

Translations

[Chinese \(Simplified\)](#)
[English](#)
[French \(Canada\)](#)
[French \(France\)](#)
[German](#)
[Japanese](#)
[Portuguese](#)
[Spanish \(Latin America\)](#)

Definitions

Media: covers all external media, including print, broadcast, electronic, and online.

Investment Community: includes (i) broker-dealers and persons associated with them, including investment analysts; (ii) investment advisers, certain institutional investment managers and their associated persons; (iii) investment companies, hedge funds, and affiliated persons; and (iv) stockholders it is reasonably foreseeable would purchase or sell securities on the basis of the information.

Social media: includes blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

For a definition of **Material Nonpublic Information**, [click here](#).

Related Policies and Processes

- [Code of Ethics](#)
- [Cognizant's Ethics & Compliance Helpline](#)
- [Procedure for Official Social Media Content and Channels](#)
- [Acceptable Use Policy](#)
- [Global Associate Privacy Notice](#)
- [Insider Trading Policy](#)
- [Whistleblower & Non-Retaliation Policy](#)
- [Social Media Security Guidance](#)
- [Social Media Security Quick Tips](#)

Scope

All Cognizant employees are expected to comply with this Policy, which sets out guidelines for all public interactions and engagement on behalf of the company with media and the investment community and through social media. This includes all directors, officers, and employees of Cognizant entities, subsidiaries and joint ventures over which Cognizant has operational control (collectively "Associates").

Guiding Principles

Media & Investment Community Communications

Transparency and integrity are two of our Core Values. We want to be transparent with our Associates, with our customers and with the public at large. We are also responsible for the integrity of the information we share with the media, the investment community and the public at large. U.S. securities laws and other applicable laws set out very specific requirements around the timing and manner of disclosure of important company information and require that such information be materially accurate and not misleading. In order to facilitate the company's compliance with these obligations, every Associate must understand and comply with the following guiding principles when communicating externally with the press, the investment community or the public at large (through press releases or social media):

- **Be Media & Press Savvy**
 - Only authorized employees can talk to the media on behalf of the Company. If you are approached by any media representative (e.g., reporter, blogger or editor) to speak about any aspect of Cognizant's business, our customers or competitors, our industry, or your role with the company, direct those queries to the [Corporate Communications team](#). That team works with business leadership in all geographies to prepare them for media interactions and designate official spokespeople, as appropriate. Likewise, no associate should approach any media representative to report on or speak about the aforementioned topics.
 - Engage the [Corporate Communications team](#) before agreeing to or initiating a press release. That team will collaborate with business unit marketing and leadership, and will draft the press release to ensure it adheres to Cognizant's corporate and style guidelines. They will also obtain all internal (corporate management) and external (customers and partners) approvals that may be required before any release is shared with a third party.
 - Formal client and business leadership approval must be obtained before considering a client-related press release or using a client's

name in any media or external materials.

- **Don't Speak with the Investment Community.**

- The only persons generally authorized to speak on behalf of the Company to the investment community are the Company's CEO, CFO and Head of Investor Relations (IR) and certain other designated members of the IR Department and Legal Department; and from time to time other persons may be specifically authorized by one of the foregoing to speak with respect to a particular topic or purpose.
- If you receive any inquiries from analysts, stockholders and other members of the investment community, do not respond in any way other than to direct those queries to the [Head of Investor Relations](#).
- If you are aware of sensitive company information that may have inadvertently been disclosed to a member of the investment community, inform the [Legal Department](#) immediately. This is important because securities laws require that whenever the company (or a person acting on its behalf) discloses [Material Nonpublic Information](#) to a member of the investment community, the company must simultaneously disseminate the information to the public. The Legal Department will make the determination about whether the company information disclosed to the member of the investment community constitutes Material Nonpublic Information and now requires disclosure to the general public.

- **Protect Cognizant's Reputation.** Within the framework of societal and constitutional freedoms, if you have any media interactions in a personal capacity, do not refer to Cognizant or your association with Cognizant.
- **Follow Public Relations Procedure.** All public relations activities on behalf of Cognizant (including the retention of public relations firms and advisors) are to be conducted by or with the authorization of [Corporate Communications](#).

Social Media

While different in nature, social media is another medium that can be used to disclose information to the public. Most traditional media organizations also utilize social media to report news and reach large audiences. Social networking presents an exciting way for Associates to interact with others and share thoughts and opinions on a variety of topics and interests. Your choice to participate in social media or any other form of online publishing or discussion is your own. However, as a Cognizant Associate, your online activities must comply with this policy and relevant Cognizant procedures, whether you engage in these activities during work or when off the clock — if talking about Cognizant, or our clients on your personal social networks, keep in mind that it is all covered by our policies and procedures.

