

INFOSYS LIMITED
WHISTLEBLOWER POLICY

Date	Version / amendments
09 April 2003	Original adopted
13 April 2012	Amended by Board of Directors
15 April 2014	Modified by Board of Directors
09 January 2015	Modified to change contact details of the Chief Compliance Officer by virtue of the appointment made by the Board
13 January 2017	Modified by the Board of Directors to incorporate details of the Infosys Helpline
1 April 2019	Modified by the Board of Directors to incorporate details on leak of unpublished price sensitive information
12 January 2022	Modified by the Board of Directors to make it applicable for all reporting persons
18 July 2024	Modified by the Board of Directors to incorporate the changes in legislation in European Union and India, Australia, UAE, US, Japan and New Zealand.
16 January 2025	Modified by the Board of Directors to incorporate changes related to Poland.

The Purpose of this Policy

Infosys Limited (“**Infosys**”) and its subsidiaries (collectively, the “**Company**”) are committed to complying with the foreign and domestic laws that apply to them, satisfying the Company’s Code of Conduct and Ethics, and particularly to assuring that business is conducted with integrity and that the Company’s financial information is accurate. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. That can be costly. Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Directors, employees or any other person including vendors, contractors, subcontractors, consultants, trainees, shareholders, former employees, job applicants and any other third parties (collectively referred hereinafter as “**Person(s)**”) must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (“**Policy**” or “**Whistleblower Policy**”). You are required to read this Policy and submit the attached certification that you will comply with it.

Depending on the jurisdiction in which a Person is located there may be a specific addendum to this Policy (Addendum). All Persons should consult their location specific addendum before making a report. If there is any conflict between your Location Addendum and the Policy, the Addendum will apply.

Your Duty to Report

Everyone is required to report to the Company any concerns/ grievances about illegal or unethical practices in the Company and any suspected violation of the Company’s Policies, Code of Conduct and Ethics or applicable law. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, insider trading, leak of unpublished price sensitive information, bribery, or violations of the anti-retaliation aspects of this Policy. Consult the Company’s Code of Conduct and Ethics for a more detailed description of potential violations and other areas of particular concern. Retaliation includes adverse actions, harassment, or discrimination relating to your reporting of a suspected violation.

It is the policy of the Company that you must, when you reasonably suspect that a violation of an applicable law or the Company’s Code of Conduct and Ethics has occurred or is occurring, report such potential violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of

violations of Company policies or applicable laws. You should not fear any adverse consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

How to Report

Report your concerns to your manager, Human Resources manager, or the Helpline. The helpline numbers are

- U.S. Toll Free #: 1-800-236-6618
- U.K. Toll Free #: 0-808-189-1043
- India Toll Free #: 000-800-100-4380
- Local hotline numbers for other locations are available at <http://oic.infosys.com>.
- You can also report at <http://oic.infosys.com>

You can also write to whistleblower@infosys.com, or to the Chief Compliance Officer at complianceoffice@infosys.com. If you have concerns about reaching out to the Chief Compliance Officer or in any other appropriate or exceptional case, your report may be made to the Chairperson of the Audit Committee of Infosys' Board of Directors (the "Audit Committee") at: Audit.Committee@infosys.com. The Audit Committee will oversee the vigil mechanism and implementation of this Policy. If any of the members of the committee have a conflict of interest in a given case, such member(s) will recuse themselves and the others committee members will deal with the matter on hand.

The Company provides you several means of reporting to ensure that you do not have to report your concerns to someone who you believe to be involved in the suspected violation or from whom you would fear retaliation.

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred.

Individuals have the option to remain anonymous when reporting concerns. However, Infosys will investigate depending on the details provided in the report. Where you have not reported anonymously, you may be contacted for further information.

Further details of the reporting process can be found in the relevant Addendum.

Investigations after You Report

All reports under this Policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the violation. This action may include disciplinary action against the person found to be in violation, including but not limited to termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

Confidentiality

The Company's internal reporting process is secure and confidential and will be conducted in accordance with local law.

Retaliation is not Tolerated

There shall not be any adverse action against any Person, or any individual or legal entity connected to a Person, for complaining, reporting, participating or assisting in the reporting or investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Code of Conduct and Ethics. The Company takes reports of such retaliation seriously. Incidents of retaliation against any Person reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting Persons may also be subject to civil, criminal and administrative penalties.

Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable data privacy law.

Modification

The Audit Committee or the Board of Directors of Infosys can modify this Policy and/or any Addendum unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with federal, state or local regulations and / or accommodate organizational changes within the Company.

Please sign the acknowledgment form below and return it to the Human Resources team. This will be confirmation that you have received the Whistleblower Policy and are aware of the Company's commitment to a work environment that is free of retaliation for reporting concerns / grievances about illegal or unethical practices in the company and about violations of any Company policies, Code of Conduct & Ethics or any applicable laws.

ACKNOWLEDGMENT AND AGREEMENT REGARDING THE WHISTLEBLOWER POLICY

This is to acknowledge that I have received a copy of the Company's Whistleblower Policy. I understand that compliance with applicable laws and the Company's Code of Conduct and Ethics is important and, as a public listed company, the integrity of the financial information of the Company is paramount. I further understand that the Company is committed to a work environment that is free of retaliation for employees who have raised concerns regarding violations of this Policy, the Company's Code of Conduct and Ethics or any applicable laws and that the Company specifically prohibits retaliation whenever an employee makes a good faith reporting regarding such concerns. Accordingly, I specifically agree that to the extent that I reasonably suspect there has been a violation of applicable laws or the Company's Code of Conduct and Ethics, including any retaliation related to the reporting of such concerns, I will immediately report such conduct in accordance with the Company's Whistleblower Policy and any relevant Addendum. I further agree that I will not retaliate against any employee for reporting a reasonably suspected violation in good faith.

I understand and agree that to the extent I do not use the procedures outlined in the Whistleblower Policy and/or any relevant Addendum, the Company and its officers and directors shall have the right to presume and rely on the fact that I have no knowledge or concern of any such information or conduct.

Employee's signature

Employee's Name [printed]

Date