PROMOTING A CULTURE OF PERFORMANCE WITH INTEGRITY
Team,

It is my sincere pleasure to introduce the newly revised CSC Code of Business Conduct.

As members of the global CSC community, all of our decisions and actions have the power to impact not just our clients, our shareholders, or our fellow employees near and far, but our company reputation. A reputation we want to stand out in the market for competing, winning, and delivering with integrity.

This revised Code of Business Conduct contains practical information and clearly stated guidance to help us all live by the values and to achieve our successes ethically. Please read it, refer to it often, and uphold its spirit in all that you do.

We are also introducing a new set of CSC values. Our new CLEAR values will replace all other management principles and value statements and align us as “One CSC.” Our new Code will serve as a resource for how to apply these values in our everyday business.

As we press forward together to deliver value and innovation to our client, I’m eager for all of us to join together and collectively commit to strengthening CSC’s culture of integrity and performance.

Thank you for your unwavering commitment to these ideals and for your many contributions to CSC’s continued success.

Sincerely,

Mike Lawrie
CSC President and Chief Executive Officer
CSC’s values are the core of who we are, bringing us together as one in service to our clients, our shareholders and each other. Our values unite the global CSC community, transcending our cultural differences and our geographic separation.

Our values are simply stated and should be easy to remember. Each of us is expected to know the values and use them to guide our everyday business decisions and actions. Taken together, these values remind us that an ethical, honest, inclusive and transparent workplace is critical to our long-term success and that, for this reason, our commitment to these values — by the entire global CSC community — must never be taken for granted.
OUR VALUES ARE CLEAR

CLIENT FOCUSED

Our success derives from a deep understanding of our clients, to whom all of CSC is committed to deliver exceptional service and value.

LEADERSHIP

We lead from the front, displaying our integrity and using facts to support our straight talk. We create an environment for positive change built on collaboration and trust.

EXECUTION EXCELLENCE

We insist on excellence in all we do for clients and ourselves, striving always for recognition among the leaders in our industry.

ASPIRATION

We aspire individually and collectively to be more tomorrow than we are today.

RESULTS

We accept individual responsibility for our commitments and expect to be accountable for results.
# TABLE OF CONTENTS

**WHY DO WE HAVE A CODE OF BUSINESS CONDUCT?**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adherence to the Code</td>
<td>1</td>
</tr>
<tr>
<td>Your Leadership Role</td>
<td>2</td>
</tr>
<tr>
<td>Manager Responsibilities</td>
<td>2</td>
</tr>
<tr>
<td>Special Duties for the CEO and Our Senior Financial Officers</td>
<td>3</td>
</tr>
</tbody>
</table>

**WHAT ARE MY RESPONSIBILITIES?**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Dialogue</td>
<td>4</td>
</tr>
<tr>
<td>When Should I Speak Up?</td>
<td>4</td>
</tr>
<tr>
<td>Reporting Follow-Through</td>
<td>5</td>
</tr>
<tr>
<td>Retaliation is Prohibited</td>
<td>5</td>
</tr>
<tr>
<td>CSC’s Ethics and Compliance Office</td>
<td>6</td>
</tr>
</tbody>
</table>

**HOW DO I REPORT A CONCERN OR ASK A QUESTION?**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respect</td>
<td>7</td>
</tr>
<tr>
<td>Fairness</td>
<td>9</td>
</tr>
<tr>
<td>Safety</td>
<td>9</td>
</tr>
</tbody>
</table>

**WE ARE COMMITTED TO EACH OTHER IN THE WORKPLACE**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technology Use</td>
<td>10</td>
</tr>
<tr>
<td>Caring for Company Assets</td>
<td>12</td>
</tr>
<tr>
<td>Company Records</td>
<td>14</td>
</tr>
<tr>
<td>Confidential Information</td>
<td>16</td>
</tr>
</tbody>
</table>

**WE ARE COMMITTED TO OUR COMPANY**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conflicts of Interest</td>
<td>18</td>
</tr>
<tr>
<td>Preventing Corruption</td>
<td>21</td>
</tr>
<tr>
<td>Securities and Insider Trading</td>
<td>25</td>
</tr>
<tr>
<td>Trade Restrictions</td>
<td>26</td>
</tr>
<tr>
<td>Supporting Transparency</td>
<td>27</td>
</tr>
</tbody>
</table>

**WE ARE COMMITTED TO OUR SHAREHOLDERS**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fair Practices</td>
<td>28</td>
</tr>
<tr>
<td>Service Quality</td>
<td>29</td>
</tr>
<tr>
<td>Government Clients</td>
<td>30</td>
</tr>
<tr>
<td>Respecting Rights</td>
<td>30</td>
</tr>
<tr>
<td>Environmental Responsibility</td>
<td>31</td>
</tr>
<tr>
<td>Charitable Activities</td>
<td>31</td>
</tr>
<tr>
<td>Political Activities</td>
<td>31</td>
</tr>
<tr>
<td>Lobbying</td>
<td>31</td>
</tr>
</tbody>
</table>

**WE ARE COMMITTED TO OUR CLIENTS AND COMMUNITIES**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Restrictions for Amending or Waiving Our Code</td>
<td>32</td>
</tr>
<tr>
<td>Conclusion</td>
<td>32</td>
</tr>
<tr>
<td>Resources</td>
<td>33</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contacts for Reporting a Concern or Asking a Question</td>
<td>33</td>
</tr>
<tr>
<td>Business Code Policies</td>
<td>33</td>
</tr>
</tbody>
</table>

**ALPHABETICAL INDEX**

<table>
<thead>
<tr>
<th>Why?</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alphabetic Index</td>
<td>34</td>
</tr>
</tbody>
</table>
WHY DO WE HAVE A CODE OF BUSINESS CONDUCT?

CSC’s Code of Business Conduct (Code) is an enduring reminder to all of us of our corporate values and the standards by which we conduct our operations and business affairs. These standards address our deepest beliefs and make reference to many of our most important business conduct policies. Our Code, however, cannot possibly address every situation we face at work; therefore, the Code is by no means a substitute for your good judgment, upon which CSC depends. We all must remember that each of us is responsible for our individual actions and that the ethical choice is always the best choice.

Our Code sets expectations and offers direction on ethics and compliance. The Code is a good guide when our business choices are not clear. The Code gives us realistic examples of situations that may occur in our work environment, resources to consult for help and recommendations on appropriate actions for us to take. It is our primary reference when confronted by ethical dilemmas or unfamiliar or complex situations.

When we each understand our individual responsibilities and follow the principles of our Code, we build as a global community a culture of high integrity for CSC. And when there is a culture of high integrity, the business is strong. Please take time to become familiar with our Code and refer to it frequently when you have questions.
WHAT ARE MY RESPONSIBILITIES?

ADHERENCE TO THE CODE

Our Code applies equally to all CSC directors, officers and employees around the world. The Code also applies to our subsidiaries, business partners, suppliers, agents or others acting on the Company’s behalf.

As employees, it is important that we know the Code, refer to it when we have questions and concerns, and follow its direction. This commitment will guide ethical decision making that enhances your personal success and that of the Company.

