



# Cognizant's Core Values and Standards of Business Conduct





---

## Our Reputation is in Your Hands

Dear Associates,

For over two decades, Cognizant has maintained a positive work environment that is fair, productive, and rewarding. We built our reputation by respecting each other and behaving with integrity in all of our interactions. Our work is imbued with a shared culture and values, an unwavering belief in doing the right thing and in doing the best work for our clients no matter where we are in the world.

I have said many times that the easy way is not the Cognizant way. We do not cut corners, bend the rules, or look for shortcuts—and we have a zero-tolerance policy toward those who do. This document represents the comprehensive, across-the-board ethics program that underscores our commitment to integrity and moral responsibility. I encourage all of us to freely report any suspected misconduct with the confidence that our company protects us from retaliation for doing so in good faith.

Business integrity is woven into the cultural fabric of Cognizant. Every time we interact with clients, partners, competitors, and each other, we carry a piece of Cognizant's reputation with us. Every day, we work to fortify the strong tradition of ethics, integrity, and transparency that has been pervasive in our organization since our founding.

These Standards of Business Conduct, combined with our Core Values, reflect the best practices and highest standards in our industry. It's up to all of us to maintain those high standards in all that we do to ensure that we continue to raise the bar and set the example for our peers and competitors around the globe.



Best regards,

**Francisco D'Souza**  
Chief Executive Officer



## The Right Way at Cognizant

In the competitive service environment in which we operate, we must maintain the highest standards of integrity. Our reputation and our success depend on it. Whether we're working in a development center, on-site with our customers, in our corporate office, or in our everyday lives, we must be role models of integrity.

Our Core Values (Values) define the behaviors that will make us successful in the marketplace.

### Our Core Values

- ▶ Transparency
- ▶ Passion
- ▶ Empowerment
- ▶ Collaboration
- ▶ Customer Focus
- ▶ Integrity





# Table of Contents

---

▶ Our Reputation is in Your Hands	i
▶ Our Core Values in Action	ii
▶ The Right Way at Cognizant	ii
▶ Our Core Values	ii
▶ We are Guided by Our Standards	1
▶ Getting Help or Reporting a Possible Violation	1
▶ How Reports are Handled	2
▶ Prohibiting Retaliation for Reporting	2
▶ Managers' Additional Responsibilities	2
▶ Our Ethics Earn Trust	4
▶ Preventing Corrupt Activities	4
▶ Avoiding Conflicts of Interest	5
▶ Never Engaging in Insider Dealing	9
▶ Creating Effective Records	10
▶ We do Business the Right Way	14
▶ Explaining Competition Laws	14
▶ Conducting Ethical Sales and Marketing	14
▶ Respecting International Trade	15
▶ Driving Quality	16
▶ Our Responsibilities are Clear	18
▶ Practicing Good Corporate Citizenship	18
▶ Participating in Public Activities	18
▶ Adhering to Safety Standards	20
▶ We Take Principled Actions	21
▶ Harassment and Discrimination	21
▶ Using Cognizant's Technology the Right Way	22
▶ Safekeeping of Company Assets	23
▶ Respecting Others' Data and IP	25
▶ Communicating About Cognizant	26
▶ Waivers of These Standards	28
▶ Certification	29
▶ Appendix	40



## We are Guided by Our Standards

---

These Standards of Business Conduct (Standards) explain how our Values are infused throughout our work for Cognizant. They provide a shared understanding not just about what we do, but also how we do it. They are a framework for ensuring consistent professional conduct across diverse cultures and work environments worldwide.

Our Standards apply to all associates, officers and members of the Board of Directors of Cognizant Technology Solutions Corporation and its direct and indirect subsidiaries, and other businesses controlled by Cognizant worldwide. Such entities are collectively referred to herein as “Cognizant” or the “Company” and such persons to which these Standards apply are referred to as “Cognizant Associates.” The term “Cognizant Associates” also refers to our contractors, subcontractors, suppliers, and others who assist us in servicing our clients or otherwise conducting our business.

As a global business, Cognizant is committed to complying with the laws of the countries in which we operate. We make this pledge not just because it’s the right thing to do, but also because it’s an integral part of our commitment to excellence and exceeding client expectations, as well as our dedication to being a good corporate citizen and improving our communities.

## Getting Help or Reporting a Possible Violation

As Cognizant Associates, we have a responsibility to ask questions, seek guidance, and express concerns about our Standards. These Standards and our Company policies (located on our public website and Intranet) exist to give context to the ethical behavior expected from us, guide us in making a report, and direct us to various sources with whom we may ask questions. As part of our commitment to our stakeholders, we are also expected to cooperate fully with any investigation into any actual or potential violation. To report a real or suspected violation of these Standards, the following individuals and resources are available to you:

▶ Your manager

▶ Your talent manager

▶ The Chief Compliance Officer:

 By email: [chiefcomplianceofficer@cognizant.com](mailto:chiefcomplianceofficer@cognizant.com)

 By fax: 201-801-0243

 By mail: Cognizant Technology Solutions

Attn: Chief Compliance Officer

Glenpointe Centre West

500 Frank W. Burr Boulevard

Teaneck, New Jersey 07666

▶ Chief Legal and Corporate Affairs Officer

▶ The Cognizant Compliance Helpline

The Cognizant Compliance Helpline is serviced by a third-party provider and is available by phone or online. Reports 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.

To access the Compliance Helpline via the internet, go to:

<https://www.compliancehelpline.com/welcomepagecognizant.com/>

and follow the instructions for submitting a report.

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

- ▶ U.S. and Canada: 1-866-824-4897
- ▶ India: AT&T Direct Access Code 000-117 followed by 866-824-4897
- ▶ UK: AT&T Direct Access Code 0-800-89-0011 (or 0-500-89-0011) followed by 866-824-4897
- ▶ All other locations: Use the appropriate access code for your country, followed by 866-824-4897

Additional AT&T Direct Access Codes are available at: <http://www.usa.att.com/traveler/index.jsp>.



## How Reports are Handled

Cognizant treats reports of misconduct seriously. All reports are reviewed by the Chief Compliance Officer, who appoints a responsible person as appropriate to conduct an informal inquiry or a formal investigation. If a violation of our Standards has occurred, appropriate disciplinary action will be taken against individuals involved as permitted by local laws. Additional steps will be taken if an alleged violation involves an Executive Officer or Board Member.

## Prohibiting Retaliation for Reporting

It takes courage to raise concerns about our Standards, Company policies, or the law. That is why our Company is committed to ensuring that an individual does not face retaliation for reporting real or potential violations. Prohibited acts of retaliation include discharge, demotion, suspension, harassment, threats, or any other action that discriminates against an individual who submits a report. 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 the Chief Compliance Officer or the Compliance Helpline immediately.

Remember, you will always be protected from retaliation for making an honest, accurate report (also known as a “good-faith” report). On the other hand, knowingly filing a false or misleading report will subject you to disciplinary action.

