



Cognizant's Core Values and Standards of Business Conduct



Cognizant

Passion for building stronger businesses

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| Introduction

Our Reputation is in Your Hands



Dear Associates,

I am continually impressed by the quality and dedication of our people and our ability to meet the highest standards of performance and business conduct. As we dedicate our global resources, industry intelligence and systems expertise to strengthen our clients' businesses, our single-minded passion for our customers shows.

In this exciting and challenging time, we must remember that it's our reputation and the behavior demonstrated by our people that ultimately influence customers to work with and stay with us. As we continue to grow, we may be faced with pressures arising from our high-performance environment that could tempt us to take shortcuts to achieve our goals. It is critical that we never

let these pressures and challenges affect our integrity even when we think it will help to satisfy our clients. Our clients are never well served when our actions are in conflict with our Core Values and Standards of Business Conduct.

As a global organization operating in diverse cultures, these standards provide a shared understanding of what appropriate business conduct means at Cognizant. It is our guide to acting with integrity. I hope you find it to be a valuable decision-making tool.

As Cognizant Associates, we must remember that our winning mentality isn't just about doing great things. It's about doing great things the right way. That's how we continue to build trust with our customers, and protect the valuable asset that is Cognizant.

Best regards,



President and Chief Executive Officer

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 elsewhere, we must be role models of integrity and ensure that we handle our clients' systems, confidential information or sensitive *intellectual property*, as well as our own, with the utmost of care. Associates assigned to client engagements are expected to follow both Cognizant and client policies, as well as standards of conduct. In cases where standards differ, the more stringent standard will apply.

Our Core Values and Standards in Action

Cognizant's *Core Values* (Core Values) and *Standards of Business Conduct* (Standards) is our guide to meeting our business goals the "right way." Our *Core Values* define the behaviors that will make us successful in the marketplace. Our *Standards* define what constitutes acceptable and appropriate behavior at Cognizant in particular situations where our service levels and our reputation (or that of our clients) could be compromised.

Although these Standards do not cover every possible situation, they reflect our basic philosophy of conducting business lawfully and with integrity. Together, our Core Values and Standards provide a shared understanding not just about what we do but also how we do it. They are a framework for ensuring consistent professional conduct across diverse cultures and work environments.

To provide relevant examples, many of the scenarios described in the Q&A's that follow each Standard were taken from real-life situations experienced by Cognizant Associates.

Our Core Values

■ Open

Our environment is one of open doors and open minds. Our competitive advantage is derived from being open to all ideas, no matter their source, that will improve our ability to deliver excellence.

Anyone, regardless of level, who takes the initiative to present an innovative idea or express a concern will be openly and respectfully heard.

We highly encourage all managers to make themselves available to the ideas or concerns of our Associates.

■ Transparent

Our communications - positive or negative - are always proactive, direct and honest. We view this transparency as critical to the health of our company. We practice this same transparency with our clients. It is a critical element in achieving our status as a trusted advisor.

As a trusted advisor, we will never hide or ignore ethical issues. We understand that bringing forward bad news early allows us to be proactive and able to address an issue before it turns into a crisis.

■ Driven

We expect and reward personal and team initiative. Our clients experience this as a nimble, "can do" approach focused on delivering excellence at all times, with individuals and teams taking complete ownership of problems and developing creative solutions. Associates who show initiative and drive have tremendous growth opportunities.

Our initiative will never come at the expense of our Core Values, Standards or our ethics.

■ Empowered

We believe the best way to deliver excellence to our clients is to unleash the excellence in our people. Cognizant Associates have the freedom, empowerment and responsibility to find the best way to meet customers' needs. We are trusted to apply our passion, intelligence and skills in each and every endeavor. In every decision we make, we seek to uphold our integrity, not compromise it.

■ Opportunity-filled

We believe that only by encouraging promising Associates to pursue paths that will fulfill their personal and professional goals will we be able to attract and maintain the type of quality people our customers have come to expect. Employee fulfillment is a key attribute of a healthy ethical culture.

■ Flexible

While recognizing the advantages of process and consistency, we know that a hallmark of excellence is adaptability. We know that clients care most about results; we must adapt in real time to each new challenge in the marketplace. We recognize that, as Associates, we have lives outside of Cognizant and that we are trusted to choose how and when we will do our work so that Cognizant continues to exceed client expectations.

We also recognize that flexibility taken too far can result in recklessness. We will never try to exceed client expectations by compromising our Core Values or Standards.

■ Collaborative

Our commitment to collaboration is evident in our matrix organization and team-based project structure. We reject the model of individual star performers who stand out by claims of superior personal contribution. Instead, we choose to predicate the growth of individuals on their contributions to the team's success in delivering exceptional customer experiences.

Part of that contribution is to work with others to identify and address risks to our integrity, reputation and client systems before they escalate into major issues.

Cognizant is committed to complying with these *Core Values and Standards of Business Conduct* and all laws and governmental regulations that are applicable to the Company's activities. We make this pledge not just because it's the right thing to do, but also because it is an integral part of our commitment to excellence and exceeding client expectations.

To Whom these Standards Apply

These Standards apply to all Cognizant Associates, meaning Associates at all levels of the Company (including officers and members of the *Board of Directors*) at all subsidiaries and other businesses controlled by Cognizant worldwide. The term "Cognizant Associates" as used in these Standards also refers to our contractors, sub-contractors, suppliers and others who assist us in servicing our clients.

Our Commitment as Cognizant Associates

As Cognizant Associates we have a responsibility to ask questions, seek guidance and express concerns about these Standards. We must comply with these Standards and report any known or potential violations to our manager, our talent manager, the Director - Compliance or the General Counsel, even when we are not personally involved in the potential violation (subject to applicable laws and regulations).

As Cognizant Associates, we are also expected to cooperate fully with any inquiry or investigation by the Company regarding an alleged violation of these Standards. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including termination (subject to applicable laws and regulations).

Managers have an additional responsibility to help Associates resolve ethical issues, and to create an environment where Associates feel comfortable coming to them to discuss possible violations of the Standards. Any Cognizant manager who receives a report of a violation of these Standards is also responsible for immediately informing the Company's Director - Compliance.

Questions about these Standards

As an organization, Cognizant welcomes comments, questions and discussions on our *Core Values and Standards of Business Conduct* and any ethical issues relating to the Company. Any questions regarding these Standards or their application in any situation can be directed to a manager, talent manager or the Director - Compliance.

We recognize that these Standards can only provide a basic understanding of the rules that apply to how we conduct our business. That is why we have other policies, including those in our HR Handbooks, that provide more detailed information regarding our Standards. As Cognizant Associates, we are responsible for knowing the policies that apply to us. Relevant policies are referenced within this document.

Not Sure what a Particular Word or Phrase Means?

Throughout this document, we have italicized terms that may not be familiar to you and have provided definitions in the "Defined Terms" section.

Getting Help or Reporting a Possible Violation of these Standards

To report a suspected violation of these Standards, Associates should contact their manager, talent manager or the Director - Compliance. It is recommended that Associates identify themselves when reporting possible violations so that additional information can be obtained if necessary. When possible and permitted by law, the identities of Cognizant Associates who file such reports will be kept strictly confidential.

Potential violations can also be reported on a confidential or anonymous basis as follows:

- **By Fax**
201-801-0243
Attention: Director - Compliance
- **By Mail**
Cognizant Technology Solutions
Attn: Director - Compliance
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, New Jersey 07666
- **By Email**
misty.pederson@cognizant.com



■ Cognizant Compliance Helpline

Another channel for reporting is Cognizant's Compliance Helpline. Cognizant Associates can file reports using the Compliance Helpline, either by phone or via the Internet (see below). Anonymous reporting of violations is permitted in most of the Countries in which Cognizant operates. Cognizant's Compliance Helpline is administered subject to Country-specific laws and regulations, which in some cases prohibit anonymous reporting.

Via the Internet: <https://www.compliancehelpline.com/welcomepagecognizant.com>

Via phone from the U.S. or Canada: Dial 1-866-824-4897

International callers will utilize AT&T Direct Access Service to reach the toll-free Global Compliance Helpline.

To call from India:

Step 1: Dial AT&T Direct Access Code 000-117.

Step 2: Listen for the AT&T Prompt/Operator asking for the number you are calling.

Step 3: Dial or speak the Cognizant Compliance Helpline number **866-824-4897**

To call from the UK:

Step 1: Dial AT&T Direct Access Code 0-800-89-0011 (or 0-500-89-0011).

Step 2: Listen for the AT&T Prompt/Operator asking for the number you are calling.

Step 3: Dial or speak the Cognizant Compliance Helpline number **866-824-4897**

To call from countries not listed above:

Follow the **3-step** international calling process noted above using the appropriate access code from your country.

AT&T USADirect ACCESS NUMBERS are available on the internet at: <http://www.usa.att.com/traveler/index.jsp>.

