

Translations

Chinese (Simplified)
English
French (Canada)
French (France)
German
Japanese
Portuguese
Spanish (Latin America)

Related Policies & Processes

- Code of Ethics
- Cognizant's Ethics & Compliance Helpline
- Whistleblower and Non-Retaliation Microlearning
- Company Investigations Web Page
- What to Know about Company Investigations
- Global Policies website

Scope

All Cognizant employees are expected to uphold this Policy which pertains to the reporting and investigation of legal and ethical issues and the protection from retaliation for those who report concerns. This includes all directors, officers, and employees worldwide as well as all Cognizant business units and subsidiaries, and joint ventures over which Cognizant has operational control (collectively "Associates").

Local law may require modifications to the scope, applicability and requirements of this Policy. Certain differences are reflected in the country-specific Whistleblower and Non-Retaliation policies on Cognizant's Global Policies website.

Guiding Principles

At Cognizant, we promote a speak-up culture that depends on our Associates raising questions or concerns so that appropriate actions can be taken. Reports of suspected improper or unethical activity will be investigated and treated confidentially to the maximum extent possible. Reports can be made anonymously where local law permits, though Associates are encouraged to identify themselves so additional information can be obtained as necessary. Under no circumstances will we tolerate retaliation against anyone for making a report in good faith, even if no violation is found.

In support of this, Associates must understand and comply with the following:

- If you become aware of or suspect a possible violation of law, the Code of Ethics, or other Cognizant policies, you must report it using one of the channels outlined below;
- If you receive a report of a possible violation, do not conduct your own investigation. Report it using one of the channels outlined below to ensure it is handled by an experienced Company investigator;
- Do not intimidate, harass, or take any retaliatory action against a person who makes a report of a potential violation or who cooperates with an investigation of any such report; and
- If you suspect retaliation for making a report, or for providing information in an investigation, contact our Ethics & Compliance Helpline or Chief Ethics & Compliance Officer immediately.

To report a possible violation of law, the Code of Ethics, or other Cognizant policies, the following individuals and resources are available:

- Our Cognizant Ethics & Compliance Helpline, which is resourced by a third-party provider and can be accessed online or by telephone:
- To access the Ethics & 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, please dial the number specific to your country and follow the prompts:
 - U.S. and Canada: 1-866-824-4897
 - India: 000-117 followed by 866-824-4897
 - UK: 0-800-89-0011 (or 0-500-89-0011) followed by 866-824-4897
 - Philippines: 105-11 followed by 866-824-4897
 - Netherlands: 0800-022-9111 followed by 866-824-4897
 - Brazil
 - Mobile: 0-800-888-8288 followed by 866-824-4897
 - Landline: 0-800-890-0288 followed by 866-824-4897
 - Germany: 0-800-225-5288 followed by 866-824-4897
 - Singapore: 800-011-1111 followed by 866-824-4897
 - All other locations: Use the appropriate AT&T Direct Access Code for your country, followed by 866-824-4897
 - Additional AT&T Direct Access Codes are available at <https://www.business.att.com/collateral/access.html?c=0>.
- Any member of the Cognizant Legal or Compliance Departments
- Our Chief Ethics & Compliance Officer
 - By email: chiefcomplianceofficer@cognizant.com
 - By fax: (+1) 201-801-0243
 - By mail: Cognizant Technology Solutions
Attn: Chief Ethics & Compliance Officer
Glenpointe Centre West
300 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
USA
- Any member of the Cognizant Human Resources Department
- Any member of the Cognizant Corporate Security Department

Nothing in this Policy precludes any Associate from reporting a violation of law to a government agency, or from cooperating in any government investigation. If you have any questions about government investigations, please direct them to the Legal Department, the Chief Legal Officer/General Counsel, our Chief Ethics & Compliance Officer or your local compliance resource.

Disciplinary Consequences

Cognizant takes violations of this Policy very seriously. Depending on the facts and wider circumstances involved, violations could result in disciplinary action, up to and including termination (subject to local laws and regulations).

Version History

Revision Date	Description of Change
Jan-01-2017	Initial release of policy
Sep-01-2019	Complete update of policy content. Incorporated critical links to related procedures and other resources.
Oct-01-2020	Updated to include reference to country-specific versions of this Policy.

Policy Control Information

Policy Name: Whistleblower and Non-Retaliation Policy

Revision Date: Dec-01-2020

Policy Owner: Marc Levin, Ethics & Investigations – Legal

Department: Ethics & Compliance

Effective Date: Jan-01-2017