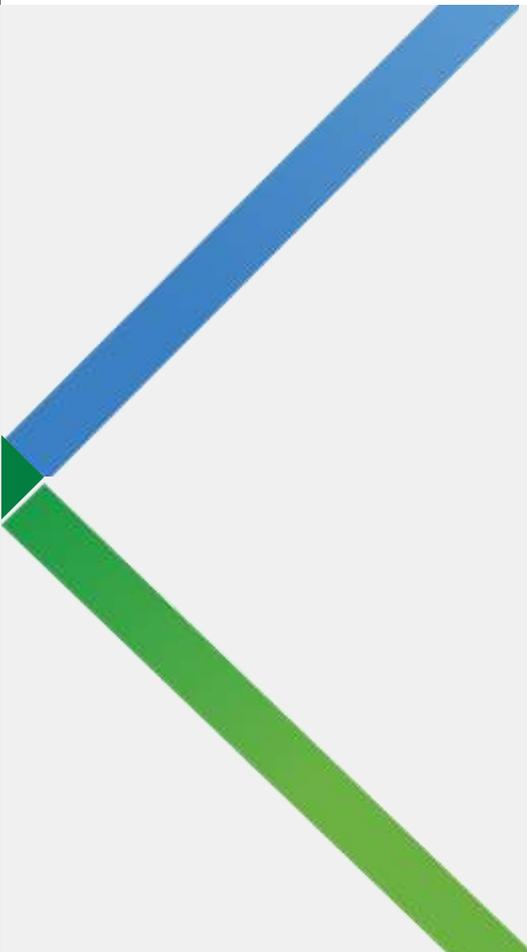
## Managers’ Additional Responsibilities

All of us are responsible for maintaining a standard of excellence at Cognizant. For those of us in positions of leadership, that means having additional duties fostering ethics and integrity. If you are a manager, you are expected to help Associates resolve ethical issues. It is up to you to create an atmosphere where Associates feel comfortable coming to you to discuss questions and possible violations. As a manager, never retaliate or tolerate retaliation against any individual for making a good-faith report. If you receive a report of misconduct, you are responsible for immediately informing the Chief Compliance Officer. Any manager who directs or approves of any conduct in violation of these Standards, or who has knowledge of such conduct and does not immediately report it, will also be subject to disciplinary action.



## Our Ethics Earn Trust

*At Cognizant, we continually strive to be a trusted advisor. In pursuing this goal, we must consistently incorporate the following standards into our day-to-day business activities.*





## Preventing Corrupt Activities

Today's dynamic global marketplace demands that we achieve the highest standards of behavior. It is therefore critical that all of us at Cognizant make business decisions that align with our ethical principles. This means, in part, that we comply with all applicable anti-corruption laws, rules, and regulations wherever we conduct business.

We do not corruptly give or offer, directly or indirectly, anything of value to a government official to obtain or maintain business or any other advantage for the Company. It is a violation of the U.S. Foreign Corrupt Practices Act (FCPA) and other similar international anti-corruption laws to engage in any form of bribery, including improper payments to government officials like bribes, kickbacks, or facilitating payments, in such forms as money, gifts, favors, or entertainment. Penalties for violating the FCPA and other anticorruption laws are severe and can include large fines and prison time. Bona fide expenses may be paid, and gifts provided, only if done so without corrupt intent and pursuant to Company's Anti-Corruption Policy, which can be found at

<http://www.cognizant.com/InsightsWhitepapers/AnticorruptionPolicy.pdf>

We must also avoid commercial bribery or anything that could look like it.

Government Official	Any government representative or employee, including those from government-owned enterprises
Bribe	Anything of value that can appear to or actually influence business decisions related to Cognizant
Kickback	The return of a sum paid (or due to be paid) for making business arrangements
Facilitating Payment (or: "Grease Payment," "Expediting Payment")	A small payment to a government official to speed up common actions like issuing permits, licenses, or other documents necessary to do business in a particular country. Facilitating payments may only be paid where pre-approval is granted by our Legal Department.
Commercial Bribery	Giving something of value intending to receive a favorable business decision, or something valuable, in return

Regardless of the form an improper payment takes, we are never allowed to make, offer, or accept one without pre-approval from our Legal Department. All such payments must be reported and documented as part of the FCPA's and other laws' books and records requirements. We are also prohibited from retaining a third party representative to knowingly make such a payment on our behalf. Engaging in acts of corruption, even in places where bribery is a customary business practice, violates our Standards, Company policies, and the law, and tarnishes our ethical reputation.

It is also in our own best interests to remember that anti-corruption law violations come with severe legal penalties to the company, its executives and the individuals involved in such actions. If you have questions about this information, please refer to our FCPA, UK Bribery Act and Anticorruption Policy (our "Anticorruption Policy"), which can be found at [https://ecm.cognizant.com/cs/groups/confidential\\_cts\\_internal/@cwhr\\_ind\\_g/documents/cwhr\\_docs/xzix/nzq2/~edi\\_sp/ctsecmin\\_21746974.pdf](https://ecm.cognizant.com/cs/groups/confidential_cts_internal/@cwhr_ind_g/documents/cwhr_docs/xzix/nzq2/~edi_sp/ctsecmin_21746974.pdf) or speak to a member of our Legal Department.

*Interacting with government officials*

*I work for Cognizant in a country in which the government is very active in promoting and influencing business within the country, and my team has been talking about an upcoming meeting we have with some representatives of a government agency. We want to impress the representatives because we are excited about the opportunity to win new business in the country.*

<p>Keep in mind</p>	<ul style="list-style-type: none"> <li>▶ We must be very cautious when communicating or working with government officials</li> <li>▶ Your team's enthusiasm about the potential work is exciting—but it must not be allowed to lead to wrongdoing</li> <li>▶ Special laws and regulations control our interactions with government officials</li> </ul>
<p>Take appropriate action</p>	<ul style="list-style-type: none"> <li>▶ Ensure that no inappropriate gifts or entertainment are exchanged with the government officials</li> <li>▶ Think about whether you feel comfortable in your understanding of anti-corruption laws, review our Anticorruption Policy, and consult our Legal Department with any questions</li> <li>▶ Take it upon yourself to get the additional education you need in anti-corruption laws, and be on the lookout for signs any of your teammates might not understand our shared responsibilities in this area</li> <li>▶ Report any concerns you have right away</li> </ul>



## Avoiding Conflicts of Interest

---

As Cognizant Associates, we have a responsibility to conduct business only in our Company's best interests—not based on our personal relationships or any benefits we might seek. There are times in which we may have a personal or financial stake in the outcome of a decision, as well as influence over that decision. In these situations, putting our personal interests before Cognizant's creates a conflict of interest.

Conflicts of interest (or even something that only seems like one) can have serious consequences for our Company, so we have to disclose real or potential conflicts right away. Not every real or perceived conflict will violate our Standards, but to protect ourselves we must disclose any such concern to a member of our Legal Department or Chief Compliance Officer so it can be resolved.

Some of the more common types of conflicts we might face are described below.

### Gifts and Entertainment

To maintain trust in our business relationships, we must avoid giving or receiving gifts that influence, are intended to influence, or appear to influence business decisions except in accordance with standard business practices. Accepting or giving such gifts can undermine client relationships, hurt our reputation, and put the Company in legal jeopardy.

