



## Statement on Modern Slavery 2021

### Our Business

Cognizant is one of the world's leading professional services companies transforming clients' operating and technology models for the digital era. The Group is headquartered in Teaneck, New Jersey (US). The Group has approximately 330k employees worldwide as of 31 December 2021.

Cognizant Worldwide Limited ("Cognizant") (CWW) is the primary contracting entity for Cognizant's UK business though it often utilises the services of other group companies from around the globe. The ultimate parent entity of all Cognizant entities globally is Cognizant Technology Solutions Corporation (CTS Corp), a company listed and registered in the USA. CWW has provided four statements to date under the Modern Slavery Act 2015 (UK).

Modern slavery is the illegal exploitation of people for personal or commercial gain and encompasses slavery, servitude, human trafficking and forced labour. Cognizant has a zero-tolerance approach to any form of modern slavery – whether in its operations or those of its suppliers -- and is committed to ensuring effective systems and restrictions are in place to protect against it.

### Risk Analysis

Cognizant is fundamentally a "people business" and we are an Equal Opportunity employer. Cognizant does not manufacture any products, nor do we usually directly procure products for clients.

Since IT consulting and professional services is a highly competitive industry, we need to attract and retain top talent while building a diverse, inclusive workforce that delivers exceptional client service. We consider the nature of the industry in which we operate means the risk of indentured or bonded labour being used within our sphere of influence is lower than in some other industries. However, we are not complacent about this and the procedures for ensuring that we do not engage or condone suppliers who engage in modern slavery continue to develop rigorously.

Following a risk assessment we undertook across all aspects of our business and supply chain, we have updated our process to include targeted modern slavery due diligence within our global supply chain. Cognizant's main focus has been ensuring that its standards and expectations are clearly communicated to existing and prospective suppliers. High risk suppliers are required to provide details of their own practices and their supply chain in relation to modern slavery. These suppliers are required to provide evidence that they have implemented modern slavery prevention mechanisms.

### Policies and Practices

Cognizant is dedicated to improving everyday life and believes in acting ethically throughout our business. This is why we have built a strong Environmental Social Governance (ESG) program. Cognizant has proudly invested in diverse and dedicated leaders to drive our integrated ESG management approach and deliver tangible results, hiring a Chief Sustainability Officer in 2020 and further expanding the ESG team in 2021. The [Cognizant ESG Report](#) is published annually and includes information about new commitments, policies, and processes.

In February 2021, we updated our [Code of Ethics](#) (Code) to reaffirm our core values and emphasize the standards of conduct that we expect from managers and associates to ensure that they are aligned to the Cognizant agenda.

Our Code is publicly available and 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, business partners, and third-party representatives worldwide (collectively “Associates”). All our Associates are required to undertake our Code of Ethics mandatory training on an annual basis. The Code of Ethics highlights the company focus on respecting people and the environment.

Our code requires that Associates must be committed to upholding the company’s core values of Doing the Right Thing in the Right Way, including complying with the laws of all the countries in which Cognizant operates. 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 superior corporate citizen.

Specifically in relation to labor practices, we uphold human rights in all our global operations. All Cognizant Associates worldwide 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 labor (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), does not condone any form of human trafficking, and will not work with third parties who engage in such practices.

Our commitment to uphold human rights, across our global operations, is supported by our [Human Rights Policy](#). Our initial Statement on Modern Slavery was launched in 2017 and was accompanied by a training and awareness communication to Cognizant Associates globally. We continue to generate awareness with our Associates; we ensure that as Associates arrive in the UK, they receive education about our zero-tolerance approach to modern slavery in the UK induction programme.

Our Associates or Third Parties can report suspected violations of any of these policies/standards via Cognizant’s [Compliance Helpline](#). All reports are taken seriously and investigated by the company. If any deficiencies in compliance were to be uncovered, remediation plans may be devised to address the deficiencies, but failure to comply may also result in termination of the relationship.

#### Supply Chain Due Diligence

Cognizant extends its commitment to address modern slavery to how it thinks about its supply chain. Our supply chain management policies include:

- Our [Supplier Diversity Policy](#) sets out Cognizant’s commitment to working with historically underrepresented and diverse businesses such as minority-, women-, disabled-, LGBTQ+-, or veteran-owned companies. By cultivating an array of relationships, we provide business opportunities to various enterprises, while enabling our long-term success. We seek to verify supplier self-declarations from third party certified diversity supplier databases, and we use third party sources to identify diverse suppliers and related spend in the United States.
- In 2021, Cognizant updated our [Supplier Standards of Conduct \(Supplier Standards\) to formalise its expectations and requirements in terms of ethical business conduct. The Supplier Standards](#) set out the principles by which all of Cognizant’s third-party representatives, suppliers, vendors, and subcontractors and their parent, subsidiary, and affiliated entities are expected to abide by. The Supplier Standards list a number of specific requirements. Those addressing child labour and forced labour are:
  - *Prohibition on child labour: Cognizant strictly prohibits the use of child labour in any of the supplier’s operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 years of age where the local law allows such exception consistent with International Labor Organization guidelines, or (b) the age for completing compulsory education, or (c) the minimum age established by law in the country of manufacture. In addition, suppliers must*

