

A woman with long dark hair, wearing a black and white striped shirt, is shown in profile, looking towards the right. She is standing in front of a whiteboard covered in numerous sticky notes. The scene is bathed in a soft blue light, suggesting an office environment. The woman is holding a pen in her right hand, which is positioned near the whiteboard. She is wearing a ring on her right hand and a small earring. The overall mood is professional and focused.

Cognizant[®]

Code of Ethics

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Cognizant's Ethics & Compliance
Be.Cognizant page

Cognizant's Global
Corporate Policies

A Message from Brian

Team,

Each day provides opportunities to show that we are truthful, ethical, and principled. Every time we interact with clients, prospects, partners, and one another, we are making a statement about our company's character. Simply put, Cognizant's global reputation is in our hands. Staying true to our values of integrity, ethical behavior, and lawfulness is critically important.

As ingrained and powerful as our culture of integrity is, our reputation can be damaged with just one small lapse. So we must stay ever vigilant to maintaining our culture of ethics and compliance. Our Code of Ethics is designed to help us do so.

This Code, together with our company's vision, purpose, and values, serves as our guide to conducting business the right way. We follow all applicable laws in the countries in which we do business. We never cut corners or bend the rules. We treat one another with respect. We always report suspected misconduct with the knowledge that our company will protect us from retaliation for doing so in good faith. In short, we fuse high performance with high integrity.

Living by a clear set of values, ethics, and standards is what earns and sustains the trust of clients, which in turn creates a competitive advantage, contributes to our growth, and strengthens our brand.

Let's all work together to ensure that acting with integrity remains core to our culture.

A handwritten signature in black ink, appearing to read 'Brian Humphries', written in a cursive style.

Brian Humphries
Chief Executive Officer

The Right Way at Cognizant

We engineer modern businesses to improve everyday life. This is our purpose, and how we do it matters more now than ever.

At the heart of our purpose is a desire to improve not just our clients' businesses, but how we operate as a leader in our industry. One way we distinguish ourselves in the market is by maintaining the highest standards of integrity. Our reputation and our success depend on it— but it's more than that. Whether at work, in a development center, on-site with our clients, in our corporate office, or in our everyday lives, integrity is core to who we are.

We created our Code of Ethics ("Code") to help you ensure that everything you do at Cognizant is in accordance with our standards of integrity. The principles of this Code, and the related Ethics and Compliance Program are approved by and have the full support of Cognizant's Board of Directors. The Board of Directors and management is responsible for overseeing the Ethics and Compliance Program and compliance with this Code.

**Everyone is responsible
for maintaining a culture of
integrity at Cognizant.**

Our Code applies to all Cognizant directors, officers, and employees worldwide as well as all Cognizant business units, subsidiaries, and joint ventures over which Cognizant has operational control (collectively "associates").

The Four Principles:

How we do our work defines us.

1. We earn trust.

We continually strive to be a trusted business partner and corporate citizen. In pursuing this goal, we must consistently incorporate ethical standards into our day-to-day business activities

2. We do the right thing, the right way.

Our clients, shareholders, and communities depend on our commitment to perform with the highest level of integrity.

3. We respect people and the environment.

We are committed to a safe and healthy work environment.

4. We live up to our responsibilities.

Our commitment to doing business ethically includes respecting privacy, protecting information, and safeguarding assets.

How to Follow Our Code of Ethics

As an employee at Cognizant, you are expected to:

- Uphold our culture of integrity in all you do.
- Understand and follow our Code, policies, and procedures.
- Follow applicable laws, rules, and regulations in every country in which we operate.
- Report all suspected violations of our Code without fear of retaliation.

What Associates Must Do

All associates are responsible for upholding our culture of integrity. It is not only the right thing to do, but also an integral part of our commitment to excellence and our dedication to being a responsible corporate citizen.

LEARN

- Be familiar with, understand, and uphold our Code.
- Know the details of any part of our Code, policies, and procedures that are relevant to your specific daily responsibilities.

BE AWARE

- Look for and address developments in your business or functional area that might impact Cognizant's compliance with laws and regulations, or our reputation.

BE VIGILANT

- Report any suspected violations of our Code, policies, and procedures or law.
- Cooperate fully in Cognizant investigations related to our Code, policies, and procedures.

COMMIT

- Complete Cognizant's required compliance training courses on a timely basis.
- Execute an annual certification acknowledging your commitment to the principles in our Code.