YOUR LEADERSHIP ROLE

When it comes to ethics, we are all expected to lead. We are to lead by example and to be accountable for our actions. Ethics touches everything we do, the decisions we make and the courses we chart. When we see something that gives us pause, we ask questions. When a coworker seeks our advice about a potentially difficult ethical issue, we try to help. When the path forward is uncertain, we step up to the challenge and act responsibly in service to a culture of high integrity.

MANAGER RESPONSIBILITIES

Managers play a special role in ethical leadership and are the most effective resource for detecting and helping to resolve ethics- and compliance-related issues. A manager is often the first person to be contacted about a concern in our work environment. Employees rely on their managers for guidance and support when navigating all difficult or confusing situations, including ethical ones. Managers have the following unique responsibilities to help ensure our Company’s ethical success:

- Act — always — as a model of ethical behavior
- Encourage your employees to speak up by voicing concerns and reporting issues
- Communicate a positive message about your commitment to ethics and compliance
- Promote our values, the Code of Business Conduct and compliance with policies and the law
- Actively support ethics and compliance awareness and training programs
- Commit to open communication
- Listen and respond fairly to employee concerns
- Find satisfactory and complete resolutions to ethical issues
- Escalate concerns when additional assistance is needed
SPECIAL DUTIES FOR THE CEO AND OUR SENIOR FINANCIAL OFFICERS

The CEO and our senior financial officers have a special and unique responsibility to ensure that material information on CSC’s financial condition is thoroughly and accurately reported and disclosed expeditiously. These personnel are responsible for carefully reading, reviewing and revising most reports filed with the U.S. Securities and Exchange Commission (SEC) and other regulators.

More specifically, the CEO and our senior financial officers — including the CFO, our Controllers, and the Chief Accounting Officer — must:

- Take all the steps reasonably necessary to promote full, fair, accurate, timely, and understandable disclosure in all public regulatory filings.
- Not ever overlook any known or suspected unethical behavior or dishonest or illegal act of any management or other employee who has a significant role in the Company’s financial reporting, disclosure, or internal control functions.
- Not ever knowingly misrepresent facts in response to any inquiry of the Company’s internal or external auditors.
- Disclose promptly any actual or apparent conflict of interest between their personal and professional relationships.
- Ensure our Company’s books and records are maintained in accordance with applicable accounting policies, laws, rules, and regulations.
- Comply completely and thoroughly with, and report any known material violation of, the securities or other laws, rules, or regulations applicable to the Company.
- Ensure there are adequate procedures — including for anonymous reporting, as allowable by law — for employees to raise questions or to report suspected accounting, internal accounting control or audit violations, or any other issue or violation that should be reported to the SEC.
HOW DO I REPORT A CONCERN OR ASK A QUESTION?

OPEN DIALOGUE

Integrity starts with a commitment to ask questions, raise concerns and engage in an open dialogue. Because we work as a team, we depend on each other to **speak up** when there is an issue that affects our Company or one another.

CSC’s Open Door Policy promotes an environment of open communication between employees and all levels of management; this means that you are encouraged to speak with your immediate manager about questions or concerns you have about anything that affects you or that is occurring in your workplace. Other than your manager, you have several other available channels for communication at CSC to which you may express ethical concerns, including:

- Your department or function head
- Your local Human Resources manager, or an HR representative at a higher level
- CSC’s Ethics and Compliance Office, reached by email at ethics@csc.com
- CSC OpenLine, the Company’s confidential resource for seeking ethics advice and reporting misconduct, at www.cscopenline.ethicspoint.com

We must feel free to ask questions and report concerns, no matter the topic. There may be times when reporting or discussing a matter is uncomfortable; remember, however, that it is your obligation to raise the issue and to **speak up** about a known or suspected violation. By asking questions and voicing concerns, even when we may feel awkward doing so, we all do our part to protect the reputation of our Company and to sustain a culture of high integrity.

WHEN SHOULD I SPEAK UP?

Employees should **speak up** in any of the following situations:

- When the direction I’m given by my supervisor or my manager seems inconsistent with CSC’s Code of Business Conduct
- When I’m confused or worried by something I’ve seen or heard
- When I know or suspect that a policy has been violated
- When I need advice for clarity
- When I don’t understand a policy, a law or a regulatory compliance obligation
- When I know or suspect an instance of fraud, corruption or abuse
- When I’m faced with an ethical dilemma and I’m reluctant to proceed
- When I’m unsure of the consequences of an action I’m considering
- When I feel concerns I’ve previously raised have been mishandled or set aside
- When I know or suspect a violation of the Code of Business Conduct
REPORTING FOLLOW-THROUGH

Once we report questions and concerns, it is our Company policy that each issue will be handled or investigated promptly, consistently and appropriately. Confidentiality will be maintained to the extent the law permits. When an investigation is completed, CSC will take the necessary corrective actions — including disciplinary measures, as appropriate — in accordance with local law and our Human Resources procedures. Personnel who initiate a report may be updated on the actions taken, to the extent allowed by law and our internal policies.

RETAILIATION IS PROHIBITED

CSC employees will never be disciplined for speaking up in good faith and reporting a concern completely and honestly. CSC has zero tolerance for threats to or actual retaliation against employees who report a concern even if the report turns out to be mistaken or the concern is not actionable. CSC does not tolerate retaliation in any form — whether direct or indirect — and will never discourage, dissuade, or harass an employee, or threaten action against an employee, who wishes to report or has reported a concern. If you have faced retaliation for reporting a concern, contact a resource listed in this Code immediately.
ANSWER
Yes, Amanda should report this situation to her department head, Human Resources, the Ethics and Compliance Office, or CSC OpenLine. This conversation between Amanda and her manager demonstrates both a breach in confidentiality and a threat of retaliation, which is strictly prohibited. We are all protected from retaliation when reporting a concern in good faith. Amanda’s decision to report this incident will help the Company review a potentially serious concern. Amanda did not do anything wrong by choosing to report the allegation to another resource listed in the Code instead of her manager. Amanda acted with integrity.
WE ARE COMMITTED TO EACH OTHER IN THE WORKPLACE

RESPECT

One important way to demonstrate our values is by showing respect to each other in the workplace. We know that we cannot accomplish as individuals what we can as a global team, and so unity is an important driver of our success.

STRENGTH IN DIVERSITY

Our Company’s diversity is a valuable asset, and we are committed to creating a work environment that reflects this diversity and harnesses its strength. Our different perspectives and backgrounds are important, and they serve to strengthen, through our successful collaboration, our ideas, solutions and results. Our excellent client service is enriched by the Company’s diverse culture and an inclusive work environment where everyone is welcomed and treated fairly.

Respect also means that our Company supports equal opportunity and that we base employment decisions on an individual’s personal qualifications. We never discriminate against anyone on the basis of race, color, religious creed, national origin, citizenship, marital status, sex, sexual orientation/gender identity, being over age 40, genetic information, disability or protected-veteran status. At CSC, we are committed to working with and providing reasonable accommodations for applicants and employees with physical and mental disabilities.

