

Translations

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

Key Definitions

Business Record: Substantive materials, information, data or documents (regardless of format) created, received or maintained as part of Company business activities that may include, but is not limited to, the following: emails, memorandum, reports, data compilation, in any form, of acts, events, conditions, opinions or diagnoses, books of account, scientific and production documentation, payroll data, employee files, corporate documents, and other business documents used or created by the Company and its workforce. This does not include non-substantive business communications and non-business related communications (e.g., communications related strictly to scheduling, social/personal matters, or administrative matters).

Legal Hold: An exception to the normal retention procedure due to litigation, government investigation, audit, or other event.

Related Policies and Processes

- [Code of Ethics](#)
- [Cognizant's Ethics & Compliance Helpline](#)
- [Record Retention & Disposal Training](#)
- [Procedure for Record Retention](#)
- Record Retention Schedules:
 - [Global Records](#)
 - [Global Healthcare Records](#)
- [Whistleblower and Non-Retaliation Policy](#)

Scope

The purpose of this Policy is to ensure that company Business Records are adequately protected and maintained and to make certain that records that are no longer needed by Cognizant or are of no value are purged at the proper time. This Policy is also for the purpose of guiding Cognizant employees in the understanding their obligations in retaining company Business Records.

All Cognizant employees are expected to uphold this Policy which establishes our record retention principles. This includes all directors, officers, and employees of all Cognizant entities, subsidiaries, and joint ventures over which Cognizant has operational control (collectively "Associates").

If specific regions, locations, or business units impose exceptions to or stricter requirements than those described in this Policy, Associates must comply with those rules.

Guiding Principles

In support of the above and to maintain the Company's reputation and continued success, we count on each and every Associate to understand and comply with the following guidelines:

- Always adhere to the [Procedure for Record Retention](#) to ensure appropriate Business Record retention periods and disposal methods are followed.
- Do not change, conceal, falsify, or destroy any record with the intent to impede or obstruct any official or government proceeding.
- If you believe, or the Legal Department communicates, that Cognizant Business Records are under a Legal Hold, you must preserve those records until the Legal Department determines those Business Records are no longer needed.

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 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
20-Dec-2017	Initial release
08-Apr-2019	Simplified policy released along with accompanying procedures

Policy Control Information

Policy Name: Record Retention Policy

Department: Legal

Revision Date: 08-Apr-2019

Effective Date: 20-Dec-2017

Policy Owner: [Jacob Hill](#), Associate General Chief Counsel Global Litigation