



CORE VALUES & CODE OF ETHICS



Cognizant

TABLE OF CONTENTS

Letter From the CEO	3	Never Engage in Insider Dealing	12	Adhering to Safety Standards	18
The Right Way at Cognizant	4	Creating and Maintaining Accurate and Complete Records	12	Participating in Political and Lobbying Activities	18
Cognizant's Core Values	5	Records Management	13	We Take Principled Actions	20
Who Must Follow The Code?	6	Accurate Billing and Representations to Customers and Others	13	Respecting Others' Privacy and Securing Their Data	21
What Do I Need to Do?	7	Prohibition Against Money Laundering	13	Using Technology the Right Way	21
Getting Help or Reporting a Possible Violation	8	We Do Business the Right Way	15	Safekeeping of Company Assets	21
The Cognizant Compliance Helpline	8	Competing Fairly and Honestly and Complying with Competition Laws	16	Communicating About Cognizant	22
Accessing the Compliance Helpline	8	Conducting Ethical Sales and Marketing	16	Discrimination and Harassment	22
Prohibiting Retaliation for Reporting	8	Respecting International Trade	16	Government Investigations	23
Our Ethics Earn Trust	9	Driving Quality	16	Waivers of This Code	24
Preventing Corrupt Activities	10	Our Responsibilities are Clear	17	Appendix	25-29
Avoiding Conflicts of Interest	10	Practicing Good Corporate Citizenship	18	Scenario 1: Interacting with Government Officials	25
Outside Employment	10			Scenario 2: Corporate Opportunities	26
Financial Investments and Arrangements	10			Scenario 3: Speaking Up	27
Our Significant Customers	11			Scenario 4: Safekeeping of Company Assets	28
Close Personal Relationships	11			Scenario 5: Hostile Work Environment	29
Corporate Opportunities	11				
Gifts and Entertainment	11				



LETTER FROM THE CEO

Dear Associates,

Cognizant has maintained a positive work environment that is fair, productive, and rewarding. We built our reputation by respecting each other and behaving with integrity in all of our interactions. Our work is imbued with a shared culture and values, an unwavering belief in doing the right thing and a commitment to doing the best work for our clients no matter where we are in the world.

At Cognizant we do not cut corners, bend the rules, or look for shortcuts — and we have a zero-tolerance policy toward those who do. This document summarizes our comprehensive ethics program and underscores our commitment to integrity and moral responsibility. I encourage all associates to freely report any suspected concern with the confidence that our company protects us from retaliation for doing so in good faith. Indeed, reporting suspected misconduct is required.

Business integrity is woven into the cultural fabric of Cognizant. Every time we interact with clients, partners, competitors, and each other, we carry a piece of Cognizant's reputation with us. Every day, we work to fortify the strong tradition of ethics, integrity, and transparency that has been pervasive in our organization since our founding.

This Code of Ethics, combined with our Core Values, reflects the best and highest standards of business conduct. It's up to all of us to maintain those high standards in all that we do to ensure a culture dedicated to integrity and ethics.

Best regards,

A handwritten signature in black ink, which appears to read "Francisco D'Souza". The signature is stylized and fluid.

Francisco D'Souza
Chief Executive Officer

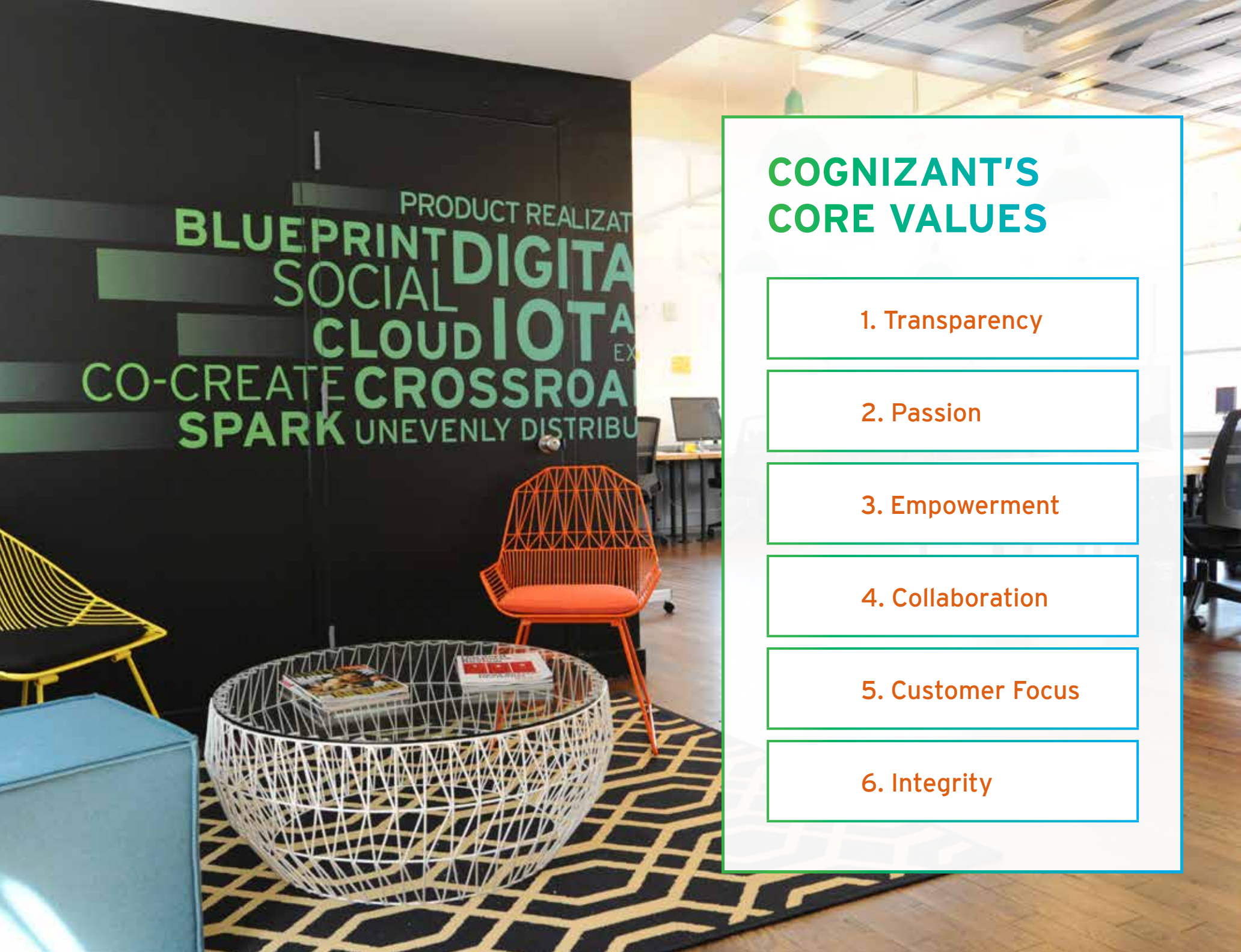
The background image shows a modern multi-story office building with a large, cantilevered upper section. The building has a mix of white, beige, and blue panels. In the foreground, there is a paved plaza with a circular fountain area containing several white swans. The sky is overcast.

