



INFOSYS LIMITED
SUPPLIER CODE OF CONDUCT
December 2021

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Authorized by	<i>Koushik R. N.</i>	Date:	16 th December 2021
Prepared by	Office of Integrity and Compliance		



A MESSAGE FROM OUR GROUP HEAD – PROCUREMENT

As we move forward in a world that is rapidly changing and competitive, the onus is on us to create a responsible supply chain that is aligned to our sustainability practices. We at Infosys have always focused on delivering value with utmost integrity and transparency.

In line with this, we have revised our Supplier Code of Conduct to stay relevant in today's business landscape. Infosys policies are always designed to empower all stakeholders in alignment with the existing laws and industry best practices.

We hope that this will be of value to the supplier ecosystem and support our constant endeavor to build a long-lasting business relationship.

Best Regards

Koushik R.N.
EVP - Group Head - Procurement & Global Immigration



Introduction

As outlined by our C-LIFE values and our Code of Conduct and Ethics, Infosys Limited and its subsidiaries ("Infosys") are committed to conduct its business in an ethical, legal and socially responsible manner. Infosys provides a safe working environment for all its employees and partners and ensures that they are treated with respect and dignity.

Infosys firmly believes that the Suppliers are an integral part of our ecosystem and is committed to create an environment where our Suppliers are confident that they are treated with respect.

Infosys also expects its Suppliers to conform to a similar standard of conduct. This Supplier Code of Conduct ("Supplier Code") details the expectations that Infosys has from its Suppliers.

The term "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services, to Infosys or its subsidiaries including the Supplier's employees, agents and other representatives. Infosys has classified its suppliers into three major categories.

- **Supplier of People:** This refers to contractors (business and support) who provide manpower to Infosys. The manpower assigned to Infosys works at Infosys and/or its client locations as an integral part of the workforce.
- **Supplier of Services:** This refers to partners/agencies which provide essential services (such as catering, food and beverage counters, transportation, construction etc.) at Infosys locations.
- **Supplier of Products:** This refers to partners who supply products to Infosys (such as hardware, software, electrical / electronic equipment, furniture, heavy equipment, stationery etc.) across Infosys locations.

Infosys firmly believes in conducting all business transactions with integrity and transparency and ensures that it is ethical, sincere and open in all its transactions. We expect our Suppliers to uphold the values of integrity and ethics in all business dealings, which are in line with the Infosys policies and applicable laws.

The Supplier Code is made up of six sections followed by a list of Dos and Don'ts'. Sections A, B, C and D outline standards for Ethics and Compliance, Labor Practices and Human Rights, Health & Safety and Environment respectively. Section E covers management system to be put in place by the Suppliers and obligations of Suppliers. Section F provides avenues for reporting concerns in event of breach of the Supplier Code.

A. ETHICS AND COMPLIANCE WITH LAWS

Infosys enjoys a hard-won reputation for honesty, integrity and fair dealing. Without question, this reputation for integrity is an invaluable part of our success. We expect our Suppliers to partner with us with integrity and in an ethical manner.

1. Uphold Business Integrity and Ethics

Infosys enjoys a hard-won reputation for honesty, integrity and fair dealing. As a global company, Infosys is subject to all relevant anti-bribery and corruption laws including but not limited to Prevention of Corruption Act, 1988 (India), the U.S. Foreign Corrupt Practices Act (FCPA) and Bribery Act 2010 (U.K.). The Suppliers should ensure that they comply with the relevant anti-bribery and corruption laws in both letter and in spirit.

Infosys has a zero tolerance policy with respect to any form bribery and/or corruption. Bribery and corruption are against our C-LIFE values. Infosys does not permit such actions, nor do we allow third parties acting on our behalf, such as agents, consultants, suppliers and contractors to make any such payments. The Supplier shall ensure the following.

- Implement monitoring and enforcement procedures to ensure compliance with anti-bribery and corruption laws;
- Raise invoices and claims in line with the agreed services and supplies, along with the supporting documents;



- Perform all business dealings transparently and maintain accurate details of the same in business books and records;
- Never offer, directly or indirectly, any form of gift, entertainment or anything of value to anyone on behalf of Infosys including government officials, customers or their representatives to obtain or retain business; influence business decisions; and/or secure an unfair advantage;
- Abstain from offering any bribe, kickbacks and/or facilitation payments.