"Gifts" usually include goods and services, but can be anything of value, including meals, travel expenses, tickets to or attendance at events, discounts or credits, employment or investment opportunities, and honoraria. We may give or accept a gift only when it meets the following conditions:

- Modest
- In good taste
- Unsolicited
- Not cash or a cash equivalent
- Permissible under relevant laws and rules

"Entertainment" includes events where both the person offering and the person accepting both attend. We can give or receive entertainment only when it meets all of the following conditions:

- Infrequent
- Unsolicited
- Modest
- Intended to serve legitimate business goals
- Appropriate for a business setting
- Permissible under relevant laws, rules and policies

To protect ourselves, we must not give a gift, and must immediately return a gift received that does not meet these conditions, and also report the event to our manager. If immediate return of an inappropriate gift is not practical, we should ask our manager to help us transfer the gift to Cognizant. Our Company will donate it to charity or find another appropriate way to handle the item.

Gifts to and from government officials are governed by much stricter rules than standard business gifts and entertainment. For example, as a federal lobbying registrant in the U.S., Cognizant may not make any gift to a Member of Congress or congressional employee unless allowed under a specific exception to the congressional gift

rules. Moreover, in many jurisdictions, Cognizant may be required to track and disclose gifts provided to government officials. These kinds of exchanges require pre-approval from our Legal Department because of the added complexity. If you could interact with a government official as part of your job, familiarize yourself thoroughly with the applicable sections of our Anticorruption policy.

If you have any questions about gifts or entertainment, please discuss them with the Legal Department or Chief Compliance Officer. A table with current gift and entertainment limits by geography may be found in Appendix A of these Standards.

## Corporate Opportunities

This area refers to circumstances in which we might compete with Cognizant. To remain objective and ethical, we must never do so. Should we ever discover a business opportunity through our Cognizant work, we must first inform our Company about it, rather than personally pursuing the opportunity. And, this same principle extends to others—we aren't permitted to help anyone else take personal advantage of an opportunity to compete with Cognizant, including family members and friends.

### *Corporate opportunities*

*I am part of the team responsible for deciding which new projects our business unit will bid on. While reviewing requests for proposals one day, I came across a proposed project that I think would actually fit my cousin's company better than Cognizant.*

<p>Keep in mind</p>	<ul style="list-style-type: none"> <li>▶ We all have a responsibility to make decisions in Cognizant's best interests</li> <li>▶ We must never put our own or someone else's personal interests ahead of what is best for Cognizant</li> <li>▶ Any time our personal interests could conflict with our work, we should report the situation to get help resolving it</li> </ul>
<p>Take appropriate action</p>	<ul style="list-style-type: none"> <li>▶ Do not tell your cousin about the opportunity before Cognizant has made a decision regarding whether to pursue it</li> <li>▶ Talk with your manager about your thoughts and whether you should participate in making this decision</li> </ul>

## Significant Customers

At Cognizant, we often maintain long-term relationships with our valued clients. Due to the lasting nature of these relationships, conflicts of interest can arise if we develop intimate, non-professional relationships with employees of our client companies. Engaging in social activities outside of work, or getting involved in personal or intimate relationships, are particularly damaging to those who are directly involved in management of the project.

## Close Personal Relationships

At times we may find ourselves working with family or others with whom we have close ties. While this does not always create a conflict situation, it can in many cases lead to favoritism, or its appearance. For this reason, we may not supervise, review, or influence the job evaluation or compensation of another Associate with whom we have a close personal relationship, including family members, friends, a domestic partner, or a significant other. Furthermore, we may not engage in a personal, intimate or romantic relationship with a direct or indirect report.

Family Member	Common examples include a spouse, child, stepchild, sibling, parent, grandparent, cousin, aunt, uncle, or in-law
---------------	--

## Outside Employment

Accepting outside employment can easily interfere with our work for Cognizant. This would be especially true if we took a position with a company whose interests conflict with Cognizant's, such as a customer, supplier, or competitor of our Company. Any positions we accept with other organizations cannot conflict with Cognizant's interest and must not affect our ability to work efficiently on our Company's behalf or otherwise fulfill our responsibilities to Cognizant. Because it is not always easy to determine whether outside employment could be to the detriment of Cognizant, before accepting any offer of outside employment, you must receive pre-approval of such outside employment from our Legal and/or Compliance team.

Outside Employment	Serving as a consultant, associate, officer, Board of Directors member, or advisor
--------------------	--

Other outside work you perform—including volunteer work or otherwise donating your time and skills to a charity project—may also interfere with the interests of our Company. For this reason, be particularly cautious if you are creating IP that may be assigned to an outside party, making sure that in doing so you fulfill all of your Cognizant obligations. Be sure to consult the Legal Department with any questions.

## Financial Investments and Arrangements

Another important type of conflict involves our personal finances. To maintain the highest standards of integrity that we value so much, we must not hold a substantial financial interest in a customer, supplier, or competitor of our Company. Our close personal relations may not hold such interests either. For instance, if you or a family member (or other close personal relation) holds a significant financial interest in any customer, supplier, or competitor of Cognizant, disclose the situation immediately to the Chief Compliance Officer.

Substantial Financial Interest	Holding greater than 1% of the outstanding shares of a publicly held company, or greater than 5% of those of a privately held company
--------------------------------	---

Conflict of interest situations can be complex, but can many times be resolved through good judgment and consulting the proper resources early on. By understanding the types of conflicts that exist, avoiding situations that are most likely to result in conflicts, and disclosing actual or potential conflicts, we ensure that our decisions are made in a fair and unbiased manner. Such assurance is vital to maintaining our valuable reputation as a trusted advisor.



## Never Engaging in Insider Dealing

Our success in the marketplace depends on the trust and confidence of the investment community. Earning this trust requires us to act with integrity when trading public securities, and follow all securities laws that apply to us and our business. In order to uphold our commitments to our stakeholders, we will never participate in insider dealing (also called “insider trading” in the U.S. and some other countries).

Public Securities	<ul style="list-style-type: none"> <li>▶ Any securities issued by a publicly traded company, including:             <ul style="list-style-type: none"> <li>• Common stocks</li> <li>• Options to purchase common stock</li> </ul> </li> <li>▶ Any other type of securities of that company (such as preferred stock, bonds, or derivative securities)</li> <li>▶ Any derivative securities that provide the economic equivalent of ownership of the company’s securities, or any opportunity to profit from any change in value of the company’s securities</li> <li>▶ Other financial assets of such a company</li> </ul>
Trading Public Securities	Buying, selling, or participating in a decision to buy or sell Public Securities

Through our work at Cognizant, some of us may learn about material, nonpublic (or “inside”) information, potentially relating to our Company as well as other companies with which we work.

Material, Nonpublic (“Inside”) Information	<ul style="list-style-type: none"> <li>▶ Information not publicly released, and</li> <li>▶ Has the potential to influence an investor to buy, sell, or hold a security (if the investor were to learn the information)</li> </ul>
Examples	<ul style="list-style-type: none"> <li>▶ Earnings and earnings forecasts</li> <li>▶ Changes in senior management</li> <li>▶ Significant changes in earnings patterns</li> <li>▶ Mergers or acquisitions</li> <li>▶ New product developments</li> </ul>

Because of the sensitivity of this kind of information, and the laws governing it, we must not trade securities based on it. To do so could affect stock prices, potentially negatively impacting stockholders. Also we may not give any such inside information to—or “tip”—others who might make trades based on it. Doing so violates insider trading laws, which can be severe and may include civil and criminal penalties for our Company and the individuals involved.