Cognizant

THE RIGHT WAY AT COGNIZANT

In the competitive service environment in which we operate, we must maintain the highest standards of integrity. Our reputation and our success depend on it. Whether we're working in a development center, on-site with our customers, in our corporate office, or in our everyday lives, we must be role models of integrity. Our Core Values ("Values") define the behaviors that will make us successful in the marketplace.

When conducting business on Cognizant's behalf, always ask yourself whether the actions you take are consistent with our core values and standards in this Code of Ethics ("Code").



COGNIZANT'S CORE VALUES

1. Transparency

2. Passion

3. Empowerment

4. Collaboration

5. Customer Focus

6. Integrity

WHO MUST FOLLOW THE CODE?

Our Code 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”).

Associates must be committed to upholding the Company’s core value of Integrity, including complying with the laws of all of 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.

**EVERYONE IS RESPONSIBLE FOR MAINTAINING
A CULTURE OF INTEGRITY AT COGNIZANT.**



A tall, modern office building with a glass facade and a large 'Cognizant' sign on top. The building is surrounded by a landscaped area with a fountain and some trees.

Cognizant

WHAT DO I NEED TO DO?

AS A COGNIZANT ASSOCIATE, YOU MUST:

- Be familiar with, understand, and uphold the Code and be aware of policies that are relevant to your job responsibilities.
- Report any suspected violations of this Code, Company policies, or law.
- Timely complete Cognizant's required compliance training courses.
- Execute an annual certification acknowledging your commitment to the principles in this Code.

AS A COGNIZANT MANAGER, YOU MUST:

- Promote a culture of compliance in which Associates understand their responsibilities and feel comfortable asking questions or reporting suspected violations without fear of retaliation.
- Foster a spirit of ethics, integrity, and lawfulness by personally leading compliance efforts.
- Never retaliate or tolerate retaliation against any individual for making a good-faith report.
- Ensure that Associates understand that business results are never more important than ethical conduct and compliance with this Code.
- Immediately inform our Chief Compliance Officer if you receive a report of suspected violation of this Code, Company policies, or law.

Any Manager who directs or approves of any conduct in violation of this Code, Company policies, or law, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action.

GETTING HELP OR REPORTING A POSSIBLE VIOLATION

Cognizant Associates have a responsibility to report suspected violations of this Code (located on our public website at www.cognizant.com/codeofethics.pdf). Cognizant is committed to ensuring that an individual does not face retaliation for reporting such concerns. Here is how to report suspected violations or get help on these issues:

To report a real or suspected violation of this Code, the following individuals and resources are available:

- Any member of the Cognizant Legal Department
- Our Chief Compliance Officer
By Email: chiefcomplianceofficer@cognizant.com
By Fax: 201-801-0243
By Mail: Cognizant Technology Solutions
Attn: Chief Compliance Officer
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
- Our Chief Legal Officer/General Counsel
- Our Cognizant Compliance Helpline

THE COGNIZANT COMPLIANCE HELPLINE

The Cognizant Compliance Helpline is serviced by a third-party provider that is available by phone or online 24 hours a day, 7 days a week. Reports of suspected violations or concerns may be made anonymously, where local laws allow. However, you are encouraged to identify yourself when making a report, so that additional information can be obtained if needed. Whenever possible and permitted by law, your identity will be kept strictly confidential. The Compliance Helpline also features a Question Manager, where an Associate may seek advice.

PROHIBITING RETALIATION FOR REPORTING

It takes courage to raise concerns about actions that may violate or be inconsistent with our Code or the law, and Cognizant is committed to ensuring that an individual does not face retaliation for reporting such concerns. Prohibited acts of retaliation include discharge, demotion, suspension, harassment, threats, or any other action that discriminates against an individual who submits a report of suspected non-compliance. Those engaging in acts of retaliation are subject to disciplinary action, up to and including termination, as permitted by local laws. If you know or suspect that you or someone you know has been retaliated against, you should contact our Chief Compliance Officer or the Compliance Helpline immediately.

For more information about our prohibition on retaliation for reporting, please see our [Whistleblower and Non-Retaliation Statement](#).

ACCESSING THE COMPLIANCE HELPLINE

- To access the Compliance Helpline via the internet, please 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:** 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:** Use the appropriate access code for your country, followed by 866-824-4897
- Additional AT&T Direct Access Codes are available at <https://www.att.com/esupport/traveler.jsp?tab=3>.

OUR ETHICS EARN TRUST

At Cognizant, we continually strive to be a trusted advisor. In pursuing this goal, we must consistently incorporate ethical standards into our day-to-day business activities.