Policy Prohibiting Retaliation for Reporting Code Violations

It can take courage to raise an issue relating to our Standards. We know it can be a difficult decision. That is why we are committed to ensuring that Associates do not face *retaliation*, reprisals or any career disadvantage for complying with or reporting potential violations of these Standards. Discharging, demoting, suspending, threatening, harassing or in any other manner discriminating against any Associate who complies with or reports a violation of our Standards is considered *retaliation* and is strictly prohibited. The Company will take action against individuals engaging in retaliatory behavior up to and including termination. Any Cognizant Associate who suspects that they or someone they know has been retaliated against should contact the Director - Compliance or the Compliance Helpline immediately.

However, if a Cognizant Associate knowingly files a false or misleading report, he or she may be subject to disciplinary action up to and including termination.

How Reports are Handled

When the Company's Director - Compliance receives information regarding an alleged violation of these Standards, he or she, as appropriate, will:

- Evaluate the information provided.
- Determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate the inquiry or investigation.

After determining that a violation of our Standards has occurred, he or she will:

- Determine what disciplinary measures are to be taken against the involved individual(s).
- Report the results of any inquiry or investigation, together with steps taken to resolve the matter, to the Audit Committee of the *Board of Directors*.

If the alleged violation involves an Executive Officer or a *Board Member*, the Director - Compliance will notify the General Counsel who will inform the Chief Executive Officer and *Board of Directors* of the alleged violation and report the results of any inquiry or investigation to the *Board of Directors* or the appropriate Board committee.

Disciplinary Action

Failure to comply with these Standards may result in disciplinary action up to and including termination (subject to applicable employment laws).

Any manager who directs or approves of any conduct in violation of these Standards, or who has knowledge of such conduct and does not immediately report it, will also be subject to such disciplinary action.

In the event that the alleged violation involves an Executive Officer or *Board Member*, the Chief Executive Officer and the *Board of Directors* (in consultation with the Director - Compliance and General Counsel when appropriate), respectively, shall determine whether a violation of these Standards has occurred and, if so, shall determine the disciplinary measures to be taken against such Executive Officer or *Board Member*.

Certain violations of these Standards may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution.

Waivers of these Standards

While the policies contained in these Standards must be strictly adhered to, there may be special circumstances where an exception may be appropriate. Any Associate who believes that an exception to any of these policies is appropriate should first contact his or her immediate manager. If the manager agrees that an exception is appropriate, the Associate must then obtain the approval of the Company's General Counsel. The Company's General Counsel is responsible for maintaining a record of all requests for exceptions to any of these policies and the disposition of such requests, and will report such requests and such dispositions to the Company's Audit Committee.

Any Executive Officer or *Board Member* who seeks an exception to any of these policies should contact the Company's General Counsel. Any waiver of these Standards for Executive Officers or *Board Members* or any change to these Standards that applies to them may be made only by the *Board of Directors* of the Company and will be disclosed as required by law or stock market regulation.



| The Standards

Acceptable Use of Cognizant and Client Assets

- **Acceptable Use Policy available at:**
<https://groups.cognizant.com/corporate/CGandRM/Pages/AcceptableUsePolicy.aspx>
- **Acceptable Use Policy training available at:**
<http://myacademy.cognizant.com/elearning/course/view.php?id=102> (Internet)
 Or
<http://myacademy/elearning/course/view.php?id=102> (Intranet)

Why it is Important

Effective use of Cognizant and client resources is critical to the Company's performance and success. When we are efficient in our use of these resources, we create value, both for ourselves and our customers. We recognize that when we misuse Company resources, we subject ourselves and our customers to potential financial, legal, operational and reputation risks.

Our Commitment

As Cognizant Associates, we must protect Cognizant and client assets from misuse, abuse or theft. Such assets include equipment, physical property, supplies, *intellectual property* and *information systems* used by Cognizant and its Associates to conduct its business. While Cognizant recognizes that incidental personal use of Cognizant assets by Associates is sometimes unavoidable, such assets should be used principally for Cognizant work and not for any personal benefit or the personal benefit of others.

As Cognizant Associates, we must:

- Take all measures to protect Cognizant and client assets, whether at Cognizant, a client facility, or while traveling.
- Ensure that all use of Cognizant and client equipment and *information systems* conforms with Cognizant's Acceptable Use Policy.
- Send communications that are professional in tone and subject matter, and consistent with Cognizant's goal of maintaining a respectful workplace.
- Make it clear, when expressing a personal point of view using Cognizant or client *information systems* that the views expressed are those of the author and not of Cognizant.
- Disclose unacceptable use of Cognizant or client assets to our manager or the Company's Chief Security Officer.

We must not:

- Use Cognizant or client property or information -- or our role within Cognizant or the client -- for activities that express religious or political viewpoints, or are offensive, illegal, fraudulent or for improper personal gain.
- Use Cognizant or client property or information -- or our role within Cognizant or the client -- to compete with the Company directly or indirectly.
- Use Cognizant or client *information systems* in activities that could lead to security breaches or disruptions of network communications.
- Circumvent user authentication or the security protocols of any host, network or account.

Because Cognizant assets (including *information systems* and messages communicated using those systems) are the sole property of Cognizant, the Company reserves the right to:

- Monitor, audit and inspect Associate use of Cognizant *information systems* when we believe such systems are being used improperly.
- Block e-mails containing security-sensitive content.

Cognizant also reserves the right to search the belongings of anyone entering or leaving Cognizant's premises for security purposes (consistent with local laws).

Do	Do Not	Seek Permission
Protect portable electronic devices from theft	Download files, use applications or participate in online games that use high bandwidth	<i>From your manager and the GIS team to:</i> Execute any form of project related network monitoring, port scanning or network sniffing
Exercise care in the use of e-mail, including targeting messages to the appropriate audience	Use Company or client facilities to download, distribute or use software or data without appropriate permission	<i>From your manager and the GIS team to:</i> Download software for direct business use
Contact the <i>Global Help Desk</i> to get the latest virus software, or to report system-related issues	Propagate viruses, worms or other malicious code or send malicious e-mails or SPAM	<i>From your manager and the GIS team to:</i> Use high bandwidth applications such as streaming media and Internet radio for business purposes
Inform the <i>GIS team</i> and local administration of loss or theft of any personal items inside Cognizant premises	Execute any non-business form of non-project related network monitoring, port scanning or network sniffing	<i>From your manager to:</i> Retrieve executable files
Inform the Global Help Desk of errors in addresses in Cognizant directories	Join non-business-related mailing lists, solicit information on the Internet or send non-business mass or chain letters	
Run only client-approved software on workstations or laptops when working on projects	Access illegal, pornographic or other material with which the Company would not want to be associated	
Take reasonable precautions to safeguard personal belongings in the workplace (e.g. cellphones, jewelry, briefcases, wallets, etc.) Such belongings should not be left in Cognizant offices overnight	Send or knowingly post inaccurate, unsubstantiated, discriminatory or abusive/derogatory comments about any individual or company (including its products and services)	
	Use Cognizant assets to offer non-Cognizant products items or services	
	Install software without the knowledge of <i>NSS</i>	
	Use client-supplied software to write code for a colleague who works for a different company or a different client within Cognizant	
	Post Cognizant or client confidential information in public forums	

Q&A

Acceptable Use of Cognizant and Client Assets

■ Question:

I work very long hours for a Cognizant client and sometimes need to use my Cognizant or client e-mail to exchange messages with family and friends. Is this prohibited by our *Acceptable Use policy*?

■ Answer:

No. We understand that in today's work environment, there will be the occasional need to communicate with friends and family via e-mail. Cognizant e-mail may be used for such purposes assuming that the communications do not violate our Standards (e.g., sending pornography) and are not associated with outside business pursuits. In addition, Associates should not send non-business related mass e-mails via company distribution lists (e.g., sports pools, religious or political content, etc.). The majority of our customers prohibit the use of their systems and/or equipment for personal purposes. Accordingly, prior permission must be obtained from your Manager before Associates use client systems and/or equipment for sending/receiving personal e-mail.

■ Question:

We have been working around the clock to deliver an application to our client. To enable us to complete the assignment on time, a colleague suggested that it would be more efficient if we shared an ID. A manager employed by the client stated that he didn't care if we did so. Is this prohibited by our Acceptable Use policy?

■ Answer:

Yes. All clients have IT security policies, and as an Associate working on an engagement you are responsible for understanding and complying with such policies. These policies (as well as our own) generally prohibit the sharing of IDs and passwords. The manager who allowed the exception may not have been authorized to do so. You should never share passwords with anyone without the prior written permission of the Chief Compliance Officer or General Counsel.

Accuracy of Books, Records and Public Reports

Why it is Important

Our reputation depends on the confidence that others have in us, which is partly based on the accuracy of our written records and verbal statements. By demonstrating honesty in our accounting and public reports, we generate trust with our stockholders and enhance our reputation. Accurate information is also essential to the Company's ability to meet legal and regulatory obligations. When we fail to record financial information and public reports accurately, we severely damage our reputation, expose ourselves to legal liability, risk losing business and decrease customer and shareholder confidence.