For all of our protection in these matters, our Company has adopted certain blackout periods during which none of us may trade in Cognizant securities, including buying or selling Cognizant stock. This helps prevent insider trading, and even the appearance of an improper transaction. If we are uncertain about our ability to purchase or sell any securities, we should consult with the Chief Compliance Officer or Chief Legal and Corporate Affairs Officer before taking any action.

For additional information, please see our Statement of Company Policy on Insider Trading and Disclosure, which can be found at

[https://ecm.cognizant.com/cs/groups/confidential\\_cts\\_internal/@cgrm\\_g/documents/cgrm\\_docs/bl82/mdcy/~edisp/ctsecmin\\_6072557.pdf](https://ecm.cognizant.com/cs/groups/confidential_cts_internal/@cgrm_g/documents/cgrm_docs/bl82/mdcy/~edisp/ctsecmin_6072557.pdf)

You may also find an updated list of blackout dates here.

## Creating Effective Records

Our reputation as a trusted advisor is built by the confidence others have in us. This is, in part, based on the accuracy of the written records and verbal statements we produce. By providing full, fair, accurate, timely, and understandable disclosures, we generate trust with our stockholders and the public. We also meet important legal and regulatory obligations, including items filed with or submitted to the U.S. Securities and Exchange Commission (SEC). Failing to accurately record financial information and public reports severely damages our name, exposes us to legal liability, and harms the trust our customers and stockholders place in us.

As Cognizant Associates, we are responsible for the accuracy of the books and records we maintain in the course of our jobs. These include:

- Financial records
- Timesheets
- Travel and expense reports
- Forecasts, resource allocations, and billings
- Financial statements

In addition, we must ensure that all Company books, records, accounts, and financial statements:

- Are maintained in accordance with all applicable regulations and standards
- Accurately reflect the true nature of the transactions they record
- Conform to generally accepted accounting practices (GAAP) and Company accounting policies

We must never:

- Establish any undisclosed or unrecorded account or fund for any purpose
- Make false or misleading entries in the Company's books or records for any reason
- Make a written commitment on behalf of Cognizant that exceeds our individual signature authority
- Disburse corporate funds or other corporate property without adequate supporting documentation and authority to do so

*Books and records – signature authority*

*I have received approval to retain the number of resources I requested for an upcoming project. While calculating the project's estimated costs, though, I notice that the overall cost for the resources slightly exceeds the amount I was authorized to spend. I'm not sure it's a big deal though, since the number of people I'll need has been approved. I can just go ahead and sign for the resources allocation, right?*

Keep in mind	<ul style="list-style-type: none"><li>▶ Adherence to Cognizant's internal controls and procedures is always crucial</li><li>▶ Our stakeholders and the public rely on us to follow the highest standards of integrity</li><li>▶ Our approval processes and controls on individual authority are in place to protect our Company, whose wellbeing ultimately supports our own</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ Do not sign for the resources</li><li>▶ Obtain the proper approval for the excess expense, even though the amount is only slightly above your authority</li><li>▶ Whenever you are unsure or think something's not quite right, seek guidance from the resources in these Standards</li></ul>

## Records Management

Just as we maintain our financial and business records in accordance with various policies, rules, and regulations, we must also retain and dispose of these records lawfully and ethically. This means we must always follow the document retention guidelines that apply to our locations and projects. We must never destroy records unless we have received permission from our manager and the Legal Department to do so. Destroying or disposing of documents without such permission could violate specifications in our client contracts, resulting in loss of those clients' trust, among other consequences. If you have questions regarding the status of any records in your possession, consult your manager and the Legal Department before taking further action.

## Money Laundering

As part of our commitment to accurate recordkeeping, we must understand how to spot suspicious activities—including money laundering. Money laundering is never condoned by our Company.

Money Laundering	The process by which certain individuals or groups attempt to conceal illicit funds, or make the sources of such funds appear legitimate
Illicit Funds	Money obtained through illegal or improper activities

To combat money laundering, we perform due diligence on customers, suppliers, and other business partners who seek to do business with Cognizant. Always ensure that those with whom you are doing business maintain a physical presence, are engaged in legitimate business, and have proper compliance processes in place. If you have questions or concerns about potential money laundering, consult the Legal Department for guidance.

Our team will need to take some corporate guest houses to accommodate some resources required by a new client project. While researching available places, one of the property managers said they only accepted rent payments in cash. Is this is a normal practice?

Keep in mind	<ul style="list-style-type: none"><li>▶ Global anti-corruption laws require us to avoid unethical actions</li><li>▶ This means some local practices may not be allowed</li><li>▶ We must be suspicious of any vendor or other third party who demands payment in cash</li><li>▶ Demands for cash may be signs of illegal activity</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ Keep track of which property managers require cash payments and which do not</li><li>▶ Only consider and ultimately rent properties that do not require cash payments</li><li>▶ Apply similar standards to all of your other Cognizant activities</li></ul>



## We do Business the Right

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



## Competing Fairly and Honestly and Complying with Competition Laws

---

We believe the best way to outperform our competition is by fairly and honestly seeking competitive advantages through superior performance, never through unethical or illegal business practices. This means, in part, that we never unfairly disparage our competitors, their products, or their services.

In our competitive business environment, we often seek to acquire information about our competitors and their products and services. 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. This means we may only gather competitive information in a lawful and ethical manner, never through deception or misrepresentation. For example, we also 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.

We must comply with the antitrust and competition laws of the countries where we do business. In general, we must avoid agreements, understandings or plans with competitors that limit or restrict competition, including price fixing and allocation of markets. Some examples of topics to avoid discussing with competitors include:

- Market share or price-fixing
- Pricing schedules, bids, or client lists
- Boycotting a third party

Be particularly cautious when you are attending a trade show or conference. Even casual conversations with competitors about certain topics could represent the sharing of confidential information and may lead to penalties for you and our Company. If a competitor attempts to discuss an inappropriate topic with you, stop the conversation immediately and report the incident to the Legal Department.

## Conducting Ethical Sales and Marketing

Cognizant is committed to dealing honestly, ethically, and fairly with all of our suppliers, customers, competitors, recruitment candidates, and fellow Associates. It is our policy to engage in sales, marketing, advertising, and other competitive practices that do not jeopardize the trust placed in us by our valued stakeholders. We never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

As part of this commitment, we must make sure that our communication of information about our services is truthful and accurate. Promotional materials and other statements we distribute regarding our Company's services must be true, and never misleading, deceptive, or fraudulent.