If you have any questions about diversity or equal employment opportunities at CSC, or about your responsibilities regarding these topics, talk with Human Resources and refer to our Equal Employment Opportunity policy.
A WORKPLACE FREE OF HARASSMENT

Cultivating an environment of respect means that there is no place for harassment in our Company. At CSC, we do not allow harassing behaviors, and we expect our business partners, subcontractors, suppliers and guests to our worksites to demonstrate the same intolerance of harassment.

Sexual harassment is one form of unacceptable harassing behavior. Sexual harassment includes conduct such as unwelcome sexual advances, requests for sexual favors, inappropriate sexual jokes or personal remarks, sexually suggestive comments, inappropriate touching, engaging in written communications of a sexual nature and inappropriate comments about another’s appearance. These sorts of behaviors can create a hostile or offensive working environment and will not be tolerated.

Harassment also can be nonsexual in nature and include frequent foul or coarse language or offensive comments, jokes or pictures related to a person’s race, color, religious creed, national origin, citizenship, marital status, gender, sexual orientation/gender identity, being over age 40, disability or protected-veteran status.

At CSC, we are expected to report any harassing behavior we either observe or personally experience to Human Resources. If you have a question or concern about harassing behavior, you also may consult our Harassment policy.

QUESTION

As a team leader, Eva is responsible for assigning responsibilities to members of the project team. After the meeting, she pulls aside a team member, Brandon, to tell him that she has decided not to assign him creative tasks because she assumes he “would not be able to produce new and fresh ideas like his younger colleagues.” Brandon does not appreciate the comments and reminds Eva of his excellent performance on the project so far. Eva responds that she thought she was doing Brandon a favor. What should Brandon do next?

ANSWER

Brandon should immediately report the conversation to his manager to help review and resolve this problem. Although they were probably not meant that way, Eva’s comments are nonetheless derogatory and discriminatory in nature and have no place in our work environment. We must work with trust and unity to foster an inclusive work environment where our diversity is highly valued as the strength it is. By reporting this situation, Brandon helps our Company to adhere to these principles while sustaining a cohesive project team.
SAFETY

SUBSTANCE ABUSE

We cannot succeed if we allow the abuse of alcohol or illegal drugs to cloud our minds and impair our judgment. Substance abuse limits our effectiveness, drains our energy and productivity and reduces trust. CSC has a zero tolerance policy with regard to substance abuse, and employees are not permitted to use, possess or be under the influence of alcohol or illegal drugs when on company time and property. If you have questions about our Company’s position on these issues, contact Human Resources or consult the Drug and Alcohol Abuse policy.

WORKING CONDITIONS

The health and safety of CSC employees and our visitors at all of our worksites cannot be compromised. This means we must carefully follow all applicable health and safety rules and regulations, as well as our Company’s internal policies and procedures regarding health and safety requirements. We are expected to observe all posted safety procedures and to report any unsafe situation to our manager, Human Resources or a facility manager. If there is an accident in the workplace, you must report it immediately. If you have questions about our policies regarding workplace safety, please refer to the Environmental, Health and Safety Programs policy and the Health and Safety Program Manual.

WORKPLACE VIOLENCE

We cannot work together successfully in an environment where threats, intimidation or acts of violence are accepted. Our Company does not allow threatening behavior — whether physical, verbal, written or electronic — in the workplace. Immediately call the local authorities if you see that someone is in imminent danger. If you have been threatened or if you are aware of a situation where threats or workplace violence have occurred, you must immediately report this to your manager, Human Resources or Corporate Security so that appropriate corrective actions can be taken.

FAIRNESS

WAGES

Our Company is committed to ensuring that each of us is treated fairly and, with respect to pay, compensated equitably. CSC complies with all applicable employment laws including those governing wages and work hours. Our Human Resources Department can answer questions about wages and employment issues, including work hours. CSC does not retaliate against anyone who asks such questions or who attempts to invoke his or her rights under applicable employment laws and regulations. You should feel free to come forward if you need answers or clarification.
WE ARE COMMITTED TO OUR COMPANY

TECHNOLOGY USE

PROTECTING OUR COMPANY’S REPUTATION

Today’s communication technology allows us to collaborate in new and extraordinary ways, yet it also makes it much easier for us to unintentionally create a misleading picture of our Company or to otherwise damage its reputation. Whether we are communicating internally or externally, we must always do so respectfully, professionally and accurately. We must understand and remember that as CSC employees, we represent not just ourselves but our Company and its values.

Unless your designated job responsibilities include external communications, you should not respond to outside inquiries as a representative of the Company. This is particularly important to keep in mind with respect to inquiries from either the press or members of the financial analyst community, which should be politely directed to CSC’s Media Relations, Investor Relations and/or Corporate Communications departments.

SECURITY GUIDELINES

To ensure the integrity of our networks and communication resources, we never unlawfully or inappropriately use our communication resources. To further protect these resources, employees recognize and understand that, as appropriate and when allowed by law, the Company may monitor information stored or transferred on electronic communication media or on any computing equipment that accesses CSC’s systems and networks. For more information regarding our guidelines, please refer to the Use of Electronic Communication Media policy.

When using CSC’s electronic assets, we must always adhere to the following guidelines:

• Use our Company’s equipment and data responsibly
• Comply with our policies and applicable laws
• Avoid wasting time or other Company resources
• Avoid questionable websites and suspicious files
• Report all concerns or abuses
PROPER INTERNET AND EMAIL USE

We use our Company Internet access and email responsibly. While some personal use is allowable, we should do our best to keep this activity to a minimum so that it neither adds cost to CSC nor affects our productivity or network resources.

Unacceptable uses of CSC resources include transmitting or storing data that violates the law, using resources for inappropriate or harassing communications, accessing questionable Internet sites or other resources, using resources carelessly or exposing confidential or proprietary information or downloading or using unauthorized software or applications.

SOCIAL MEDIA GUIDELINES

CSC encourages users to responsibly leverage public social media for business-related purposes, with the understanding that users will exercise good judgment and abide by CSC and/or client policies, as applicable. Use of social media must be approached with the same care and restraint that we would demonstrate with any of our public-facing communications. Although the platform is different and more casual, the rules for confidentiality, respectful communication and accountability still apply.

The following are simple guidelines to consider when using social media:

• Treat social media communications with the same rigor and professionalism as any corporate communication
• Respect our audience and only provide worthwhile and accurate information
• Never reveal confidential, proprietary or nonpublic information about CSC, our clients or other partners; do not engage in any securities-related risks such as insider trading, market manipulation or the spreading of false rumors
• Do not attempt to speak for CSC on any issue unless approved to do so
• Do not engage in speculation, rumor or divisive and confrontational communications
• Always identify yourself

If you are unsure about our responsibilities for using social media, please review the Social Media policy, or contact your manager with questions.
CARING FOR COMPANY ASSETS

PROTECTING PHYSICAL PROPERTY

All CSC facilities and associated assets, including vehicles, furniture, equipment, telephones, computers, mobile devices, copiers and printers, are to be used responsibly and thoughtfully. We must protect these assets from damage and misuse and use them only for legitimate Company business purposes. Company assets should never be used for prohibited conduct or to do work for an outside party.