Preventing Corrupt Activities	10
Avoiding Conflicts of Interest	10
Outside Employment	10
Financial Investments and Arrangements	10
Our Significant Customers	11
Close Personal Relationships	11
Corporate Opportunities	11
Gifts and Entertainment	11
Never Engage in Insider Dealing	12
Creating and Maintaining Accurate and Complete Records	12
Records Management	13
Accurate Billing and Representations to Customers and Others	13
Prohibition Against Money Laundering	13

PREVENTING CORRUPT ACTIVITIES

No Bribery. Bribing a government official is illegal no matter where it occurs. Specifically, we do not corruptly give or offer, directly or indirectly, anything of value, including cash, gifts, favors, charitable and political contributions, or hospitality/entertainment, to a government official to obtain or maintain business or any other advantage for the Company. The same is true for private individuals doing business with Cognizant.

Maintain Accurate Books and Records. Anti-corruption laws require that we maintain accurate books and records. Never misconstrue or mislabel a transaction in our books and records. All transactions must be accurately and timely recorded on the Company's books and records.

Third Parties. Retaining a third party to make an improper payment or take an action that is inconsistent with this Code or Cognizant's Anti-Corruption Statement is strictly prohibited.

For more information on the Company's expectations in regards to combatting bribery please see our [Anti-Corruption Statement](#).

AVOIDING CONFLICTS OF INTEREST

We have a responsibility to conduct business only in Cognizant's best interests — not based on our personal relationships or any personal or financial stake we may have in the outcome of a decision. Putting our personal interests before Cognizant's creates a conflict of interest and is not allowed.

Avoiding Conflicts of Interest — Outside Employment

Accepting outside employment, such as serving as a consultant, employee, officer, Board of Directors member, or advisor, can easily interfere with our work for Cognizant, especially if the position is with a customer, supplier, or competitor. Because it is not always easy to determine whether outside employment could be in conflict with our work for Cognizant, before accepting any offer of outside employment, full time employees

must receive pre-approval of such outside employment from our Chief Compliance Officer.

Cognizant encourages its Associates to be active participants in our community. However, other outside work we perform — including volunteer work or otherwise donating our time and skills to a charity project — may also interfere with the interests of our Company.

If you have any questions about outside employment, please direct them to our Chief Compliance Officer or your local compliance resource.

Avoiding Conflicts of Interest — Financial Investments and Arrangements

Another important type of conflict of interest involves our personal finances. To maintain our high standards of integrity, we must not hold a substantial financial interest in a customer, supplier, or competitor of our Company. If we hold or one of our family members (or other close personal relations) holds a significant financial interest in any customer, supplier, or competitor of Cognizant, we must disclose the situation immediately to our Chief Compliance Officer.

Substantial financial interest means holding greater than 1% of the outstanding shares of a publicly-held company, or greater than 5% of those of a privately-held company.

Associates must also be mindful of certain types of personal borrowing. We must not borrow money from subordinates as this may give rise to a perception of a conflict with respect to reviews, assignments, promotions, and compensation decisions.



Avoiding Conflicts of Interest — Our Significant Customers

At Cognizant, we often maintain long-term relationships with our valued clients. Due to the lasting nature of these relationships, conflicts of interest can arise if we develop close personal, non-professional relationships with employees of our clients.

Avoiding Conflicts of Interest — Close Personal Relationships

At times we may find ourselves working with family members or others with whom we have close ties. While this does not always create a conflict situation, it can in many cases lead to favoritism, or its appearance. For this reason, Cognizant Associates may not:

- hire, supervise, report to, review, or influence the job evaluation or compensation of another Associate with whom they have a close personal relationship;
- participate in or make a procurement decision that could benefit themselves, a relative, or friend; or



- engage in an intimate or romantic relationship with a direct or indirect report or supervisor.

Avoiding Conflicts of Interest — Corporate Opportunities

To remain objective and ethical, we must never pursue opportunities that compete with Cognizant. Specifically, we must refrain from activities, investments, or associations that compete with Cognizant or exploit our position with Cognizant for personal gain. Should we discover a potential business opportunity through our Cognizant work, we must first inform the Company about it, rather than personally pursuing the opportunity. This same principle extends to helping anyone else, including family members and friends, take personal advantage of an opportunity to compete with Cognizant.

Avoiding Conflicts of Interest — Gifts and Entertainment

Giving or receiving gifts or entertainment that influence, are intended to influence, or appear to influence business decisions is prohibited. The

Company's Gifts and Entertainment Statement provides guidance on acceptable gifts and entertainment and also sets forth specific approval requirements for certain gifts and entertainment.

For more information on the Company's expectations in regards to giving or receiving Gifts and Entertainment please see our [Gifts and Entertainment Statement](#).

NEVER ENGAGE IN INSIDER DEALING

Through our work at Cognizant, some of us may learn about material, nonpublic (or "inside") information, potentially relating to our Company as well as other companies with which we work. Trading securities, whether Cognizant's or a company with which we do business, based on inside information is illegal and is strictly prohibited. Also, we may not give any such inside information — or "tip" — to others who might make trades based on it.

You must strictly comply with the Statement of Company Policy on Insider Trading and Disclosure, which can be found [here](#).

CREATING AND MAINTAINING ACCURATE AND COMPLETE RECORDS

We are all responsible for upholding all internal controls and for the accuracy of the Company's books and records, including timesheets, travel and expense reports, and financial statements we create and maintain.