*Ethical sales and marketing*

*A potential client has responded to our bid by asking how we would address an emerging trend of particularly malicious malware in our proposed application. I am certain Cognizant has the best approach in the industry for protecting this type of application from the latest malware threats, and I want to focus my response on the deficiencies of our competitors.*

Keep in mind	<ul style="list-style-type: none"> <li>▶ We have an ethical and legal duty to avoid communicating disparagingly about competitors</li> <li>▶ We have no real way of knowing our competitors' exact capabilities</li> </ul>
Take appropriate action	<ul style="list-style-type: none"> <li>▶ Instead of focusing your response on competitors, describe your knowledge of Cognizant's leading approach</li> <li>▶ Emphasizing the way Cognizant does business together with our past and current successes is the right way to win business</li> </ul>

## Respecting International Trade

As a global company, Cognizant transfers goods, services and technologies across national borders. Our business transactions are subject to various trade controls and laws that regulate export and import, including:

- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts; and
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government.

Export	<ul style="list-style-type: none"> <li>▶ A product, service, technology, or piece of information shipped from one location to a person in another country, or</li> <li>▶ Technology, technical information, or software provided to a non-U.S. citizen who receives these when located either in the U.S. or in a third country</li> </ul>
--------	--

Before we allow any export of controlled items to occur, we must first perform a restricted party screening of the parties and foreign countries involved in the transaction, based on the location of delivery, as well as that of the recipient and end user. We are also required to obtain all required licenses and permits, and pay all proper duties.

Imports	Goods we purchase from a foreign or external source and bring into another country
---------	--

Import activity is generally subject to various laws and regulations as well—specifically, such activity may require us to pay duties and taxes, as well as submit certain filings.

In addition to laws governing exports and imports, under U.S. law we must not cooperate with any request for an unsanctioned foreign boycott or any related restrictive trade practice. This means we must not take any action, furnish any information, or make any statement that could constitute participation in an illegal foreign boycott. Such activity is contrary to our Standards, Company policies, and Values, and there are severe penalties for violating these laws.

If you have any questions about export, import, or boycott rules, please direct them to the Legal Department.

## Driving Quality

Cognizant is committed to providing quality services with a strong customer focus—consistent with our Values. This means all of the services we offer must meet stringent requirements for the safety and satisfaction of our valued customers. To achieve this high performance and maintain our reputation for quality, we must all comply with quality control standards and follow contract specifications at all times. As Cognizant Associates, we must be familiar with the standards and specifications that apply to the projects we work on, and raise any potential issues immediately.

We uphold the same strict standards for quality when working under our client contracts. As Cognizant Associates, we are each responsible for knowing and complying with the exact requirements of a contract at all times. We must take steps to ensure that we never deviate from contract specifications without prior authorization. This means we cannot make unapproved substitutions in:

- How we deliver our services, and
- How we utilize our suppliers and the materials and resources we use to perform our jobs

We also cannot fail to perform essential tests or inspections.

It's equally important that we provide only accurate, complete, and honest information to our customers. We must properly record and categorize all costs to the appropriate account, and must carefully review all documentation to ensure its accuracy before it's submitted.

If you have any questions about the information in this section, please consult with the Legal Department or the appropriate Business Unit Head.

*Product quality*

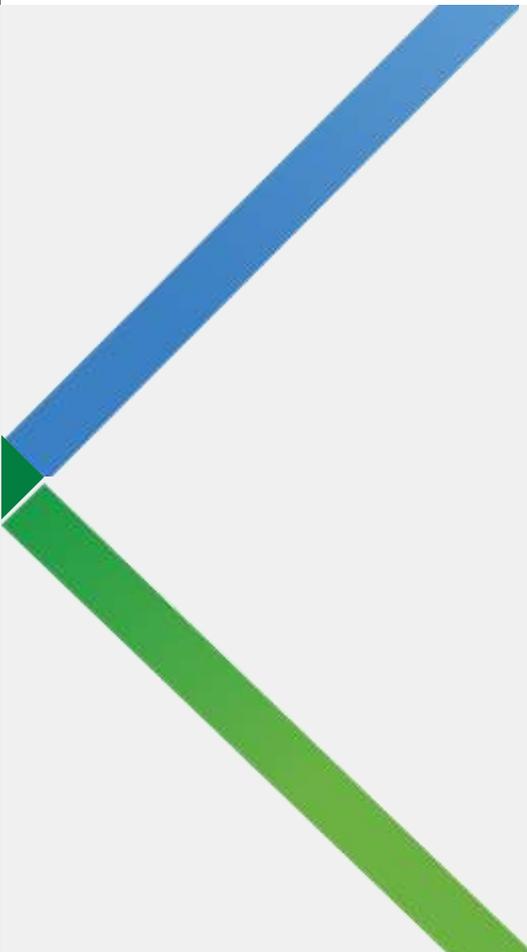
*About a month ago I started working with a new team on a new project, developing an important application for a highly valued client. As the work has progressed though, I've noticed that one of the client's requests for certain application functionality will probably lead to some data security vulnerabilities in the final design. Because this client is very picky about their specifications, I'm not sure what to do, since I don't want to upset them.*

Keep in mind	<ul style="list-style-type: none"><li>▶ You're correct that client satisfaction is a top Cognizant priority</li><li>▶ As a trusted advisor, we strive to share our knowledge and expertise with our clients</li><li>▶ We have a responsibility to deliver the highest quality products and services to our clients</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ If you are concerned about disturbing the client, share your concerns with your project leader or your manager</li><li>▶ Do not keep your concern to yourself—even if the client isn't concerned at first, we should fully share our expertise with our clients</li></ul>



## Our Responsibilities are Clear

*As Cognizant Associates, we seek ways to lead in the following areas.*





## Practicing Good Corporate Citizenship

---

Cognizant believes in being a responsible corporate citizen that places high value on respect for individuals and sustainability. As such, we uphold human rights in all of our global operations, in line with the United Nations Global Compact and the principles set out by the International Labor Organisation. All Cognizant Associates around the world are entitled to fair wages and hours, consistent with local laws, and are entitled to work in an environment free from discrimination. Our Company does not make use of child (i.e., a person under the minimum age provisions of applicable laws and regulations) or forced labor (i.e., prison labor, indentured labor, bonded labor, military labor, slave labor or any form of human trafficking), and won't work with third parties who do so.

Cognizant is equally committed to preserving the environment. We utilize sustainable practices throughout our business to reduce our carbon footprint and ensure our impact on the world is a positive one. We succeed in this area by complying with all applicable environmental laws, regulations and standards. In addition to meeting these requirements, we look to exceed them whenever possible. We are all encouraged to submit any suggestions and ideas regarding ways to bring our practices closer to these goals to our Chief Legal and Corporate Affairs Officer.

We are also active contributors to charitable organizations and events, including our Outreach program and the Cognizant Foundation. However, we should never make a charitable contribution if doing so may violate a law or regulation, or if such charitable contribution may benefit, or give the appearance of benefiting, government officials and are intended, or perceived to be intended, to obtain or retain business or gain an unfair advantage. For more information about these and other initiatives, please see the information contained in the Corporate Social Responsibility section of our website located at

<https://cognizant20.cognizant.com/cts/OrgCommunities1/EnHanS/Shared%20Documents/Sustainability%20Policy.pdf>

## Participating in Political and Lobbying Activities

Cognizant advocates before government officials and agencies in support of the Company's public policy objectives consistent with relevant law and (in the United States) the principles of the First Amendment to the Constitution. Cognizant pursues its policy goals through lobbying and other advocacy efforts, as well as through political activities, including the sponsorship of a federal political action committee ("PAC") in the U.S.

