

## **Human Rights Policy**

#### Scope

This Policy applies to all directors, officers, and employees of all Cognizant entities, subsidiaries, and joint ventures over which Cognizant has operational control (collectively "Associates").

## **Guiding Principles**

Cognizant is committed to respecting human rights. The basic principles of human rights align with our company values and commitment to the highest standards of business practices and performance in all that we do. We respect, consider, integrate, and promote internationally recognized human rights in accordance with principles outlined in the United Nations Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, in addition to complying with all local laws and regulations. Cognizant also expects its suppliers, business partners, and clients to uphold these principles and urges them to adopt similar policies within their own businesses.

As a participant of the UN Global Compact, Cognizant aligns with their Ten Principles surrounding human rights, labor, environment, and anti-corruption become as part of our strategy, culture and day-to-day operations.

To maintain the Company's reputation and ensure that we are not, directly or indirectly, in any way complicit in human rights abuses – we rely on everyone to whom this policy applies to understand and comply with the following principles:

- End human trafficking. Never engage in trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. We are all responsible for proactively reporting human trafficking to the appropriate authorities. If you know or suspect that human trafficking is occurring/has occurred in any parts of our business or supply chains of any supplier, promptly inform your manager, local HR Manager, or the <a href="Ethics & Compliance Helpline.">Ethics & Compliance Helpline.</a>
- Maintain a safe and healthy workplace. Always follow all applicable safety and health laws and regulations, as well as internal requirements within our Cognizant facilities and our client sites. Immediately report any potential

#### **Translations**

Chinese (Simplified)

English

French (Canada)

French (France)

German

Japanese

Polish

Portuguese (Brazil)

Spanish (Latin America)

### **Key Definitions**

**Human rights**: refer to the basic standards of treatment to which all people are entitled.

Child labor: Work that deprives any person under 18 of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development. It refers to work that is mentally, or morally dangerous and harmful to children; and/or interferes with their schooling.

**Forced labor:** Work or service obtained from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

**Trafficking in persons**: The use of force, fraud, or coercion to compel persons to provide labor or services or commercial sex.

health or safety issues to your manager.

- Consider our supply chain. Cognizant has zero tolerance for human rights abuses in the supply chain. Our <u>Supplier Standards</u> of <u>Conduct</u> prohibits and addresses human rights abuses and is embedded into every vendor contract throughout our supply chain.
- Respect freedom of association. Cognizant respects the right of all its Associates to freely join a trade union of its own choosing, engage in peaceful assembly and bargain collectively in accordance with the law. Associates are expected to show the same respect to their colleagues. Associates and their representatives are free to openly communicate and share ideas and concerns with management without fear of discrimination, reprisal, intimidation or harassment.
- Ensure fair and merit-based employment decisions. Cognizant Associates are entitled to fair treatment in all aspects of their employment, including compensation and working conditions, consistent with local law. Be mindful that Cognizant does not tolerate discrimination against a person's legally protected characteristics, such as race, color, religion, gender identity, pregnancy, age, national origin, sexual orientation, marital status, disability status, veteran status, or freedom of association including political affiliations and union memberships, when making employment decisions.

# Related Policies and Processes

- Code of Ethics
- Cognizant's Ethics & Compliance Helpline
- Supplier Standards of Conduct
- Anti-corruption Policy
- Anti-corruption Compliance for Our Vendors
- Statements on Modern Slavery
- Whistleblower and Non-Retaliation Policy

- Treat others with dignity and respect. Always engage with colleagues and others in work-related situations with professionalism and courtesy. Never engage in discriminatory conduct or any form of harassment. Fostering a Work as One mindset helps create a vibrant culture where everyone feels respected, heard, and empowered. Cognizant's Code of Ethics principles reinforce that:
  - We earn trust.
  - We do the right thing.
  - We respect people and the environment.
  - We live up to our responsibilities.

## Responsible Al

At Cognizant, we are committed to shaping an Al-enabled future that upholds the highest ethical standards while driving transformative innovation. As Al continues to revolutionize industries and societies, we recognize the need for robust principles and actionable frameworks to guide responsible development, deployment, and governance. To turn our Responsible Al principles into real-world impact, we have developed the TRUST Framework—a practical model for embedding Responsible Al across how we design, deliver, and manage Al systems. You can learn more about this at Responsible Al.

Cognizant actively aligns with these key global Al frameworks:

- OECD AI Principles
- UNESCO Ethical Al Guidelines
- EU Al Act
- NIST Risk Management Framework
- ISO Al Standards

## **Delivering On Our Commitments**

We meet our commitments on human rights via stakeholder engagement, training, and supply chain engagement. We also expect our direct suppliers to respect internationally recognized human rights.

#### **Stakeholders**

Our intention to clients, associates, investors, suppliers and communities is that we strive to act with integrity. This guides everything we do—the way we serve our clients and the work we do to help them build better businesses. We believe it is critical that we maintain the highest ethical standards. We encourage those external to Cognizant to maintain similar standards.

#### Governance

Our Chief Ethics and Compliance (E&C) Officer spearheads the day-to-day operation of the E&C program and organization while maintaining a direct reporting line to our Chief Legal and Administrative Officer, with E&C program oversight responsibility vested in the Audit Committee of the Board of Directors.

## **Training and Communication**

Our mandatory annual training includes Cognizant's Code of Ethics course, designed to help associates understand and adhere to the company's values and ethical standards.

The Preventing Harassment and Discrimination course for associates encourages an environment that is free of any behavior that could be interpreted or perceived as harassment, discrimination or bullying.

### **Modern Slavery Statements**

We currently publish Australian, Norwegian and UK modern slavery statements.

#### **Risk Identification**

We conduct risk-based modern slavery due diligence during supplier onboarding and annually reassess high-risk suppliers.

## **Disciplinary Consequences**

Subject to local laws and regulations, a violation of this policy could result in disciplinary action, up to and including termination. If anyone is aware of a violation of this policy, they 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, anyone can visit Cognizant's Ethics & Compliance Helpline (a secure and confidential reporting system) at: <a href="http://www.cognizant.com/compliance-helpline">http://www.cognizant.com/compliance-helpline</a>

## **Version History**

Revision Date	Description of Change
Nov-02-2022	Initial release
Jun-22-2023	Revised
Jul-30-2025	Revised

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## **Policy Control Information**

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Policy Owner: Ethics & Compliance

Policy Availability:

Internal ⊠ External ⊠ **Department:** Ethics & Compliance **Effective Date:** NOV-02-2022

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