To protect Cognizant's reputation and your professional brand, every Associate must understand and comply with the following guiding principles when participating in social media in their personal capacity:

- **Be Confidential.** Never reveal classified or sensitive information about Cognizant, partners, clients, or prospects. When posting your job description on LinkedIn, do not disclose confidential information — including the names of clients or descriptions of deals that you have been involved in. If you are unsure, check with Cognizant's Corporate Marketing Social Media or

Corporate Communications teams. Off-limit topics include mergers and acquisitions, litigation or potential litigation, non-published client and Company financials, and client information. Additionally, you must not disclose non-public, internal information related to Cognizant and/or clients to unauthorized recipients, including Internet groups, mailing lists, blogs and other Internet forums.

- **Be Respectful.** Do not post information about client contacts or other third parties (which could lead to such individuals being identified) without their express permission. Please be sure to review and follow the terms of the [Global Associate Privacy Notice](#), which also applies to interactions on social media.
- **Be Discreet.** Do not say anything disparaging about our competitors, clients, fellow associates or the general business community. Always respect the laws regarding brand, privacy, trademark, copyright, fair use, and trade secrets. If promoting, endorsing or speaking favorably about any of Cognizant's products or services, you must disclose your connection to Cognizant in any such social media post.
- **Be Compliant.** Comply with Cognizant's policies and rules at all times. Do not use social media to engage in illegal activity of any kind. Do not purport to represent or speak on behalf of Cognizant. You should also never post or disclose any Material Nonpublic Information about Cognizant or any other company where the information was obtained through your work with Cognizant.
- **Be Honest.** Act with integrity. Do not use false identities or post false information about Cognizant. Do not hack anybody else's account, page or blog. Do not invite third parties to use Cognizant social media accounts or allow third parties to represent themselves as representing Cognizant.
- **Be Thoughtful.** Use good judgment when posting on social media. Be smart and emotionally intelligent with your posts. Once you share, you can never retract your statement, so think about how they may be perceived by others.
- **Be Valuable.** There are millions of words out there — if you are going to post, make yours helpful and thought provoking. Build the Cognizant community by posting content to invite thoughtful conversation and stay engaged.
- **Be Professional.** Do not post anything that could be viewed as malicious, libelous, obscene, abusive, threatening or intimidating, that disparages clients, associates, competitors, or suppliers, that might constitute harassment, bullying, or victimization, or that could amount to retaliation against an individual. Examples of such conduct might include untrue posts designed to harm someone's reputation or posts that could contribute to a hostile work environment on the basis of gender, race, sexual orientation, disability, religion or any other status protected by law or company policy.
- **Be Upfront.** If you make a mistake, quickly admit it. Be upfront and act with urgency to fix your mistake. For example, if you are posting to a blog and need to correct information that is inaccurate, please modify your incorrect post — making it clear that you have done so in the blog post or comments. If you are uncertain as to what the best approach is, reach out to the [Corporate Marketing Social Media Team](#) for assistance.

- **Be Watchful.** Immediately contact social.media@cognizant.com if you encounter negative comments about Cognizant’s products or services. Remember that you are not authorized to respond on the Company’s behalf.
- If you are posting on a Cognizant-branded social media channel, you must also review and adhere to the [Procedure for Official Social Media Content and Channels](#).

If you have any queries, concerns, or complaints for any social media content or channels or are unsure about whether any proposed online interaction or posting may breach the social media portion of this Policy, please contact the [Corporate Marketing Social Media Team](#) for further guidance.

This Policy should not be interpreted to limit or interfere with the rights of Associates to discuss terms of employment (such as wages, hours or benefits) or conditions of employment (such as safety conditions or harassment), as protected under the U.S. National Labor Relations Act, or to communicate or cooperate with any U.S. government agency in an investigation of matters affecting Cognizant. This policy should also not be interpreted to restrict any similar or other rights that Associates may have under any other applicable law or regulation.

Disciplinary Consequences

Subject to local laws and regulations, a violation of this policy could result in disciplinary action, up to and including termination. If you are aware of a violation of this policy, you have an obligation to report it to the Company. As stated in Cognizant’s [Whistleblower and Non-Retaliation Policy](#), Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Core Values & 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
2012	Initial release of policy
Aug-6-2014	Minor copy changes
Mar-11-2015	Content and presentation refresh
Jun-26-2018	Added a section on launching official channels and ownership
Jun-04-2019	Added definition of “Associate”
Oct-01-2019	Integrated with the External Communications Policy

Policy Control Information

Policy Name: External Communications & Social Media Policy

Department: Corporate Marketing

Revision Date: Oct-01-2019

Effective Date: 2012

Policy Owner: [Gerry Moran](#), AVP Corporate Marketing