GUARDING CONFIDENTIAL INFORMATION

We safeguard CSC’s and our clients’ confidential and proprietary information to prevent it from misuse. We take great care when working with, storing, copying or transporting information that could be of use to our competitors or which could bring harm to our Company if disclosed, such as client and pricing information, bid proposals, sales projections, forecasts, lists of legal actions, project activities or corporate strategies. Similarly, we should not solicit, use or receive another company’s proprietary material unless authorized by that company.

We never share confidential information with third parties unless such distribution has been properly authorized. Unless our coworkers have a business need to know and have authorization to access it, we also do not disclose confidential information to fellow employees. Even if our employment with our Company ends, we are obligated to not disclose confidential or proprietary information afterwards.

If you discover or suspect that CSC’s or a client’s confidential information is being used or disclosed without the proper authorization, immediately notify the ECO of the situation. We are responsible for recovering all confidential information when possible and for preventing further unauthorized use or disclosure. For more information, please consult our Data Protection policy.
QUESTION
As the lead for a proposal team, Emile is curious to find out the pricing of his competitor. A friend who owes Emile a favor works for the competitor, and Emile is considering contacting the friend to inquire about its pricing strategy. Is it acceptable for Emile to try to seek pricing information in this manner?

ANSWER
No. Emile’s idea is improper and in direct conflict with the guidelines of this Code. We must never seek or access the non-public confidential information of another company without both a legitimate need and the proper authorization. While such circumstances exist they arise infrequently, such as when companies team together and agree to share otherwise non-public confidential information in support of a joint bid pursuit. However, without both a legitimate need and the proper authorization, it would be inappropriate for Emile to use the relationship with his friend to discover the competitor’s pricing information.

INTELLECTUAL PROPERTY

Our Company’s intellectual property (IP) comprises vital business assets, which should be protected like any other vital asset is. CSC’s IP includes but is not limited to copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands and know-how. The use, treatment and safeguarding of our valuable IP must be meticulous and focused on protecting these assets.

To the extent permitted by law, the rights to all IP created using the Company’s time and expense or that are within the scope of our duties are assigned to and are the property of CSC. Any works, inventions or developments we create during the course of our employment should be promptly disclosed to the Company to obtain legal protection over them. Please contact the ECO if you have questions regarding IP.
COMPANY RECORDS

Keeping accurate records gives our Company reliable data to use in making sound decisions and planning for the future. Accurate records also help us to promptly report on our financial condition, which allows us to maintain our reputation with our stakeholders. We carefully and completely follow our internal controls, as detailed in our Summary of Internal Controls policies.

We take seriously our responsibility to accurately record financial transactions including bank transactions, purchasing and contracting agreements, payments to employees, transactions with our clients, and others. This means we report all “side letter” agreements between our account teams and customers to legal and finance personnel for appropriate consideration of any contractual obligations or financial impact these agreements may impose. Likewise, we recognize that expense accrual transactions must always be recorded in the current period, without regard for the future timing of vendor invoices and related cash payments. We understand our shared obligations to immediately report all inaccuracies, errors or other inconsistencies in our Company’s records or financial reporting to our managers or any other resource identified in this Code.

CSC periodically reports material from our financial records to external sources including government regulators like the SEC. Any role that you play in compiling, reviewing or certifying information that is reported externally should be executed with the utmost care and accuracy. Although those of us involved in external reporting may work under considerable time constraints, we always take care to raise any concerns about the content of these reports to ensure their authenticity and completeness.

ACCURATE TIMEKEEPING AND EXPENSE REPORTS

We are each accountable for the accuracy and completeness of our timekeeping records and expense reports that we submit for reimbursement. Our individual timekeeping practices must follow the parameters outlined in the Employee Timekeeping policy. The accuracy of timekeeping records is necessary for our Company to properly calculate employee pay and to charge time-based fees to our clients. We must be familiar with the timekeeping requirements of our respective positions, complete our timekeeping records regularly, and ensure that we receive all necessary approvals. If you have questions about timekeeping requirements or related policies, please contact your manager.

Similarly, we must follow our internal procedures when preparing and submitting expense reports. These records should be completed accurately and expeditiously and include all required back-up documentation. If you have questions about the procedure for completing expense reports, please get clarification from your manager.

CLIENT BILLING

CSC’s reputation and our ability to be successful rely on the trust our clients have in our work. The assurance of accuracy and completeness in client billing is essential to maintaining our relationships and trust with our clients. Inaccurate billing records can cause unnecessary problems with our clients, which can also lead to legal complications for our Company. If you have questions or need to report a concern about a client-billing issue, please contact your manager or any other resource in this Code.
QUESTION

Sandra is serving a client who has expressed significant concern over the cost of the project. When Sandra accurately totals her monthly hours spent on the project, the total is higher than expected, and she believes that the total may cause the client to raise concerns to her management. Sandra knows that another one of her client projects has billed less time than originally estimated. She considers recording some of her hours under that second project to reduce the hours billed to the first project. While Sandra’s concern does center around the client relationship, is there anything else she should consider?

ANSWER

Yes, Sandra must consider CSC’s policy on timekeeping with respect to accuracy and accountability. Our values, Code, policies and the law require us to accurately compile company records, including timekeeping and client billings. Sandra must report her hours exactly as they were spent. Ultimately, our clients and other stakeholders depend on us to be honest in all our dealings. Additionally, false billings create potential criminal liabilities for the Company and individual employees.

MANAGEMENT, RETENTION, AND DESTRUCTION OF RECORDS

We manage our records to comply with legal and regulatory requirements, to support our business goals and to ensure high-quality and accountable planning and decision making. The Global Information Management Department (GIM) is responsible for guiding us on existing recordkeeping processes, rules and programs to determine which records we keep, how long we keep them, and how and when they are to be destroyed. Since all CSC employees have records covered by our global recordkeeping policies, we must all know our responsibilities to ensure we do not tamper with or destroy records prior to their expiration date.

Additionally, we must be aware of and observe all legal preservation holds. A “legal hold” is a request to preserve all records related to a specific topic. If you are notified by the Legal Department that you are under a preservation order, you must follow the instructions to maintain or turn over any applicable records.

Review the Records and Information Management policy, and identify your unit’s GIM coordinator to become more familiar with these requirements.
QUESTION

Luisa's office was full of files that she received from the employee who previously held her position. Luisa determined that she was comfortable in her new role and didn’t need to retain her predecessor’s files for reference. She decided to dispose of the files by putting them into the recycling bin in the copier room. Do Luisa’s actions cause any risk to the company?

ANSWER

Yes, Luisa’s actions will cause risk if not corrected. She should not have made decisions about company records without consulting her manager and GIM coordinator to understand the retention period for the files, whether the records were under a protective order, and how to properly dispose of the records if they in fact had been cleared for destruction. Luisa’s actions are in direct conflict with company policy and the Code’s guidance for understanding individual responsibility for records management.

