

# Cognizant UK Statement - Modern Slavery Statement FY 2024

### **Background**

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Cognizant Worldwide Limited's modern slavery and human trafficking statement for the financial year ending 31 December 2024. This statement was approved by the Board of Directors on 26 June 2025.

Our Modern Slavery statements since 2017 are also available.

Introduction Cognizant Worldwide Limited (CWW) is the primary contracting entity for Cognizant's UK business though it often utilises the services of other group companies from around the globe. The ultimate parent entity of all Cognizant entities globally is Cognizant Technology Solutions Corporation, a Delaware corporation listed on the Nasdaq Global Select market in the USA. CWW has provided seven statements to date under the Modern Slavery Act 2015 (UK).

Cognizant is one of the world's leading professional services companies transforming clients' operating and technology models for the digital era, headquartered in Teaneck, New Jersey (USA). Cognizant has approximately 336,800employees worldwide as of 31 December 2024.

## Modern Slavery, Human Trafficking and Forced Labour

Cognizant opposes all forms of slavery, human trafficking and forced labour in its operations and the operations of its suppliers. Cognizant's management of modern slavery risks falls within its overall approach to protecting human rights and equal opportunity and upholding business ethics.

Given the nature of the industry in which we operate, and our risk assessment of modern slavery practices emerging in our operations and supply chain, Cognizant's focus has been ensuring that its standards and expectations are clearly communicated to existing and prospective suppliers.

### **Alignment with External Initiatives**

## **United Nations Global Compact**

In February 2021 Cognizant joined the United Nations Global Compact (UNCG), a worldwide network of companies and non-business participants that are committed to building a sustainable future. In October 2021, we deepened our commitment by joining the United Nations Global Compact India (UNGCI), a country-level leadership platform for strengthening sustainable business practices.

These principles focus on supporting the protection of human rights, promoting greater environmental responsibility, and working against corruption in all forms. In keeping with these principles, we adopted goals for our company and report regularly on our progress toward their achievement.

## **Policies and Practices**

Our Code of Ethics (Code) sets out our core values and emphasizes the standards of conduct that we expect from managers and associates to ensure that they promote our culture of integrity.

Our Code is publicly available and applies to all Cognizant directors, officers and employees worldwide as well as all Cognizant business units and subsidiaries, joint ventures over which Cognizant has operational control,

business partners and third-party representatives worldwide (collectively "Associates"). All our Associates are required to undertake our Code of Ethics mandatory training on an annual basis. Our Code requires that Associates must be committed to upholding the company's core values including Do the Right Thing, which requires, at a minimum, complying with the laws of all countries in which Cognizant operates. This is an integral part of our commitment to excellence and responsible business practice. The Code of Ethics highlights the company's focus on respecting people and the environment.

Specifically in relation to labour practices, we uphold human rights in all our global operations. All Cognizant Associates worldwide are entitled to fair wages and hours, consistent with local laws and are entitled to work in an environment free from discrimination. Our company does not make use of child labour (i.e., a person under the minimum age provisions of applicable laws and regulations) or forced labour (i.e., prison labour, indentured labour, bonded labour, military labour, slave labour), does not condone any form of human trafficking and will not work with third parties who engage in such practices.

Our commitment to uphold human rights across our global operations is supported by our Human Rights Policy which applies to our directors, officers and employees. We consider, integrate, and promote internationally recognized human rights principles, in addition to complying with all local laws and regulations.

Pursuant to our Whistleblower and Non-Retaliation policy, our Associates and Third Parties can report suspected violations of any of these policies/standards via numerous channels including Cognizant's Ethics and Compliance helpline. Reports are taken seriously and investigated by the company. If any deficiencies in compliance were to be uncovered, remediation plans would be devised to address the deficiencies. Failure to comply with any of these policies/standards may lead to consequences up to and including termination of the relationship.

Our Supplier Diversity Policy sets out Cognizant commitment to providing opportunities for all qualified businesses to participate as suppliers of products and services to our company. Our commitment to supplier diversification is not philanthropic, nor does it contradict the application of existing purchasing goals, policies and procedures. The award of opportunities to all Suppliers will be based on criteria established as part of the sourcing request or other criteria that may arise from time to time, including, but not limited to their relative competitiveness, the value of their offerings, and their demonstrated performance.

Our Supplier Standards of Conduct (Supplier Standards), which Cognizant updates on an annual basis, was updated in Q3 2024 to formalise Cognizant's expectations and requirements in terms of ethical business conduct. The Supplier Standards set out the principles by which all of Cognizant's third-party representatives, suppliers, vendors and subcontractors and their parent, subsidiary and affiliated entities are expected to abide by. The Supplier Standards list a number of specific requirements. Those addressing child labour and forced labour are:

