



Code of Ethics



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A message from Ravi



Team Cognizant,

Every day, in every interaction—with clients, partners or one another—we send a message about who we are. At Cognizant, that message is simple: You can trust us.

Trust is the foundation of our success. It's taken decades to build, but it only takes one lapse to put it at risk. That's why integrity isn't just a personal value. It's a shared responsibility.

Our **Code of Ethics** helps us protect what matters most: Our reputation. It guides how we do business—legally, ethically and respectfully—across every market we serve.

The Code makes clear:

- We follow all applicable laws
- We speak up when something isn't right
- We don't cut corners to win business
- We treat everyone with respect

These expectations reflect the values we live by:

Work as one

Collaboration and trust go hand in hand

Own it

For our company, colleagues and clients

Living with integrity isn't just about avoiding mistakes. It's about how we lead, how we earn trust and how we grow—together. Let's lead the way.

A handwritten signature in black ink, appearing to read "Ravi Kumar S".

Ravi Kumar S
Chief Executive Officer

Raise the bar

We strive for excellence in conduct as well as performance

Do the right thing

Especially when it's hard

Dare to innovate

Boldly and responsibly

Our Code



The right way at Cognizant

We engineer modern businesses to improve everyday life. This is our purpose, and how we do it matters more now than ever.

- At the heart of our purpose is a desire to improve not just our clients' businesses, but how we operate as a leader in our industry. One way we distinguish ourselves in the market is by maintaining the highest standards of integrity. Our reputation and our success depend on it—integrity is core to who we are.
- We created this Code of Ethics ("Code") to guide you in acting in accordance with our standards of integrity. Following all applicable laws and regulations is the starting point, but it does not end the integrity inquiry. Consulting the Code is also a necessary step to making decisions and taking actions that best represent Cognizant.
- The principles of this Code are foundational to Cognizant's Ethics & Compliance program and have been approved by, and have the full backing of, Cognizant's Board of Directors. The Board of Directors is responsible for overseeing the Ethics and Compliance Program.

- **Who has to comply with our Code?**

Our Code applies to all Cognizant directors, officers and employees worldwide as well as all Cognizant business units, subsidiaries and joint ventures over which Cognizant has operational control (collectively "associates").

- **What happens when our Code is violated?**

Depending on the seriousness of the violation, our stakeholders' trust may be weakened, and our brand may be tarnished. That's why violations of the Code, our policies or the law can result in disciplinary action, up to and including termination of employment.

Depending on the seriousness of the incident, there can even be civil or criminal consequences for the person(s) involved and for Cognizant.

Our values, fundamental to our culture

The Code of Ethics connects directly to Cognizant's core values, which define our way of working and reflect how we operate when we are at our best. Our values emphasize the importance of how we achieve. They are the foundation of our success, driving us to collaboration, excellence, integrity and accountability in everything we do.

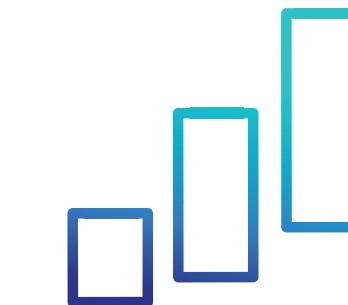
By living our values, we create a positive and productive work environment where everyone is empowered to contribute to our collective success. Our commitment to these values is unwavering.

The Code serves as a roadmap to do the right thing. But it also encompasses each of the other values in guiding decision-making across the organization.



Work as one

We think beyond roles, relying on each other's strengths to win as a team



Raise the bar

We always aim for excellence in how we work and what we deliver



Dare to innovate

We push boundaries and take chances to reimagine what's possible



Do the right thing

We all lead with integrity and make the ethical choice



Own it

We own the outcomes for our company, colleagues and community

Our Code principles

Our Code principles define what it means to Do the Right Thing at Cognizant. They describe the workplace we want to have and the company we aspire to be to our stakeholders—our people, our clients and our communities.



01



02



03



These principles are:

We earn trust

We continually strive to be a trusted business partner, following not just the letter but the spirit of the law and incorporating ethical standards into our day-to-day business activities.