EMPLOYEE INFORMATION

Each of us provides certain personal information to the Company as part of our employment, so we must treat the protection and privacy of employee information as a high priority. Those of us who are responsible for collecting, storing and using employees’ private information will carefully handle it in accordance with the Company’s policies and applicable privacy laws wherever we are doing business.

Employee information must not be shared with others, whether internally or externally, unless there is a business need to provide this information. The handling and disclosure of such information must follow our policies and procedures. If you have questions about employee data or about the laws that apply to its use and storage, please contact your manager.
CLIENTS AND THIRD PARTIES

We are careful custodians of our clients’ and other third parties’ confidential and proprietary information. When we are given access to this information we will never purposefully reveal its content. We also guard third-party IP data just as we would protect our own, and we do not seek to use or modify it in any way that would violate our license with that third party. This includes the use and duplication of copyrighted materials, such as software, which our Company has licensed. We must also protect confidential information that we have learned about competitors. If you have questions about confidential or IP information, or if you suspect such information has been purposefully or accidentally released, please contact the ECO.

MEDIA AND FINANCIAL ANALYSTS

We must protect confidential or proprietary information from purposefully or accidentally being revealed to the press or other third parties. Part of protecting our Company’s vital information is centered on having a consistent voice when we speak to the media. For that reason we rely on our Company’s communications professionals to handle exchanges with the media or financial analysts. If you are contacted by someone from the media, or by an analyst, investor or any other outside party seeking official CSC comment, you must redirect that person to Investor Relations and/or Corporate Communications.

QUESTION

Zoe works as a financial analyst in the corporate headquarters, but her role does not involve communicating with external analysts or the press. She receives an email from a reporter asking about recent headlines involving the Company. Zoe feels confident that she is able to answer the reporter’s questions and clarify the issue, thus helping to improve the public record about the Company. Is it a good idea for Zoe to independently respond to this inquiry?

ANSWER

Although Zoe’s intentions are good, she is not an authorized Company spokesperson. This means that she must not answer the reporter’s questions. Instead, she should immediately forward the email and any other related information to CSC’s Media Relations, Investor Relations or Corporate Communications department.
WE ARE COMMITTED TO OUR SHAREHOLDERS

CONFLICTS OF INTEREST

The appearance of favoritism or bias in any of our business activities can cause significant harm to CSC’s reputation. We must each act with integrity and transparency in all personal dealings that would or could appear to conflict with the business interests of CSC. We are open about conflicts as soon as they arise and report them to our manager or Human Resources immediately. Additional information can be found in our Conflicts of Interest or Personal Conflict of Interest policies.

FAVORS, GIFTS AND ENTERTAINMENT

The exchange of favors or gifts, and the offer of entertainment or other hospitality are business gestures that are very situational and must be evaluated carefully. Generally speaking, CSC employees are not to accept favors, gifts, entertainment or other hospitality gestures from the people with whom we are in business. Occasionally, however, a limited exchange is appropriate, provided:

• The exchange is neither illegal nor a violation of either party’s internal policy
• The exchange is a modest show of courtesy appropriate to the relationship shared
• The exchange is infrequent and unsolicited
• The exchange is not one of cash or cash equivalents, including loans
• CSC is not participating in a public tender or commercial bid process at the time of the exchange
• Personal funds of CSC employees are not used to pay for the exchange

Although local custom or generally accepted practices may allow for such gifts, we must always be mindful of the appearance of these activities. We can never accept a gift or entertainment that would or could be viewed as influencing our decision making for the Company. We must never accept or participate in entertainment that would embarrass CSC. Employees with direct procurement responsibilities, whether in the Supply Chain Department or not, may never accept gifts or entertainment from suppliers or vendors.
AVOIDING IMPROPER OPPORTUNITIES

We cannot make equitable and sound business decisions if we are in competition with our Company. Information that we learn as part of our job cannot be traded on for our own personal benefit. For this reason, we do not personally profit from opportunities developed on behalf of our Company or seek business or investment opportunities that we are aware of only because of our employment with CSC. Additionally, we do not provide this information to others for their benefit, nor do we take advantage of information we learned while working for CSC, even if we leave the Company.

SPEAKING ENGAGEMENTS, EXTERNAL BOARDS AND ASSOCIATIONS

We may be asked, from time to time, to participate as speakers, lecturers or moderators at public events. Our Company encourages us to seek opportunities that enhance our personal reputation as long as those opportunities do not work against CSC’s reputation or interests. We must never participate in a forum, while using our CSC credentials, in which the topics discussed are overtly controversial or at odds with the goals of our Company. We choose with care the opportunities we take, seek advice of our manager when in doubt, and always remember that as Company representatives we must promote a favorable view of CSC.

We also may be asked to serve on the board of directors for an external organization, charity or association, or to be asked or elected to an executive position in an organization or association. CSC encourages these affiliations, for their benefits to employees and our Company, as well as to our community. However, these activities must be undertaken with care and consideration for both CSC’s reputation and the impact these extra activities may have on our job performance for the Company. An outside directorship or executive position with any organization or association should be preapproved by management in consultation with the Legal Department. Under no circumstances should we take a position on the board of a competitor or a company that does business with CSC.
OUTSIDE EMPLOYMENT

Just as we must be careful in our acceptance of a leadership position with an outside organization, we must be equally mindful of conflicts that could develop when we take outside employment in addition to our CSC work responsibilities. Under no circumstances may we accept outside employment in competition with CSC or where such work would impede the performance of our regular duties for the Company. We owe our Company and each other our best efforts and must not allow outside opportunities or interests to influence our decision making or impair our service delivery for the Company. If you are considering an offer of outside employment you must first discuss this with your manager or Human Resources.

WORKING WITH FAMILY AND FRIENDS

While our Company allows the employment of relatives, to avoid conflicts of interest, including the appearance of favoritism, we may not work directly for, supervise or make employment decisions about a family member.

If we seek to hire a company to provide goods or services to CSC and that company employs a family member or friend (or is a company in which a family member or friend has an ownership interest), we must disclose the circumstances to management or Human Resources prior to conducting business.

QUESTION

Malee is a CSC manager in a department that is hiring for multiple positions and knows her brother is looking for a new job. Her brother’s expertise would be valuable to the Company, but she also knows that our policies require that we avoid actual and potential conflicts of interest. Is there anything Malee can ethically do to help her brother be considered for employment?

ANSWER

Yes, Malee can provide her brother with the appropriate, publicly available contact information for a Human Resources recruiter. Any further involvement in her brother’s application or hiring process would be inappropriate. Further, if her brother is hired by CSC, Malee should disclose the relationship to her manager or Human Resources to ensure there are no conflicts.
INVESTMENTS AND INTERESTS IN OTHER BUSINESSES

As employees, we cannot have significant personal interests or investments in a competitor or in a current or prospective CSC client, vendor or other business partner. Holding such an interest personally, or the holding of such an interest by one of our relatives, can constitute a significant conflict of interest. For these purposes, a “significant investment” means an ownership greater than 1% of the outstanding stock of a publicly traded company, with the exception of an investment we might have in a mutual fund. It is important to report any significant financial interest you or a relative has that may pose a conflict.