In addition, Cognizant encourages our participation in the political process when it is clear that it's conducted on an individual basis—not on behalf of our Company. As Cognizant Associates, we must conduct personal political activities on our own time and using our own resources. This means we must not make use of Company time, resources, funds, or facilities to engage in outside political activities, and we may not use the Company's name in any way to ensure that there can be no interpretation of sponsorship or endorsement by the Company.

In certain jurisdictions, it may be permissible for Cognizant to host political activities at Company facilities or otherwise use corporate resources in a limited way under the law. However, any use of facilities or resources for political activity must be approved in advance by the Legal Department.

Further, we may not:

- Seek or hold a political office without advising our supervisor in advance so that any potential conflicts of interest and other applicable laws can be reviewed and followed (and supervisors are required to review any such requests with our Legal Department)
- Request reimbursement for any political contribution or expenditure
- Make any direct or indirect contribution to a political candidate, political committee, or political party on behalf of our Company or the PAC, unless the contribution is legal and approved in advance by the Chief Legal and Corporate Affairs Officer (for corporate contributions) or in accordance with the PAC Articles of Association (for PAC contributions). This includes the sponsorship, donation or contribution to an event in support of a candidate, political party or government entity or official, even if in doing so we are marketing the Company and our service, or a political or charitable contribution to a government official, entity or agency connected to a government or government official.
- Force, direct, or coerce another Associate into making a political contribution
- Make Company contributions to trade associations or their political action committees where such contributions will be directly or indirectly used for political purposes, unless approved in advance by the Legal Department

Note that there may be instances when our personal political contributions are subject to review by Cognizant to ensure that they do not inadvertently jeopardize government business for the Company. In such cases, we will follow guidance from the Legal Department.

We also must not lobby the government or other organizations on behalf of Cognizant unless it is explicitly part of our job to do so or with the advance approval of the Legal Department. Lobbying is strictly regulated under the laws of most jurisdictions and is often defined broadly to include communications about and efforts to influence not just legislation, but also executive action, administrative matters, the execution of government programs, regulatory proceedings, and government contracts and procurement. When we engage in lobbying in a jurisdiction, we will maintain the highest standards of professional integrity and conduct, will abide by relevant rules applicable to lobbyists and lobbying registrants, and will maintain an auditable record of lobbying activities as needed by Cognizant to ensure compliance. Any exception to this section should be approved by the Legal Department or Chief Compliance Officer.

*Community activities / company resources*

*A friend of mine asked me to help her build a website for a local charitable cause she wants to help out.*

Keep in mind	<ul style="list-style-type: none"><li>▶ As Cognizant Associates we are free to participate in any community activity we see fit</li><li>▶ We must keep our personal activities separate from our work activities</li><li>▶ We may not use Company resources—including funds, technology, materials, or time—to work on personal matters</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ If you want to help your friend with her request, feel free to do so on your own time</li><li>▶ Do not work on the website while working under Cognizant time or using Cognizant resources</li><li>▶ Be sure to keep any work-related information or proprietary tools or methods strictly confidential and separate from your personal work</li><li>▶ Consult the Legal Department if you are engaging in outside employment or volunteerism to create IP that may need to be assigned</li></ul>



## Adhering to Safety Standards

Cognizant is committed to providing a safe, healthy workplace where all of us can thrive. In pursuit of this critical goal, we comply with all Company health and safety policies related to our jobs, as well as health and safety laws or regulations in the countries where we do business. We are expected to promptly report any potential health and safety issues to a manager. Doing so helps us maintain our own safety, as well as the safety of our fellow Cognizant Associates.

As part of our commitment to maintaining a safe working environment, we never react with threats or violence. This includes implicit or explicit verbal threats, intimidation, bullying or any physical act of violence. We resolve our conflicts professionally—to do otherwise would create unnecessary risk, which wouldn't be tolerated. If you witness or are the victim of an act of violence, intimidation, or other threatening behavior, report the matter immediately to a manager. If you or others are in danger, contact the local authorities first.

Just as we must not introduce violence into our workplace, we may not work under the influence of drugs or alcohol. The use, sale, purchase, or possession of illegal drugs, as well as the abuse, sale, or purchase of alcohol or doctor-prescribed drugs while on Company property or while conducting Company business is strictly prohibited. Such behavior puts all Cognizant Associates and our clients at risk. We should also talk to a manager or a talent manager if we notice another associate's performance on the job is impaired due to the use of alcohol, illegal substances, or drugs, or that another associate is using illegal substances on Company or client property.



## We Take Principled Actions

*Our commitment to ethically doing business means keeping the following important guidelines in mind.*





## Harassment and Discrimination

Cognizant is committed to providing an inclusive work environment where respect is practiced, diversity is valued, and all Associates and clients enjoy freedom from discrimination, intimidation, and harassment. To foster this type of environment we must treat others with fairness and respect, and value each other's individual contributions. We never discriminate against a person's legally protected trait when we make employment decisions. We also comply with all applicable equal employment opportunity laws, including those related to discrimination and harassment.

Examples of Employment Decisions	Recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment
Examples of Legally Protected Traits (which can vary by location)	Race, color, religion, gender, age, national origin, sexual orientation, marital status, disability status, veteran status

We must never tolerate discriminatory conduct, abuse of authority, or harassment of any kind, including that of a sexual nature. We must also refrain from making jokes, slurs, or other remarks about a person's legally protected trait, as applicable in specific country, or those of a sexual nature. At no time should we allow, encourage or create an offensive 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).

Similarly, we may not retaliate against a person who makes a report of discrimination or harassment in good faith, or who participates in an investigation. If we as Cognizant Associates have witnessed or experienced discrimination, intimidation, harassment, or retaliation, we should promptly report the behavior to our manager, a talent manager, the Chief Compliance Officer, or the Chief Legal and Corporate Affairs Officer.

### *Employment discrimination*

*I'm concerned that a manager in my business unit often makes hiring decisions based on the personal characteristics of applicants, rather than solely on their qualifications. But I don't want to get in trouble if it turns out not to be true.*

Keep in mind	<ul style="list-style-type: none"><li>▶ Cognizant constantly seeks to value and enhance the diversity of our Associates</li><li>▶ Our Company never condones illegal or unethical discrimination</li><li>▶ Anyone who makes a report of suspected wrongdoing in good faith is protected from retaliation</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ If you believe that your concern might be true, make a report about it using any resource listed in these Standards</li><li>▶ Contact the resource with whom you feel most comfortable</li><li>▶ If you think you've experience retaliation after making the report, report that incident so Cognizant can take appropriate action</li></ul>



## Using Cognizant’s Technology the Right Way

Our computer networks, computers, other devices, and software are Company-provided technologies—and also important assets. If left unsecured, these items can pose a substantial risk to our confidential information. As Associates, we must protect Cognizant information systems from unauthorized access. Further, we must ensure that all use of Cognizant and client equipment and information systems conforms with Cognizant’s Acceptable Use Policy, which can be found at

<https://cognizant20.cognizant.com/sites/process%20space/inc/Docs/CorporateQP/InformationSecurity/QPIS-AUP.pdf>

When sending communications through Cognizant networks or using Cognizant resources, we must maintain a professional tone and discuss only appropriate subjects, consistent with Cognizant’s goal of maintaining a respectful workplace. When expressing a personal viewpoint while using Cognizant or client information systems, make it clear that the views expressed are yours, not Cognizant’s.