We respect people and the environment

We are committed to a safe and healthy work environment and good corporate citizenship.

We live up to our responsibilities

Our commitment to doing business ethically means being accountable to each other and our stakeholders, from making sound financial choices to safeguarding information and assets.

Making ethical decisions

Our Code does not take the place of the good judgment that all Cognizant associates must exercise every day. When faced with an ethical dilemma or difficult decision, ask yourself the following questions before you decide to take action.

- Could the action be against the law?
- Could the action breach the spirit or letter of our Code or policies or those of our business partners?
- Could the action cause harm to Cognizant's brand, reputation or business relationships?
- Could other associates or someone outside Cognizant reasonably perceive the action as improper or lacking integrity?

When in doubt, seek guidance. We must all be prepared to be held accountable for our decisions.





Voicing concerns

Concerned? Speak up. If you observe or have a good faith basis to suspect behavior that is unsafe, unethical, unlawful or is inconsistent with the spirit of our Code, policies or procedures, have the courage to speak up. Cognizant takes all reported concerns seriously. There are many ways to raise your concerns, and you should feel free to use the reporting channel that is most comfortable for you.

How to raise concerns

- You may want to start locally—your manager is often in a good position to understand and respond to your concern.
- Associates are highly encouraged to use Cognizant's Ethics & Compliance Helpline (see [this document](#)). Accessible by phone or web, the Helpline allows you (anonymously, if you wish) to ask questions or share your concerns 24 hours a day, 7 days a week. Information you provide through the Helpline is documented in detail and forwarded to the Helpline Office.
- If you wish, you can always reach out to any member of Cognizant's Legal department, Human Resources or Ethics & Compliance.
- You can also contact our Chief Ethics & Compliance Officer
Email: chiefcomplianceofficer@cognizant.com
Mail: Cognizant Technology Solutions
Attn: Chief Ethics & Compliance Officer
Glenpointe Centre West
300 Frank W. Burr Boulevard, Suite 36, 6th Floor
Teaneck, New Jersey 07666 USA

We never allow retaliation

Cognizant is committed to ensuring that associates do not face retaliation for reporting ethics and compliance concerns in good faith. Acts of retaliation could include, but are not limited to, dismissal, demotion, suspension, harassment, exclusion or any other action that targets an individual for raising a concern about possible non-compliance or unethical behavior.

Associates engaging in acts of retaliation are subject to disciplinary action, up to and including termination, as permitted by local laws. If you suspect that you or someone you know has been retaliated against, raise it through one of our reporting channels immediately.

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

What does the process look like for an ethics or compliance investigation?



All concerns are promptly acknowledged and evaluated to decide the next steps. Those who raise concerns may be contacted by Ethics & Compliance or HR to aid that evaluation. Concerns alleging violations of the Code or other company policies will be investigated. Complaints about roles, ratings, performance management, interpersonal disputes or other employee relations issues will usually be referred to HR to handle outside of the investigation process.

Investigate concerns

Matters in scope for an investigation are assigned to an internal investigator in Ethics & Compliance or HR, depending on the issue and location. Investigators follow a standard process based on confidentiality, neutrality and thoroughness. They may review documents and interview associates to gather information and determine if the Code or company policies have been violated.

Concluding an Investigation

Those found to be responsible for wrongdoing will be notified by Human Resources about any disciplinary measures. The reporter will be notified that the investigation has concluded. Specific investigation findings and disciplinary decisions are treated as confidential. Note that potential disciplinary actions vary depending on local law and the specific circumstances of the violation, and can include, for example, verbal or written warnings, financial impacts or termination of employment.

Manager responsibilities

As a manager, you have a unique responsibility with respect to the investigations process:

- Do not engage in acts of retaliation, or permit others in your organization to do so
- Be alert to possible retaliation—which can often be subtle and happen months after a report is made—within your team
- Maintain confidentiality regarding any investigation activity

The company may respond to a concern by conducting an investigation. Always cooperate fully and provide truthful information whenever you are involved in a company investigation. Never initiate an investigation of your own—the company has specialized personnel to conduct investigations. Consult the [“What to know about company investigations”](#) resource for more information.

