

Cognizant Technology Solutions Whistleblower and Non-Retaliation Statement

Effective January 2017

Why Do We Have This Statement?

We actively encourage Associates to report concerns and ask questions. Specifically, this Statement provides that:

- Under the oversight of the Cognizant Audit Committee, Cognizant maintains a reporting system whereby Cognizant Associates, as well as third parties (such as competitors, vendors, and consumers) can report suspected legal and ethical concerns, including those related to accounting, internal accounting controls, auditing matters, and corruption;
- Cognizant Associates and third parties may report their concerns confidentially and anonymously;
- Reports of suspected violations of law, the Code, or other Cognizant policies will be investigated; and
- Cognizant is committed to protecting anyone that makes a report of a legal or ethical concern from retaliation, retribution, or harassment; investigating each complaint of retaliation; and taking appropriate disciplinary action for retaliation, up to and including termination of employment.

Reporting Suspected Violations of Law or Company Policies

The Company provides a number of channels to make reports of actual or potential violations of the Code or of any applicable law. Associates may request guidance about how to comply with applicable law or the Code and report violations through any of the following channels:

- 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
- Your local compliance resource
- Our 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. 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>.

Will the Information I Provide be Kept Confidential?

Associates who report a concern may choose to remain anonymous, although we encourage reporters to provide contact information to assist the Company in investigating reports. Cognizant will keep reports confidential to the extent consistent with its ability to conduct a full and fair investigation and to comply with its legal obligations.

How are reports handled?

Any manager or other individual who receives a report of a violation or a possible violation should refrain from conducting their own investigation, and promptly forward the report to our Chief Compliance Officer. Cognizant will assign an experienced professional to investigate any known or suspected misconduct. Our experts will investigate professionally, and any appropriate corrective action will be taken with management oversight.

Protection Against Retaliation for Reporting Suspected Violations or Cooperating with Investigations

Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code, or other Cognizant policies. Cognizant Associates must never intimidate, harass, or take any retaliatory action against a person who makes a report of a potential violation of law, regulation, the Code, other Cognizant policies, or who cooperates with an investigation of any such report.

“Retaliation” includes, but is not limited to any adverse action taken against a person because he or she:

- Submitted a report of a violation or suspected violation of the Code, other Cognizant policies or procedures, or applicable law (including those regarding accounting irregularities);
- Participated or provided information or otherwise assisted in an investigation of any suspected violation of the Code, other Cognizant policies or procedures, or applicable law; or
- Provided truthful information to any regulatory or law enforcement agency regarding the commission or possible commission of any federal or state offense, or regarding potential violations of anti-corruption, workplace safety, anti-discrimination, anti-harassment, or other laws.

We Encourage Associates Who Believe They are the Subject of Retaliation to Report Violations

Anyone who is the target of retaliation should promptly report it to one of the resources listed in the Code or in this Statement. Examples of prohibited retaliation, retribution, and harassment include:

- Attempting to intimidate an Associate into withdrawing or altering his/her report;
- Punishing a person who has made a good faith report by taking adverse action concerning the Associate’s work or shift assignments, salary, evaluation, vacation, and/or other terms of employment;
- Terminating, demoting, suspending, or disciplining an Associate for making a good faith report; or
- Threatening to do any of the above.

Any Associate who witnesses or knows about any Associate retaliation, retribution, or harassment must make a report through one of the reporting channels set forth above.

Cognizant Pledges to Appropriately Investigate Any Allegation of Retaliation

Cognizant shall investigate each complaint of retaliation and, if any such retaliation claim is substantiated, take appropriate disciplinary action, up to and including termination of employment, and implement any appropriate remedial measures.

Who should I contact with questions?

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