INVENTIONS, BOOKS AND PUBLICATIONS

As discussed in this Code under “Intellectual Property,” our Company reserves the rights to copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands, know-how and any other tangible or intangible property that is developed by an employee during CSC work hours or with CSC resources. IP developed in this way, including all inventions and books or other publications, should be disclosed to our Company promptly.

PREVENTING CORRUPTION

CSC’s position with respect to bribery and corruption is principled and simple. We will compete vigorously and fairly for business solely on the merits of our competitive offerings. In all markets — whether public or private — we do not bribe anyone to obtain, retain or direct business, or to secure any other improper advantage. Likewise, we do not allow other parties or CSC associates to make or take bribes for us. We do not condone the use by employees of unreimbursed personal funds to violate this stance.

In both public- and private-sector marketplaces, a “bribe” is anything of value that may be viewed as an effort to influence an action or decision in an attempt to obtain or retain business, or in an effort to acquire an improper advantage. Such items of value can include:

- Money
- Gifts
- Favors
- In-kind use of company resources
- Entertainment
- Other items or services of value

Globally applicable anticorruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom’s Bribery Act of 2010 (Bribery Act), prohibit bribery of foreign government officials and commercial partners. These laws can apply to conduct that happens outside the United States and the United Kingdom, where these laws originate. Violations can result in severe penalties for both our Company and individual employees. In addition to the FCPA and the Bribery Act, many other countries have laws prohibiting the payment of or the receipt of a bribe. We must be familiar with these laws as they apply in all the places we do business.
We must take particular care when interacting with public officials, whether foreign or domestic, from our unique points of view. Those of us who work routinely with government officials, or who work with third parties who interact with government officials on our behalf, must be familiar with the restrictions involving interactions with such officials. A “government official” includes employees of any government, political candidates and party officials, members of royal families, employees of businesses that are owned or otherwise controlled by a government and employees of international organizations.

Our policies also prohibit conduct commonly known as “kickbacks,” which occur when a sum of money, or anything of value, is returned to another party in exchange for arranging a business transaction. Additionally, the law and our policies prohibit “commercial bribery,” which includes attempts to bribe clients, partners, suppliers, vendors or anyone else working on our behalf (commercial partners) in an effort to influence their business decision making.

We face exposure to corruption risk from our relationships with third parties and partners. When managing these relationships, we must always be on the lookout for bribery, kickbacks, improper payments or other corrupting influences because we can and will be held responsible for our third parties’ and partners’ actions if they violate the law while working on our behalf.

Anticorruption is an extremely complex area of the law. It is not uncommon to have questions about our policies, and you should seek guidance from the ECO if you have questions or believe any of these guidelines have been violated. Additional information can be found in our anti-corruption and improper payments policies, as follows:

- Global Anti-Corruption and Improper Payments
- Third-Party Commercial Intermediary Selection – Due Diligence – Contracting – and Administration
- Business Development Gift and Hospitality Expenditures and Related Bookkeeping
FACILITATING PAYMENTS

We do not provide any improper payments to government officials. While we understand that in certain parts of the world it is common for government officials to receive so-called “grease,” “facilitating” or “expediting” payments to perform routine actions, we at CSC do not provide such payments. Examples of these routine actions may include:

• Issuing licenses or permits
• Obtaining utility services
• Issuing work permits or visas
• Providing police or fire protection

Our Code and our anticorruption policies, as well as most local corruption statutes, forbid such payments. If you are approached to make such a payment, or if you have any questions about this policy, please contact the ECO.

QUESTION

Sanjay works in a CSC office in London and occasionally interacts with employees of the British government. After a meeting to discuss a new contract, Sanjay is invited to join his colleagues and their potential new government clients for lunch. What should he and his coworkers remember during this lunch?

ANSWER

Sanjay and his CSC colleagues must remember our Code’s guidelines for interactions with public officials, as well as our values — including accountability. In this situation, no CSC employee may pay for the government officials’ meals or any other items of value. Our interactions with public officials must always adhere to the highest standards of ethics and transparency and must never carry even the suggestion of improper influence.
MONEY LAUNDERING

We keep trust with our stakeholders and the public by making sure our Company is never used as a channel for illegal funds. As with all our third-party relationships, we are mindful when we work with others by performing careful due diligence and investigating any suspicions about the origin of a party’s funds. Under no circumstance should any funds of dubious or unlawful origin be transferred to our Company. When working with third parties, we must be mindful of suspicious circumstances and behaviors that may include:

- The lack of a physical address
- A complicated or suspicious business history
- Reluctance by the third party to provide information, particularly about the source of the funds

If you have questions about money laundering or have a concern you want to report, contact the ECO for assistance.
SECURITIES AND INSIDER TRADING

In the course of working at CSC, we may gain access to significant information about the Company or one of our clients, vendors or other organizations with which we do business. When other investors are not privy to this information, it is unlawful for us to use this “nonpublic” information for investment decisions. Our Company and our business partners trust us to take great care not to reveal or seek personal benefit from material, nonpublic information to which we are given access. Further, the law is very clear that trading on information gained in this manner is illegal. Information is considered “nonpublic” if it has not yet been released to the general public. The prohibitions on insider trading continue to apply to transactions in Company Securities even after separation of employment with CSC.

Information is considered “material” if it could reasonably be expected to affect a stock or other security’s market price and is information that a reasonable investor would want to know before making an investment decision. Either positive or adverse information may be considered material. If the information in question meets these two definitions, it is considered “inside information.”

Inside information can be either positive or negative and can include:

- Financial results or information regarding future earnings or losses
- Impending bankruptcy or liquidity problems
- A major change in management
- A significant acquisition or divestiture
- The gain or loss of a significant client or contract
- Significant new discoveries or developments
- An impending dividend or an offering, sale or repurchase of securities

“Tipping” — providing inside information to others — is also a violation of our Code, policy and the law. We keep confidential any inside information to which we are privy until after it is publicly released. We do not reveal or discuss this information with anyone at our Company unless that person has firmly established a legitimate business reason to know the information.

If we become aware of material, nonpublic information regarding CSC or any other company, we:

- Must keep that information confidential and not disclose it to anyone, except on a need-to-know basis as specifically authorized by CSC
- Must not purchase, sell or recommend the purchase or sale of any of that company’s securities
- Must ensure that each of our immediate family members and each person living in our household complies with these restrictions

The laws that govern insider trading and tipping can be very complex, so you should consult our Insider Trading policy and ask your manager if you have any questions. It is also important to speak up and report any violations of this policy immediately to the ECO.
TRADE RESTRICTIONS

EXPORT RULES

Our work involves the deployment, use and administration of sophisticated technology. We take great care to ensure that when we use or transfer such technology in the course of our business, we do so legally. When we operate internationally we must be aware that there are strict laws and regulations limiting the transfer of certain products and technologies to certain individuals, organizations and nations. We must verify the eligibility of both the location and the recipient before exporting any product, technology or other information. We also must ensure that we have properly secured all required licenses and permits and paid all duties. These laws and regulations can be complex, and they often change. If your responsibilities include the use or transfer of products and technology across international borders, or with individuals or organizations that originate outside the United States, you should make sure that you understand our procedures in such cases. Ask the ECO if you have concerns.