Government investigations

Nothing in our Code should be misunderstood to prevent you from reporting a violation of law to a government agency, or from cooperating in a government investigation. If you have any questions about government investigations, please direct them to the legal department.



Trust

We earn trust

At Cognizant, we continually strive to be a trusted business partner and lawful corporate citizen. In pursuing this goal, we must always comply with all applicable laws and go beyond compliance by consistently incorporating ethical standards into our day-to-day business activities.

Prevent corrupt activities

We are committed to upholding transparency in all our interactions with business partners and governments. Acting with integrity means that we do not attempt to influence their decisions through bribes, improper payments, promises or other unethical arrangements. Such actions not only betray our commitment to conducting business ethically but may also violate global anticorruption laws (e.g., US Foreign Corrupt Practices Act, UK Bribery Act), potentially leading to criminal or other serious legal exposure for the company and the individuals involved. These risks are greatest when interacting with government institutions and officials.



We do not give or receive bribes. Never authorize, offer, promise or provide anything of value—including a bribe—to get business or secure any advantage in connection with Cognizant's business or operations. Similarly, do not request or accept any bribes, kickbacks or any other improper benefits.

We do not make facilitation payments. Facilitation payments to expedite routine government administrative actions are expressly prohibited, even if this is considered normal business practice locally.

We understand how Cognizant defines government officials. Cognizant considers government officials to include a broader group than just those who hold public office or work for a government agency. It encompasses the employees of many of our clients that are either wholly or partially state-owned or controlled. Be familiar with Cognizant's definition as articulated in the glossary.

We keep accurate business records. The company's books and records must correctly reflect the true nature of all business transactions, no matter how small. This includes timesheets, travel and expense reports, customer billing and other records.

We do not use third parties to work around our policies. Do not engage a third party to make an improper payment on our behalf or to do anything that we cannot do under our own policies and standards.

We give and receive gifts and business hospitality only as appropriate and under certain circumstances. Gifts, meals or other courtesies can foster goodwill and strengthen business relationships. However, if they might appear as extravagant to the reasonable person, lack transparency or are not related to a legitimate business purpose, they may be seen as improper and possibly raise concerns about corruption. Exercise good judgment and moderation to ensure that business courtesies are reasonable and within established limits. The company's [Procedure for Gifts and Entertainment](#) provides guidance and specific approval requirements that all associates must follow.

Exchanging gifts and entertainment with our clients, partners and suppliers can build goodwill and strengthen relationships if done properly. Follow these tips to respect the laws and the rules applicable to Cognizant and most companies.



Manager responsibilities

Monitor the gifts and entertainment offered or accepted by your team members to ensure they are infrequent, do not involve the same recipients as part of a pattern and are not lavish. Be aware that the [Procedure for Gifts & Entertainment](#) requires managerial approval in certain situations, and such approvals should only be given when the gift or entertainment at issue aligns with all of the Procedure's requirements.

Can I keep it? You may accept gifts and entertainment if they are not intended to influence your business judgment, and they comply with our procedure. They must be of modest value, appropriate and infrequent. However, you may never accept (or offer) cash or cash equivalents like gift cards/certificates. Refer to the [Procedure for Gifts & Entertainment](#) for any pre-approval requirements.



Respect data privacy

Cognizant is committed to upholding the highest standards of data privacy and protection across all our operations. Safeguarding personal data is essential to earning trust, ensuring compliance with global data protection laws and enabling responsible innovation with emerging technologies.

Our privacy program is based on guiding principles of our [Global Privacy Policy](#) with which all associates should be familiar:

- Lawfulness
- Fairness and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Security, integrity and confidentiality
- Accountability



We are responsible for protecting and managing any personal data we handle in accordance with these principles. That includes personal data we hold on behalf of our clients, as well as the personal data of colleagues and other individuals in the work lifecycle, such as job candidates, external workers and contractors, and former associates. These responsibilities also extend to associates working with third parties that process personal data on our behalf—we must establish contractual expectations with those third parties about the handling and use of any personal data and implement appropriate data security arrangements with them.

The Privacy Office is always available to address any privacy questions that arise in your work.