WE MUST ENSURE:

- All Company books, records, accounts, and financial statements:
 - Are maintained in accordance with all applicable regulations and standards
 - Accurately reflect the true nature of the transactions they record
 - Conform to generally accepted accounting principles (GAAP) and Company accounting policies

WE MUST NOT:

- Create any pool of money that is not appropriately disclosed in the Company's books or records
- Make false or misleading entries in the Company's books or records (including false entries to any timesheets or expense reports) for any reason
- Misconstrue or mislabel a transaction
- Circumvent any internal controls
- Make a written commitment on behalf of Cognizant that exceeds our individual signature authority
- Disburse corporate funds or other corporate property without adequate supporting documentation and authority to do so





Records Management

Just as we must maintain our financial and business records in accordance with relevant policies, rules, and regulations, we must also retain and dispose of these records lawfully and ethically. This means we must always follow the document retention guidelines that apply to our locations and projects and never destroy records unless doing so is compliant with any applicable document retention schedule requirements and/or any legal hold notices. If you have questions regarding the status of any records in your possession, consult your Manager and the Legal Department before taking further action.

Accurate Billing and Representations to Customers and Others

Any time we submit an invoice to a customer, the information contained in that invoice must be complete and accurate. Intentionally submitting an invoice with information that does not accurately reflect the work performed is a false claim and can result in significant liability for the Company. Submitting knowingly inaccurate or false invoices and supporting documents such as time sheets to customers is never condoned by our Company. This is even more important when we deal with government customers because certain laws allow the federal and state governments to recover money paid to contractors that were not reflective of the services provided and/or supported by the invoices or documents submitted to the government entity as well as substantial fines and penalties. These laws broadly prohibit government contractors from making false representations to the government or concealing any information or facts. Cognizant has a zero tolerance policy on submitting false or inaccurate claims to its customers, including any governments.

Prohibition Against Money Laundering

As part of our commitment to accurate recordkeeping, we must be aware that people involved in criminal activity may attempt to enter into transactions with our Company to “launder” the proceeds of their criminal activities to hide the funds or make them appear to be from legitimate activities. Cognizant is committed to conducting business only with

reputable customers involved in legitimate business activities, with funds derived from legitimate, lawful sources.

Cognizant Associates can help ensure compliance with all applicable money laundering laws and regulations by:

Working with the appropriate Cognizant team (such as finance, accounting and compliance) to perform appropriate due diligence on prospective customers, agents and business partners to ensure that they are involved in legitimate business activities and their funds come from legitimate sources. Raise concern if any customer, agent or proposed business partner who is reluctant to provide complete information, provides insufficient, false or suspicious information, or is anxious to avoid reporting or record-keeping requirements.



Following our rules concerning acceptable forms of payment. Some forms of payments and payment related activities that have become associated with money laundering include:

- Payments using monetary instruments that appear to have no identifiable link to the customer
- Payments in cash
- Unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms
- Fund transfers to or from countries unrelated to the transaction or not logical for the customer
- Transactions involving locations identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity
- Transactions involving foreign shell or offshore banks, unlicensed money remitters or currency exchangers, or nonbank financial intermediaries
- Payment structures that appear to evade record keeping or reporting requirements (for example, multiple transactions below the reportable threshold amounts)
- Requests to transfer money or return deposits to a third party or unknown or unrecognized account.

If you have questions or concerns about potential money laundering, consult our Chief Compliance Officer or your local compliance resource.

WE DO BUSINESS THE RIGHT WAY

Our clients, stockholders, and communities depend on our commitment to perform with the highest level of integrity.

Competing Fairly and Honestly and Complying with Competition Laws

16

Conducting Ethical Sales and Marketing

16

Respecting International Trade

16

Driving Quality

16

COMPETING FAIRLY AND HONESTLY AND COMPLYING WITH COMPETITION LAWS

To compete fairly in the marketplace, we must show the same respect for the confidential information of our competitors that we show for our own. This means we may only gather competitive information in a lawful and ethical manner, never through deception or misrepresentation. For example, we do not use our access to customer systems to search for competitor presentations or other such information that may be viewable without proper authorization. Similarly, we may not retain or use a third party to do what we ourselves cannot.

We must comply with the antitrust and competition laws of the countries where we do business. In general, we must avoid agreements, understandings, or plans with competitors that limit or restrict competition, including price fixing and allocation of markets.

CONDUCTING ETHICAL SALES AND MARKETING

We never take unfair advantage of potential or current customers or vendors through manipulation, concealment, abuse of confidential information, misrepresentation of facts, or any other unfair-dealing practice. Our communications about our services, whether oral or in written promotional materials, presentations, or slide decks should always meet our high standards of accuracy and integrity.

RESPECTING INTERNATIONAL TRADE

Cognizant must comply with numerous international trade laws, including those dealing with embargos, export controls, economic sanctions, and anti-boycott regulations, and our Associates must comply with these laws whether based in the United States or another country. In addition, these laws and regulations apply to a number of aspects of our business. For example, these laws may apply to technology transfers, travel across

borders with technical documents, the sharing of information with foreign nationals during visits to the United States or even to foreign nationals working on government contracts in the United States. In addition, Cognizant is not permitted to do business in or ship products or equipment to certain jurisdictions (e.g., North Korea), nor can it do business with sanctioned individuals or companies.

For more information on the Company's expectations in regards to international trade please see our [Export Compliance Program Manual](#).

DRIVING QUALITY

We uphold strict standards for quality when working under our client contracts. As Cognizant Associates, we are each responsible for knowing and complying with contractual obligations applicable to our work. This means we cannot deviate from contractual specifications without the proper approvals.

Properly recording and categorizing all costs to the appropriate accounts and customers and carefully reviewing all documentation to ensure its accuracy before it is submitted to our customers is a fundamental part of delivering quality service.

If you have any questions about the information in this section, please consult with the Legal Department, or the appropriate Business Unit Head.

A modern office interior featuring a large brown leather sofa with several colorful pillows (green, blue, and grey). In the foreground, there is a long wooden table with black chairs. On the table, there are some potted plants. The floor is made of dark wood. In the background, there are large windows and an orange 'EXIT' sign hanging from the ceiling.

OUR RESPONSIBILITIES ARE CLEAR

As Cognizant Associates, we seek ways to lead in the following areas.