2. Conflict of Interest

This includes situations where an Infosys employee or director may have an interest of any kind in the Supplier's business, whether through personal relationships, investments, directorships or any kind of economic ties with the Supplier. In event of any conflict of interest arising at the time of empanelment or prior/post/during engagement, Suppliers are required to promptly disclose such situations to Infosys.

3. Quality & Product responsibility

Suppliers must ensure that the quality of product/service delivered shall be in-line with all the contract terms and conditions. Suppliers shall adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances, including labelling of products, if required.

4. Fair Business, Advertising and Competition

Suppliers must uphold standards of fair business, advertising and competition. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of applicable antitrust laws.

5. International Trade

Suppliers will comply with all applicable laws and regulations concerning importing, exporting, re-exporting or transfer of Infosys products and services.

6. Confidentiality

Suppliers must ensure that confidential or proprietary information about Infosys, our clients, employees or other parties, which has been gained through employment or affiliation with Infosys, is not used for personal or professional advantage. The confidential information also extends to any employee data, personal data or third party information as shared by Infosys.

7. Intellectual Property Rights

The Supplier shall take all steps to adhere to the intellectual property rights of Infosys including but not limited to the Infosys copyrights, patents, trade secrets and trademarks.

8. Data Privacy

Infosys along with its subsidiaries ensures that it complies with all applicable data protection laws and contractual requirements. Infosys is committed to uphold highest data protection and privacy standards with respect to all Supplier data and Personally Identifiable Information (PII).¹ We expect our Suppliers to adhere to similar standards.

The Supplier shall also comply with obligations under applicable data protection laws and contractual requirements, and ensure adequate measures are implemented to address technical and organizational security measures, data access rights, transfer of data and retention of data, while processing personal data owned, controlled and managed by Infosys. Supplier shall inform Infosys of any instance of data breach within 12 hours of discovery of the same on vendorincident@infosys.com. The Supplier is expected to fully

¹ “Personally Identifiable Information” means any information when used alone or with other relevant data of an identified or identifiable natural person (‘data subject’) who can be identified, directly or indirectly.



cooperate with Infosys and provide them with reasonable access to data processing facility, for conducting investigations into the reported data breach incident.

9. Information Security

Infosys has a holistic Supplier Information security risk assurance process which helps in identification of Information security risks through different stages of supplier relations with the end objective of safeguarding critical & sensitive information; and information systems handled by suppliers. Infosys expects its suppliers to comply with the applicable laws and regulations and Infosys security requirements as communicated from time to time and included under the agreement.

Supplier organization is responsible for agreeing on service deliverables, ensuring compliance against contractual security requirements, extending support on annual security assessments, ensuring timely notification of incidents and notifying major changes/vulnerabilities to Infosys.

Supplier is expected to comply with the following.

1. Upon becoming aware of any security incident/breach involving Infosys or Infosys's customers data, notify Infosys within 12 hours on vendorincident@infosys.com
2. Mitigate any security risks identified as part of due diligence assessment performed by Infosys on the Supplier's security practices

Supplier shall write to VendorSecurity@infosys.com for any security related queries.

10. Business Continuity

The Supplier shall ensure that there are plans and procedures to resume business in the event of any physical disaster (e.g. Such as fire, flood, wind, earthquake, explosion, etc.) or work stoppage of any kind (e.g. Labor strike, economic/social structure breakdown, etc.). Subject to mutual agreement on business continuity plan terms by both parties, the Supplier shall resume services within committed timelines following a disaster or work stoppage event.

11. Insider Trading

Infosys complies with SEBI (Prohibition of Insider Trading) Regulations, 2015 and the applicable US Securities law. During the course of engagement, if the Supplier becomes aware of any Unpublished price sensitive information ("UPSI") relating to Infosys, The Supplier of Infosys shall not communicate such UPSI nor trade in securities of Infosys that are listed or proposed to be listed when in possession of UPSI, in violation of applicable securities laws.

12. Infosys Brand Name and Logo, Media Rights

Our logo is the most prominent symbol of our products, platforms, and services. The Supplier shall ensure the following.

- All usage of the Infosys logo must strictly adhere to Infosys brand guidelines with respect to color, appearance and size.
- All manifestations of the Infosys brand including but not limited to case studies, brochures and advertisements must be in accordance with established brand guidelines;
- Suppliers shall not use Infosys brand name, logo or any other visual vehicles implying or representing Infosys without explicit consent

Suppliers shall not make any comments about their engagement with Infosys in the media without prior approval. The specific content of any media report and/or comments and details of usage shall be shared for approval with Infosys.