We immediately report any unauthorized disclosure, mishandling or loss of personal data. Various global data protection laws require reporting of such situations within a very short time period. Quick reporting using the appropriate data security incident reporting channels action is therefore critical.

Compete fairly and honestly

Fair competition is not just a legal obligation—it is essential to innovation and driving value for our clients and stakeholders. As such, it is part of how we live our values to Raise the Bar and Dare to Innovate, while at the same time being a cornerstone of how we Do the Right Thing. Compete vigorously on the merits of our talent and offerings, but always do so lawfully and ethically.



We respect our competitors' confidential information. To compete fairly in the marketplace, we must show the same respect for the confidential information of our competitors that we show for our own. Always gather competitive information in a lawful and ethical manner, never through deception or misrepresentation. For example, we never:

- Use our access to customer systems to search for or view competitor information, such as presentations, headcount data or commercial terms;
- Disregard the confidentiality obligations that candidates and new associates from competitors have to those firms; or
- Retain or use a third party to collect confidential information that we ourselves cannot.

We comply with antitrust and competition laws of every country where we do business. Never agree or plan with competitors to limit or restrict competition. Do not discuss any competitively sensitive topics with competitors, such as prices, commercial terms, financial performance, market strategy or employee compensation. Should a competitor raise any of these topics with you, politely disengage from the interaction and promptly report it to Ethics & Compliance or Legal.

Be familiar with Cognizant's [Global Competition Policy](#) and seek guidance whenever unsure.

We engage in ethical sales, marketing and delivery practices. Never seek an unfair advantage by abusing confidential information, manipulating, concealing or misrepresenting facts, or any other unfair-dealing practice. Our communications about our services, whether oral or in written promotional materials, should always be accurate. Never make misrepresentations about our competitors or disparaging their products, services or talent. Avoid commitments on which we cannot reasonably deliver up to our standard of excellence. Recognize that doing business with government entities may involve legal requirements and restrictions that apply to bidding, pricing and delivery, and Legal should be consulted before pursuing such opportunities.



Never engage in insider trading

Cognizant strives to preserve fair and open markets for transacting in the company's securities. We never trade on the basis of material nonpublic information or allow our family or friends to do so.

Through our work at Cognizant, we may from time to time learn of material nonpublic information about Cognizant or another company (such as a current or potential customer, partner or acquisition target). We have an obligation not to disclose any such information—both inside and outside the company—and to ensure that we and our affiliated persons, such as family members, do not trade on it.

Cognizant associates must fully understand and comply with Cognizant's [Insider Trading Policy](#) and related policies and procedures.



Adhere to international trade laws and travel requirements

At Cognizant, our global footprint requires an awareness of and commitment to international trade compliance. In today's interconnected world, adherence to trade laws is not only a legal obligation—it protects our people, our clients and our reputation, and ensures we can continue to deliver innovation across borders without disruption.

We obey all trade laws and regulations applicable to our global business. These include embargoes, economic sanctions, export controls, import requirements and antiboycott regulations. Such laws and regulations apply to a number of aspects of our business—including how we import and export goods, services, software and technologies. In some instances, they may restrict or prohibit us from doing business in or with certain countries, governments and individuals.

Associates should be familiar with the embargoed jurisdictions and types of restrictions outlined in the [Global Trade Compliance Policy](#) and should reach out to the Global Trade Compliance Team for guidance.

Relatedly, as a global company that relies on workforce mobility, we must be aware of and follow the immigration laws of the locations from which we work, whether as a business visitor or as part of a longer-term relocation. All associates must obtain the necessary work permits or visas in consultation with the Global Mobility team before traveling internationally in connection with your Cognizant work. Always obtain approval from Global Mobility, HR and your management before you travel to work overseas.



Prevent money laundering

Cognizant is committed to preventing the use of our company for money laundering or the financing of criminal activity. Money laundering involves moving proceeds derived from criminal activity through the financial system to conceal its criminal origins, often through transactions with businesses that appear legitimate. We comply with all anti-money laundering laws to prevent third parties from attempting to conceal the source illicit funds.

We know who we do business with. We are committed to conducting business only with reputable parties involved in legitimate business activities. Follow all procedures for conducting appropriate due diligence on clients, suppliers and business partners and monitor for any suspicious transactions, payment requests or changes in ownership structures or behavioral patterns. If you observe or suspect such activity, report it immediately to Finance, Ethics & Compliance or Legal.



