



Cognizant

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Integrity, compliance with laws, ethical behaviour, and good conduct are central to our culture and approach to risk management. We aim to comply with both the spirit and letter of the law in tax matters.

Scope of Policy

This tax policy applies to Cognizant Worldwide Limited and other UK operating companies (referred collectively as "Cognizant UK") that are direct or indirect subsidiaries of Cognizant Technology Solutions Corporation ("CTSC"). CTSC and its consolidated group of companies, including Cognizant UK, are referred to herein as "Cognizant". Cognizant Worldwide Limited is the primary operating company of Cognizant in the UK. This tax policy has been published in accordance with paragraphs 16(4) and 20(1) of Schedule 19 to the Finance Act 2016. This tax policy covers both direct and indirect taxes, including corporate tax, PAYE and VAT.

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Governance

Cognizant maintains internal governance policies to support its tax control framework and provides guidance to its personnel to manage tax risk. Regarding roles and responsibilities: the Chief Financial Officer of CTSC is ultimately responsible for Cognizant's overall tax risks, while the management of tax risks in global markets and the day-to-day management of UK tax risks is performed by the Group Head of Tax based in London with support from Group Tax. Group Tax is made up of a team of tax professionals based predominantly in the US, UK, and India.

Management of tax risk

Cognizant is exposed to a variety of tax risks. These can be grouped under the following headings:

1. Tax compliance and reporting risks, which cover risks associated with compliance failures such as submission of late or inaccurate returns, the failure to submit claims and elections on time or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements.
2. Transactional risks, which arise where transactions are carried out or actions are taken without appropriate consideration of the potential tax consequences or where advice taken is not correctly implemented.
3. Reputational risk looks beyond financial risks to the wider impact tax risk may have on our relationships with our stakeholders, including shareholders, clients, tax authorities and the general public.

Cognizant's core values include compliance with laws, acting with integrity and adhering to good ethical principles. These values apply to the company's tax affairs and attitude towards risks. Cognizant has internal governance procedures set at the executive level and by other senior

personnel throughout Cognizant. Through people, processes, controls and systems, Cognizant manages tax risks and compliance with tax laws. Where a tax risk is identified, Cognizant's governance procedures require its escalation and prompt notifications to the appropriate senior personnel or executives.

Tax Planning

When entering into transactions or making changes to its business, Cognizant assesses what it must do in order to remain compliant and takes appropriate steps to achieve this. The same approach is taken whenever new tax legislation is introduced or HMRC changes their policies. Where there is uncertainty or complexity in relation to the law or its application, expert advice may be sought.

Cognizant's tax positions and reporting reflect the business activities undertaken in the UK. Cognizant does not enter into artificial or abusive arrangements in order to reduce its liability to UK, or any other, taxes.

Transparency

We support and comply with initiatives to improve international transparency on taxation matters, including OECD measures on country-by-country reporting, transfer pricing documentation and automatic exchange of information.

Cognizant does not tolerate any form of behaviour that facilitates the evasion of tax, whether in the UK or in any other jurisdiction. Cognizant is committed to ensuring that it has reasonable procedures in place at all times to prevent tax evasion by any one acting on its behalf.

Cognizant seeks to have a constructive and cooperative relationship with **HMRC**.

Last updated: 11 December 2017.