13. Third Party engaged by Supplier

In event the Supplier engages any third party to provide services/goods to Infosys, the Supplier shall ensure that such third party adheres to the Supplier Code and does not indulge in any activity that violates the



terms of the Supplier Code. The Supplier shall be responsible to monitor compliances by such third party and determine that they are in accordance with the applicable laws and regulations.

14. Compliance with Laws

Suppliers shall fully comply with all applicable national and/or local laws and regulations, treaties and industry standards including, but not limited to, those related to labor, immigration, health and safety and the environment. The Supplier shall maintain all records of such compliance as mandated under the applicable laws and provide the same to Infosys upon request.

B. LABOR PRACTICES AND HUMAN RIGHTS

Infosys is committed to uphold human rights of the workers and treating them with dignity and respect.

1. Wages and Benefits

Suppliers shall comply with all applicable wage laws and regulations including but not limited to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. All legally mandated benefits viz. leaves, social security, insurance etc. shall be provided by the Suppliers to its employees. Deductions, if any, from wages shall be made in strict compliance with the applicable laws. Suppliers shall not use deductions from wages as a disciplinary measure.

2. Working hours

Suppliers shall comply with prevailing applicable laws and regulations on working hours, overtime and maximum hours. Suppliers shall carry out its business in a manner that limits overtime to a level that ensures humane and productive working conditions.

3. Child labor

Suppliers shall not employ, engage or otherwise use any child labor. Infosys expects its suppliers to not engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, ILO Minimum Age Convention and Prohibition and Immediate Elimination of the Worst Forms of Child Labor Convention. The term 'child' refers to any person employed normally under the age of 18 where the law of the country permits, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

4. Forced or compulsory labor/No Human Trafficking

Suppliers shall not engage in any instance of forced, bonded or compulsory labor and/or slavery or trafficking of people in their supply chain. All employment with Suppliers shall be voluntary and employees shall be free to leave their employment in compliance with applicable laws. Workers will not be required to surrender any government-issued identification, passports or work permits as a condition of employment. Excessive fees are unacceptable and Supplier shall disclose all fees charged to workers.

5. Human Rights

Infosys expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

6. Humane Treatment

Supplier shall not tolerate any instance of harsh and inhumane treatment including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, including the threat of any such treatment. Supplier shall clearly lay down and communicate to workers the disciplinary policies and procedures in this regard. Suppliers shall have a written policy that bans any form



of discrimination, harassment and/or bullying² and provides for a grievance mechanism to address any concerns raised by its employees.

7. Non-Discrimination

Suppliers shall not discriminate in hiring or employment practices based on pregnancy, childbirth or related medical conditions, race, religious creed, colour, sex, gender, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, union membership or any other criteria protected under law. Supplier shall uphold the dignity of its employees at all times and work towards establishing and reinforcing a positive work culture.

8. Freedom of Association and Collective Bargaining

Infosys expects its Suppliers to respect and recognize the rights of its employees to freely associate, organize and bargain collectively.

9. Harassment

Infosys expects its Suppliers to provide a harassment-free workplace for everyone. Harassment based on any protected criteria is unlawful and the Suppliers shall not commit any act, which is not in compliance with applicable laws. Infosys has a zero tolerance policy with respect to any form of harassment including sexual harassment and the Suppliers shall take appropriate initiative to ensure a harassment-free workplace by way of publication of policies, periodic trainings and requisite & timely support to affected parties.

Suppliers shall also organize awareness programs at regular intervals for sensitizing the employees on the law pertaining to harassment in the applicable jurisdiction. Kindly refer to the 'Reporting Concerns' section for Infosys channels vide which any harassment related grievances can be raised.

C. HEALTH AND SAFETY

Infosys expects its Suppliers to provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

Suppliers shall provide their employees safe and healthy workplace, which is in compliance with all applicable safety and health laws, regulations, and practices. Suppliers shall ensure that all legal requirements including but not limited to occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing are addressed. Suppliers shall take adequate steps to minimize the causes of hazards inherent in the working environment. Suppliers shall take adequate steps to address the issue of substance abuse and shall prohibit the use, possession, distribution or sale of illegal drugs in their supply chain,

D. ENVIRONMENT

As part of our commitment to create a responsible supply chain, Infosys has set up VIVA Framework (Goodwill towards business, society and environment) that aims at aligning our sustainability practices to our supply chain. We are constantly innovating towards the following aims.