Policies, procedures and resources related to Trust

[Anti-Corruption Policy](#)

[Procedure for Gifts & Entertainment](#)

[Doing Business with the U.S. Public Sector Policy](#)

[Global Charitable Giving Policy](#)

[Anti-Corruption Procedure for the Selection & Retention of Third Parties](#)

[Government Client List](#)

[Global Competition Policy](#)

[Global Trade Compliance Policy](#)

[Insider Trading Policy](#)

[Cognizant Ethics & Compliance Portal](#)

[Procedure for Anti-Money Laundering Compliance](#)

[Procedure for Anti-Corruption Compliance in Referrals from Third Parties](#)

[Global Privacy Policy](#)

[Associate Privacy Notice](#)

Respect

We respect people and the environment

Cognizant is a people company. One of our core values is Work as One, which directs us to think beyond our roles and titles and to rely on each other's strengths to win as a team. By working collaboratively as a team, we position ourselves to live our core value to Raise the Bar—to achieve excellence in how we work and what we deliver. Teams thrive in environments built on fairness, respect and safety. Teams are strongest when differences are valued, and ideas can be expressed comfortably.

To Work as One and Raise the Bar require us to be engaged and invested members of the Cognizant team. That sense of citizenship extends to the communities and environments in which we operate.



Maintain the highest standards of professionalism

We treat colleagues with dignity.

There is no place at Cognizant for inappropriate, disrespectful or abusive treatment of co-workers. People managers are expected to lead by example—management responsibilities or other positions of authority must never be misused to undermine our culture of professionalism or for personal benefit.

We communicate respectfully and appropriately.

Be thoughtful in your communications with colleagues, clients and others with whom you work. Recognize that personal social media activity can impact the workplace environment—avoid posting anything that could be interpreted as harassing or discriminatory, violate the privacy of co-workers or clients or threaten or insult any person or company.

We act as representatives of Cognizant.

Our individual professionalism and behavior can influence how clients, business partners, suppliers and future employees view Cognizant. Whether in the office, online, on business travel, at a conference or event or in a recruitment activity, act as though your reputation and Cognizant's are at stake.

Respect human rights

We uphold human rights in all of our global operations. Everyone who works for Cognizant is entitled to fair wages and hours, consistent with local laws, and is entitled to an environment free from discrimination, harassment and retaliation.

We do not condone modern slavery in any form. We are committed to preventing all types of modern slavery practice and do not use, or tolerate the use of, child forced or bonded labor or human trafficking. We will not work with third parties that engage in such practices.

Commit to environmental responsibility

We are committed to operating in an environmentally responsible manner.

We utilize sustainable practices to help reduce our environmental footprint and ensure our impact on the world is a positive one. Always follow the environmental laws, regulations and standards that apply in your location.



Protect the health and safety of each other

Our success depends on everyone feeling safe in the workplace:

- **We maintain a safe working environment**
- **We conduct all business activities with the necessary permits, approvals and controls**
- **We do not tolerate violence, threats of violence, intimidation, bullying or any form of abuse in the workplace**
- **We do not work under the influence of drugs or alcohol**
- **We forbid the use, sale or possession of illegal drugs on our property or while on company business**

If you witness any unsafe situations in the workplace, report it immediately to a manager, Corporate Security, Ethics & Compliance or Human Resources.

Treat people fairly and prohibit discrimination and harassment

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

We do not tolerate discriminatory conduct, abuse of authority, retaliation or harassment of any kind, including that of a sexual nature. We also refrain from making jokes, slurs or other remarks about a person's legally protected characteristics or items of a sexual nature. At no time should we allow, encourage or create an offensive, violent, discriminatory, abusive, retaliatory, or hostile environment, whether in a location where we conduct company business such as a Cognizant office or a client site or at other locations where we congregate for a work-related activity or event (such as a restaurant, hotel or conference center).