What Managers Must Do

Managers are accountable for fostering an atmosphere of compliance in which associates clearly understand their obligations and feel at ease to raise a concern without fear of retaliation.

EDUCATE

- Remind associates that business results are never more important than ethical conduct and compliance with our Code.
- Ensure that associates know that they can always report suspected violations of the law, or of our Code, policies or procedures, without fear of retaliation.

LEAD

- Foster a spirit of ethics, integrity, and lawfulness by personally leading compliance efforts.
- Communicate the importance of compliance at every appropriate opportunity.
- Never retaliate or tolerate retaliation against any individual for making a good-faith report.

COMMUNICATE

- Immediately inform our Chief Ethics & Compliance Officer upon receiving a report of suspected violation of our Code, policies, procedures or law.

We Earn Trust

At Cognizant, we continually strive to be a trusted business partner and corporate citizen. In pursuing this goal, we must consistently incorporate ethical standards into our day-to-day business activities.

Prevent Corrupt Activities

We do not give or receive bribes. Never authorize, offer, promise, or provide “anything of value” – including a bribe – to get business or secure any advantage in connection with Cognizant’s business. Do not request or accept any bribes, kickbacks or other improper benefits.

We do not make facilitation payments. Do not make facilitation payments to expedite routine government administrative actions, unless approved in writing by the General Counsel.

We keep accurate business records. Submit accurate and complete timesheets, travel and expense reports, financial statements, customer billing, and other records. Never misconstrue or mislabel a transaction in our books and records or circumvent stated policies or controls. The company’s books and records must correctly reflect the true nature of all business transactions, no matter how small.

We do not use third parties to “work around” our policies. Do not retain a third party to make an improper payment on our behalf or to do anything that we cannot do under our company policies.



IMPORTANT DEFINITIONS

A **bribe** is any payment or “Anything of Value” offered or provided to improperly influence a decision-maker or to obtain an unfair business advantage.

Anything of Value includes items such as cash, bonuses, gifts, favors, charitable donations, political contributions, offers of employment, hospitality/entertainment, kickbacks, or any other type of preferential benefit.

A **facilitation payment** is generally a small, unofficial payment made to a low-level Government Official for the purpose of expediting the performance of a routine, nondiscretionary government action.

A **Government Official** is any individual acting in an official capacity for or on behalf of a Government Entity, including an employee or official of any Government Entity.

A **Government Entity** refers to any:

- Government or government division;
- Department, agency, or instrumentality of such a government or organization;
- Political party; or
- Company or entity owned or controlled (partially or wholly) by or acting on behalf of any of the above.

Q&A

A Simple Thank You?

I am planning to give a gift to my client to thank them for their loyalty to Cognizant. I know he has children so I am planning to purchase an Xbox for each child. They are so popular right now! Since this client is a platinum account, this seems appropriate, right?

No, that would not be appropriate.

Cognizant has specific principles that govern the provision of gifts, entertainment, and hospitality. This proposed gift would be inconsistent with those principles. Always review and follow our Procedure for Gifts & Entertainment before giving or receiving a gift. Providing expensive gifts or entertainment to clients or their relatives could create the appearance of improper influence, even if it is legally permitted.

Expecting Too Much?

I am considering a new vendor for an initiative our team is launching later this year. As part of the evaluation process, I asked the vendor if they would agree to comply with the detailed anti-corruption provisions in our agreement, which include compliance with anti-corruption laws, completing anti-corruption training, and conducting anti-corruption diligence on sub-vendors that may interact with government officials on Cognizant's behalf. The vendor was noncommittal. Am I expecting too much?

If Legal or Ethics & Compliance deem your vendor to be high risk for one reason or another, then **you are obligated to ensure that appropriate controls are in place to manage that risk.**

In this instance, if the vendor has been deemed high risk for anti-corruption purposes, then the requirements set forth by Legal or Ethics & Compliance – including contractual provisions with related consequence management, including termination rights – must be complied with. **You are not expecting too much** and you should not move forward with the vendor unless they agree to comply.

Manager Approval Allowed?

A client has asked if Cognizant would like to be a sponsor for their annual golf tournament at the silver level for USD \$4K. The sponsorship includes our logo in the event ad/program, company signage throughout the event, two foursomes, and promotional item giveaways. If we have the funding available, can the decision to participate be made by my manager?