Our Commitment

Cognizant is committed to providing full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission (SEC) and other public communications.

As Cognizant Associates, we are responsible for the accuracy of the books and records we maintain as part of our job. These books and records include financial records, travel and expense reports, forecasts, resource allocations and billings, financial statements, etc.



We must ensure that 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 practices (GAAP) and Company accounting policies.

We must not:

- Establish any undisclosed or unrecorded account or fund for any purpose.
- Make false or misleading entries in the Company's books or records for any reason.
- Make a written commitment on behalf of Cognizant that exceeds our *signature authority*.
- Disburse corporate funds or other corporate property without adequate supporting documentation and authority to do so.

Dealings with Independent Auditors

Cognizant Associates must act with the utmost integrity when engaged with an *independent auditor* in any audit, review or examination of the Company's financial statements or in the preparation or filing of any document or report with the SEC in connection with the Company's financial statements.

When engaged in these activities, we must not:

- Knowingly make or cause others to make a false or misleading statement.
- Knowingly mislead an auditor by omitting any fact that is needed for the auditor to get an accurate picture of the Company's financial position.
- Cause another person to mislead an auditor in this manner.
- Directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence any accountant engaged in the performance of an audit or review of the Company's financial statements.

Examples of Appropriate and Inappropriate Behavior

Do	Don't
<ul style="list-style-type: none"> ■ Pay careful attention to the accuracy of books, records and financial statements ■ Report any known or potentially false or misleading information in the Company's financial statements to the Director - Compliance or the General Counsel ■ Know the limits of your <i>signature authority</i> and stay within them. If you are unsure of these limits please check with the appropriate Finance or Legal representative 	<ul style="list-style-type: none"> ■ Bill more hours to the client than worked to meet revenue goals ■ Intentionally submit expenses for reimbursement that are not business-related or violate company policies ■ Misrepresent financial results submitted to the client as part of Cognizant's capabilities ■ Intentionally submit an inaccurate resource, expense or revenue forecast

Q&A

Accuracy of Books, Records and Public Reports

■ Question:

For purposes of recognizing fixed-bid revenue, I am asked to submit a monthly forecast of the remaining efforts to complete a project. I know that the project will most likely wrap up by March but I want to retain the Associates for another project that I believe we may win from the same customer. May I extend the forecast of the project beyond March so that I can retain these resources to work on the second project, which has yet to commence?

■ Answer:

No. Resource forecasts for each individual project must be accurate to ensure that our revenue is properly and accurately recognized. Forecasts are critical to management's ability to run the company and they must correctly reflect the true nature of the transactions they are intended to capture.

■ Question:

I recently transferred from the U.S. back to India. My transfer was not properly reflected in Peoplesoft by my manager. I continue to receive U.S. wages while working in India. Do I need to report that my wages paid to me are incorrect and that I'm being overpaid?

■ Answer:

Yes. Even though the overpayment is an administrative error on the part of the Company, you have an obligation to communicate the error to Finance.

Competing Honestly and Fairly in the Marketplace (Fair Dealing)

Why it is Important

Cognizant is committed to dealing honestly, ethically and fairly with suppliers, customers, competitors and Associates. We believe that the best way to outperform our competition is fairly and honestly, by seeking competitive advantages through superior performance, never through unethical or illegal business practices.

It is our policy to engage in sales, marketing, advertising and other competitive practices that do not jeopardize the trust placed in the Company by customers, vendors, suppliers and the public and that do not violate antitrust and competition laws.

Our Commitment

As Cognizant Associates, we must make sure that our communication of information about our products and services is truthful and accurate. Promotional materials and other statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent.

We must not:

- Take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.
- Unfairly denigrate our competitors and/or their products or services.
- Use unauthorized access to search for competitor presentations or other such information that may be viewable on customer systems.

Examples of Appropriate and Inappropriate Behavior

Do	Don't
<ul style="list-style-type: none"> ■ Use care and prudence in making fair and factually-based comparisons on attributes such as price and performance 	<ul style="list-style-type: none"> ■ Deliver a flawed product to a customer to meet a deadline ■ Include comparisons to our competitors and their products in our client presentations or RFI's that denigrate our competitors ■ Communicate inaccurate or misleading information about our competitors' pricing and performance

Q&A

Competing Honestly and Fairly in the Marketplace (Fair Dealing)

■ Question:

I heard a rumor that one of our competitors may be laying off a large number of associates. If true, this could give us a competitive advantage in one of our service offerings. Is it OK to incorporate this information into a formal presentation that we are making to a prospective client?

■ Answer:

No. Presentations that contain competitor information must not be untrue, misleading, deceptive or fraudulent. Since the information is only a rumor, it should not be incorporated into any written materials presented to the client.

■ Question:

A close friend of mine works for a competitor of Cognizant. He is trying to develop capabilities in the same practice that I work in at Cognizant. He has asked me to share materials including pricing, tools, presentations, etc. May I do so?

■ Answer:

No. As a Cognizant Associate, you must not share any Cognizant or client materials, tools, methodologies, etc. with others outside the organization.

Compliance with Laws, Rules and Regulations

Why it is Important

Because today's dynamic global marketplace demands that companies achieve higher standards of behavior, it is critical that all Cognizant Associates make business decisions that are aligned with our ethical principles of integrity, quality and innovation. This means complying with all laws, rules and regulations applicable to the Company wherever we conduct business.

Our Commitment

As Cognizant Associates, we must use good judgment and common sense in complying with all applicable laws, rules and regulations. We are expected to ask for advice when we are uncertain about what to do.

Examples of such laws include:

- Antitrust and competition laws
- Bribery and anti-corruption laws
- Environmental laws
- Immigration laws
- Labor laws
- Software import/export compliance laws
- Data privacy laws

If we become aware of a violation of law, rule or regulation by the Company, whether by its Officers, Associates, *Board Members* or any third party doing business on behalf of the Company, it is our responsibility to promptly report the matter to Cognizant's Director - Compliance or the Company's General Counsel.

While it is the Company's desire to address matters internally, nothing in these Standards should discourage us from reporting any illegal activity to the appropriate regulatory authority. These Standards also do not prohibit any Cognizant Associate from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

We must never terminate, demote, suspend, threaten, harass or in any other manner discriminate or *retaliate* against another Associate because he or she reports any such violation. However, if a person knowingly files a false or misleading report, he or she may be subject to disciplinary action, up to and including termination.

Examples of Appropriate and Inappropriate Behavior

Do	Don't
<ul style="list-style-type: none"> ■ Comply with all laws, rules and regulations applicable to the Company wherever we conduct business, including environment and green company compliance requirements as per local laws 	<ul style="list-style-type: none"> ■ Solicit or accept resources to work on a project that do not have the correct visa type to perform the services ■ Misrepresent to clients the visa status of specific resources in order to win new business or expand an existing relationship ■ Get involved with middlemen and/or the bribing of government officials while procuring or leasing land and infrastructure

Q&A

Compliance with Laws, Rules and Regulations

■ **Question:**

A client has requested three additional long-term resources to immediately begin work on a new project. I know that it will take at least two months to process the necessary paperwork to relocate these resources into this country. Is it OK to bring these associates in on business visas for billable work until we can obtain work visas for them?

■ **Answer:**

No. Despite our goal to provide rapid response to customer requests, we must always abide by local laws in the countries in which we operate. In general, local laws prohibit people on business visas from performing billable services for our customers. Accordingly, we must work with the Global Immigration Team to satisfy the customer request in the proper manner.

■ **Question:**

What can I do if I don't know what laws apply to me or want to learn more about the laws that do?

■ **Answer:**

You should talk with your manager, your talent manager, our General Counsel or the Director - Compliance about which specific laws apply to your job.

Confidential Information and Intellectual Property Protection

Confidential Information

Why it is Important

As Cognizant Associates, we sometimes have access to client and/or Cognizant information that is not generally known to the public and provides the Company or our clients with a business advantage. This confidential information includes, but is not limited to, strategic and business plans, financial, sales or pricing information, customer lists and data, vendor terms with suppliers, system code or designs, tools, methodologies and promotional plans, proprietary computer systems, and copyrights or trademarks on certain brand names. Our stockholders and clients rely on us to protect this important business information from unlawful or inadvertent disclosure.

Our ability to protect the confidentiality of this information is critical to our ability to obtain and retain customers. Unauthorized or premature disclosure could have a serious financial impact on the Company and our clients and may subject the Company and our Associates to liability, including penalties for insider trading.

Our Commitment

As Cognizant Associates, we must maintain the confidentiality of sensitive information entrusted to us by the Company, our clients and suppliers, except when disclosure is authorized by a manager (and legally permissible), or legally mandated.

We must always:

- Take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is communicated on a confidential basis only to those Associates who have a need to know such information to perform their job responsibilities.
- Abide by any lawful obligations to former employers. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-compete obligations.