Practicing Good Corporate Citizenship	18
Adhering to Safety Standards	18
Participating in Political and Lobbying Activities	18

PRACTICING GOOD CORPORATE CITIZENSHIP

Labor Practices. We uphold human rights in all of 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. **Environmental Practices.** Cognizant is committed to preserving the environment. We utilize sustainable practices to reduce our carbon footprint and ensure our impact on the world is a positive one. We expect compliance with all applicable environmental laws, regulations, and standards.

For more information about these and other initiatives, please see the information contained in the Corporate Social Responsibility section of our website located [here](#), our [Policy on Sustainability and Corporate Responsibility](#), and our [Anti-Corruption Statement](#).

ADHERING TO SAFETY STANDARDS

We are expected to promptly report any potential health and safety issues to a Manager. Doing so helps us maintain our own safety, as well as the safety of our fellow Cognizant Associates.

As part of our commitment to maintaining a safe working environment, we never react with violence, threats of violence, abuse, or retaliation. This includes implicit or explicit verbal threats, intimidation, bullying, or any physical act of violence. If we witness or are the victim of an act of violence, intimidation, the threat of violence, abuse, retaliation, intimidation, or other threatening behavior, we must report the matter immediately to a Manager. If we or others are in danger, we must contact the local authorities first.

Just as we must not introduce violence into our workplace, we may not work under the influence of drugs or alcohol. The use, sale, purchase, or possession of illegal drugs, as well as the abuse of alcohol or doctor-prescribed drugs while on Company property or while conducting Company business is strictly prohibited. Such behavior puts all Cognizant Associates and our clients at risk. We should also talk to a Manager or a talent Manager if we notice another Associate's performance on the job is impaired due to the use of alcohol, illegal substances, or drugs, or that another Associate is using illegal substances on Company or client property.

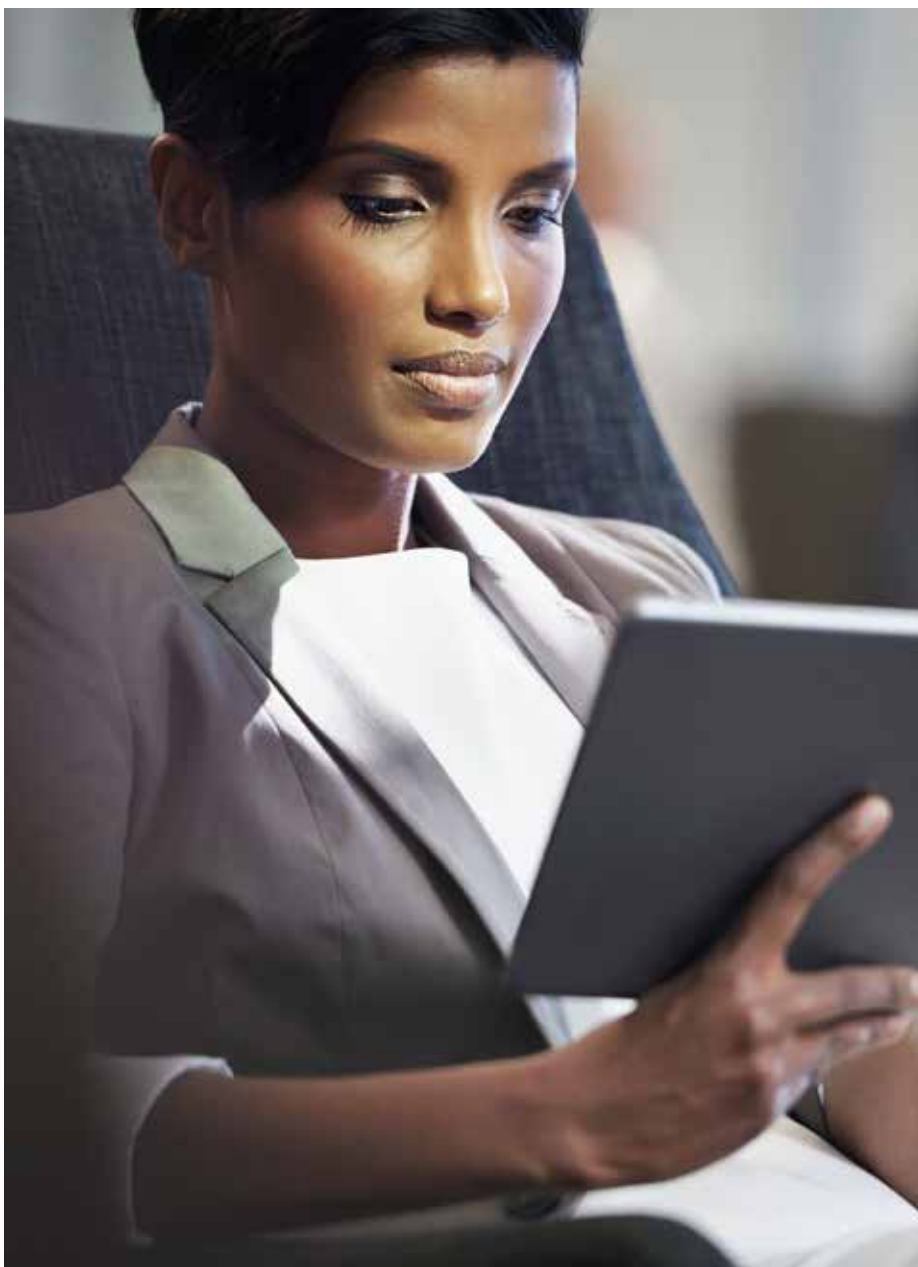
Additionally, all business activities must be conducted with all necessary permits, approvals, and controls.

PARTICIPATING IN POLITICAL AND LOBBYING ACTIVITIES

Cognizant encourages its Associates to participate in the political process, e.g., campaigning for a candidate for political office, when it is clear that such activity is conducted on an individual basis — not on behalf of our Company or during business hours.

It may be permissible for Cognizant to host political activities at Company facilities or otherwise use corporate resources in a limited way under the law. However, any use of facilities or resources for political activity must be approved in advance by the Legal Department.