No. In addition to your manager's approval, other reviews are required depending on the nature of the activity. If the golf tournament

is a charitable event in which the proceeds are given to a charitable organization, you need to follow the process outlined in the Procedure for Charitable Contributions & Sponsorships. If the golf tournament is not a charitable event, you must follow the Global Events Requisition Policy. For more information on the requirements and review process, see the Global Events page.

Also, if the sponsorship is approved to move forward, be mindful of the requirements of the Procedure for Gifts & Entertainment if others outside of Cognizant are invited to play golf (as part of the two foursomes) or receive anything else of value that only a paying attendee would receive.

Avoid and Manage Conflicts of Interest

We conduct business only in Cognizant's best interests. Putting our personal interests over the interests of Cognizant creates a conflict of interest and is not allowed. We never conduct business based on our personal relationships or any personal or financial stake we may have in the outcome of a decision. Similarly, we never use our connection to Cognizant for personal gain of any kind. Potential conflicts could arise through:

- **Outside Employment & Board Memberships**
- **Financial Investments and Arrangements**
- **Close Personal Relationships**
- **Government Roles**
- **Corporate Opportunities**
- **Gifts & Entertainment**

Cognizant requires that associates disclose any situation that would reasonably be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your manager or Cognizant's Chief Ethics & Compliance Officer as set forth in our Conflicts of Interest Policy.

If you are an executive officer or Board Member, you must report any such situation in writing to Cognizant's General Counsel who will then discuss with the Chair of the Audit Committee of the Board of Directors, as needed. Cognizant's Chief Ethics & Compliance Officer or the General Counsel, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could potentially give rise to a conflict of interest involving an executive officer or Board Member must then be referred to and approved by the Audit Committee.

We give and receive gifts and business hospitality only as appropriate and under certain circumstances. It is the obligation of all associates to ensure that any gift or business hospitality is only offered or accepted in strict accordance with applicable company policies. As a general rule, giving or receiving gifts or entertainment that improperly influence business decisions, or create the appearance of doing so, is prohibited. While the provision of reasonable (non-lavish) gifts and entertainment in support of relationship building with a client given in an open and transparent fashion can be permissible, care must be taken to comply with applicable law and avoid any appearance of impropriety. The Company's Procedure on Gifts and Entertainment provides guidance on acceptable gifts and entertainment and also sets forth specific approval requirements for certain gifts and entertainment.

Participation In Political and Lobbying Activities

Associates may participate in the political process when it is clear that such activity is conducted on an individual basis — not on behalf of our company or during working hours. Use of company facilities or resources for political activity may be permissible, but only with advance approval by our Government Affairs Department. Similarly, we do not make political contributions to candidates or lobby the government on behalf of Cognizant unless it is explicitly approved in writing by Cognizant's Government Affairs Department.

PLEASE NOTE

A conflict of interest is not automatically a violation of Cognizant's Code. However, a failure to promptly disclose a conflict is always a violation. In fact, many conflicts can be cleared or easily resolved once reported.

Disclosing and seeking approval for any activity that may give rise to a potential conflict allows the company to document its approval and any agreed upon controls to mitigate the impact of that conflict on the company.

Q&A

Asking For A Friend

I am part of a team selecting a new vendor and my brother-in-law works for one of the companies we are considering. Looking at the facts and data, his company does great work and I think it is the right choice. Is it okay for me to recommend his company since I think that is what is best for Cognizant?

You can recommend the company, but you need to **inform your manager** about your relationship and **excuse yourself from the decision-making process**. This is the best way to ensure there is no appearance of something unfair or improper.

Work On The Side

I am considering working part-time for a start-up company that does not compete with or have offerings similar to Cognizant. Since the work I would be doing for them is different from my job at Cognizant, it should not be a problem, right?

Disclose, disclose, disclose!

With limited exceptions, all outside roles and interests must be disclosed on the Cognizant Ethics & Compliance Portal. Refer to Cognizant's Conflicts of Interest Policy for more information about conflict of interest principles. If you have questions, ask the Ethics & Compliance Helpline – click Ask A Question.

KEY TAKEAWAYS

- Prevent corrupt activity.
- Always report any sign of corruption or unethical behavior, even if you're not absolutely sure.
- Putting our personal interests before Cognizant's creates a conflict of interest and is not allowed.
- You have a duty to report any possible conflicts of interest right away.
- Associate involvement in the political process should be done only in a personal capacity and not on behalf of the company.