Additionally, while Cognizant encourages us to participate in social media, we should always use proper judgment when conversing or posting content. Remember that because the Internet is a public and permanent place, we must all take care to safeguard our Company’s hard-earned assets and reputation. For more information, please see our Social Media Policy, which can be found at

[https://ecm.cognizant.com/cs/groups/confidential\\_cts\\_internal/@cwhr\\_ind\\_g/documents/cwhr\\_docs/xzix/nzq3/~edis/p/ctsecmin\\_21747443.pdf](https://ecm.cognizant.com/cs/groups/confidential_cts_internal/@cwhr_ind_g/documents/cwhr_docs/xzix/nzq3/~edis/p/ctsecmin_21747443.pdf)

Cognizant assets like information systems and the messages communicated with them are the sole property of Cognizant, and the Company reserves the right to monitor, audit, and inspect our use of these resources. Our Company may also block emails containing security-sensitive content. If you know or suspect unacceptable use of Cognizant or client assets, disclose the issue to your manager or the Company’s Chief Security Officer.

### Privacy

*Lately I’ve been getting the impression that some of my coworkers—who do the same work as me—might be getting paid significantly more than me. I think I can probably figure out how to access HR records without being noticed, and I want to expose this unfairness.*

	Keep in mind	<ul style="list-style-type: none"> <li>▶ Each of us trusts both Cognizant and our fellow Associates to show the utmost respect to our own personal data</li> <li>▶ Compromising Cognizant’s systems—or those of any company—is never acceptable</li> <li>▶ Our Standards provide us with many resources for reporting concerns or grievances</li> </ul>	
	Take appropriate action	<ul style="list-style-type: none"> <li>▶ Do not attempt to access HR records</li> <li>▶ Speak to your manager, talent manager, an HR representative, or the Compliance Helpline about your concern</li> </ul>	

## Safekeeping of Company Assets

Effective use of Cognizant and client resources is critical to our success and performance as a Company. When we use these resources efficiently and appropriately, we create value for ourselves and our customers. As Cognizant Associates, we must protect Company and client assets from misuse, abuse, and theft. Such assets include monetary and physical property like equipment, supplies, facilities, and funds. They also include intangible assets, like confidential information and intellectual property (IP), and information systems we use to conduct Cognizant business. While we may make incidental personal use of Cognizant assets, they should be used primarily for Cognizant business.

Confidential Information	Client or Cognizant information not generally known to the public that provides clients or our Company with a business advantage, including but not limited to: <ul style="list-style-type: none"><li>▶ Strategic and business plans</li><li>▶ Financial, sales, or pricing information</li><li>▶ Customer lists and data</li><li>▶ Vendor terms with suppliers</li><li>▶ Promotional plans</li></ul>
Intellectual Property (IP)	Our tools, methodologies, creative ideas, expressions, and their associated commercial value, including: <ul style="list-style-type: none"><li>▶ System code or designs</li><li>▶ Proprietary computer systems</li><li>▶ Copyrights and trademarks</li></ul>

Our stockholders and clients rely on us to protect this important information from unlawful or inadvertent disclosure. Safeguarding it is critical to our ability to obtain and retain customers. Therefore, we must always take appropriate precautions to ensure that sensitive business information is only communicated confidentially, and only to those Associates with a business need to know. Never provide confidential information to a third party without the appropriate approvals and non-disclosure agreements in place.

Miguel has just been approached by Teresa, a member of another Cognizant team, to access data only Miguel's team was authorized to use. The data was given to Miguel's team for the purpose of developing an application to store and secure information for a client. Teresa asks Miguel if she can borrow that data for an unrelated project that she and her team are working on. Teresa says the data would help her team complete their prototype quickly, and promises to keep it confidential. What should Miguel do?

Keep in mind	<ul style="list-style-type: none"> <li>▶ All those whose data we handle trust us to protect and use it appropriately</li> <li>▶ Keeping confidential information secure and private within Cognizant is just as important as preventing its public release</li> </ul>
Take appropriate action	<ul style="list-style-type: none"> <li>▶ Miguel should decline to provide the data because it was only authorized to his team</li> <li>▶ If Teresa continues to request the information, Miguel should contact the Chief Compliance Officer or Legal Department for assistance handling the matter</li> </ul>

Our obligation to protect information also extends to our IP because it has commercial value and is crucial to our effective competition in the marketplace. Any IP we generate in our Cognizant work belongs to our Company or our clients, including business-related written works, technological advances, or unique solutions to business problems. Whenever we create IP, we must ensure it is disclosed to the Company and protected in accordance all applicable policies and contractual obligations. We should also seek guidance from the Legal Department if we suspect IP of the Company or a client has been infringed or otherwise misused, or if we have any questions on the use or appropriate protection of IP.

We are also expected to abide by any legal obligations we may have to our former employers. These obligations may include restrictions on the use and disclosure of confidential information, soliciting former colleagues to work at our Company, and non-compete obligations. If we know of a situation in which any of our confidential information has been compromised, we should notify the Chief Compliance Officer or Chief Legal and Corporate Affairs Officer immediately.

*I always like to talk with my friends about the latest technology coming on the market. This week at work, I've learned about some really exciting projects in the early stages of development at Cognizant.*

Keep in mind	<ul style="list-style-type: none"><li>▶ Our roles as Cognizant Associates sometimes allow us to learn about new products or services before the general public</li><li>▶ These types of advances give our Company a competitive advantage, and it is up to us to carefully protect this information</li><li>▶ Releasing confidential or proprietary information—belonging to Cognizant or our clients—could seriously harm the companies and individuals involved</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ Do not disclose the new information you've learned to your friends</li><li>▶ Only speak about the developmental projects with other Associates that have a need to know the information</li><li>▶ Remember to only discuss information with your friends that is already publicly available</li></ul>



## Respecting Others' Data and IP

Our customers and fellow Cognizant Associates entrust us with certain private information. This includes account and purchasing information, addresses, telephone numbers, Social Security numbers, and information regarding medical and other benefits. We have a responsibility to safeguard this information from unauthorized use or disclosure. We must follow all Company, country-specific, local, and client policies related to data privacy. In observing these policies, we only provide customer and Associate information to those inside Cognizant who have a clear business need for the information.

To this end, we never give customer information to outside companies or other persons, except:

- As directed by clients
- To conduct our business properly
- To stay in compliance with applicable privacy laws
- To protect against fraud or suspected illegal activity
- To provide customer services

Similarly, we do not provide Associate information to anyone outside our Company without first consulting our talent managers in our Human Resources Department or Legal Department, and we comply with all related legal requirements. We never misuse client or other third-party confidential information or IP, nor do we discuss, disclose, copy, or use any copyrighted, licensed, or confidential client or third-party information.