- Properly label confidential documents.
- Follow all company and client policies related to the protection of confidential information, as well as project-specific security, artifacts-handling, non-disclosure, or privacy requirements.

We must never:

- Disclose confidential information to anyone except in relation to their job duties.
- Misuse client or other third-party confidential information or *intellectual property*.
- Inappropriately discuss, disclose, copy or use any copyrighted, licensed or confidential client or third-party information.
- Discuss confidential Company matters with, or disseminate confidential Company information to, any third party outside the Company, except as required in the performance of our Company duties and after an appropriate confidentiality agreement is in place.
- Disclose confidential information for personal gain.

We must also notify the Director - Compliance or General Counsel if we know of a situation in which Company or customer confidential information has been compromised.

Intellectual Property Protection

Why it is Important

Our obligation to protect the Company's confidential information includes our *intellectual property*-- those tools, methodologies, creative ideas and expressions of our Associates -- because they have commercial value and are crucial to our ability to compete effectively in the marketplace.

Our Commitment

As Cognizant Associates, we must:

- Disclose any business-related written works, technological advances or unique solutions to business problems to the General Counsel so that the Company can provide appropriate legal protection.
- Mark any written documents whose content is protected under a trademark with the appropriate symbols such as "®," "™," or "SM" when using our works in text. Copyrighted work should contain the notice "© (Company) (Year)."
- Seek guidance from the General Counsel if we suspect that Company *Intellectual Property* is being infringed, including patents or trademarks, or if we have any questions on the use of patents, trademarks or copyrights.

Customer and Associate Privacy

Why it is Important

Our customers and Associates entrust us with certain information such as account and purchasing information, addresses, telephone numbers, Social Security numbers and information regarding medical and other benefits. We have a responsibility to safeguard this information from unauthorized use or disclosure.

Our Commitment

As Cognizant Associates, we must:

- Follow all Company, Country/local and client policies related to data privacy.
- Provide customer and Associate information only to those inside the Company who have a clear business need for the information.

We must not:

- Give customer information to outside companies, except as directed by clients, to conduct our business, to stay in compliance with applicable privacy laws, to protect against fraud or suspected illegal activity or to provide customer services.
- Provide Associate information to anyone outside the Company without the Associate's prior written consent, except to verify employment or to comply with legal requirements.

We must immediately contact our manager, our talent manager, the General Counsel or the Director - Compliance should we believe that such information has been compromised.

Do	Do Not	Seek Permission
Protect personally-identifiable information from loss, misuse, alteration or destruction	List customer names, logos, project names or other identifying information in external resumes or on professional networking sites	<i>From the GIS team to:</i> Take pictures inside Cognizant premises (need manager approval as well)
Use access cards and badges while working on premises where required	Share access cards or badges	<i>From the project manager or manager to:</i> Remove hard copies of source code/documents from Cognizant or client premises (must be in writing)
Label customer artifacts with appropriate copyright statements	Leave confidential information as voice mail messages on internal or external systems	<i>From the Communication Group to:</i> Use company or client names, project names, logos and other identifying information
Remove printouts from printers promptly	Leave confidential documents in unattended work areas or on white boards or in discussion rooms	
Lock drawers, cabinets and rooms before leaving a work area	Unless appropriate, take pictures inside Cognizant premises without permission from the <i>GIS team</i> .	
Comply with open source licenses	Use any unlicensed third party or open source software without appropriate authorization	
	Have conversations involving confidential information in a public place	
	Reuse proprietary software that was built specifically for a client unless permission has been obtained to do so. Please contact the General Counsel for such permission	
	Incorporate open source software into client software when it is client policy not to do so	
	Document experiences servicing a client in a public forum using actual names, dates, facts and figures without appropriate permission	



Cognizant Information Systems

Our computer networks, computers and software, if left unsecured, can pose a substantial risk to our confidential information. As Cognizant Associates, we must do everything possible to protect Cognizant *information systems* from unauthorized access.

Tips for Protecting Confidential Information when using Cognizant Information Systems

Do	Do Not	Seek Permission
Use only those IDs assigned for our use	Share passwords or IDs or otherwise try to bypass security controls	From the GIS team to: Copy confidential information to external drives
Notify the <i>GIS team</i> of any security breaches or suspicious activities in our systems or around our work areas	Use or access another Associate's e-mail	Send project-related instant messages (need client permission as well)
Use Company-approved anti-virus software to scan all downloadable files, including e-mail attachments	Inappropriately forward confidential information outside the Cognizant e-mail system	Get local administrative access to a workstation or laptop
Use an effective password	Send files using instant messaging applications, or send codes, large files or sensitive documents to customers as e-mail attachments	Install encryption software
Shut down computers at the end of the work day	Inappropriately reveal source code and such documents to external parties through e-mail or other electronic means	From your manager to: Send any code or specification to any Cognizant client or vendor
When required, obtain a pass to bring in or take out any electronic media or devices to or from Cognizant premises	Connect to a customer network from home unless using an <i>NSS</i> -approved laptop or client-approved laptop built for secure remote operation	
Store project-related work on project share only and give project-related artifacts to the project manager at the completion of the assignment	Violate licensing policies when downloading or using third-party software	
Inform <i>NSS</i> when access to a system is no longer required; recertify access each quarter		
Use only the Cognizant e-mail system (i.e., your cognizant.com e-mail ID) when sending e-mail containing confidential or sensitive information		

Q&A

Confidential Information and IP Protection

■ Question:

I like to keep an updated resumé on certain professional networking websites and with certain recruiters that I have used in the past. Is it OK to include client names, project names and project details in these resúmes?

■ Answer:

No. Almost all of the legal agreements we have with customers prohibit us from disclosing a client's name, project details and other identifying information. Our customers expect that we will keep such details strictly confidential.

■ Question:

A friend of mine asked me to give her the names and phone numbers of people I know so that she can send them a solicitation for a charity she is helping. Can I include co-workers on this list?

■ Answer:

Not without permission from your co-workers. When you obtain personal information about a co-worker, such as their address, telephone number, Social Security number, etc. that information is not to be disclosed to others without the Associate's permission. Of course, if you have access to the information as part of your job, you can use the information in the performance of your duties.

■ Question:

I work in the Benefits area and an Associate recently asked me if another Associate we know is HIV- positive. What should I do?

■ Answer:

Nothing. HIV status is private employee medical information and because HIV is not contagious through casual contact, it is not a health risk for other Associates. You need to respect this employee's privacy by not sharing this information with anyone else.

■ Question:

I know where to access trial versions of software that will help me deliver services to clients. The software is not supposed to be used for commercial purposes but this will save my project and the company time and/or money. Is it OK to do so?

■ Answer:

No. The use of unauthorized software in ways that violate licenses and policies is theft. It exposes the company to litigation, financial penalties and significant damage to our reputation. If you need to use third-party software, please contact NSS who will acquire the software in accordance with licensing requirements.

- **Acceptable Use Policy available at:**
<https://groups.cognizant.com/corporate/CGandRM/Pages/AcceptableUsePolicy.aspx>
- **Acceptable Use Policy training available at:**
<http://myacademy.cognizant.com/elearning/course/view.php?id=102> (Internet)
Or
<http://myacademy/elearning/course/view.php?id=102> (Intranet)

Conflicts of Interest

Why it is Important

As Cognizant Associates, we have a responsibility to act honestly, objectively and effectively, conducting business solely in Cognizant's best interests and not based on personal relationships or benefits. Sometimes, however, we may have a personal or financial stake in the outcome of a decision, as well as influence over that decision. In these situations, if we put our own interests ahead of the interests of Cognizant or our client's, a conflict of interest exists. Even the appearance of a conflict of interest in such situations can damage the reputation of both the Associate and the Company, and could negatively affect the Company or its business.

Our Commitment

As Cognizant Associates, we must avoid certain situations and relationships that may influence our judgment and cause us to act outside the best interests of the Company, our clients and our stockholders. By understanding the types of conflicts that exist, avoiding situations that are most likely to result in conflicts of interest and by disclosing any potential conflicts to our manager, we can ensure that decisions are made in a fair and unbiased manner.

Types of Conflicts

Conflicts of interest generally fall into one of three categories: actual, potential and apparent conflicts.

■ Actual Conflict

An *actual conflict of interest* exists any time a Cognizant Associate makes a business decision based on personal relationships or benefits rather than the best interests of Cognizant.

■ Potential Conflict

A *potential conflict of interest* is a situation where a change in circumstance could result in an actual conflict of interest.

■ Apparent Conflict

An *apparent conflict of interest* exists where it appears -- or could reasonably be perceived by others -- that a Cognizant Associate is acting outside the best interest of Cognizant, whether or not this is really the case.

Type of Conflict	Example
Actual Conflict	Awarding a consulting contract to a <i>close relative</i> without going through an appropriate bidding process, including having a disinterested Cognizant associate involved in the decision-making process.
Potential Conflict	Being invited to an extravagant dinner by a supplier in the middle of a bidding process. This would become an actual conflict if the Associate went to dinner with the supplier.
Apparent Conflict	A Manager who supervises, reviews or influences the job evaluation or compensation of an Associate with whom he/she has a close personal relationship, including an <i>immediate family member</i> .