**LEARN MORE**

- Anti-Corruption Policy
- Conflicts of Interest Policy
- Procedure for Gifts & Entertainment
- Procedure for Charitable Contributions & Sponsorships
- Procedure for the Selection & Retention of Third Parties
- United States Political Activities and Gifts to Government Officials Compliance Policy
- Doing Business with the U.S. Public Sector Policy

We Do the Right Thing, the Right Way

Our clients, shareholders, and communities depend on our commitment to perform with the highest level of integrity.

Compete Fairly and Honestly

We respect our competitors' confidential information. To compete fairly in the marketplace, we must show the same respect for the confidential information of our competitors that we show for our own. Always gather competitive information in a lawful and ethical manner, never through deception or misrepresentation. For example, we do not use our access to customer systems to search for competitor presentations or other such information that may be viewable without proper authorization. Similarly, we may not retain or use a third party to do what we ourselves cannot.

Comply with Competition Laws

We comply with antitrust and competition laws of every country where we do business. Never engage in agreements, understandings, or plans with competitors that limit or restrict competition, including price-fixing and allocation of markets. Do not discuss the prices we charge for services or our business strategies with competitors.

Conduct Ethical Sales, Marketing & Delivery

We use ethical sales and marketing techniques. Never seek an unfair advantage over potential or current clients, vendors or competitors by abusing confidential information, manipulating, concealing or misrepresenting facts, or any other unfair-dealing practice. Our communications about our services, whether oral or in written promotional materials, presentations, or slide decks should always be accurate.

A Competitive Edge

I have access to a client's intranet as part of my job. I know we are trying to win more business with the client and I found some information on their intranet that I think could be helpful to the bid team. It is not marked confidential and I have access to it, so it is okay to share it, right?

No, it is not okay to share. It is also not okay to view this information unless doing so is part of your role. We cannot use our access to client systems to search for competitive information or other such information that may be viewable without proper authorization. When our clients give us access to their systems and internal information, we need to respect that trust and always act ethically with integrity. Even if the information available is not restricted, otherwise protected, or marked confidential, we have to consider the commercial sensitivity of the information and not use it for our benefit without approval. We should never compromise our integrity, our reputation, or our standards. No shortcuts, no cutting corners, no unethical or questionable practices. That is not how we ever want to win business. We only want Cognizant winning business the right way – with integrity and on the strength of our talent and work ethic.

Respect International Trade

We follow all international trade regulations.

Wherever you work, you must obey laws and regulations concerning embargoes, economic sanctions, export controls, import requirements, and antiboycott regulations. Cognizant prohibits doing business with or supporting – directly or indirectly – certain countries and parties. In addition, these laws and regulations apply to a number of aspects of our business; including technology transfers, accessing software, travel across borders with technical data documents, the sharing of controlled information with foreign nationals during visits to the United States or even to foreign nationals who may have access to export-controlled software, data, or technology while working in the United States.

Prohibit Money Laundering

We do not engage in money laundering. We are committed to conducting business only with reputable clients involved in legitimate business activities, with funds derived from legitimate, lawful sources. Never participate in acquiring, using, converting, concealing or possessing the proceeds of crime, nor assist any other party in doing so.

KEY TAKEAWAYS

- **Compete ethically.**
- **Obey all laws and regulations governing competition and trade.**
- **Know your client and only do business with reputable clients involved in legitimate business activities with funds derived from lawful sources.**

LEARN MORE

- Financial Stewardship Policy
- Procedure for Anti-Money Laundering Compliance
- Global Trade Compliance Policy
- Intellectual Property Policy

RFP Dilemma

I am working on an RFP for a customer that is looking for Cognizant to provide onsite support for its worldwide locations, which include some countries I believe are embargoed. The project will also require Cognizant to license and send copies of software to the customer's different locations around the world and contains an export compliance provision that requires Cognizant to obtain export licenses from the relevant authorities. Can I proceed with responding to the RFP?

Before proceeding, you must involve Cognizant's Global Trade Controls ("GTC") team and Legal. First, Cognizant prohibits doing business with embargoed countries and sanctioned parties. You think you may have identified some of those countries in the RFP. GTC will need to determine whether Cognizant can provide onsite support in the countries involved. Second, the RFP appears to require Cognizant to take on export and import obligations for sending the software. Such activity requires GTC assistance to ensure we proceed in compliance with the applicable laws.