Policies and resources related to Respect

[Environmental, Health and Safety Policy](#)

[Human Rights Policy](#)

[Global Harassment, Discrimination & Workplace Bullying Prevention Policy](#)

[Social Media Policy](#)

[Whistleblower and Non-Retaliation Policy](#)

See the [Human Resources Policies site](#) for country specific policies and information.

[Sustainability and Corporate Citizenship site](#)



A professional woman with short grey hair, wearing a tan blazer and a light blue blouse, is gesturing with her hands while speaking in a meeting. She is wearing gold hoop earrings and a gold watch. In the background, other people are visible, and there is a laptop and a coffee cup on the table.

Responsibility

We live up to our responsibilities

One of our core values is Own It, which speaks to our shared responsibility for the outcomes we deliver as a company, for our clients, our shareholders and our people.

In order to deliver the best outcomes, we must all act as owners of the company—with a stake in its success and reputation. That means safeguarding our confidential information and assets and those of our clients, practicing good financial stewardship and following all established procedures and protocols applicable to our operations. It also means exercising sound judgment in making decisions, staying within the limits of our authority and knowing when to escalate to management or seek guidance from a subject matter expert.

Ensure information security

Information security depends on vigilance, common sense and good judgment. Remember the following key points:

We operate on a need-to-know basis when it comes to securing information. Never access, handle or retain confidential or other protected information unless you have a legitimate business need to do so. Likewise, only share such information with others who have a legitimate business need. Understand whether any additional legal, contractual or policy restrictions apply to such information and, if so, respect them.

We use Cognizant-approved or client-approved devices, tools and software to conduct our work. Do not download or install unauthorized software onto Cognizant or client computers. Do not use unapproved third-party software, apps or cloud-based services for Cognizant or client work without first obtaining all necessary permissions. Similarly, do not engage in substantive business communications using unapproved messaging apps.

Vigilance regarding use of company and client assets, systems and property is also crucial to information security.

- Be familiar with Cognizant's [Acceptable Use Policy](#)
- When using client systems and technology, know and follow all contractual obligations
- Guard against loss or theft of company and client devices and unauthorized access to facilities
- Never share your passwords or credentials, even with colleagues or for the purpose of getting work done

We promptly report all information security incidents to Corporate Security.

Report by using the online [MyService Portal](#)

Emailing CorporateSecurity@cognizant.com

Or calling one of the following toll free numbers:
1800-572-0473 (India),
0800-678-1616 (UK), or
1-866-822-2024 (US).

For inquiries relating to information security, including requests for permission to use tools or software that are not generally approved, reach out to Corporate Security.

Protect confidential information and intellectual property

Confidential information is defined broadly and can encompass almost any type of nonpublic information relating to a company's business activities, performance, operations or people.

Examples include but are not limited to: strategic plans, financials, pricing or cost information, customer lists, and contract terms.

Cognizant's confidential information is one of our most important assets. The same is true for our clients and business partners—the confidential information we hold on their behalf, or have access to in their environments, is critical to them. Mishandling confidential information can compromise our competitive advantage and that of our clients.



We are all responsible for managing and securing any confidential information we handle in the course of our work in accordance with all relevant corporate policies and procedures. This obligation extends even after leaving the company, when we must continue to maintain the confidentiality of company (or client) information and return all documents and electronically stored files. Relatedly, we must respect the confidential information of our prior employers—do not share a prior employer's confidential information or documents, even those you created, within Cognizant and do not ask colleagues to share any such material from their prior employers.

The same principles apply to intellectual property. Safeguard our ideas and those of our clients, competitors, business partners and prior employers to maintain our competitive advantage and reputation. Respect the intellectual property rights of others by obtaining appropriate licenses or approvals before accessing or using third-party software or code, content or copyrighted materials—do not mistake availability for permission.

Report any misuse of confidential information or intellectual property to Ethics & Compliance or Legal.

Avoid and manage conflicts of interest

Occasionally our personal interests come into conflict with our roles at Cognizant. A conflict of interest arises when our outside activities, interests or relationships could create or appear to create a motive to make a decision that is not in Cognizant's best interests. Potential conflicts could arise through:

- Outside employment
- Board memberships and other organizational roles
- Financial investments and arrangements
- Close personal relationships
- Corporate opportunities
- Gifts and entertainment

We conduct business only in Cognizant's best interests. Putting our personal interests over the interests of Cognizant creates an active conflict of interest and is not allowed. We never make decisions in our Cognizant roles where we have any personal stake in the outcome. Similarly, we never use our connection to Cognizant for personal gain of any kind.