Conflict of Interest Situations

■ Significant Customers

Given the long-term nature of our customer relationships, conflicts of interest can arise if you develop intimate, non-professional personal relationships with employees of our clients that involve socializing outside of work, particularly if you are directly involved in management of the project.

■ Close Personal Relationships

Any Cognizant Associate who has an *immediate family member* or close personal relationship that might influence him or her to act outside the best interests of the Company faces a *potential conflict of interest*. This is most likely to happen when an Associate demonstrates favoritism toward another Associate with whom he/she has a close personal relationship, including an *immediate family member*.

■ Outside Employment

Associates may only work with organizations whose interests do not interfere with Company responsibilities and for which they do not receive remuneration. Such work must not interfere with an Associate's ability to perform their Cognizant responsibilities. Exceptions may be approved by the Director – Compliance for certain circumstances that may be in the best interest of the company. Exceptions for Vice Presidents and above must be approved by the *Board of Directors*. Associates should also check with their talent manager to ensure that such work does not violate local HR policies.

■ Financial Investments

Associates must not have or permit any close relative to have a *significant financial interest* in a *significant customer*, *significant supplier* or direct competitor of the Company.

As Cognizant Associates we must:

- Be aware of any relationships that present a *potential conflict of interest*, or that create the appearance of such a conflict and discuss them with our manager.
- Talk with our managers before accepting an affiliation with any organization, particularly if the company is a *significant customer*, *significant supplier* or direct competitor of the Company.
- Disclose to the Director – Compliance or General Counsel any *significant financial interest* that we, or an immediate family member, hold in any *significant customer*, *significant supplier* or direct competitor.

- For Associates with the title of Director and above, disclose to the Director - Compliance if a *close relative* serves as a consultant, associate, Officer, Member of the *Board of Directors*, advisor or in any other capacity for a *significant customer, significant supplier* or direct competitor of the Company.

We must not:

- Supervise, review or influence the job evaluation or compensation of an Associate with whom we have a close personal relationship, including an *immediate family member*.
- Engage in a dating relationship with a direct or indirect report.
- Receive remuneration that exceeds \$250 (annually) for services performed for any other organization than Cognizant. Exceptions may be granted for certain circumstances that are in the best interest of the company by contacting the Director - Compliance or, for Vice Presidents and above, the Board of Directors.
- Serve as a consultant, associate, officer, member of the *Board of Directors*, advisor or in any other capacity for a *significant customer, significant supplier* or direct competitor of the Company, except as approved by the *Board of Directors*.
- Make or influence any decision on behalf of the company that could directly or indirectly benefit a family member who has a *significant financial interest* in a transaction with a competitor or a supplier.

Examples of Actual Conflicts of Interest

Situation	Example
Significant Customer Relationships	<ul style="list-style-type: none"> • An Associate working at a client site provides company-confidential materials or advice to a client that allows the client to better negotiate with Cognizant.
Close Personal Relationships	<ul style="list-style-type: none"> • An Associate's relative is bidding for a vendor contract for Cognizant and the Associate is a member of the panel that will be selecting the vendor. • A Manager is reviewing the year-end appraisal of a team member who is also an immediate family member. • A Manager is dating an Associate who works for him/her.
Outside Employment	<ul style="list-style-type: none"> • An Associate accepts a consulting contract with a company other than Cognizant without prior approval from the <i>Board of Directors</i>.
Financial Investments	<ul style="list-style-type: none"> • An Associate's spouse works for a significant supplier and has a significant financial interest in the supplier.

Financial Interest Guidelines for Senior Executives and Board Members

Senior executives (Associates with the title of Vice President or above) and *Board Members* have additional obligations with respect to financial investments and conflicts of interest.

Associates with the title of Vice President or above must not receive remuneration in any form that exceeds \$250 (annually) from any party other than the Company. The only exception is if the *Board of Directors* of the Company approves remuneration for the Associate in an advisory or other capacity.

Associates with the title of Vice President or above and *Board Members* must not have, or permit any *close relative* to have, a financial interest in a direct competitor of the Company, other than an investment representing less than one percent (1%) of the outstanding shares of a *publicly-held company* or greater than five percent (5%) of the outstanding shares of a *privately-held company*, unless approved by a majority of the *Board of Directors*.

In the case of executive officers or *Board Members*, the General Counsel or the *Board of Directors* would determine whether or not a conflict exists. Associates with the title of Vice President or above and *Board Members* must not engage in any other activity or have any other interest that the *Board of Directors* of the Company determines to constitute a *conflict of interest*.

A Cognizant *Board Member* must never use his or her position with the Company to influence a decision of the Company relating to a contract or transaction with a supplier or customer of the Company if the *Board Member* or a *close relative* of the *Board Member*:

- Performs services as a consultant, associate, Officer, *Board Member*, advisor or in any other capacity for such supplier or customer; or
- Has a financial interest in such supplier or customer, other than an investment representing less than one percent (1%) of the outstanding shares of a *publicly-held company* or greater than five percent (5%) of the outstanding shares of a *privately-held company*.



Q&A

Conflicts of Interest

■ Question:

Why are potential conflicts covered in the Standards if having a potential conflict isn't a violation of the Standard?

■ Answer:

It's important for us to identify and disclose potential conflicts because it allows us to take action to prevent actual conflicts from occurring. For example, an Associate is asked to be on a recruitment committee where one of the interviewees is a close friend. If she recognizes that she has a *potential conflict of interest* she can remove herself from the recruitment committee to prevent an *actual conflict of interest* from occurring.

■ Question:

What happens once I disclose an *actual, apparent or potential conflict of interest* to my manager?

■ Answer:

Your manager will answer any questions and help determine whether the transaction or relationship constitutes a *conflict of interest*. If an actual *conflict of interest* is thought to exist, the conflict will need to be discussed with the Director - Compliance or General Counsel.

The Company will then determine whether the situation is detrimental to the interests of the Company. Many conflicts of interest can be resolved in a simple and mutually acceptable way. However, while we respect each individual's right to privacy, if an Associate's personal affairs create, or appear to create, a *potential conflict of interest*, we may insist on full disclosure of the relevant facts so we can determine whether or not an actual conflict exists.

■ Question:

My spouse works for a competitor. Is this a conflict?

■ Answer:

No. We understand that many Associates have friends or relatives that work for competitors of Cognizant. In general, Associates should be aware of the *potential of a conflict of interest* in such situations and should take extreme care not to disclose or share Cognizant or client business plans, forecasts, tools, methodologies, etc. with such individuals. Associates with the title of Director or above must disclose to the Director - Compliance if a *close relative* serves as a consultant, associate, Officer, Member of the *Board of Directors*, advisor or in any other capacity for a significant competitor of the Company.

Gathering Information about Competitors

Why it is Important

In our competitive business environment, we often seek to acquire information about our competitors and their products and services. To compete fairly in the marketplace, we must show the same respect for the confidential information of competitors that we show for our own confidential information. We may only accept competitive information when there is a clear and reasonable belief that receipt and use of the information is lawful and ethical.

Our Commitment

As Cognizant Associates, we must gather information about competitors only from permissible sources (e.g., published articles, advertisements, brochures and customer conversations).

We must not:

- Use illegal or unethical means to seek or receive such information (such as misrepresentation, deception, theft, spying, bribery or unauthorized disclosures by a competitor's employees).
- Misrepresent ourselves, our positions or our circumstances to persuade another to release confidential information.
- Use a third party to seek this information unethically.

Examples of Appropriate and Inappropriate Behavior

Do	Don't
<ul style="list-style-type: none"> ■ Use published research reports or other public documents to gather information on competitors. 	<ul style="list-style-type: none"> ■ Steal customer or client <i>intellectual property</i>. ■ Use a client's materials, systems, communications, etc. to obtain confidential information on competitors.

Q&A

Gathering Information about Competitors

■ Question:

I have been asked to help prepare a new proposal for a current client. I know that I can bypass their security to obtain information off the client's system that will help win the contract. Is it OK to do so?

■ Answer:

No. You may not seek an unfair advantage by searching for confidential information that is not available to other bidders using unauthorized access to client systems. If you have a question on a specific type of information you are seeking, contact your manager or the Director - Compliance.

Gifts and Gratuities

Why it is Important

To maintain trust in our business relationships, we must avoid giving or receiving gifts that influence, are intended to influence, or appear to influence business decisions except in accordance with standard business practices. When we accept or give such gifts, particularly when they exceed local social and/or business customs, it can undermine customer relationships, hurt our reputation and put the Company in legal jeopardy.

Our Commitment

As Cognizant Associates, we must only give gifts in compliance with applicable law that are nominal in amount and not given in consideration or expectation of any action or favor by the recipient.

