

Cognizant Technology Solutions Supplier Standards of Conduct

Version 1.3 | Effective September 30, 2021

Cognizant's Supplier Standards of Conduct, or Supplier Standards, which align with our Code of Ethics, apply to all of our third-party representatives, suppliers, vendors, subcontractors and business development agents and their parent, subsidiary and affiliated entities, or collectively, Suppliers, including Suppliers engaged by Cognizant's subsidiaries and affiliates. These include Suppliers that are:

- Producing or manufacturing products, parts, equipment, packaging, soft goods, consumables and other materials procured for the purpose of supporting Cognizant's business;
- Providing services, including essential services (e.g., food preparation, catering, transportation, cleaning, construction, maintenance), to or on behalf of Cognizant regardless of where the services are performed; and
- Providing people who are contracted to support Cognizant at Cognizant sites or at other relevant business locations (e.g., client sites).

These Supplier Standards, and other policies that may be enumerated in Cognizant's Supplier contracts, apply to all individuals working on behalf of Suppliers, including temporary, migrant, student, contract and direct employees. Cognizant expects all Suppliers to uphold the Supplier Standards and urges its Suppliers to adopt similar standards within their own businesses and apply those standards to their next-tier suppliers (e.g., subcontractors).

We Earn Trust

The relationship between Cognizant Technology Solutions Corp. and its direct and indirect affiliates and its Suppliers is an integral part of achieving and maintaining high performance in Cognizant's business. Cognizant is committed to working with reputable business partners who share our dedication to ethical business conduct and policies.

We Do the Right Thing, the Right Way

All Suppliers must operate in full compliance with all applicable laws and regulations of the country and location in which the Supplier operates and provides goods and services to Cognizant. Suppliers must conduct business interactions and activities with integrity and must, without limitation:

1. Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdiction(s) in which they conduct business.
2. Comply with applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act 2010, and local anti-corruption laws, as well as laws governing lobbying, gifts, donations, hiring and payments to public officials, political campaign contribution laws and other related regulations. In addition, we expect our Suppliers to prohibit any and all

forms of bribery, corruption, extortion and embezzlement, to keep accurate books and records regarding business with Cognizant and to make reasonable efforts to implement procedures to ensure compliance with anti-corruption laws.

3. Not engage, directly or indirectly, in bribery or corruption. Suppliers must not promise, authorize, offer, or pay anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any person, including in particular any “Government Official,” in order to improperly influence any act or decision of such official for the purpose of obtaining or retaining business or any improper business advantage related to Cognizant. A Government Official is any individual acting in an official capacity for or on behalf of any government or government division; department, agency, or instrumentality of such a government or organization; political party; or company or entity owned or controlled by or acting on behalf of any of the above.
4. Report signs of any personnel, representative, or partner engaged in unethical activity, bribery or kickbacks in connection with Cognizant’s business interests as set forth in the “Reporting Violations” section below.
5. Honestly and accurately maintain business records related to Cognizant’s business, and report all business information and comply with all applicable laws regarding their completion and accuracy. Suppliers must create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.
6. Be honest, direct and truthful when answering questions from Cognizant about relationships to Cognizant employees. Avoid improprieties and conflicts of interests or the appearance of either. Suppliers must not deal directly with any Cognizant employee who has a close personal relationship with anyone that holds a financial interest in the Supplier, including their family members, intimate partners and close friends. In addition, Suppliers may not engage any Cognizant employee to work in any capacity (whether paid or unpaid).
7. Not conduct insider trading. Under Federal Securities Laws individuals or entities cannot buy or sell Cognizant or another company’s securities when in possession of information about Cognizant or another company that is (a) not available to the investing public and (b) could influence an investor’s decision to buy or sell the security.
8. Comply with all international and local rules, regulations and international trade controls (i.e., export controls, economic sanctions and anti-boycott laws), including those relating to technology transfers (physical and electronic), exports, re-exports and imports.