WE MAY NOT:

- Seek or hold a political office without advising our supervisor in advance so that any potential conflicts of interest and other applicable laws can be reviewed and followed (and supervisors are required to review any such requests with our Legal Department)
- Request reimbursement for any political contribution or expenditure
- Make any direct or indirect contribution to a political candidate, political committee, or political party on behalf of Cognizant or the PAC (or similar structure in your jurisdiction), unless the contribution is legal and approved in advance by our Chief Legal Officer/General Counsel (for corporate contributions) and is in accordance with the PAC Articles of Association (for PAC contributions). This restriction includes the sponsorship, donation, or contribution to an event in support of a candidate, political party or government entity or official
- Make Company contributions to trade associations or their political action committees where such contributions will be directly or indirectly used for political purposes, unless approved in advance by the Legal Department

Note that there may be instances when our personal political contributions (whether federal, state, municipal, provincial or otherwise) are subject to review by Cognizant to ensure that they are compliant or do not inadvertently jeopardize government business for the Company. The Legal Department will provide specific guidance

We also must not lobby the government (whether federal, state, local, central, municipal, provincial or otherwise) or other organizations on behalf of Cognizant unless it is explicitly part of our job to do so or with the advance approval of the Legal Department. Lobbying is strictly regulated under the laws of most jurisdictions and is often defined broadly to include communications about and efforts to influence not just legislation, but also executive action, administrative matters, execution of government programs, regulatory proceedings, and government contracts.

WE TAKE PRINCIPLED ACTIONS

Our commitment to do business ethically means keeping the following important guidelines in mind.

Respecting Others' Privacy and Securing Their Data	21
Using Technology the Right Way	21
Safekeeping of Company Assets	21
Communicating About Cognizant	22
Discrimination and Harassment	22

RESPECTING OTHERS' PRIVACY AND SECURING THEIR DATA

We must follow all Company, country-specific, local, and client policies related to data privacy and data protection. As Cognizant is an international company, we are required to comply with all relevant international laws, including appropriate European Union data transfer laws. Cognizant limits disclosure of customer information to those inside our organization who have a clear business need for the information.

We do not give customer information to outside companies or other persons, except:

- As directed by clients
- To conduct our business properly
- To stay in compliance with applicable privacy laws
- To protect against fraud or suspected illegal activity
- To provide customer services

We must immediately contact our Manager, talent Manager, our Chief Security Officer, our Chief Legal Officer/General Counsel, or our Chief Compliance Officer if we believe such data has been compromised. For further information, please consult Cognizant's [Global Data Privacy Policy](#) and [Global Associate Privacy Notice](#).

USING TECHNOLOGY THE RIGHT WAY

We must protect Cognizant information systems from unauthorized access or modification. Further, we must ensure that all use of Cognizant and client equipment and information systems conforms to Cognizant's Acceptable Use Policy, which can be found [here](#). Additionally, when we access client information systems we should familiarize ourselves with any additional contractual obligations that may apply.

Cognizant assets like information systems and the messages communicated with them are the sole property of Cognizant, and where permitted, the

Company reserves the right to monitor, audit, and inspect our use of these resources. The Company may also block emails containing security-sensitive content. If we know or suspect use of Cognizant or client assets in violation of this Code or any policy, we must disclose the issue to our Manager or the Company's Chief Security Officer.

When sending business communications in our capacity as a Cognizant Associate, we must maintain a professional tone, discuss only appropriate subjects and not threaten, libel, or defame any other person or company. We should be thoughtful in all of our communications and dealings with others, including on social media.

For more information on the Company's expectations in regards to the use of social media in connection with our work please see our Social Media Policy, which can be found at [here](#).

SAFEKEEPING OF COMPANY ASSETS

As Cognizant Associates, we must protect Company and client assets from misuse, abuse, and theft. Such assets include monetary and physical property like equipment, supplies, facilities, and funds. They also include intangible assets, like confidential information and intellectual property ("IP"), and the information systems we use to conduct Cognizant business. While we may make incidental personal use of Cognizant assets, Company assets should be used primarily for Cognizant business.

Confidential information means client or Cognizant information not generally known to the public that provides clients or our Company with a business advantage, including but not limited to strategic and business plans; financial, sales, or pricing information; customer lists and data; vendor terms with suppliers; and promotional plans

Intellectual property means our tools, methodologies, creative ideas, expressions, and their associated commercial value, including system code or designs, proprietary computer systems, and copyrights and trademarks

Our stockholders and clients rely on us to protect important information from unlawful or inadvertent disclosure. We must take appropriate precautions to ensure that sensitive business information is only communicated confidentially, and only to those Associates with a business need to know. We never provide confidential information to a third party without the appropriate approvals and non-disclosure agreements in place.

Our obligation to protect information also extends to our IP. Any IP we generate in our Cognizant work belongs to our Company or our clients, including business-related written works, technological advances, or unique solutions to business problems. Whenever we create IP, we must ensure it is disclosed to the Company and protected in accordance with all applicable policies and contractual obligations.

We are also expected to abide by any legal obligations we may have to our former employers. These obligations may include restrictions on the use and disclosure of confidential information, soliciting former colleagues to work at our Company, and non-compete obligations.

If you know of a situation in which any of our confidential information has been compromised, you should notify our Chief Compliance Officer or Chief Legal Officer/General Counsel immediately.

COMMUNICATING ABOUT COGNIZANT

As a publicly traded company, Cognizant has a responsibility to disclose information to the public that is completely accurate.

We must not speak on behalf of Cognizant, our customers or competitors, or our industry with any member of the media or investment community (including all “market professionals” such as securities analysts, institutional investors, investment advisors, brokers, dealers, and security holders) unless we are authorized to do so.

All public disclosures including forecasts, press releases, speeches, and other communications must be accurate, timely, and representative of the facts.