We must immediately return any gift that is not nominal in value and report its receipt to our manager. If immediate return of the gift is not practical, we should give the gift to the Company for charitable disposition or such other disposition that the Company believes appropriate.

We must not:

- Accept or permit any member of our *immediate family* to accept any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with the Company, other than items of nominal value or items that do not exceed local social and/or business customs.
- Give gifts outside of standard business practices in hopes of influencing a business decision.
- Give Company funds or assets for gifts, gratuities or other favors to government officials.

■ Bribes and Kickbacks

Bribes and kickbacks are criminal acts, strictly prohibited by law. As Cognizant Associates we must never offer, give, solicit or receive any form of bribe or kickback anywhere in the world.

■ Business Entertainment

Common sense and moderation should prevail in business entertainment engaged in on behalf of the Company. Cognizant Associates should only provide or accept business entertainment to or from someone doing business with the Company if the entertainment is modest and intended to serve legitimate business goals.

■ International Considerations in the Receipt of Gifts

Laws and customs of some countries permit gifts and courtesies beyond those considered customary in the U.S. Refusing such gifts or courtesies might be considered offensive in that country. If, as Cognizant Associates, we find ourselves in a situation where it is difficult or inadvisable to refuse a gift or courtesy, we must disclose receipt of the gift to our manager immediately. He or she will assist in handling the matter.

Examples of Appropriate and Inappropriate Behavior

Do	Do Not
<ul style="list-style-type: none"> ■ Follow Company guidelines for accepting gifts or entertainment ■ Accept a gift if refusing the gift will insult or embarrass the giver, and then give it to the Company for charitable or other disposition if it exceeds the limits in the table below 	<ul style="list-style-type: none"> ■ Agree to frequent client requests for meetings involving extravagant entertainment ■ Accept a family outing in a tourist resort as a gift from a prospective vendor

Guidelines for Determining the Acceptability of Gifts and Entertainment

Gifts and entertainment generally fall into three categories:

- Those that are usually acceptable and that you may approve yourself.
- Those that are never acceptable.
- Those that may be acceptable but require prior approval.

Usually acceptable

Some gifts and entertainment are sufficiently modest that they do not require prior approval. The following are usually acceptable without prior approval:

- Meals: modest occasional meals with someone with whom we do business.
- Entertainment: occasional attendance at ordinary sports, theatre and other cultural events.
- Gifts: gifts of nominal value (see tables below), such as pens, calendars or small promotional items.

Always unacceptable

Other types of gifts and entertainment are simply wrong. These are never permissible, and no one can approve them. These are:

- Any gift or entertainment that would be illegal (anything offered to a government official in breach of local or international bribery laws).
- Gifts or entertainment involving parties engaged in a tender or competitive bidding process, except in accordance with standard business practices.
- Any gift of cash.
- Any gift or entertainment that is a “quid pro quo” (offered for something in return).
- Any entertainment that is indecent, sexually oriented, does not comply with Cognizant’s commitment to mutual respect or that otherwise might adversely affect Cognizant’s reputation.
- A gift or entertainment that you pay for personally to avoid having to report or seek approval for it.

May be acceptable with prior approval

If the gift or entertainment you are considering does not fit into the other categories, it may or may not be permissible. You must get approval from a manager (with a designation of Manager or above) for the following:

- Gifts and entertainment valued at more than the amounts in the first column on the next page.
- Meals that cost more than \$150 (or equivalent) per person.
- Special events such as a World Cup game or major golf tournament.
- Client or vendor paid non-business travel or overnight accommodation, as this normally raises the personal benefit to material levels.

For gifts and entertainment that exceed the limits in the right-hand columns on the next page, you must notify one of the following: Chief Executive Officer, Chief Financial Officer, General Counsel or Director - Compliance.

Gifts	No Approval Required	Manager Approval Required	Notification Required
U.S. and Canada	Up to U.S. \$100	Between U.S. \$100 & \$250	Greater than U.S. \$250
UK	Up to £75	Between £75 & £150	Greater than £150
Europe	Up to €100	Between €100 & €250	Greater than €250
India / China	Up to \$50	Between \$50 & \$125	Greater than \$125
Latin America including Mexico	Up to \$50	Between \$50 & \$125	Greater than \$125

Entertainment	No Approval Required	Manager Approval Required	Notification Required
U.S. and Canada	Up to U.S. \$250 per person	Between U.S. \$250 & \$1,000 per person	Greater than \$1,000 per person
UK	Up to £150 per person	Between £150 & £600 per person	Greater than £600 per person
Europe	Up to €250 per person	Between €250 & €1,000 per person	Greater than €1,000 per person
India / China	Up to \$125 per person	Between \$125 & \$500 per person	Greater than \$500 per person
Latin America including Mexico	Up to \$125 per person	Between \$125 & \$500 per person	Greater than \$500 per person



Q&A

Gifts and Gratuities

■ Question:

What is the policy when a client gives a gift to the whole team?

■ Answer:

Discuss the situation with your manager who will address the issue with the client manager.

■ Question:

I received a gold coin valued at over \$300. I know this exceeds our definition of “nominal” value, but the giver would be offended if I gave the gift back. What should I do?

■ Answer:

Contact the Director - Compliance who will arrange disposition of the gift to a charitable or other appropriate organization.

■ Question:

A manager who works for our client has promised me that we will win a new contract if we give him 5% of the contract value. What should I do?

■ Answer:

This is clearly a bribe. You should immediately discuss the situation with your manager, the Director - Compliance or the General Counsel.

■ Question:

At the beginning of the year, a vendor gave me a “nominal” gift, which I accepted. Now I seem to be getting a new “nominal” gift every month. What should I do?

■ Answer:

You should discuss the gifts with the vendor, explain that the frequency of gift giving could be sending the wrong message to other vendors and the public, and ask that they be discontinued.

Insider Trading

Insider Trading policy available at:

<https://groups.cognizant.com/corporate/CGandRM/Documents/Insider%20Trading%20Policy.doc>

Blackout dates available at:

<https://groups.cognizant.com/corporate/CGandRM/Pages/Black-outwindow.aspx>

Why it is Important

Our success in the marketplace requires the trust and confidence of the investment community. Achieving this trust requires that we act with integrity when trading public *securities*, following federal and state *securities* laws.

As Cognizant Associates, we may have “inside information” (*material non-public information*) about Cognizant or our customers, suppliers and other companies with whom we conduct business. We are engaging in an illegal practice known as insider trading if we:

- Use this information to trade in the *securities* of Cognizant or other companies.
- Communicate the inside information to others so they can trade on the basis of the information.

Insider trading violations are costly. They can affect stock prices, often negatively impacting stockholders. They can also result in large civil and criminal penalties against the Company and individual Associates.

Blackout Periods

To help ensure that Cognizant Associates do not engage in prohibited insider trading and to avoid even the appearance of an improper transaction, the Company has adopted certain *blackout periods*, during which no Associate can purchase or sell Company stock. The Company’s Director – Compliance will communicate the dates of each *blackout period* to all Associates.

Our Commitment

As Cognizant Associates, we must always be cautious about buying or selling *securities* and respect Company *blackout periods*.

We must not make trades based on inside information, or give such inside information to others who might trade on the basis of that information.

If we are uncertain about the constraints on our purchase or sale of any Company *securities* or the *securities* of any other company with which we are familiar by virtue of our relationship with the Company, we should consult with the Company’s Director – Compliance or General Counsel before making any such purchase or sale.

Examples of Appropriate and Inappropriate Behavior

Do	Do Not
<ul style="list-style-type: none"> ■ Keep all <i>material non-public information</i> confidential ■ Comply with Cognizant <i>blackout periods</i> 	<ul style="list-style-type: none"> ■ Buy or selling <i>securities</i> based on “inside” information about a client ■ Pass <i>material, non-public information</i> to anyone at anytime

Q&A

Insider Trading

■ Question:

I work at a client site and overheard that a merger is being announced soon. I'm thinking about buying some stock. Can I do this?

■ Answer:

No. If you buy stock based on such information, you would be acting on non-public, *material information* and violating insider trading laws.

■ Question:

My parents live with me. Are they subject to Cognizant's *blackout period* and insider trading policy?

■ Answer:

Yes. Anyone who lives in your household or whose finances you manage is subject to Cognizant's *blackout period* and insider trading policy.

■ Question:

What if my sister wants to trade, but she doesn't live with me and I don't manage her finances? Is she subject to Cognizant's *blackout period* and insider trading policy?