We identify and disclose potential conflicts of interest. Cognizant requires that associates disclose any situation that could reasonably be expected to give rise to a conflict of interest. If you suspect that you have a situation that could lead to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it to your manager or Ethics & Compliance as set forth in our [Conflicts of Interest Policy](#). The earlier you disclose, the better.

The existence of a conflict is not an indication of wrongdoing. Often conflicts can be addressed with little or no further action, though sometimes they require more robust intervention. The key to effective management is prompt disclosure, which ensures integrity and transparency in our operations. Failure to do so could damage your reputation, Cognizant's and our relationships with clients and suppliers.

Manager responsibilities

- Ensure team members recognize conflicts of interest, including those involving close personal relationships and promptly address
- Be transparent about personal connections to organizations and candidates and take appropriate steps to protect the integrity of any Cognizant decisions involving them
- Understand the criteria for approving conflicts of interest within your authority
- Monitor any cleared conflicts for changes that may require reassessment

Key questions to help identify conflicts of interest

- Am I using a company resource for my own benefit?
- Do I have a relationship that may appear to impact decisions I make for Cognizant?
- Do I have an ownership stake in a business working with or competing with the Company?
- Would someone question my judgment based on something I'm doing outside of work or a relationship I have?

Use emerging technologies and artificial intelligence (AI) responsibly

At Cognizant, we believe that technology should serve humanity. As we continue to deploy new technologies including artificial intelligence (AI) into our solutions and operations, we are committed to ensuring their use is ethical, transparent and consistent with our core values.

Responsible AI at Cognizant is built on a foundation of trust and designed to uphold the highest standards of safety, reliability and human empowerment. Be guided by our [Responsible AI Principles](#) in your use of AI:

- Design for transparency, explainability and traceability
- Promote fairness, inclusivity and accessibility
- Safeguard personal information and protect AI systems against threats and vulnerabilities
- Enable human accountability and participation
- Develop robust and safe systems that consistently perform as intended
- Produce AI solutions that can grow and adapt over time, while also considering environmental and social impacts

Our Responsible AI Principles apply to all AI systems developed, used or deployed by Cognizant, whether for internal use or as part of client services. They apply to all Cognizant teams involved in the AI lifecycle: from data acquisition to design, deployment, monitoring and decommissioning. As we embrace AI's potential, visit the [Responsible AI Hub](#) for guidance, training and frameworks to empower you to address ethical issues and ensure alignment with evolving global standards and regulations.



Practice good financial stewardship

We have a responsibility to our stakeholders to be good financial stewards of the company's resources. As a public company, we must provide accurate and timely financial disclosures to the US Securities and Exchange Commission and other regulators, and all associates have a role to play in the integrity of those disclosures. Integrity above all else must be at the heart of our financial decisions and reporting without exception.



We make fiscal and financial decisions that best serve the interest of the company. Always use company resources wisely and carefully, and ensure expenditures comply with all relevant Cognizant policies and procedures. By doing so, we not only protect the company's assets but also contribute to its overall success and sustainability.

We accurately enter our time and expenses, and record and support all transactions, in our books, records and accounts. As a prerequisite to preparing accurate financial statements and invoices, our accounts and records must properly and timely reflect all activity and transactions—without exception. Cognizant has zero tolerance for fraud of any kind, the submission of false or misleading entries in our books and records, or inaccurate invoices or claims to clients or third parties with whom we work.

We protect sensitive financial data from disclosure to third parties. Only share sensitive financial data with those who have a legitimate need to know and are authorized to receive it. Before transmitting any Cognizant sensitive financial data to a third party, take all necessary precautions to ensure that information remains confidential and secure. This could involve using encryption, secure communication channels and verifying the recipient's identity and authorization to receive the data.

