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Key Definitions

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Related Policies and Processes

- [Code of Ethics](#)
- [Cognizant's Ethics & Compliance Helpline](#)
- [Global Anti-Corruption eLearning](#)
- [Anti-Corruption Web Page](#)
- [Anti-Corruption Compliance Procedure for the Selection & Retention of Third Parties](#)
- [Procedure for Charitable Contributions & Sponsorships](#)
- [Procedure for Gifts & Entertainment](#)
- [Conflicts of Interest Policy](#)
- [Talent Acquisition Group](#)
- [Travel & Expense Policy](#)
- [Whistleblower & Non-Retaliation Policy](#)

Scope

Cognizant is subject to various anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, the India Prevention of Corruption Act, and other laws that apply in the various jurisdictions where we do business.

All Cognizant employees are expected to comply with this Policy and its implementing procedures, which are designed to promote compliance with these laws throughout our operations. This includes all directors, officers, and employees of Cognizant entities, subsidiaries and joint ventures over which Cognizant has operational control (collectively "Associates").

If local law or a business unit imposes stricter requirements than those described in this Policy, Associates must comply with those rules.

Guiding Principles

Cognizant is committed to conducting business ethically. Our rule is simple: we never pay [bribes](#) or act [corruptly](#), and we never ask a third party to do so on our behalf. This commitment is a core part of our [Code of Ethics](#) and a part of how we do business the right way.

In support of this commitment – and to protect Cognizant's reputation and ensure our continued success – every Associate must understand and comply with the following guiding principles:

- **No Bribes.** Do not authorize, offer, promise, or provide [anything of value](#) – including a bribe – to get business or secure any advantage in connection with Cognizant's business. Do not request or accept any bribes, kickbacks or other improper benefits.
- **Provide Gifts and Entertainment with Caution.** Be mindful of unique risks and restrictions that apply to giving gifts or entertaining, particularly where a [Government Official](#) is involved. Follow the [Procedure for Gifts & Entertainment](#) for pre-approval requirements and restrictions when providing anything of value to anyone outside the Company – both recipients at [Government Entities](#) and the private sector.
- **No Preferential Hiring.** Do not offer or promise employment to, or hire, relatives of a client or [Government Official](#) for the purpose of improperly influencing their decision-making. Follow the processes established by our [Talent Acquisition Group](#) to ensure only qualified candidates are hired and any [Conflicts of Interest](#) are addressed.
- **Maintain Accurate Books & Records.** Submit accurate and complete timesheets, [travel and expense reports](#), financial statements, customer billing, and other records. The Company's books and records must correctly reflect the true nature of all business transactions, no matter how small.

- **No Facilitation Payments.** We generally prohibit [facilitation payments](#) – or small, unofficial cash payments to a low level [Government Official](#) – to expedite routine administrative actions.
- **No Improper Conduct by Third Parties.** We cannot allow any third party to act on our behalf in a way that violates applicable laws or our policies. Follow Cognizant’s [Third Party Due Diligence Procedure](#) before engaging a third party to act on Cognizant’s behalf in business dealings with [Government Officials](#); be mindful in managing relationships with third parties – including reviewing and approving invoices – of facts or circumstances that suggest the third party may act improperly.
- **No Improper Charitable Contributions or Sponsorships.** Charitable contributions and sponsorships can present corruption risks if used to improperly influence a decision-maker in connection with Cognizant business. Obtain pre-approval before making charitable contributions or sponsorships, and comply with our [Procedure for Charitable Contributions & Sponsorships](#).
- **Mitigate Corruption Risks in Merger, Acquisition, and Joint Venture Activity.** Ensure that appropriate anti-corruption due diligence is conducted prior to entering into a joint venture, or entering a new market, and in connection with every merger or acquisition. Contact your [local Legal contact](#), the [Ethics & Compliance M&A Lead](#), or your [Regional Ethics & Compliance Officer](#) for assistance.

Disciplinary Consequences

Subject to local laws and regulations, a violation of this Policy or applicable anti-corruption laws could result in disciplinary action, up to and including termination.

Speak up! If you become aware of a violation of this Policy, you [must report it](#). Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code of Ethics, or other Cognizant policies.

To report a possible violation of this policy, visit Cognizant’s Ethics & Compliance Helpline (a secure and confidential reporting system) at: www.cognizant.com/compliance-helpline.

Version History

Revision Date	Description of Change
Jan-01-2011	Initial release of policy
Dec-01-2016	Condensed policy content
Sep-01-2019	Complete update of policy content. Incorporated critical links to related procedures and other resources.

Policy Control Information

Policy Name: Anti-Corruption Policy

Department: Ethics & Compliance

Revision Date: Sep-01-2019

Effective Date: Jan-01-2011

Policy Owner: [Kari K.G. Chandler](#), Vice President Anti-Corruption Compliance