■ Answer:

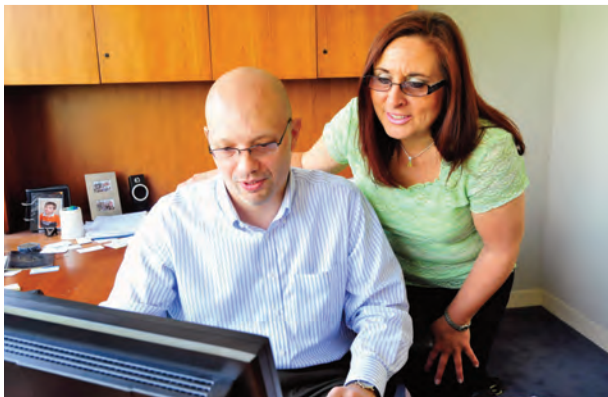
No. She is not subject to Cognizant's *blackout period* or insider trading policy. She is always subject to insider trading rules, which prevent her from trading if she is in possession of material *non-public information*.

■ Question:

I have submitted my resignation, which will be effective at the end of the month. Am I still subject to the *blackout period* and insider trading policy?

■ Answer:

Yes, until you are no longer an employee (officially terminated from the payroll of the Company) you are bound by Cognizant's *blackout period* and insider trading policy. Once the date of your termination has passed, you are no longer bound by the blackout period and insider trading policy. You are always subject to insider trading rules, which prevent you from trading if you are in possession of material *non-public information*.



Media, Analyst and Investor Communications

Why it is Important

Cognizant is committed to delivering accurate and reliable information to the media and market professionals such as securities analysts, institutional investors, investment advisors, brokers, dealers and security holders.

Our Commitment

As Cognizant Associates, we must:

- Respect the abilities of our public relations and investor relations professionals and promptly forward all requests for information to them.
- Ensure that all public disclosures, including forecasts, press releases, speeches and other communications are accurate, timely and representative of the facts.

We must not:

- Intentionally mislead the public in our public disclosures.
- Give any investor, broker or financial analyst special or favored treatment.

Please note that only AUTHORIZED or DESIGNATED spokespeople from Cognizant may talk to the media, analysts or investors. If you are approached by any media person, analyst or investor please direct those queries to the Communications Group and DO NOT attempt to provide any information. Please ask the media person to send an e-mail to: cogcomgrp@cognizant.com, and the Communications Group will respond appropriately.

Any time you are unsure as to whether you should be addressing a specific outside inquiry you should contact Cognizant's SVP of Marketing (chiefmarketingofficer@cognizant.com) or Chief Financial Officer.

Examples of Appropriate and Inappropriate Behavior

Do	Do Not
<ul style="list-style-type: none"> ■ Seek advice about how to handle media-related issues 	<ul style="list-style-type: none"> ■ Respond to media inquiries when not authorized to do so ■ Provide content for external publications that contains direct references to client names, project names and other identifying information without the permission of the client

Q&A

Media, Analyst and Investor Communications

■ Question:

What should I do if I realize that I inadvertently gave out some information to a member of the press and realized later it might not be accurate?

■ Answer:

Contact the SVP of Marketing so he or she can discuss the information with the reporter.

Political Activities

Why it is Important

Cognizant encourages participation in the political process by Cognizant Associates when it is clear that such activity is being conducted on an individual basis and not on behalf of the Company. However, it sends mixed messages to our stockholder when it appears that individuals are trying to influence the political process on behalf of the Company.

Our Commitment

As Cognizant Associates, we must conduct personal political activities on our own time and using personal resources.

We must not:

- Conduct personal political activities on Company time or at Company facilities (in certain countries, political party meetings at Company facilities may be permitted, if prohibitions of such meetings are illegal).
- Use Company property or equipment on behalf of a political candidate or cause.
- Make political contributions or incur political expenditures on behalf of the Company.
- Obtain reimbursement for any such contributions or expenditures.
- Make any direct or indirect contributions to political candidates, office holder or any political parties on behalf of the Company unless the contribution is legal and directly authorized by the Company's Chief Executive Officer.
- Force, direct or coerce another Associate into making a political contribution.
- Make contributions to trade associations or their political action committees where such contributions will be directly or indirectly used for political purposes. This includes campaign contributions and lobbying expenses, except for contributions made in connection with the support of legitimate lobbying efforts by trade associations that are previously approved by the General Counsel.

We also must not lobby the government or other organizations on behalf of Cognizant unless it is explicitly part of our job to do so.

Examples of Appropriate and Inappropriate Behavior

Do	Do Not
<ul style="list-style-type: none"> ■ Keep personal political activities separate from professional activities 	<ul style="list-style-type: none"> ■ Make copies of political campaign materials on Company photocopiers ■ Use Company letterhead when making a personal political donation ■ Require company personnel to work for a political campaign during work hours ■ Advertise in the media for a prospective political candidate under the company logo and name

Q&A

Political Activities

■ Question:

When you talk about “contributions and expenditures,” are you talking about cash payments only?

■ Answer:

No. Contributions and expenditures are not limited to cash contributions to candidates or committees. They also include purchases of tickets to political dinners, advertisements on behalf of candidates, and donations of corporate property, services or personnel.

■ Question:

What do you mean by “any direct or indirect contribution?”

■ Answer:

Direct or indirect contributions include (but are not limited to) purchasing tickets to political events, furnishing company goods or services, loaning Company personnel during working hours or paying for advertisements and other campaign expenses.

Respectful Treatment of Associates, Customers and Business Partners

Why it is Important

Cognizant is committed to providing a safe, healthy work environment where respect is practiced, diversity valued and where all Cognizant Associates and customers are free of intimidation or harassment.

Our Commitment

To ensure this type of work environment we must:

- Treat others with fairness and respect.
- Recruit, hire, train, promote and provide other terms and conditions of employment without regard to a person's race, color, religion, gender, age, national origin, sexual orientation, marital status, disabilities or veteran status and comply with all applicable equal employment opportunity laws, including those related to *discrimination* and *harassment*.
- Comply with any Company health and safety policies related to our jobs, as well as health and safety laws or regulations in the countries where we do business.
- Promptly report health and safety issues to a manager.

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 that are about race, color, religion, gender, age, national or ethnic origin, sexual orientation, marital status, disabilities or veteran's status or are of a sexual nature that can encourage or create an offensive or hostile environment.
- Implicit or explicit verbal threats, intimidation or violence.

- *Retaliation* against a person who makes a complaint of *discrimination* or *harassment* in good faith, or who participates in an investigation.
- The use, sale, purchase or possession of illegal drugs, nor the abuse, sale, or purchase of alcohol or doctor-prescribed drugs while on Company property or while conducting company business.

As Cognizant Associates, if we feel discriminated or retaliated against or harassed, or witness *discrimination, retaliation or harassment*, we should promptly report the behavior to our manager, a talent manager, the Director - Compliance or the General Counsel. We should also talk to a manager or a talent manager if we observe that 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.

Examples of Appropriate and Inappropriate Behavior

Do	Do Not
<ul style="list-style-type: none"> ■ Speak up when you feel someone is being treated disrespectfully 	<ul style="list-style-type: none"> ■ Ask support staff to act as personal assistants or do personal errands, etc. ■ Require an Associate to work on a practiced religious holiday ■ Verbally threaten a client contact to renew a contract ■ Report to work in an inebriated state ■ Delay a promotion for an Associate who recently reported a security violation



Q&A

Respectful Treatment of Associates, Customers and Business Partners

■ Question:

What do I do if a client keeps asking me out on dates, even after I've told him I want the relationship to be strictly professional?

■ Answer:

Such behavior is inappropriate and could be considered harassment. You should discuss the situation with your manager or talent manager.

■ Question:

My manager is verbally demeaning to me. I want to talk to someone about it but I'm afraid that she will find out. What should I do?

■ Answer:

You should contact your talent manager, the Director - Compliance or use the Compliance Helpline if you wish to make an anonymous report.

■ Question:

A male colleague always makes comments about the appearance of female employees. I find it harmless, but is it appropriate?

■ Answer:

It depends on whether you or other Cognizant Associates find the comments offensive or inappropriate, particularly the female Associates to whom he is referring. Under no circumstances is it appropriate to make comments that are derogatory, abusive or sexual in nature, including references to any part of an individual's anatomy. If you are concerned about the Associate's behavior and you don't feel comfortable talking to him directly, you should talk to your manager, your talent manager or the Director - Compliance.

Dissemination and Amendment

These Standards will be distributed to each new Associate of the Company upon commencement of his or her employment or other relationship with the Company and will also be available on the company's intranet and external website.

Each Associate with the title of Vice President or above (and any other Associate as so directed by the Chief Executive Officer or the Chief Financial Officer of the Company) shall certify no less than once during each 12-month period that he or she has received, read and understands these Standards and has complied with their terms.

The Company reserves the right to amend, alter or terminate these Standards at any time for any reason. The most current version of these Standards can be found in the "about us" section of the Company's Intranet at: <https://groups.cognizant.com/corporate/CGandRM/Pages/CodeofEthics.aspx>



Defined Terms

■ Abuse of Authority

The misuse of an Associate's position of authority to intimidate or harass another Associate. While abuse of authority most often occurs in supervisor/subordinate relationships, the abusive party can be a direct supervisor, a peer, a subordinate or someone outside the reporting relationship.