We Respect People and the Environment

We are committed to a safe and healthy work environment.

Respect Human Rights

We uphold human rights in all of our global operations. Everyone who works for Cognizant is entitled to fair wages and hours, consistent with local laws, and is entitled to an environment free from discrimination, harassment and retaliation.

We do not condone human trafficking in any form. We do not make use of child labor or forced labor and we will not work with third parties that engage in such practices. In the event we were to learn of human trafficking, we immediately report such incidents to law enforcement.

Commit to Environmental Responsibility

We are committed to operating in an environmentally responsible manner. We utilize sustainable practices to help reduce our environmental footprint and ensure our impact on the world is a positive one. Always follow the environmental laws, regulations, and standards that apply in your location.

Protect the Health and Safety of Ourselves and Others

We maintain a safe working environment.

All business activities should be conducted with the necessary permits, approvals, and controls. Report any potential health or safety issues to your manager.

We do not tolerate violence, threats of violence, intimidation, bullying, abuse, or physical retaliation in the workplace. If you are a victim or witness these activities, report it to a manager immediately.

We do not work under the influence of drugs or alcohol. We forbid the use, sale, purchase or possession of illegal drugs, the abuse of doctor-prescribed drugs, and the abuse of alcohol on our property or while on company business. Tell a manager if an associate's performance seems impaired, or if someone is using a banned substance at work.



PLEASE NOTE

If you witness or are the victim of an act of violence, intimidation, the threat of violence, abuse, physical retaliation, or other threatening behavior, you should report the matter immediately to a manager.



Treat People Fairly and Prohibit Discrimination and Harassment

We make employment decisions based on merit. We treat others with fairness and respect, and value each other's individual contributions. We never discriminate against a person's legally protected characteristics, such as race, color, religion, gender identity, age, national origin, sexual orientation, marital status, disability status, or veteran status when we make employment decisions including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment. We also comply with all applicable equal employment opportunity laws, including those related to discrimination and harassment.

We do not tolerate discriminatory conduct, abuse of authority, or harassment of any kind, including that of a sexual nature. We also refrain from making jokes, slurs, or other

remarks about a person's legally protected characteristics as applicable in a specific country, or those of a sexual nature. At no time should we allow, encourage or create an offensive, violent, discriminatory, abusive, or hostile environment, whether in a location where we conduct our business (such as a Cognizant office or a client site) or at other locations where we congregate for a work-related activity or event (such as a restaurant, hotel or conference center).

LEARN MORE

- Statement on Modern Slavery
- Human Rights Policy
- Environmental, Health and Safety Policy
- Sustainability and Social Responsibility site
- See the Human Resources Policies site for country specific policies and information.

Hostile Work Environment

My boss is verbally demeaning to me and several other women on the team about our appearance and intellect, and offers us very few opportunities. While, on the other hand, she always praises and rewards other male members of the team. I want to speak up, but I'm afraid that if I do, my boss will find out. Should I just keep quiet?

Absolutely not! This type of behavior is inappropriate and could be considered harassment. Under no circumstances is it appropriate for any Cognizant associate to make comments that are derogatory, abusive, or sexual in nature. We have a strict prohibition on retaliation for reporting suspected or actual ethical violations, including workplace harassment and Cognizant will protect you if any manager were to act against you because you raised a concern.

We Live Up to Our Responsibilities

Our commitment to doing business ethically includes respecting privacy, protecting information, and safeguarding assets.

Respect Privacy, Confidentiality and Keep Our Data Secure

We respect and protect the confidential and personal information we hold on behalf of our clients, our associates, and third parties. We collect and handle confidential and personal information in accordance with applicable laws and take measures to maintain it securely in accordance with our corporate policies.

Safeguard Company and Client Assets

We use company and client technology properly. When using client systems and technology, know and follow all contractual obligations. Be familiar with Cognizant's Acceptable Use Policy.

We safeguard company and client assets from misuse, abuse, unauthorized disclosure and theft. We safeguard company and client assets – including physical property, intellectual property, and confidential information (e.g. strategic and business plans; financial, sales, or pricing information; customer lists and data; vendor terms with suppliers; and promotional plans) – from misuse, abuse, and theft. Misuse includes sharing confidential information with associates who do not need to know it for their job responsibilities and disclosing confidential information outside the company without authorization.