We must immediately contact our manager, talent manager, the Chief Legal and Corporate Affairs Officer, or the Chief Compliance Officer if we believe such data has been compromised.

### *Data security*

*I've just left the office, and I realized that I might have forgotten to properly lock and shut down my computer. I was working late, so I'm thinking about just going home since almost everyone has already left.*

Keep in mind	<ul style="list-style-type: none"><li>▶ The security of our systems and devices must always take top priority</li><li>▶ Our systems contain not only Cognizant information, but also client information—both are highly sensitive and must be protected, always</li><li>▶ Our clients and fellow Associates rely on us to always act ethically</li></ul>
Take appropriate action	<ul style="list-style-type: none"><li>▶ Return to the office and ensure that your system is properly secured</li></ul>



## Communicating About Cognizant

As a publicly traded company, Cognizant has a responsibility to disclose information to the public that is completely accurate. Because Cognizant is committed to delivering proper and reliable information to the public, we must not speak on behalf of our Company, our competitors, or our industry with any member of the media or investment community (including all “market professionals”) unless we are designated to do so.

Market Professionals	Include securities analysts, institutional investors, investment advisors, brokers, dealers, and security holders
----------------------	---

We must ensure that all public disclosures are accurate, timely, and representative of the facts.

Public Disclosures	Include forecasts, press releases, speeches, and other communications
--------------------	---

If you are approached by any media person, analyst, or investor please direct those queries to the Communications Group. Do not attempt to provide any information yourself. Please ask the person approaching you to send an email to: [GlobalPR@cognizant.com](mailto:GlobalPR@cognizant.com), and the Communications Group will respond appropriately.

Any time you are unsure about responding to an outside inquiry, please contact Cognizant’s SVP of Marketing ([chiefmarketingofficer@cognizant.com](mailto:chiefmarketingofficer@cognizant.com)) or the Chief Financial Officer ([chieffinancialofficer@cognizant.com](mailto:chieffinancialofficer@cognizant.com))

Another area in which we must demonstrate our integrity and trustworthiness occurs in those times when our Company may undergo a third-party audit or government investigation. These events could include engaging with an independent auditor undertaking an audit, review, or examination of the Company’s financial statements, or participating in the preparation or filing of any document or report with a government agency such as the SEC.

When interacting with these individuals and entities, we must not knowingly make or cause others to make a false or misleading statement. Similarly, we may not mislead an auditor by omitting any fact that is needed for him or her to develop an accurate picture of our Company’s financial position. Finally, never directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence anyone engaged in the performance of an audit or review of Cognizant’s financial statements.



## Waivers of These Standards

While the policies contained in these Standards must be strictly adhered to, there may be special circumstances where an exception could be appropriate. If you believe an exception to any of these policies is appropriate, you should first contact your immediate manager. If your manager agrees that an exception is appropriate, obtain approval from the Chief Compliance Officer. Our Chief Legal and Corporate Affairs Officer is responsible for maintaining a record of all requests for exceptions to any of these policies and the disposition of such requests, and will report such requests and such dispositions to the Company's Audit Committee.

Any Executive Officer or Board Member who seeks an exception to any of these policies should contact the Company's Chief Legal and Corporate Affairs Officer. Any waiver of these Standards for Executive Officers or Board Members or any change to these Standards that applies to them may be made only by the Board of Directors of the Company, and will be disclosed as required by law or stock market regulation.





# Certification

## Certification of Commitment to Cognizant's Core Values and Standards of Business Conduct

I hereby acknowledge receipt of Cognizant's Core Values and Standards of Business Conduct (the Standards). I have read the Standards and understand and acknowledge that I may be subject to disciplinary action or other action consistent with local laws in the event of my violation of these Standards, up to and including termination or legal action, by Cognizant Technology Solutions Corporation or the appropriate employing subsidiary.

I, \_\_\_\_\_ do hereby certify that:

(Print Name)

1. I have received, carefully read, and understood Cognizant's Core Values and Standards of Business Conduct (the Standards).
2. I have complied, and will continue to comply, with the terms of these Standards, and will ensure that all Cognizant Associates reporting to me (directly or indirectly) are familiar with the terms of these Standards.
3. Except as set forth below,
  - (i) I am not aware of any conflict of interest or potential conflict of interest (as described in these Standards); and
  - (ii) No members of my immediate family are Associates of Cognizant (associates, officers or members of the Board of Directors of Cognizant, or contractors, subcontractors, suppliers, or others who assist Cognizant in servicing our clients or otherwise conducting our business). If you do have immediate family members who are Associates of Cognizant you must disclose such relationships in the Exceptions box below.

Exceptions:

I hereby also declared to the best of my knowledge and understanding the names of my family members and relatives, currently working with Cognizant, as below:

Date of Joining	Employee ID	Name	Business Unit	Designation

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Title: \_\_\_\_\_



## Appendix A

### Current Gift and Entertainment Limits

---

<b>Gifts</b>	<b>No Pre-Approval Required</b>	<b>Manager Advance Approval Required</b>	<b>Advance Approval of CFO or CCO Required</b>
U.S. and Canada	Up to U.S. \$100	Between U.S. \$100 & \$250	Greater than U.S. \$250
U.K	Up to £75	Between £75 & £150	Greater than £150
Europe	Up to €100	Between €100 & €250	Greater than €250
India/China	Up to \$50	Between \$50 & \$125	Greater than \$125
ASEAN(Singapore, Malaysia, Hong Kong)	Up to 125 SGD	Between 125 & 310 SGD	Greater than 310 SGD
Australia	Up to AUD 100	Between AUD 100 & 250	Greater than AUD 250
Latin America including Mexico	Up to \$50	Between \$50 & \$125	Greater than \$125

<b>Entertainment</b>	<b>No Pre-Approval Required</b>	<b>Manager Advance Approval Required</b>	<b>Advance Approval of CFO or CCO Required</b>
U.S. and Canada	Up to U.S. \$250 per person	Between U.S. \$250 & \$1,000 per person	Greater than U.S. \$1,000
U.K	Up to £150	Between £150 & £600	Greater than £600
Europe	Up to €250	Between €250 & €1,000	Greater than €1,000
ASEAN(Singapore, Malaysia, Hong Kong)	Up to 310 SGD	Between 310 & 1,250 SGD	Greater than 1,250 SGD
Australia	Up to AUD 250	Between AUD 250 & 1,000	Greater than AUD 1,000
India/China	Up to \$125	Between \$125 & \$500	Greater than \$500
Latin America including Mexico	Up to \$125	Between \$125 & \$500	Greater than \$500

These limits may be updated by Cognizant management from time to time. All Associates are to refer to the most up to date limits contained in the electronic version of these Standards located at

[https://ecm.cognizant.com/cs/groups/confidential\\_cts\\_internal/@cwhr\\_ind\\_g/documents/cwhr\\_docs/xzix/nzq2/-edisp/ctsecmin\\_21746987.pdf](https://ecm.cognizant.com/cs/groups/confidential_cts_internal/@cwhr_ind_g/documents/cwhr_docs/xzix/nzq2/-edisp/ctsecmin_21746987.pdf)