■ Actual Conflict of Interest

An actual conflict of interest exists any time a business decision is based on personal relationships or benefits rather than the best interests of Cognizant.

Giving a consulting contract to a close relative regardless of whether they are the best person for the job would be an actual conflict of interest.

■ Apparent Conflict of Interest

An apparent conflict of interest exists where it appears -- or could reasonably be perceived by others -- that a Cognizant Associate is acting outside the best interest of Cognizant, whether or not this is really the case.

A manager who supervises, reviews or influences the job evaluation or compensation of an Associate with whom he/she has a close personal relationship or who is an immediate family member has an apparent conflict of interest.

■ Associate

All employees of the Company at any level, including Officers and members of the *Board of Directors*.

■ Blackout Periods

A blackout period is a specified period of time prior to and subsequent to each of the Company's quarterly and year-end earnings announcements during which no Associate can purchase or sell Company stock or exercise Company stock options. In addition, a blackout period may be any other period of time communicated by either the Director - Compliance or General Counsel relative to a special event (e.g., acquisition, merger, public offering, etc.).

■ Board of Directors

A group of individuals elected by a company's stockholders to provide guidance and management oversight.

■ Board Member

An individual member of the *Board of Directors*.

■ Close Relative

A spouse, dependent child or any other person living in the same home with the Associate, Officer or Board Member.

■ Conflict of Interest

Any situation in which we have a personal or financial stake in the outcome of a decision, as well as influence over that decision, and we put our own interests or someone else's interests ahead of the interests of Cognizant or our clients.

■ Discrimination

An unexplained differentiation between individuals or groups based on one or more characteristics protected by law, including race, color, religion, gender, age, national origin, sexual orientation, marital status, disabilities, veteran status, political views or sexual orientation.

■ **GIS Team**

A support function responsible for internal information security policies and practices.

■ **Global Help Desk**

A support function responsible for servicing requests for internal IT support.

■ **Harassment**

Any unwelcome behavior -- verbal or physical -- that unreasonably interferes with work or creates an intimidating, hostile or offensive work environment.

■ **Immediate Family**

A close relative or a parent, sibling, child, mother- or father-in-law, son- or daughter-in-law or brother- or sister-in-law.

■ **Independent Auditor**

An accountant who is not affiliated with the Company who provides an opinion on its books, records and/or financial statements.

■ **Information Systems**

Internal IT applications, hardware and devices including personal computers, e-mail, network and Internet access, file and print servers, project development servers, printers, fax machines, telephones, voicemail, and any Company-provided hand-held device such as a BlackBerry, PDA or cell phone.

■ **Intellectual Property**

Any proprietary works of authorship, including, without limitation, tools, software, methodologies, templates, flowcharts, architecture designs, tools, specifications, drawings, sketches, models, samples, records and documentation, as well as copyrights, trademarks, service marks, ideas, concepts, know-how, techniques, knowledge or data, and any derivatives thereof, which have been originated, developed, purchased or licensed by a company.

■ **Material Information**

Information is "material" if it could reasonably affect an investor's judgment about whether or not to buy, sell or hold Company *securities* or the *securities* of third parties with whom we have a business relationship.

■ **Non-public Information**

Information that has not been adequately disclosed to the public (such as through a Company press release or a filing with a government agency) is considered non-public.

■ **Network Systems and Support (NSS)**

A support function responsible for the delivery of internal IT infrastructure such as desktop and laptop software / hardware, e-mail and network access, printers, faxes and hand-held devices.

■ **Potential Conflict of Interest**

A potential conflict of interest is a situation where a change in circumstance could result in an actual conflict of interest.

■ **Publicly-held Company**

A company that has issued *securities* through a public offering that are bought and sold on the open market.

■ **Privately-held Company**

A company that does not offer *securities* that are bought and sold on the open market

■ **Retaliation**

Terminating, demoting, suspending, threatening, harassing or in any other manner discriminating behavior against an Associate who complies with or reports any violation of our Standards or policies.

■ **Securities**

Stocks, bonds and other financing and investment instruments that are traded in financial markets.

■ **Sexual Harassment**

Any unwelcome sexual advance, request for sexual favor or other verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile or offensive work environment.

Sexual harassment generally falls into one of two categories:

- **Tangible Employment Action:** Sexual conduct that results in a significant change in employment status. Examples include hiring, firing, promotion, demotion, undesirable reassignment, decisions causing significant changes in benefits, compensation or work assignments resulting from the submission to or rejection of sexual advances.
- **Hostile Work Environment:** Sexual conduct that is so serious or pervasive that it interferes with work.

■ **Signature Authority**

Permission/authority to make business commitments on behalf of the company and sign contracts.

■ **Significant Customer**

A customer that has made during the Company's last full fiscal year -- or proposes to make during the Company's current fiscal year -- payments to the Company for services in excess of five percent (5%) of (i) the Company's consolidated gross revenues for its last full fiscal year or (ii) the customer's consolidated gross revenues for its last full fiscal year.

■ **Significant Financial Interest**

An investment representing greater than one percent (1%) of the outstanding shares of a publicly-held company or greater than five percent (5%) of the outstanding shares of a privately-held company.

■ **Significant Supplier**

A supplier to which the Company has made during the Company's last full fiscal year -- or proposes to make during the Company's current fiscal year -- payments for property or services in excess of five percent (5%) of (i) the Company's consolidated gross revenues for its last full fiscal year or (ii) the supplier's consolidated gross revenues for its last full fiscal year.

EACH ASSOCIATE WITH THE TITLE OF VICE PRESIDENT OR ABOVE (AND ANY OTHER ASSOCIATE AS SO DIRECTED BY THE CHIEF EXECUTIVE OFFICER OR THE CHIEF FINANCIAL OFFICER OF THE COMPANY) IS REQUIRED TO SIGN, DATE AND RETURN THIS CERTIFICATION TO THE COMPANY'S DIRECTOR - COMPLIANCE WITHIN 30 DAYS OF ISSUANCE. FAILURE TO DO SO MAY RESULT IN DISCIPLINARY ACTION.

Certification of Commitment to Cognizant's Core Values and Standards of Business Conduct

I hereby acknowledge receipt of Cognizant's Core Values and Standards of Business Conduct (the Standards). I have read the Standards and understand and acknowledge that I may be subject to disciplinary action or other action consistent with local laws in the event of my violation of these Standards, up to and including termination or legal action, by Cognizant Technology Solutions Corporation or the appropriate employing subsidiary.

I, _____ do hereby certify that:
(Print Name Above)

1. I have received, carefully read and understand Cognizant's Core Values and Standards of Business Conduct (the Standards).
2. I have complied, and will continue to comply, with the terms of these Standards, and will ensure that all Cognizant Associates reporting to me (directly or indirectly) are familiar with the terms of these Standards.
3. Except as set forth below, I am not aware of any conflict of interest or potential conflict of interest (as described in these Standards).

Exceptions:

Name

Date

Signature

Title



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CORE VALUES AND STANDARDS



Key Contacts and Escalations

In addition to your manager and your talent manager, you can contact the individuals below to discuss questions or concerns about these Standards.

Contact...	To discuss...
Director - Compliance Misty Pederson misty.pederson@cognizant.com	Questions or concerns about ethics or compliance matters, standards of business conduct, Cognizant's Compliance Helpline, blackout periods and insider trading policy.
General Counsel Steven Schwartz generalcounsel@cognizant.com	Questions or concerns about legal matters, intellectual property, permission to re-use software, violations of Standards by Executive Officers or Board Members, violations of laws and regulations, requests for Waivers of Standards or violations of data privacy.
Chief Security Officer Satish Das chiefsecurityofficer@cognizant.com	Questions or concerns about the security of Cognizant or client assets and information systems or Cognizant's Acceptable Use or IT Security policies.
GIS Team Global Service Desk Network Systems and Support (NSS) Intranet: https://gsd Internet: https://gsd.cognizant.com Voice Net (India): 56666 Telephone (USA- Toll Free): 1-866-822-2024 Telephone (USA): 973-368-9500 X 56666 Telephone (UK/Europe): +44-207-531-9330 X 56666 China(Within Office): 56666 gsd@cognizant.com	Questions or concerns about internal information security policies and practices, internal IT support or delivery of internal IT infrastructure such as desktop and laptop software / hardware, e-mail and network access, printers, faxes and hand-held devices.
SVP, Marketing Malcolm Frank chiefmarketingofficer@cognizant.com	Questions about communications with the media, analysts and investors and persons authorized to handle outside inquiries.



Cognizant



Cognizant

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Atlanta, Boston, Chicago, Dallas, Los Angeles, Minneapolis, Norwalk, Phoenix, San Ramon, Teaneck (U.S.); Toronto (Canada); London (UK); Frankfurt (Germany); Paris (France); Zurich, Geneva (Switzerland); Amsterdam (The Netherlands); Shanghai (China); Tokyo (Japan); Melbourne (Australia); Singapore (Singapore); Kuala Lumpur (Malaysia); Buenos Aires (Argentina).