We Respect People and the Environment

Labor and Human Rights

Cognizant expects its Suppliers to commit to the principles concerning fundamental rights at work in the eight core conventions of the International Labor Organization (ILO), as set out in the Declaration on Fundamental Principles and Rights at Work and conventions on working hours. In addition, we expect our Suppliers to respect, in particular, the rights of women, children, migrants and other vulnerable groups and individuals, in accordance with the ILO conventions and the Convention on the Rights of the Child. Cognizant’s standards on labor and human rights specifically include the following requirements:

- 1. Prohibition on Discrimination.** Suppliers must provide a workplace free from discrimination, harassment, or any type of abuse. Suppliers must not discriminate against a person's Legally Protected Characteristics, such as race, color, religion, gender identity, pregnancy, age, national origin, sexual orientation, marital status, disability status, veteran status, or freedom of association, including political affiliations and union memberships, when making employment decisions, including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment. Suppliers should also promote diverse and inclusive workplace environments where everyone is treated with respect and where people are encouraged to embrace diverse backgrounds, cultures and thought. In addition, Suppliers should make reasonable efforts to engage under-represented diverse businesses such as minority-owned, women-owned, disabled-owned, LGBTQ-owned and veteran-owned companies (where it is legal to classify suppliers in these groups) when making their own sourcing decisions. Please see [Cognizant's Global Harassment, Discrimination & Workplace Bullying Prevention Policy](#).
- 2. Prohibition on Child Labor.** Cognizant strictly prohibits the use of child labor in any of the Supplier's operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 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 operations. 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.
- 3. Prohibition on Forced Labor.** All forms of forced or compulsory labor, such as prison labor, bonded labor, or indentured labor, 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.
- 4. Prohibition on charging Workers for employment:** Suppliers should not charge any recruitment or other related fees to workers for employment. If any such fees are found to have been charged by the Suppliers to workers, such fees shall be repaid to the workers immediately.
- 5. Commitment to Health and Safety.** Suppliers must provide clean, safe and healthy working conditions for all employees. Suppliers must comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate and Cognizant encourages Suppliers to implement industry best practices.
- 6. Fair Wages and Benefits.** Suppliers must pay workers according to any applicable minimum wage, as well as any legally mandated overtime premium for all hours worked. Suppliers also must ensure that any legally mandated benefits are being provided to their employees and that there are no illegal deductions for employee benefits. Workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers shall also take steps to ensure equal pay for equal work and that remuneration for work of equal value is established without discrimination.
- 7. Working Hours.** Working hours are not to exceed the maximum set by local law. Furthermore, a standard workweek should not exceed 48 hours or 60 hours, including overtime, except in emergency or unusual situations. All overtime must be voluntary and workers must be allowed at least one day off every seven days.

8. **Freedom of Association and Collective Bargaining.** Suppliers must respect the right of all workers to form and join, or not join, a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) and to bargain collectively. Suppliers will prohibit any form of intimidation, harassment, retaliation and violence against workers exercising these rights.
9. **Commitment to Responsible Sourcing.** Suppliers will be committed to sourcing goods and services for Cognizant in alignment with all the principles and standards laid out in Cognizant's Supplier Standards of Conduct. Suppliers should give exceptional emphasis to sourcing with the same fundamental support of human rights, labor, health and safety, environment and ethics as set forth in these Supplier Standards. This commitment also applies to the responsible sourcing of minerals, including conflict minerals. Suppliers must take steps to determine if their products contain conflict minerals (including tin, tantalum, gold and tungsten) and, if so, implement supply chain processes to identify the sources of these minerals and support efforts to eradicate the use of conflict minerals, which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

As expressed in Cognizant's [Human Rights Policy](#), Cognizant respects, considers, integrates and promotes internationally recognized human rights in accordance with principles outlined in the United Nations Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Environmental Responsibility

Cognizant encourages its Suppliers to draw upon internationally recognized principles to advance social and environmental responsibility.