Manager responsibilities

- People and project managers have a particularly important role to play in financial stewardship
- Review expense reports thoroughly for appropriate documentation and alignment with all policies and guidelines
- Only approve invoices that are properly supported and sufficiently detailed
- Ensure that company funds are used only for their intended purposes

Procurement

Sound procurement practices and good financial stewardship go hand in hand. We do not make procurement decisions based on favors, personal relationships or recommendations. These decisions must be based on cost, quality and Cognizant's best interests. Follow the requirements of the [Acquisition of Goods & Services Policy](#) and consult the procurement team to ensure appropriate expenditure of company resources.

Communicate carefully and thoughtfully

Communication via social media and online communities allows us to network, promote our capabilities and elevate our profile and reputation. But it is important to recognize that our external communications can have real impact on Cognizant's business, our clients and our reputation. You are responsible for using good judgment in your external communications, including online and social media activity. Follow these guidelines:

We do not communicate externally on behalf of the company unless authorized. Cognizant's public statements must always be honest and accurate, and only authorized individuals can communicate the company's official position. All communications on behalf of Cognizant must be done within the parameters outlined in the [External Communications Policy](#). Unless you have the required authorization in writing, do not communicate on behalf of Cognizant. All inquiries from the media and analyst community must be directed to, and managed by, [External Communications](#).

We use social media responsibly. Our personal social media activity can impact Cognizant's reputation, so always use good judgment and courtesy. Never share nonpublic information about Cognizant, our clients and our business partners. Recognize that context matters—when commenting about something that could be perceived as attributable to Cognizant, make it clear that your views are personal and not those of Cognizant.



Manage records responsibly

We retain and dispose of business records lawfully and responsibly.

Records created by associates in the course of their work are Cognizant property and should be managed accordingly. Always follow the [Record Retention Policy](#) and associated record retention schedules that apply to our locations and projects and never destroy records unless doing so is compliant with any applicable record retention schedule requirements and/or any legal hold notices.



Policies and resources related to Responsibility

[Acceptable Use Policy](#)

[Acquisition of Goods & Services Policy](#)

[Conflicts of Interest Policy](#)

[External Communications Policy](#)

[Financial Stewardship Policy](#)

[Intellectual Property Policy](#)

[Record Retention Policy](#)

[Responsible AI Hub](#)

[Social Media Policy](#)

We all have a role to play

Everyone's responsibilities:

As associates, each of us is responsible for upholding our culture of integrity. It's not only the right thing to do, but also an integral part of our commitment to excellence and our dedication to being a responsible corporate citizen. Associates at all levels of the company are expected to:

- Always act with integrity and honesty, using good judgment
- Avoid letting the pressure to succeed make you do things you know are wrong—no one has the authority to make you do something that violates our Code
- Follow all policies, procedures and laws that apply to your job
- Complete all training assigned to you—that's the best way to learn
- Speak up if you see or suspect misconduct or unethical behavior—it's always the right thing to do

Additional responsibilities of managers:

Cognizant managers are held to an even higher standard and have a particular responsibility to operate with integrity, model and promote ethical behavior and ensure colleagues always do the right thing. As a manager, you are expected to:

- Hold your team accountable by setting an example with your own adherence to the principles of the Code of Ethics
- Communicate with your team about our core values and the importance of integrity
- Confront difficult situations and seek guidance whenever you are unsure
- Avoid favoritism based on personal considerations and relationships
- Promote a culture of respect and collaboration within your team
- Create a safe environment for team members to share perspectives and raise concerns without fear of retaliation
- Listen to associate concerns and escalate them to the appropriate internal teams as necessary

Accessing the Cognizant Ethics & Compliance Helpline



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

To access the Ethics & Compliance Helpline via the internet, please go to <http://www.cognizant.com/compliance-helpline> and follow the instructions for submitting a report.

To make a report by telephone, please dial the number specific to your country and follow the prompts.

All other locations:
Country access code + 866 824 4897

Additional AT&T Direct Access Codes are available at <https://www.business.att.com/collateral/access.html>



Cognizant (Nasdaq-100: CTSH) engineers modern businesses. We help our clients modernize technology, reimagine processes and transform experiences so they can stay ahead in our fast-changing world. Together, we're improving everyday life. See how at www.cognizant.com or @Cognizant.

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