QUESTION

Gregory regularly receives information about the Company’s strategic plans and new product offerings before the information becomes public information. His friend has received a small inheritance and asks him over lunch if investing in the Company would be a good decision. How should Gregory respond?

ANSWER

Gregory is not alone in this situation, because many of us learn about our Company’s activities through our work. However, we must be very cautious when the subject of our Company’s stock comes up, in order to protect ourselves against engaging in insider trading. In this case, Gregory should decline to answer his friend’s question because Gregory can’t risk sharing nonpublic information.
UNDERSTANDING BOYCOTTS, RESTRICTED COUNTRIES AND SANCTIONS

On occasion, our Company may be asked to boycott certain countries, companies or other entities. Under U.S. law, we cannot cooperate with any request concerning a boycott not initiated by the U.S. government. For this reason, we do not initiate action, provide information or make statements about countries, companies or other entities, which could be considered as CSC’s participating in an illegal foreign boycott. We are also required to report to the U.S. government any boycott requests made of us as employees or as a company. We must be alert to these situations, because such requests could be contained in larger documents such as invoices or contracts. If you believe you have received such a request, please immediately notify the ECO, who will determine the appropriate course of action.

SUPPORTING TRANSPARENCY

We understand that our role with CSC means that we cooperate completely with the requests of any internal or external auditors, attorneys or investigators who have been engaged by our Company. When asked to participate in an audit or investigation, we do so willingly, and we respond expeditiously with accurate information. Under no circumstance do we ever mislead or attempt to influence the truthful outcome of any investigation, audit or inquiry. Our manager or the Legal Department will advise us regarding when and how we are to participate in an investigation, audit or inquiry.
WE ARE COMMITTED TO OUR CLIENTS AND COMMUNITIES

FAIR PRACTICES

ETHICAL MARKETING AND SALES METHODS

We offer the best products and services to our clients, and we do not mislead, misrepresent or confuse others about our offerings. We are accurate and truthful, we compete based on our strengths and we maintain our strong reputation based on what we offer and deliver to clients. Additionally, we do not make untrue or negative comments about our competitors.

FAIR COMPETITION LAWS

We believe a fair marketplace benefits all of us by ensuring that our clients receive quality products and services at a fair price. We compete fairly and do not compromise our integrity to gain business. We do not participate in collusive or anticompetitive behavior, and we report these incidents when observed. “Collusive” behavior occurs when competitors act together to restrain trade. We understand that strict competition laws apply in the countries where we operate and that it is our responsibility to understand how these laws, rules and regulations affect our operations.

Antitrust and competition laws are varied and complex, but there are some common situations that we must avoid:

• We must not enter into formal or informal agreement with our competitors to restrain trade by fixing prices, rigging bids, allocating markets or clients or otherwise colluding with our competitors to gain business.
• Even the appearance of collusion can harm our Company’s reputation, and so we are careful not to discuss our prices, customers, bid plans or other such topics with competitors; should they initiate discussions on these topics with us, we immediately signal an unwillingness to participate, and we end the communication.
• We must not make formal or informal agreements with suppliers, clients or other third parties that may restrict competition, such as boycotting particular third parties.

If we are approached by a competitor requesting collusion, or if we have knowledge of agreements that appear to be anticompetitive, we must immediately inform the ECO.
SERVICE QUALITY

The quality of the work we do for our clients has established our Company’s excellent reputation for high-integrity performance, and we work hard each day to protect that reputation. In adhering to this enduring objective, we must always strive to provide services that exceed expectations and meet all the requirements of our clients. At CSC we do not make excuses or take shortcuts. We deliver completely and with high integrity.

QUESTION

Marcos is a systems engineer who has been involved in planning a processing system for a large financial institution. He believes an important data security safeguard is missing from the system’s design. His conversations with project teammates lead him to believe that it may be difficult to add this additional feature into the project’s timeline without delaying the overall project delivery. Marcos considers the delay’s possible impact on his team’s performance review. What should Marcos do?

ANSWER

Marcos should report his concerns to his project leader and, if necessary, to his manager. The Company has a responsibility to notify the client of this security vulnerability so that the client can subsequently decide how to proceed. We have a responsibility to do the right thing, even if doing so may be difficult. We must ensure that the value and integrity of our products and services are of the highest quality and in accordance with our commitment to service quality.
GOVERNMENT CLIENTS

We treat all of our clients with respect and deliver high-quality services to all of them, yet there are special considerations when our client is a government. Those of us responsible for these relationships must be aware of the laws and regulations regarding contractual obligations and procurement, accounting and billing practices specific to our relationships with the government. There are significant suspension, debarment and other penalties for organizations that do not follow the law when working with a government, and we aim to ensure that our Company follows all necessary rules and procedures.

As noted in the “Preventing Corruption” section of this Code of Business Conduct, we must be cautious in our relationships with government officials. If you are responsible for a business relationship with a government official, you must be familiar with globally applicable anticorruption statutes, and you must not provide gifts or entertainment without following our policies and procedures.

In all countries, CSC employees must not make any attempt to influence a government employee or member of a governmental body other than through the standard preparation and discussion of CSC cost and technical proposals in conformance with procurement regulations.

We must take great care with decisions to hire or contract with government employees. CSC employees must not discuss employment opportunities with government personnel without first seeking guidance and approval from the Legal Department.

If you have any questions about these standards, or if you wish to report a concern about CSC’s relationship with a government client, please immediately contact the ECO.

RESPECTING RIGHTS

We support human rights and ensure that our operations in communities around the world function with integrity. We provide reasonable working conditions for all employees, including fair working hours and wages, and we do not tolerate the use of child or forced labor. We are concerned for the well-being of everyone who works on our behalf, regardless of whether they are an employee. We do not conduct business with subcontractors, business partners, suppliers or other third parties who knowingly violate this policy. If we suspect misconduct, then we must immediately report such matters to our manager, who will contact the appropriate internal resources.
ENVIRONMENTAL RESPONSIBILITY

We have responsibilities to the communities where we operate, and we are committed to following all environmental rules, regulations and laws that govern our operations. As citizens of these communities, we are accountable for our actions, and we do all we reasonably can to ensure our operations have minimal impact on the environment. We seek efficiencies in our use of resources, and we commit to improve the sustainability of our operations. If you have questions about our commitment to environmental responsibility, or wish to report an issue, please contact the Corporate Responsibility Department.

CHARITABLE ACTIVITIES

Our dedication to improving our communities often leads us to get involved with local and national charities. We all should take time to volunteer or otherwise support worthy charities, but we must not use CSC’s resources or time to benefit causes that are not authorized by our Company. Further, we cannot seek reimbursement from our Company for personal charitable contributions.

POLITICAL ACTIVITIES

We may freely participate in political activities that do not interfere with our responsibilities for our Company. We do not seek reimbursement for political contributions or use Company resources for personal political activities. We are careful never to suggest that we represent our Company or our Company’s opinion about a political candidate or cause.