1. **Compliance with all Applicable Environmental Laws.** Suppliers must comply with all local environmental laws applicable to their operations in the countries in which they operate.
2. **Environmental Management.** Cognizant encourages Suppliers to focus on continuous improvement of environmental performance, including in the areas of water, waste, chemicals and energy and emissions management. In particular, we encourage Suppliers to begin their journey away from fossil fuel-based energy sources and toward net-zero greenhouse gas (GHG) emissions goals. At a minimum, Cognizant encourages Suppliers to have policies and procedures in place to measure and reduce GHG emissions and be able to identify potential improvements to the goods and services being provided that will in turn contribute to reducing Cognizant's emissions.

We Live Up to our Responsibilities

Data and Intellectual Property

Suppliers will respect intellectual property rights, protect confidential information and comply with privacy rules and regulations. All Cognizant Suppliers must, without limitation:

1. Protect and responsibly use the physical and intellectual assets of Cognizant, including intellectual property, tangible property, supplies, consumables and equipment, when authorized by Cognizant to use such assets.

2. Respect and protect the intellectual property rights of all parties by using only information technology and software that has been legitimately acquired and licensed.
3. Use software, hardware and content only in accordance with their associated licenses or terms of use.
4. Use Cognizant-provided information technology and systems (including email) only for authorized Cognizant business-related purposes. Cognizant strictly prohibits Suppliers from using Cognizant-provided technology and systems to (1) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, or (2) send any false, derogatory, or malicious communications. Any solicitation of Cognizant employees using information gathered from Cognizant-provided technology or systems is prohibited.
5. Consider all data stored or transmitted on Cognizant-owned or leased equipment to be the property of Cognizant. Cognizant may monitor all use of the corporate network and all systems (including email) and may access all data stored or transmitted using the Cognizant network.
6. Comply with the intellectual property ownership rights of Cognizant and others, including but not limited to copyrights, patents, trademarks and trade secrets.
7. Manage the transfer of technology and know-how in a manner that protects intellectual property rights.
8. Follow all local privacy and data protection laws.
9. Provide clear and accurate privacy notices when collecting or processing personal data.
10. Honor privacy choices by using data only as agreed to by Cognizant representatives or Cognizant's customers.
11. Protect data by building secure products and services.
12. Cooperate with Cognizant Compliance efforts.

Information Security Responsibility

We expect our Suppliers and their third-party suppliers or subcontractors to be in compliance with contractually agreed Information Security & Privacy requirements throughout the contracted period. Suppliers must:

1. Act in good faith to deliver Information Security & Privacy obligations in a timely manner, including but not limited to extending support to annual audits and risk assessments or notifying Cognizant of, mitigating, and cooperating with Cognizant in the resolution of any security incidents or breaches impacting Cognizant or its customers.
2. Notify Cognizant:
 - Within contractually agreed upon timeframes of any security incident that impacts Cognizant or our customers at CSIRT@cognizant.com.
 - As soon as reasonably possible of any change in their security management or controls.

3. Maintain security standards commensurate with NIST 800-53.
4. Obtain approval from Cognizant's Corporate Security team prior to allowing any asset connection to or integration with Cognizant's or our customers' networks or infrastructures. Such assets must be updated with current patch levels and their configuration must be hardened and follow "least privilege policy."
5. Mitigate within contractually agreed upon turnaround times any risks discovered through Cognizant's or any external party's security assessments or audits.
6. Provide appropriate physical and technical security measures to protect Cognizant's or its clients' data in its possession throughout the contracted period against unauthorized access, use, destruction and modification.
7. Terminate the integration of its IT platforms or those of its third-party suppliers with Cognizant's or our clients' IT platforms, delete relevant security credentials created in supplier systems at the time of contract termination or when the need for such integration ceases and provide written confirmation to Cognizant of such termination.

