

### Key Definitions

#### Legally Protected

**Characteristics:** specific aspects, characteristics or any other status protected by applicable national or local law

**Work Environment:** location where someone works or is performing work duties or any location the company deems to be a Work Environment (i.e., client office, restaurants, and areas surrounding the office building); includes virtual work arrangements

### Related Policies and Processes

- [Code of Ethics](#)
- [Human Rights Policy](#)
- [Whistleblower and Non-Retaliation Policy](#)
- External Communication and Social Media Policy
- Ethics & Compliance Training Policy

### Objective

At Cognizant, we take great pride in creating an environment where everyone can thrive, feel safe and be included. That means that we must treat each other with dignity, fairness and respect. We must value everyone's unique contribution and promote an inclusive Work Environment. This creates diverse teams and a workplace where everyone can bring their whole selves to work and belong.

To achieve the above objective, this policy articulates our collective responsibility to [work as one](#) and create a Work Environment that is free of any behavior which could be interpreted or perceived as Harassment, Discrimination and Bullying.

### Scope

All Cognizant Associates are expected to comply with this Policy, which is designed to promote compliance with our [Code of Ethics](#) and local laws throughout our operations. This includes all directors, officers, and employees of Cognizant entities, subsidiaries and joint ventures over which Cognizant has operational control, in the course of employment, virtually or in-person (collectively "Associates"). Cognizant expects the same high standards of behavior from its suppliers, business partners, contract workforce and any other visitors. If there is a concern, we will refer the same to their respective employer.

### Guiding Principles

Cognizant will not tolerate any conduct that violates this policy or permit Discrimination, Harassment, retaliation, Bullying, and any actions that are unlawful or pertain to Legally Protected Characteristics in countries or regions where we operate.

In addition to complying with the standards set out in this policy, Associates are expected to behave consistent with Cognizant's [Code of Ethics](#), [Human Rights Policy](#), [Whistleblower and Non-Retaliation Policy](#), and External Communication & Social Media Policy, the company's regional and country policies on the topics of Harassment, Discrimination, and Bullying, and local laws and regulations, including situations where a specific circumstance is not explicitly defined within this policy. If local law imposes stricter requirements than those described in this policy, we must comply with the local requirements.

### Discrimination

We never discriminate 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 we make employment decisions including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment. The legal

definition of Discrimination varies based on local law. For purposes of this policy, Discrimination is defined as treating a person or group of people differently, or less favorably because of a Legally Protected Characteristic.

Actions or behavior that could be interpreted or perceived as discriminatory will not be tolerated, including, but is not limited to:

- discouraging someone from applying for a role because of their gender or gender identity, marital or parental status
- basing a promotion decision on an Associate's gender or race
- assigning work tasks based on individual's gender or religious caste

### **Harassment**

The legal definition of Harassment varies based on local law. For purposes of this policy, Harassment, including Sexual Harassment, is defined as unwanted conduct based on a Legally Protected Characteristic that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Actions or behavior that could be interpreted or perceived as harassing will not be tolerated, including, but is not limited to:

- threatening and intimidating behavior of any kind
- participating in hostile acts
- initiating or engaging in offensive communications
- using jokes, comments, slurs, epithets, stories, questions, stereotyping, and disparaging comments towards an individual, characteristic or group of people
- displaying or sharing offensive material

Sexual Harassment can be sexual in nature or based on a person's real or perceived gender, gender identity or sexual orientation. Local law may further define Sexual Harassment. Actions or behavior that could be interpreted or perceived as Sexual Harassment will not be tolerated, including, but is not limited to:

- initiating or engaging in offensive communications
- using jokes, comments, stories, questions and stereotyping
- engaging in unwanted touching of any kind or invasion of personal space
- flirting or pursuing someone persistently against their will
- whistling; leering; improper gestures; offensive, derogatory or degrading remarks
- making graphic comments about another person's body
- playing gender or sex-based pranks
- initiating quid pro quo, or "this for that", demands for sexual favors as a condition of employment or in exchange for favorable or preferential treatment

### **Workplace Bullying**

Bullying is repeated harmful or mean-spirited, targeted behavior, which is not necessarily based on a Legally Protected Characteristic that is objectively intimidating, threatening, or humiliating to the target. Local law may further define Bullying. Actions or behavior that could objectively be interpreted or perceived as Workplace Bullying include, but are not limited to:

- participating in public ridicule, written or verbal
- intentionally sabotaging the work of another
- shouting, yelling or other aggressive communication, both written and verbal
- publicly shaming

- using offensive nicknames
- pushing, shoving, kicking, poking, and tripping
- assaulting or threatening assault, including making intimidating gestures
- inflicting intentional and targeted damage to another person’s personal property or work area

Supervisors, managers or others should act on behalf of the company in a respectful, professional manner in accordance with company policies and procedures. As such, Harassment and Workplace Bullying does not include:

- providing feedback and direction, critiquing performance or work product and conducting performance reviews, and issuing counseling or disciplinary action when necessary
- being part of disagreements, conflicts, or misunderstandings that are managed in a respectful and professional manner
- engaging in mutually agreeable interactions that don’t impact the Work Environment or other Associates in a negative way

## 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 witness or are the victim of an act of violence, intimidation, the threat of violence, abuse, physical retaliation or other threatening behavior; or 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 Compliance Helpline (a secure and confidential reporting system) at: [www.cognizant.com/compliance-helpline](http://www.cognizant.com/compliance-helpline).

Under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH), India based Associates may report Sexual Harassment through their location based POSH Committee. For more details please refer to the Prevention of Sexual Harassment Policy.

## Version History

Revision Date	Description of Change
AUG-25-2021	Initial Release

## Policy Control Information

Policy Name: Global Harassment, Discrimination & Workplace Bullying Prevention Policy

Department: Human Resources

Policy Owner: Becky Schmitt, Chief People Officer

Revision Date:

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