonably limit competition.

We comply with the spirit and letter of such laws in our interactions with customers, suppliers, competitors and other third parties.

- Do not discuss or enter into prohibited agreements with competitors that restrict competition.
- Do not make misleading or untrue statements about our products or services or those of our competitors.
- Procure materials, supplies and services at fair and reasonable prices.

## Prohibited Agreements or Discussions

### EXAMPLES OF PROHIBITED AGREEMENTS OR DISCUSSIONS:

- Fixing prices or pricing levels or other terms of sale
- Allocating, dividing or sharing territories or customers
- Bidding or not bidding on contracts
- Refraining from selling or buying from particular parties

# Pay Close Attention to Government Laws and Rules

## Immigration Laws

EPAM's and our clients' ability to conduct business on a global scale may involve cross-border travel, which can raise immigration, payroll and tax requirements and obligations. Valid work authorizations and documentation, such as work permits or work visas, are usually required if you are going to perform productive work in a country other than your home country.

When you are involved in foreign travel for yourself or for others, work with the Travel team to confirm any visa requirements and/or check the following guide: <https://epa.ms/bvm>. For country relocations, work with the appropriate Relocation teams so that you take all necessary steps to comply with immigration laws.



## What Else?

### Understand

Take a moment to really understand the Code. While no document could ever provide examples of every scenario you may encounter, our Code is the foundation for proper action at EPAM. Refer to our Code often and always abide by it.

### Reach out and Speak Up

When you need more guidance, do not hesitate to reach out and speak up. EPAM respects and values such conduct because it helps us build and maintain the best working environment.

### Act as a Team

If we act as one EPAM team, we will benefit from our shared, good judgment. That will keep EPAM a company that is trusted and valued by our employees, our customers, our shareholders and all of our business partners.



## EPAM EthicsLine – Phone Number

### Contact us

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If you would prefer to speak to someone confidentially,  
call us and one of our representatives would be happy to assist you.

**For English: +1-866-786-9137**

*Call anytime on our Toll-Free Number*

<epam>

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THANK  
YOU

ISSUED - MARCH 2018   REVISED - MARCH 2021