All Suppliers must review Cognizant's [Code of Ethics](#) (the "Code"), [Anti-Corruption Policy](#) and these Supplier Standards, as they set forth the minimum standards and practices that Cognizant expects our Suppliers to uphold.

Additionally, Suppliers must comply with agreed upon provisions in contracts regarding the following business practices:

- **Use of Subcontractors.** Cognizant generally prohibits Suppliers from using subcontractors in performing their work for Cognizant unless Cognizant gives prior written approval, and then only after the Supplier acknowledges that it has provided the subcontractor a copy of this document.
- **Communication to Employees.** Cognizant generally requires Suppliers to provide these Supplier Standards to those employees engaged in providing goods or services to Cognizant.
- **Access to Cognizant.** Cognizant generally requests the right to conduct on-site audits of our Suppliers' premises, IT systems and infrastructure to monitor compliance with the Supplier Standards as related to the Cognizant relationship. Suppliers should maintain all documentation necessary to demonstrate compliance with the Supplier Standards on-site and cooperate with Cognizant associates or third-party monitoring firms in connection with such inspections.

Business Continuity Responsibility

Cognizant maintains a Global Business Resilience office, whose mission is to align, centralize and integrate disciplines and capabilities to deliver timely and effective incident identification, impact assessments, escalation, communication and resolution. The resiliency efforts extend beyond the assets of Cognizant to the third-party service providers that support our business processes.

Cognizant expects its suppliers to manage business continuity risk to ensure availability of critical services to Cognizant during a disaster event. It is a requirement that each supplier maintain a comprehensive business continuity program that addresses the loss of facilities, technology, human

capital, or suppliers necessary to support Cognizant. We routinely request collaborative disaster recovery testing with our Suppliers to appraise their resiliency and identify potential issues that would impact continuous service delivery to our customers. Suppliers are expected to share these plans as requested.

Violation of Supplier Standards of Conduct

Cognizant is committed to doing business with Suppliers who agree to comply with these Supplier Standards. Agreements between Suppliers and Cognizant generally underscore that compliance with these Supplier Standards is mandatory. All Suppliers are, at a minimum, made aware of these Supplier Standards during the vendor onboarding and contracting processes and we make efforts to ensure Suppliers understand our requirements and standards. Once onboarded, Suppliers may be monitored through surveys, questionnaires and/or audits. Failure to comply with these Supplier Standards may result in termination as a Cognizant Supplier and potential referral of the matter to local authorities.

Reporting of Violations

Cognizant Suppliers who become aware of any actual or potential violation of the Supplier Standards, Cognizant's Anti-Corruption Policy, Cognizant's Code, or of any applicable law, can report them to the Cognizant Ethics & Compliance Helpline, which is staffed by a third-party provider and available by phone or online. Individuals who provide services to or on behalf of Cognizant, or perform work on behalf of our Suppliers, may also access the Cognizant Ethics & Compliance Helpline to raise concerns or report grievances anonymously, if desired.

- To access the Ethics & Compliance Helpline via the internet, go to <http://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: [Country access code](#) + 866-824-4897

Cognizant is committed to effective remedies and expects its Suppliers to share the same commitment, including developing and providing access to their own grievance mechanisms. In addition to the Cognizant Ethics & Compliance Helpline, Cognizant supports other legitimate processes, including judicial and non-judicial grievance mechanisms, and will collaborate with Suppliers to ensure workers and other affected individuals have access to these mechanisms.

Whom Should I Contact With Questions?

Cognizant is committed to helping Suppliers comply with the Supplier Standards, Cognizant's Code and Cognizant's Anti-Corruption Policy. Accordingly, should your organization have any questions or concerns regarding these Supplier Standards, Cognizant's Code and/or Cognizant's Anti-Corruption Policy, you should reach out to your business sponsor or contact us using the Ethics & Compliance

Helpline above. Thank you for your continued efforts and collaboration to adhere to our Supplier Standards.