LOBBYING

Lobbying activities are governed by laws that are sometimes complex. Unless you are specifically designated by CSC to engage in lobbying activities, you must not claim in any way that you represent our Company. Lobbying activity by our Company is strictly controlled and done with high integrity. If you have questions about our policy or about lobbying activity, please contact the ECO.
RESTRICTIONS FOR AMENDING OR WAIVING OUR CODE

The Board of Directors must approve any waiver or substantive amendment of this Code of Business Conduct. Any such waiver or amendment shall be disclosed promptly, as required by law or regulation.

CONCLUSION

Belonging and contributing to a strong culture of integrity is rewarding for everyone — employees, customers, business partners, our shareholders and our Company. We must never compromise our shared values for short-term goals. We must always be mindful of what is expected of us and base our performance and conduct on the values, principles and guidelines of this Code. By using this Code and the resources listed within it to navigate the obstacles we may face in our daily work environment, we will feel confident in speaking up about our concerns. We are committed to our ethical culture and accountable for our actions and results. Above all, we work transparently with each other to grow — with integrity. Our shared history and future opportunities are impressive, and our continued, individual commitment to personal and professional ethics will help us as we navigate the exciting road ahead.
The reporting structure for questions and concerns about known or suspected violations of the Code, of CSC policy or of any law in any CSC jurisdiction is the following:

- Your local supervisor or manager
- Your department or function head
- Your local Human Resources manager, or an HR representative at a higher level
- CSC’s Ethics and Compliance Office, ethics@csc.com
- The CSC OpenLine, by phone or web at www.cscopenline.ethicspoint.com (OpenLine is CSC’s confidential resource for ethics advice and reporting misconduct)

Additional resources are available to help you with the programs and issues discussed in this Code.

**BUSINESS CONDUCT POLICIES**

**Management Policy Statements**

- MPS 001 - Ethical and Legal Business Conduct
- MPS 003 - Acceptance of Gifts and Gratuities by CSC Employees
- MPS 005 - Corporate Responsibility
- MPS 010 - Global Anti-Corruption and Improper Payments
- MPS 030 - Social Media
- MPS 301 - Environmental, Health and Safety Programs
- MPS 404 - Third-Party Commercial Intermediary Selection – Due Diligence – Contracting – and Administration
- MPS 408 - Business Development Gift and Hospitality Expenditures and Related Bookkeeping
- MPS 503 - Political Contributions
- MPS 505 - Compliance with Antitrust Laws
- MPS 506 - International Trade
- MPS 507 - Data Protection
- MPS 508 - Insider Trading
- MPS 509 - Integrity in Government Procurements: Employment Discussions with and Hiring of Federal Employees as Employees or Consultants
- MPS 609 - Encryption of Critical or Sensitive Information
- MPS 706 - Financial Disclosures to the Public
- MPS 714 - Employee Timekeeping
- MPS 715 - Summary of Internal Control Policies
- MPS 802 - Conflicts of Interest
- MPS 804 - Acceptance of Gifts and Gratuities
- MPS 810 - Ethics of Buying
- MPS 814 - Improper Business Practices – Kickbacks
- MPS 902 - Records and Information Management

**Human Resources Policies**

- HRMP 202 - Equal Employment Opportunity
- HRMP 203 - Harassment
- HRMP 205 - Open Door Policy
- HRMP 209 - Personal Conflict of Interest
- HRMP 210 - Employment of Relatives
- HRMP 222 - Drug and Alcohol Abuse
- HRMP 223 - Use of Electronic Communication Media
Alphabetical Index

Alcohol ................................................................. 9
Anti-corruption ..................................................... 22
Books and Records ............................................. 3, 14, 15
Boycotts ................................................................. 27
Bribery ................................................................. 21, 22
Business Partners ................................................ 2, 8, 21, 25, 30, 32
Cash Equivalent .................................................. 18
Cash ................................................................. 18
Client Billing ......................................................... 14, 15, 30
Company Assets .................................................. 12, 13
Company Records ............................................. 3, 14, 15
Competitor Data .................................................. 13, 17
Confidential Information ................................... 13, 16, 17, 25
Confidentiality ....................................................... 6, 11
Conflicts of Interest ........................................... 18, 20, 21
Copyrights ........................................................... 13, 17, 20
Corruption ............................................................ 21, 22, 23, 30
Data ................................................................. 10, 11, 12, 16, 17
Destruction of Records ....................................... 15, 16
Discrimination ...................................................... 7, 8
Diversity ............................................................... 7, 8
Drugs ................................................................. 9
Electronic Media .................................................. 10, 11
Email Use ............................................................. 11
Equal Employment Opportunity .......................... 7
Ethics and Compliance Office ............................. 4, 6, 33
Expense Reporting ............................................. 14
Export Rules ........................................................ 26
Facilitating Payment .......................................... 23
Fair Pay ............................................................... 9
Family and Friends .............................................. 20, 25
Favors, Gifts & Entertainment ............................ 18, 21
Financial Officers .............................................. 3
Financial Records ............................................... 3, 14
Global Trade ........................................................ 26
Government Officials .............................................. 21, 22, 23, 30
Harassment .......................................................... 5, 8, 11
Health & Safety .................................................... 9
Intellectual Property (IP) ...................................... 13, 17, 21
Internet ............................................................... 11
Intimidation ........................................................... 9
Inventions ............................................................ 13, 21
Investments .......................................................... 19, 21, 25
Invoices ............................................................... 14, 15, 27, 30
IT Security ............................................................ 10
Kickbacks ............................................................ 22
Media Inquiries .................................................... 10, 17
Open Door ............................................................ 4
Outside Employment .......................................... 20
Patents ............................................................... 13, 21
Preservation Order ............................................... 15
Public Officials .................................................... 21, 22, 23, 30
Publications ........................................................ 21
Records Information Management ........................ 15
Reporting ............................................................ 2, 4, 5, 33
Retaliation ............................................................ 5, 6, 9
Retention of Records ........................................... 15, 16
Security .............................................................. 9, 10
Sexual Harassment ............................................. 8
Side Letters .......................................................... 14
Social Media ........................................................ 11
Speaking Engagements ........................................ 19
Subsidiaries .......................................................... 2
Substance Abuse .................................................. 9
Suppliers .............................................................. 2, 8, 18, 22, 28, 30
Third Parties ......................................................... 12, 17, 22, 24, 28, 30
Timekeeping ........................................................ 14, 15
Tipping ............................................................... 25
Trademarks ............................................................ 13, 21
Violence .............................................................. 9
Wages ............................................................... 9
Working Conditions .............................................. 9
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About CSC
The mission of CSC is to be a global leader in providing technology-enabled business solutions and services.

With the broadest range of capabilities, CSC offers clients the solutions they need to manage complexity, focus on core businesses, collaborate with partners and clients and improve operations.

CSC makes a special point of understanding its clients and provides experts with real-world experience to work with them. CSC is vendor independent, delivering solutions that best meet each client’s unique requirements.

For more than 50 years, clients in industries and governments worldwide have trusted CSC with their business process and information systems outsourcing, systems integration and consulting needs.

The company trades on the New York Stock Exchange under the symbol “CSC.”