

Cognizant Technology Solutions Anti-Corruption Statement

Why Do We Have This Statement?

This Statement confirms that Cognizant is committed to doing business ethically and complying with all anti-corruption laws that may apply to the Company including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act 2010 (the “UK Bribery Act”), and local anti-corruption laws. No one — neither Cognizant employees nor others acting on Cognizant’s behalf — is permitted to offer, make, promise, request, or accept a bribe, or to otherwise make any improper payment in connection with Cognizant’s business.

Scope of Statement

This Statement applies to all Cognizant Directors, officers, and employees worldwide as well as all Cognizant business units and subsidiaries, joint ventures over which Cognizant has operational control, and business partners (collectively “Associates”).

If local law or a business unit imposes stricter requirements than those described in this Statement, Associates must comply with those rules.

Requirements

Prohibition Against Bribery & Corruption Generally

Cognizant’s rule about corruption is simple: we never pay bribes or act corruptly.

- 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.
- An act is **corrupt** if it is performed to secure an improper advantage, either by paying a bribe or through other means (for example, by paying a kickback or a payoff, or by laundering money).
- **Anything of Value** includes items such as cash, bonuses, gifts, favors, charitable donations, political contributions, offers of employment, offers of hospitality/entertainment, kickbacks, or any other type of preferential benefit. For further information, please consult the Code.

This Policy prohibits bribery of Government Officials and private persons, or making payments to relatives, friends, or colleagues of a private person or of a Government Official to obtain an unfair business advantage. This includes the hiring of relatives of a Government Official for the purpose of influencing the official’s decision making.

Dealings with Government Officials

All Cognizant Associates, no matter where they are located, must pay close attention to interactions with Government Entities and Officials.

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.

Examples of Government Entities include, but are not limited to: governments of countries, states, provinces or cities; the United Nations; the International Monetary Fund; a customs or patent office; and state-owned businesses, banks, hospitals, utilities, and universities.

- A **Government Official** is any individual acting in an official capacity for or on behalf of a Government Entity. Examples include, but are not limited to: a customs official; an inspector from a tax, health, or environmental agency; an employee of a state-owned bank; a journalist employed by a state-owned media company; the Chief Technology Officer of a government agency or ministry; a legislator such as a Technology Subcommittee Chairperson of a House of Parliament; a businessperson who is a consultant acting for and on behalf of such Government entity; and a professor or researcher at a state-owned university.

Facilitation Payments

A **facilitation payment** is generally a small payment made to a low-level Government Official for the purpose of securing or expediting the performance of a routine, nondiscretionary government action. Cognizant does not permit facilitation payments absent prior approval in exceptional cases from the Chief Legal Officer/General Counsel.

Gifts and Entertainment for Government Officials

Please be aware that Cognizant prohibits providing gifts to Government Officials.

Any entertainment of a Government Official with a value in excess of \$20 requires approval from our Chief Compliance Officer.

For further information and guidance regarding Gifts and Entertainment, please see the Gifts and Entertainment Statement.

Political and Charitable Contributions

Political contributions made by or on behalf of the Company within the United States are allowed only when such contributions are made under the Cognizant's Political Action Committee. Outside the United States, political contributions are not permitted by, or on behalf of, the Company unless approved in advance by our Chief Legal Officer/General Counsel. If you plan on engaging in any political activities on behalf of the Company or making a political contribution on behalf of the Company in the United States, you must contact the Legal Department prior to taking any action.

A charitable contribution is any payment or other support given to a charitable organization or to an entity organized to provide a public benefit. Cognizant only works with charities that have been vetted to ensure that they are legitimate, reputable and will not be used as a conduit for an improper payment.

All of Cognizant's charitable contributions must be:

- Reasonable in nature and amount;
- Permissible under all applicable laws and regulations;
- Provided in a manner that would not embarrass Cognizant if publicly disclosed;
- Given openly with no appearance of an improper purpose;
- Given without expecting anything in return; and
- Accurately recorded in Cognizant's books and records.

For more information about Cognizant's Charitable contributions and related requests, please see the Company's [Guidelines on Charitable Contributions](#).

Third Parties

All third parties with whom Cognizant works must comply with the Code, including its prohibitions on bribery and corruption. Retention of certain third parties can expose Cognizant to corruption risks, particularly when those third parties are likely to interact with Government Entities or Officials on Cognizant's behalf. Examples include: accountants, customs brokers, real estate vendors, logistics providers, visa processors, customs brokers, lawyers, lobbyists, and public relations representatives.

Cognizant has developed a reasonable, risk-based due diligence program for third parties that Cognizant proposes to enter into a relationship with. Please see Cognizant's Anti-Corruption Compliance Procedures for the Selection & Retention of Third Parties <https://compliance.cognizant.com/ThirdPartyDueDiligence>.

Joint Venture Transactions, Mergers, Acquisitions & New Market Entry

Cognizant sometimes expands its business by launching new products, competing for new business, or entering a new geographic market. Cognizant may conduct these activities through joint ventures, mergers, acquisitions, or new market entries. Joint ventures, mergers, acquisitions, and new market entries can present corruption risks.

Before entering into a joint venture, initiating a merger or acquisition, or entering a new market, Associates must contact the Chief Legal Officer/General Counsel, who will provide guidance about how to address anti-corruption aspects of the proposed transaction, including conducting any required due diligence or drafting relevant contractual language.

Books, Records & Internal Controls

Cognizant is required to maintain records that accurately reflect its business transactions. Associates who conduct business on Cognizant's behalf must ensure that all transactions (no matter how small) are recorded promptly and accurately, contain sufficient detail, and are supported by accessible documentation. Never misconstrue or mislabel a transaction in our books and records.

Violations

A violation of anti-corruption laws, the Code, this Statement, or its related procedures is a serious matter and can result in criminal or civil penalties against Cognizant and the individual involved in the violation, as well as harm to Cognizant's reputation.

Associates involved in a violation will be subject to appropriate discipline, up to and including termination.

Any violation of law, the Code, or this Statement may result in a loss of incentive compensation, bonuses, or other awards, to the extent permitted by law.

Mandatory Reporting of Violations & Guidance on Compliance

Associates have a responsibility to report suspected violations of this Statement, the Code, or of any applicable law. Cognizant is committed to ensuring that an individual does not face retaliation for reporting such concerns. To report concerns or ask questions Associates may contact:

- Any member of the Cognizant Legal Department
- Our Chief Compliance Officer:
 - By email: 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
- Our Chief Legal Officer/General Counsel

- Our Cognizant Compliance Helpline

The Cognizant Compliance Helpline is serviced by a third-party provider and is available by phone or online 24 hours a day, 7 days a week. Reports of 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 Compliance Helpline also features a Question Manager, where an Associate may seek advice.

To access the Compliance Helpline via the internet, go to www.cognizant.com/compliance-helpline 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 <https://www.att.com/esupport/traveler.jsp?tab=3>

Who Should I Contact with Questions?

Questions regarding this Statement should be directed to our Chief Compliance Officer or your local compliance resource.

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