If we are approached by any media person, analyst, or investor to speak on behalf of our Company, our customers or competitors, or our industry, we should direct those queries to the Communications Group. We should not attempt to provide any information ourselves. We should ask the person approaching us to send an email to: GlobalPR@cognizant.com, and the Communications Group will respond appropriately.

DISCRIMINATION AND HARASSMENT

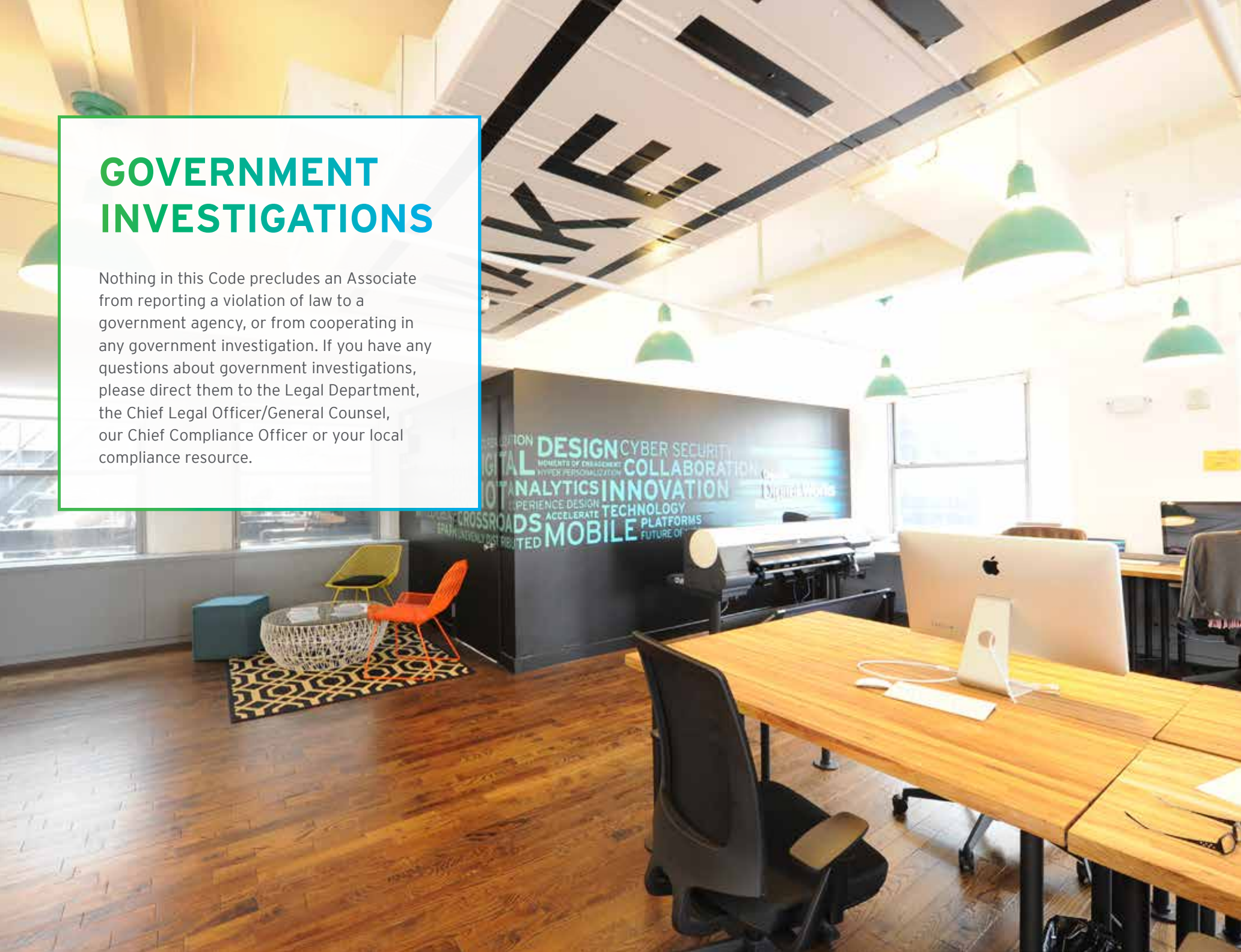
We must treat others with fairness and respect, and value each other’s individual contributions. We never discriminate against a person’s legally protected characteristics, such as race, color, religion, gender, gender identity, age, national origin, sexual orientation, marital status, disability status, or veteran status when we make employment decisions including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment. We also comply with all applicable equal employment opportunity laws, including those related to discrimination and harassment.

We must never tolerate discriminatory conduct, abuse of authority, or harassment of any kind, including that of a sexual nature. We must also refrain from making jokes, slurs, or other remarks about a person’s legally protected characteristics as applicable in a specific country, or those of a sexual nature. At no time should we allow, encourage or create an offensive, violent, discriminatory, abusive, or hostile environment, whether in a location where we conduct our business (such as a Cognizant office or a client site) or at other locations where we congregate for a work-related activity or event (such as a restaurant, hotel or conference center).

Similarly, we may not retaliate against a person who makes a report of discrimination or harassment in good faith, or who participates in an investigation. If witnessing or experiencing discrimination, intimidation, harassment, or retaliation, we should promptly report the behavior to a talent Manager, our Chief Compliance Officer, or our Chief Legal Officer/General Counsel.

GOVERNMENT INVESTIGATIONS

Nothing in this Code precludes an 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 Compliance Officer or your local compliance resource.



Periodic Table of Innovation

WAIVERS OF THIS CODE

While the policies contained in this Code must be strictly adhered to, an exception could be appropriate under special and limited circumstances. If you believe an exception is appropriate, you should contact your immediate Manager, and if he/she agrees, you must obtain approval from our Chief Compliance Officer. Our Chief Compliance Officer maintains a record of all requests for exceptions and the disposition of such requests, and reports such requests and dispositions to the Company's Audit Committee.