- Prohibition on Child Labor. Cognizant strictly prohibits the use of child labor in any of the Supplier's operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 where the local law allows such exception consistent with International Labor Organization guidelines, or (b) the age for completing compulsory education, or (c) the minimum age established by law in the country of operations. In addition, Suppliers must comply with all legal requirements for authorized young workers (including students and interns), particularly those pertaining to hours of work, wages and working conditions.
- Prohibition on Forced Labor. All forms of forced or compulsory labor, such as prison labor, bonded labor or indentured labor, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited. Additionally, Cognizant expects Suppliers to follow responsible recruitment practices to prevent forced labor and other forms of modern slavery. Suppliers and their agents and subagents shall not hold, destroy, conceal, confiscate or deny workers access to their identity or immigration documents. Cognizant leverages publicly available globally recognized slavery risk indices to assign country and purchase commodity-level risk to suppliers, which determine appropriate due diligence to perform on our supply chain.
- Our Human Rights Policy outlines our commitment to respect the basic principles of human rights and sets the expectation that our suppliers, business partners, and clients adopt similar policies within their

own businesses. When considering our supply chain, Cognizant has zero-tolerance for human rights abuses in our supply chain. Our Supplier Standards of Conduct prohibits and addresses human rights abuse and is embedded into every vendor contract throughout our supply chain

### **Risk Analysis**

### Structure, operations and supply chain

The nature of the industry in which we operate means the risk of indentured or bonded labour being used within our sphere of influence is lower than in some other industries. However, we remain vigilant in applying procedures to avoid engaging or condoning suppliers who engage in modern slavery.

Following a risk assessment, we undertook across all aspects of our business and supply chain, we updated our process to include targeted modern slavery due diligence within our global supply chain. Cognizant's main focus has been to strive for standards and expectations to be clearly communicated to existing and prospective suppliers. High risk suppliers, which are suppliers providing labor intensive goods or services in countries with high incidence of modern slavery or child labor, are requested to provide details of their own practices and their supply chain in relation to modern slavery. These suppliers are required to provide evidence that they have implemented modern slavery prevention mechanisms.

## Supply Chain Due Diligence

Cognizant extends its commitment to address modern slavery to how it thinks about its supply chain. Our supply chain management policies include:

## Actions taken to address modern slavery risks

### Supplier set-up form

For goods or services considered to be both high risk and provided from countries with a high risk of slavery or trafficking in persons, suppliers are required to upload their policy and process to avoid modern slavery and respond to a modern slavery questionnaire as part of their onboarding. The questionnaire includes questions such as whether the suppliers have taken any steps to eliminate acts of modern slavery from their own organisations and supply chain. Suppliers who do not submit sufficient documentation of their policies and procedures to address modern slavery may be prevented from doing business with Cognizant. Information gathered via the supplier set-up form is entered into a central database for visibility. The questionnaire process was made standard practice globally from 2022.

### **Training and communication**

All new employees hired by Cognizant are required to undergo mandatory training in relation to our Code of Ethics within 30 days of joining. This mandatory requirement is then maintained annually for all tenured associates. In addition to this, we make specific reference to the Modern Slavery Act and the steps we take to address modern slavery risk in our corporate induction programme and include a module on modern slavery in our in-house people manager training courses. Since 2023 we have made modern slavery training available to all global procurement associates who interact with our suppliers.

### Assessment and monitoring

The Global Ethics & Compliance team is responsible for providing oversight with respect to modern slavery risks on behalf of Cognizant. Several committees support the Board of Directors with its oversight in this area, including the Audit Committee, which is responsible for review and evaluation of the company's compliance program, enterprise risk management, and management of third parties and contractual risks.

Cognizant measures its performance and assesses the effectiveness of the control measures outlined above via

regular meetings of the senior leadership team and staff pulse surveys. On an annual basis, after each engagement survey, we develop action plans designed to continue to build on our strengths and address improvement areas.

At the time of preparing this statement, Cognizant has not been charged or convicted of any criminal offences relating to modern slavery or slavery-like practices. We are not aware of any current or previous issues relating to slavery or human trafficking within Cognizant's operations and supply chain. As such, we have not had to initiate any remediation action to rectify the effects of any modern slavery practices in our operations or supply chains.

### **Consultation and Previous Statements**

In previous reporting periods, CWW has provided a modern slavery statement covering itself. The same policies and procedures regarding responsible business, ethics and compliance apply to the affiliates in our corporate group at a global and local level. We have communicated with all relevant entities that we own and control regarding this statement and our approach to modern slavery. All previous modern slavery statements are located on this webpage: Sustainability and Corporate Citizenship | Cognizant

## Reporting

CWW is dedicated to improving everyday life and believes in acting ethically throughout our business. This is why we have built a strong sustainability programme. CWW has proudly invested in diverse and dedicated leaders to drive our integrated sustainability management approach and deliver tangible results. The Cognizant Sustainability and Corporate Citizenship Report is published annually and includes information about new commitments, policies, and processes.

Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking, striving to activate new and existing measures to support our zero-tolerance stance on modern slavery. Our next steps may include:

The continued education and dialogue with our new and existing associates on the issues and implications of modern slavery.

The continued reassessment of our high-risk suppliers to review compliance with Modern Slavery Act. Leverage third party risk intelligence to incorporate horizon screening for early detection.

Signed by:

·Signé par :

Elisa Ve Rocca Serra

Director

Cognizant Worldwide Limited

Incorporated under the laws of England and Wales and registered at Companies House under number 07195160 280 Bishopsgate, London EC2M 4RB

26 June 2025