



Whistleblower and Non-Retaliation Policy

Scope

All Cognizant employees are expected to uphold this, Policy. 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 country-specific Whistleblower and Non-Retaliation policies on Cognizant’s Global Corporate Policies website.

Guiding Principles

At Cognizant, we promote a speak-up culture that depends on our Associates raising questions and concerns so that appropriate actions can be taken. Reports of suspected improper activity will be investigated and treated confidentially to the fullest extent possible. Reports can be made anonymously where local law permits.

Under no circumstances will Cognizant tolerate retaliation against someone for reporting a concern in good faith, even if an investigation finds no violation of company policy or law.

Associates must understand and comply with the following:

- If you suspect a possible violation of the Code of Ethics, company policies, or law, report it using one of the channels outlined below.
- If you receive such a report, do not conduct your own investigation. Refer to Ethics & Compliance promptly to be addressed by a trained Cognizant investigator.
- Do not retaliate against a person who reports a suspected violation or cooperates with an investigation.
- Retaliation is broadly defined as any adverse action taken against someone because he or she has reported a concern or participated in an investigation.
- If you feel you are experiencing retaliation for making a report or cooperating with an investigation, contact the Ethics & Compliance Helpline or Chief Ethics & Compliance Officer immediately.

Related Policies and 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 Corporate Policies

Reporting Channels

Report a suspected violation of the Code of Ethics, Cognizant policies, or law using the following channels:

- Cognizant Ethics & Compliance Helpline (you may submit your report online or by telephone, and you may remain anonymous).
- To any member of Cognizant Ethics & Compliance.
- To the Chief Ethics & Compliance Officer mailbox.
- To any member of Human Resources.
 - If you are based in the EU, you are entitled to an in-person meeting with your HR Country Lead to report whistleblower concerns confidentially.
- By mail to:
Cognizant Technology Solutions
Attn: Chief Ethics & Compliance Officer
Glenpointe Centre West
300 Frank W. Burr Boulevard
Suite 36, 6th Floor
Teaneck, New Jersey 07666
USA

Nothing in this Policy precludes any Associate from reporting a suspected violation of law to the government or from cooperating in any government investigation. If you have questions about how to do so, you may direct them to the Legal Department or our Chief Ethics & Compliance Officer.

Disciplinary Consequences

Cognizant takes violations of this Policy, including protection from retaliation of those who make reports, very seriously. 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.
Apr-11-2023	Revised

Policy Control Information

Policy Name: Whistleblower and Non-Retaliation Policy

Revision Date: April-11-2023

Policy Owner: Marc Levin, Chief Ethics & Compliance Officer

Department: Ethics & Compliance

Effective Date: Jan-01-2017