Any executive officer or Board Member who seeks an exception to any of the Code provisions should contact the Company's Chief Legal Officer/General Counsel. Any waiver of the Code for executive officers or Board Members or any change to this Code that applies to them may be made only by the Board of Directors of the Company, and may be disclosed as required by law or stock market regulation.

APPENDIX**SCENARIO 1: INTERACTING WITH GOVERNMENT OFFICIALS**

A Manager on a facilities project is worried about potential delays due to difficulties obtaining permits and clearance for key supplies needed for the project. During a regular meeting with the customs official, the customs official tells the Manager that he can get the materials into the work zone if he hires a specific consultant for a fee of \$5,000. The customs official assures that this approach will allow the supplies to quickly move through customs without further delay.

KEEP IN MIND

- We must be very cautious when communicating or working with government officials, including customs officials
- Special laws and regulations control our interactions with government officials
- Even if it is a “local custom” to make such payments, and even if the payments appear small, it is never acceptable to provide cash or other benefits to a government official in exchange for preferential treatment
- Neither Cognizant nor its third parties engage in bribery. We do not corruptly give or offer, directly or indirectly, anything of value to a government official to obtain or maintain business or any other advantage for the Company

TAKE APPROPRIATE ACTION

- Ensure that no inappropriate payments are exchanged with government officials through Cognizant Associates or through third parties
- Think about whether you feel comfortable in your understanding of anti-corruption laws, our Anti-Corruption Statement, and consult our Legal Department or Chief Compliance Officer with any questions
- Take it upon yourself to get any additional education you need in anti-corruption laws, and be on the lookout for signs that Cognizant Associates or business partners might not understand our shared responsibilities in this area
- Report any concerns you have right away

APPENDIX**SCENARIO 2: CORPORATE OPPORTUNITIES**

A Cognizant Associate responsible for pitching new projects comes across a proposed project that she thinks would be well suited for her cousin's company.

KEEP IN MIND

- We all have a responsibility to make decisions in Cognizant's best interests
- We must never put our own or someone else's personal interests ahead of what is best for Cognizant
- Any time our personal interests could conflict with our work, we should report the situation to our Manager or to the Compliance Department to get help resolving it
- Avoid financial interests that are inconsistent with Cognizant's best interest
- We must refrain from activities, investments, or associations that compete with Cognizant, interfere with your judgment concerning Cognizant's best interests when conducting Cognizant business, or exploit your position with Cognizant for personal gain

TAKE APPROPRIATE ACTION

- Do not tell your cousin about the opportunity before Cognizant has made a decision regarding whether to pursue it
- Talk with your Manager about your thoughts and whether you should participate in making this decision
- Confirm with your Manager whether it is permissible to refer the opportunity to your cousin's company

APPENDIX

SCENARIO 3: SPEAKING UP

An employee was present in a business meeting with a key customer and her Manager, who is high up within the Cognizant organization. The Manager said things to the customer during the course of the meeting that the employee knows are not true and she is worried about Cognizant's reputation with the client. However, she knows that if she brings it up to the Manager, he will dismiss the statements as business as usual, and she is worried about the impact that reporting the incident to someone else might have on her career.

KEEP IN MIND

- It is important to always be truthful in our interactions and communications with potential or current customers
- Sometimes, even a failure to disclose certain information may make information communicated to a customer untrue
- Lying to or misleading a customer comes with substantial risks, including harm to the customer relationship as well as damage to Cognizant's reputation
- You do not need to be certain that inaccurate information was communicated to a customer or vendor in order to report concerns
- Cognizant has a strict prohibition on retaliation for reporting concerns about untrue or misleading information communicated to a customer

TAKE APPROPRIATE ACTION

- If you think that false or misleading information has been provided to a current or potential customer, you should report these concerns immediately, either to the Cognizant Legal Department, the Chief Compliance Officer, Chief Legal Officer/General Counsel, or the Compliance Helpline

APPENDIX**SCENARIO 4: SAFEKEEPING OF COMPANY ASSETS**

After months of hard work leading to a breakthrough in functionality, a Design Engineer copies her work onto a personal external drive and takes it home in order to make sure that she retains her work, even if she later leaves the Company.

KEEP IN MIND

- Our roles as Cognizant Associates sometimes allow us to learn about new products or services before the general public
- These types of advances give our Company a competitive advantage, and it is up to us to carefully protect this information
- Releasing confidential or proprietary information – belonging to Cognizant or our clients – could seriously harm the companies and individuals involved
- Never download confidential information outside Cognizant's network or send confidential information to private e-mail accounts

TAKE APPROPRIATE ACTION

- Do not take confidential information, Company IP, or Client IP for your own personal use
- Do not disclose any Company IP to third parties. Be careful to only discuss with your friends information that is already publicly available
- If you know that confidential information has been compromised, notify our Chief Compliance Officer or Chief Legal Officer/General Counsel

APPENDIX**SCENARIO 5: HOSTILE WORK ENVIRONMENT**

An employee thinks that her boss is harassing a number of people on the employee's team, including the employee. She observes that the Manager keeps asking a male colleague on dates, and although the colleague has declined, the Manager continues to ask him out. The Manager is verbally demeaning to the employee and several other women on the team about their appearance and intellect, and offers them very few opportunities. On the other hand, the Manager praises and rewards other members of the team. The employee wants to speak up, but is afraid that if she does so, her Manager will find out.

KEEP IN MIND

- This type of behavior is inappropriate and could be considered harassment
- Under no circumstances is it appropriate to make comments that are derogatory, abusive, or sexual in nature
- Cognizant has a strict prohibition on retaliation for reporting suspected or actual ethical violations, including workplace harassment
- Cognizant will protect you if any Manager were to act against you because you raised a concern

TAKE APPROPRIATE ACTION

- Report any concerns you have right away, either to the Cognizant Legal Department, the Chief Compliance Officer, Chief Legal Officer/General Counsel, or the Compliance Helpline



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