We respect the intellectual property rights of others and do not misuse their confidential information. We obtain appropriate approvals before accessing or using third-party software, data, information, graphics or systems. Our associates do not use confidential information from their prior employers or our competitors.

London Calling

I just received an email from someone claiming to be Kristina from our London office, but her email address is from the @gmail.com domain. Kristina requested that I share personal information such as date of birth for some of our associates. We work in a really big company so I don't know everyone but since the request is coming from another associate, should I respond?

You should verify the individual's identity, purpose of the request and their "need to know". We should not be providing personal information to anyone (inside or outside Cognizant) unless you can verify their identity, authorization to access the information and that it be sent only to a Cognizant email account. If you need help responding or making those verifications, reach out to your manager. If you become aware of or suspect a loss or misuse of personal information, report it immediately! It is very important to notify [CSIRT](#) of any data incident as soon as you become aware it.

Communicate Professionally and Accurately

We communicate professionally and appropriately. Never threaten, libel or defame any person or company. Be thoughtful in your communications, including on social media.

We do not communicate to the press or via social media on behalf of the company unless authorized. Unless you are authorized in writing by the Head of Investor Relations or the Head of External Communications, do not communicate with any member of the media or investment community on behalf of Cognizant, clients, competitors or our industry.

Never Engage In Insider Trading

We are responsible for not engaging in and helping prevent insider trading. Through our work at Cognizant, we may from time to time learn of material nonpublic information about Cognizant or another company (such as a current or potential customer, partner or M&A target). We have an obligation to ensure that we and our affiliated persons, such as family members, do not trade on such material nonpublic information or provide (“tip”) or allow access to such information to others who might trade. Cognizant associates must fully understand and comply with Cognizant’s Insider Trading Policy and related policies and procedures.

Practice Good Financial Stewardship

We are good stewards of the company’s resources — time, money, people, and property — and make decisions that best serve the interest of the company. Always use company resources wisely, and ensure expenditures comply with all relevant Cognizant policies and procedures.

We accurately record and support all transactions in our books, records, accounts, and financial statements. Associates must ensure that we maintain complete, accurate and timely books and records and that our accounts accurately reflect transactions. This is a prerequisite to preparing accurate financial statements for external stakeholders. Cognizant also has zero tolerance for submitting false or inaccurate claims to its clients or third parties with whom it interacts, including any government entities. Always ensure you record and categorize all costs — including timesheets, travel & expense reports and other billable expenses — to the appropriate accounts and clients and carefully review all documentation to ensure its accuracy.

We protect sensitive financial data from disclosure to third parties. Only share sensitive financial data with those who need to know. Prior to transmitting Cognizant sensitive financial data to a third party, take all necessary precautions to ensure that information is kept confidential and secured.

In The News

I was contacted by a reporter who is asking about some rumors I’ve been hearing in the office. Everyone is talking about it so I can help them out and share what I know, right?

Only authorized spokespeople can communicate with the media on behalf of the company. If you are approached by any media representative (e.g. reporter, blogger, editor), direct those queries to the Corporate Communications team. Never disclose company information, including emails, and always be mindful of the potential to accidentally share internal confidential information that you have been exposed to. Consider this, you could be in a WhatsApp group right now that includes third parties such as press or competitors. If you were to discuss imminent personnel changes that have yet to be announced, you would have just shared internal, confidential information. Be mindful of the information you have access to and be careful not to share confidential information externally. Thank you for doing your part in keeping all confidential information inside the company!

Manage Records Responsibly

We retain and dispose of business records lawfully and responsibly. Always follow the Record Retention Policy and associated record retention schedules that apply to our locations and projects and never destroy records unless doing so is compliant with any applicable record retention schedule requirements and/or any legal hold notices.

KEY TAKEAWAYS

- Be sure to protect our company and client information and assets.
- Communicate professionally and appropriately.
- Do you suspect misuse of Cognizant or client assets? Report it to CSIRT@cognizant.com.