*comply with all legal requirements for authorized young workers (including students and interns), particularly those pertaining to hours of work, wages, and working conditions.*

- *Prohibition on forced labour: All forms of forced or compulsory labour, such as prison labour, bonded labour, or indentured labour, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited. Additionally, Cognizant expects Suppliers to follow responsible recruitment practices to prevent forced labor and other forms of modern slavery. Suppliers and their labor agents and subagents shall not hold, destroy, conceal, confiscate, or deny workers access to their identity or immigration documents.*
- Our Human Rights Policy outlines our commitment to respect the basic principles of human rights and sets the expectation that our suppliers, business partners, and clients adopt similar policies within their own businesses. The principles addressing child labor and forced labor are:
  - *End human trafficking. Never engage in trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. We are all responsible for proactively reporting human trafficking to the appropriate authorities. If you know or suspect that human trafficking is occurring/has occurred in any parts of our business or supply chains of any supplier, promptly inform your manager, local HR Manager, or the Ethics & Compliance Helpline.*
  - *Consider our supply chain. Cognizant has zero tolerance for human rights abuses in the supply chain. Our Supplier Standards of Conduct prohibits and addresses human rights abuses and is embedded into every vendor contract throughout our supply chain.*

As part of our ongoing ESG development efforts, we are also considering ESG in our supply chain in new ways. In 2021 we conducted an ESG supply chain prioritization exercise, developed in consultation with independent external human rights experts, Article One, to identify potential ESG supplier risks, including working conditions, and established a three-year implementation roadmap for managing risks.

We have continued to invest in our procurement processes and during 2019 implemented Ariba, an automated supplier onboarding system, globally. For goods or services considered to be high risk (such as recruitment agencies, hospitality event providers, marketing & promotional material providers, construction, and facilities management), suppliers are required to upload their policy and process to avoid modern slavery and respond to a modern slavery questionnaire as part of their onboarding. The questionnaire includes questions such as whether the suppliers have taken any steps to eliminate acts of modern slavery from their own organizations and supply chain. Suppliers who do not submit sufficient documentation of their policies and procedures to address modern slavery are prevented from doing business with Cognizant.

The questionnaire process was made standard practice across the US, Europe, APAC and India in 2020, and then rolled-out to all Cognizant entities globally. Information gathered via the supplier set-up form is entered into a central database, which is designed to enhance corporate knowledge and encourage honest, two-way engagement between parties.

#### United Nations Global Compact

In February 2021 Cognizant joined the United Nations Global Compact (UNGC), a worldwide network of more than 9,500 companies and 3,000 non-business participants that are committed to building a sustainable future. In October 2021, we deepened our commitment by [joining the United Nations Global Compact India \(UNGCI\)](#), a country-level leadership platform for strengthening sustainable business practices.

By signing the UNGC, Cognizant has committed to integrating UNGC's Ten Principles into Cognizant's strategy, day to day operations and organizational culture. These principles focus on supporting the protection of human rights, promoting greater environmental responsibility, and working against corruption in all forms.

In keeping with these principles, we will be adopting additional environmental, social, and governance (ESG) goals for our company, and reporting regularly on our progress toward their achievement. Our ESG-focused intent is also reflected in Cognizant becoming a founding member of the World Economic Forum's newly launched Partnering for Racial Justice in Business initiative. This coalition of organizations is committed to building equitable and just workplaces for professionals with under-represented racial and ethnic identities.

#### Training

All new employees hired into Cognizant are required to undergo mandatory training in relation to our Code of Ethics. This is maintained annually as all associates are required to undertake refresher training. Modern slavery awareness is also included in our corporate induction and people manager training modules.

#### Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking, ensuring our new and existing measures support our zero-tolerance stance to modern slavery. Our next steps may include:

- The continued education and dialogue with of our new and existing associates on the issues and implications of modern slavery.
- The continued enhancement of our supplier and vendor due diligence processes including our Supplier Code of Conduct.
- The incorporation of an automated tool into the supplier due diligence process to reveal media coverage of potential modern slavery violations related to suppliers.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Cognizant Worldwide Limited's modern slavery and human trafficking statement for the financial year ending 31 December 2021.

Our Modern Slavery statements from 2017, 2018, 2019 and 2020 are also available. Signed by:

DocuSigned by:

*Frank Marty*, Director

1C6D82849E2A4F1...

Cognizant Worldwide Limited

Incorporated under the laws of England and Wales and registered at Companies House under number 07195160 1 Kingdom Street, Paddington Central, London, W2 6BD

# Cognizant

Cognizant Worldwide Limited

Incorporated under the laws of England and Wales and registered at Companies House under number 07195160 1 Kingdom Street, Paddington Central, London, W2 6BD