- **Visioning:** Working for alignment of our supply chain to the sustainability policy of the organization
- **Inculcating:** Constantly validate and improve our existing supply chain processes and systems
- **Valuing:** Invest time and effort aimed at value creation. Conduct awareness programs for our suppliers and ensure their engagement through appropriate mechanisms
- **Assessing:** Periodic checks to ensure compliance with the Supplier Code and sustainability practices. Ensuring corrective/preventive measures to sustain practices and achieve continual improvement

Suppliers will operate in a manner that is sustainable and strives to protect the environment. Infosys is certified to ISO14001 standards. We expect our Suppliers to adhere to Infosys standards as a minimum and work towards following objectives.

² Any intentional act that causes harm to others, and may involve verbal harassment, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion such as manipulation, blackmail, or extortion.

- **Energy and Emissions:** Infosys expects its suppliers to participate, at a minimum and co-create solutions to minimize and regulate the wastage of energy.
- **Waste:** Infosys has been persistent in its waste management efforts and ensures reuse, recycling and the responsible disposal of waste, The Suppliers shall participate in this process and take steps to reuse and recycle their products.
- **Water:** Infosys aims to make their campuses water sustainable by reducing consumption, rainwater harvesting and recycling waste water. Infosys expects its suppliers to participate, at a minimum and co-create solutions to achieve this.

E. MANAGEMENT SYSTEM

Suppliers must set up a management system and maintain documentation necessary to demonstrate compliance with the Supplier Code. The system shall be designed to monitor and ensure (a) compliance with applicable laws and regulations; (b) conformance with the Supplier Code; and (c) identification and mitigation of operational risks related to the Supplier Code.

Obligations of Suppliers

Suppliers shall ensure that the Supplier Code is communicated to their employees, subsidiaries, business partners and subcontractors involved in providing services to Infosys in the language known to them and that they abide by the same. Compliance with the Supplier Code is required in addition to any other obligations in any agreement a Supplier may have with Infosys.

Suppliers must self-monitor and demonstrate their compliance with the Supplier Code. Suppliers shall actively audit and manage their day-to-day management and share reports with Infosys upon request. Infosys retains its right to audit its Suppliers to confirm compliance. The Supplier shall extend all necessary support and cooperation to Infosys for such an audit. While Infosys will work with Suppliers to improve compliance, failure to comply with the Supplier Code may result in appropriate action including but not limited to termination of the relationship with the Supplier.

F. REPORTING CONCERNS

Should you suspect any violation of this Supplier Code, you can report through <http://oic.infosys.com/> and the Infosys Helpline nos. mentioned in the link.

All matters other than data breach or sexual harassment may be reported on whistleblower@infosys.com.

Grievances relating to sexual harassment may be raised in writing to GRB@infosys.com

All data breach and/or cyber security incidents involving Infosys or Infosys's customer data shall be reported in writing to vendorincident@infosys.com within 12 hours of discovery of the same.

It is important that you report all suspected violations, including retaliation. Retaliation includes adverse actions, harassment, or discrimination on a professional front relating to your reporting of a suspected violation. Infosys will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Supplier Code. Infosys is committed to fairly assess all the issues raised and provide resolution.

List of Dos and Don'ts

The below list of Dos and Don'ts is a guideline and does not substitute the contents of the Supplier Code, which has to be complied with in entirety.

Dos

- Read the contents of the Supplier Code and ensure that the Supplier is not in violation of any of the clauses
- Accept the Supplier Code in a timely manner
- Actively monitor and ensure compliance with all applicable laws and Infosys policies as amended from time to time
- Ensure that Supplier Code is explained to employees, subsidiaries, business partners and sub-contractors
- Conduct business with integrity and exhibit responsible ethical behavior in all interactions with Infosys and/or its customers
- Maintain documentation necessary to demonstrate compliance with Supplier Code
- Report any breach/violation of Supplier Code by employees, subsidiaries, business partners and/or sub-contractors in a timely manner

Don'ts

- Indulge in any practice or means that violates the applicable laws and/or violates the Supplier Code
- Hide or delay reporting an identified breach/violation of the Supplier Code to Infosys
- Obstruct any investigation undertaken for breach/violation of the Supplier Code
- Share confidential information or data of Infosys with any third party
- Engage in any unfair practice or exert undue influence over Infosys and/or its clients