LEARN MORE

- Global Privacy Policy
- Associate Privacy Notice
- Intellectual Property Policy
- Acceptable Use Policy
- Record Retention Policy
- External Communications & Social Media Policy
- Insider Trading Policy
- Financial Stewardship Policy

Additional Considerations

Good Judgment

Our Code does not take the place of the good judgment that all Cognizant associates must exercise every day. If you ever feel that you or another associate is dealing with an ethical issue, consider the following before you decide how to proceed:

- **Could it be against the law?**
- **Could it cause harm to Cognizant's brand, reputation, financial performance or business relationships?**
- **How would the decision look to other Cognizant associates or to someone outside of Cognizant?**
- **Am I willing to be held accountable for this decision?**
- **Is this in line with Cognizant's Code?**

Government Investigations

Nothing in our Code should be misunderstood to prevent you from reporting a violation of law to a government agency, or from cooperating in a government investigation. If you have any questions about government investigations, please direct them to the Legal Department.

Waivers of this Code

While the policies contained in this Code must be strictly adhered to, an exception could be appropriate under special and limited circumstances. If you believe an exception is appropriate, you should contact your immediate manager, and if he/ she agrees, you must obtain approval from our Chief Ethics & Compliance Officer.

Our Chief Ethics & Compliance Officer maintains a record of all requests for exceptions and the disposition of such requests, and reports such

requests and dispositions to the company's Audit Committee.

Any executive officer or Board Member who seeks an exception to any of the Code provisions should contact the company's General Counsel. Any waiver of the Code for executive officers or Board Members or any change to this Code that applies to them may be made only by the Board of Directors of the company, and may be disclosed as required by law or stock market regulation.



Getting Help or Reporting a Concern

Cognizant associates have a responsibility to report suspected violations of this Code. Cognizant is committed to ensuring that an individual does not face retaliation for reporting such concerns.

PLEASE NOTE

- **If you suspect a violation of our Code, report it.**
- **There will be no retaliation for making a report, even if no violation is found.**
- **Associates must fully cooperate with investigations of ethics or compliance issues.**

Retaliation for Reporting is Prohibited

Cognizant is committed to ensuring that an individual does not face retaliation for reporting ethics and compliance concerns in good faith. Prohibited acts of retaliation include discharge, demotion, suspension, harassment, threats, or any other action that discriminates against an individual who submits a report of suspected non-compliance. Those engaging in acts of retaliation are subject to disciplinary action, up to and including termination, as permitted by local laws. If you know or suspect that you or someone you know has been retaliated against, you should contact our Chief Ethics & Compliance Officer or the Ethics & Compliance Helpline immediately.

For more information about our prohibition on retaliation for reporting, please see our Whistleblower and Non-Retaliation Policy.

To report a real or suspected violation of our Code, the following individuals and resources are available:

- Any member of the Cognizant Legal Department
- Our Chief Ethics & Compliance Officer
email: chiefcomplianceofficer@cognizant.com
mail: Cognizant Technology Solutions
Attn: Chief Ethics & Compliance Officer
Glenpointe Centre West
300 Frank W. Burr Boulevard
Suite 36, 6th Floor
Teaneck, New Jersey 07666
USA
- Our Cognizant Ethics & Compliance Helpline (See page 20 of this document.)

Accessing the Cognizant Ethics & Compliance Helpline

To access the Ethics & Compliance Helpline via the internet, please go to www.cognizant.com/compliance-helpline and follow the instructions for submitting a report.

To make a report by telephone, please dial the number specific to your country and follow the prompts:

United States & Canada
1-866-824-4897

United Kingdom
0800-89-0011
followed by
866-824-4897

Netherlands
0800-022-9111
followed by
866-824-4897

Germany
0-800-225-5288
followed by
866-824-4897

India
000 117
followed by
866-824-4897

Philippines
105-11
followed by
866-824-4897

Singapore
800-011-1111
followed by
866-824-4897

	Brazil	
landline:		mobile:
0-800-890-0288		0-800-888-8288
followed by		followed by
866-824-4897		866-824-4897

All other locations:
Country access code + 866 824 4897

Additional AT&T Direct Access Codes are available at
<https://www.business.att.com/collateral/access.html>

The Cognizant Ethics & Compliance Helpline is serviced by a third-party provider that is available by phone or online 24 hours a day, 7 days a week. Reports of suspected violations or concerns may be made anonymously, where local laws allow. However, you are encouraged to identify yourself when making a report, so that additional information can be obtained if needed. Whenever possible and permitted by law, your identity will be kept strictly confidential. The Ethics & Compliance Helpline also features a Question Manager, where an associate may seek advice.

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