

Integrity and compliance

The Ethics and Compliance Program at Infosys has two key objectives – to uphold and ensure the values of integrity and transparency and to assure enterprise-wide regulatory compliance.

Integrity is key to nurturing a responsible business. Beyond regulation and stakeholder attention, there is a growing recognition that good behavior is good for business. At Infosys, our commitment to a value-based ethos is enshrined in our Code of Conduct and Ethics.

Our values are the principles we use to run the Company daily and are the source of our Code of Conduct and Ethics. Our values are the foundation of everything we do and are encapsulated in the acronym C-LIFE (Client value; Leadership by example; Integrity and transparency; Fairness and Excellence).



Code of Conduct and Ethics

We firmly believe that following the highest standards of business conduct and ethics helps us run our business responsibly. Our Code of Conduct and Ethics helps us maintain the highest ethical standards for our employees.

It complies with the legal requirements of applicable laws and regulations, including anti-bribery and anti-corruption and ethical handling of conflicts of interest. It also highlights expectations from our employees. The Code of Conduct and Ethics is signed off

by the Board and the Office of Integrity and Compliance is the custodian of the Code of Conduct and Ethics. Our business partners acknowledge and comply with the Supplier Code of Conduct which is based on the UNGC principles.

Purpose statement

Our Code of Conduct and Ethics now encapsulates our purpose statement: "To amplify human potential and create the next opportunity for people, businesses and communities."

Reinforcing a culture of compliance

- Code of Conduct and Ethics (Digital version):** We also have a digital version of the Code of Conduct and Ethics. It provides user-friendly access to specific topics in an interactive manner. It is a unique audio-visual experience and is easy to navigate. The Code can be accessed on mobile devices as well. The digital version of the Code aims to help every employee understand the behavior we expect and the principles and values we uphold. We aim to continue to build a culture of compliance, where everyone feels they are able to do the right thing and prioritize legal and ethical choices. The digital version of the Code is available [here](#).
- Code of Conduct and Ethics training:** Our employees and Board members are trained on the Code of Conduct and Ethics. We have a Smart Awareness Quiz (SAQ) which includes training modules that employees are mandatorily required to undertake every year to renew their commitment to the Code of Conduct and Ethics. Our vendor partners were also trained on the Supplier Code of Conduct through various channels including live sessions during the vendor partner meet called Sambandh. We also have a detailed communication plan to use multiple channels of communication like emails, video messages, blogs, gamified assessments, and storyboards to spread awareness about various policies.
- #SwipeRightforIntegrity:** #SwipeRightforIntegrity is an annual legal and compliance event organized by Infosys. The event brings our leaders together to reinforce our values of integrity,
- Local Compliance Officer program:** To further raise awareness among our employees about ethical aspects globally, a local compliance officer (LCO) network has also been created across the Infosys Group in collaboration with Office of Integrity and Compliance. The LCO network plays a crucial role, in promoting an organizational culture that encourages ethical conduct and a commitment to compliance with the law, regulations, and policies and helps in maximizing the impact of ethics-related communication and training.

transparency and good governance to build enduring relationships with our clients, employees and partners. It has become a platform to create awareness and have an engaging dialogue with all stakeholders, and influence behavior and showcase the Infosys culture. This has taken forward the compliance and ethics program and created increased awareness of expected behavior.

Recognition as one of the world's most ethical companies



Infosys has been recognized as one of the 2023 World's Most Ethical Companies for the third consecutive year by Ethisphere, a global leader in defining and advancing the standards of ethical business. Through this recognition, Infosys becomes one of only four honorees in the software and services Industry, globally, and the only honoree from India.

Anti-Bribery and Anti-Corruption (ABAC) practices and policy

Our Anti-Bribery and Anti-Corruption practices and policy is reviewed by the Management at regular intervals.

With an evolving landscape, Infosys is committed to a responsible Anti-Bribery & Anti-Corruption risk management framework to demonstrate a comprehensive risk management program to reduce the risks by regularly assessing risk in alignment with its growth strategies, and to drive an ethical and risk intelligent culture, to increase the certainty of business outcomes.

Risk assessment for bribery and corruption risks is done periodically and the criteria used for risk assessment include business units / internal departments, location and the Corruption Perception Index (CPI) index of countries, among others.

Anti-competitive practices policy

The Anti-Trust / Anti-Competitive Practices Policy states the objective, scope, applicability, and regulatory consequences, and is reviewed periodically by the Management. This policy includes the three aspects of anti-trust law: (i) abuse of dominance; (ii) anti-competitive practice; (iii) merger control. Besides, a list of do's and don'ts are communicated to the relevant stakeholders highlighting expected behaviors.

Export Control Policy

The export control policy describes Infosys' export control program and is reviewed periodically by the Management. The export control program protects the company and its employees from potential risk of violation of sanctions prescribed under export control regulations and facilitates business expansion in accordance with these regulations. All our customers and vendors are screened against various sanctions to ensure that we are compliant. As part of the program, training modules are rolled out to relevant employees to ensure that they are aware and are compliant with export control laws.

We have a self-assessment and certification program in place for anti-bribery and anti-corruption, anti-trust / anti-competition, and export control.

Whistleblower Policy

The Infosys Whistleblower Policy, last amended in January 2022, is a comprehensive and well-designed mechanism that encourages employees, vendors, customers, and any other stakeholders to report any unethical conduct, violation of applicable laws or the Company's Code of Conduct and Ethics occurring within the Company. With strict confidentiality measures and multiple reporting channels, the policy ensures that whistleblowers are protected from any retaliation. The company reviews all complaints impartially and takes appropriate action, as applicable, while providing regular communication to ensure awareness about the policy. The Infosys Whistleblower Policy is a testament to the Company's commitment to transparency, accountability, and responsible corporate citizenship.

Use of technology for effective compliance monitoring of controls

We have leveraged Artificial Intelligence (AI) and Machine Learning (ML) technology to review and identify exceptions in compliance and ABAC controls.

Compliance proof-testing

- Infosys implemented a compliance program covering 80 countries and 14 regulatory areas across major business enabling functions in September 2018.
- The program instituted a self-assessment of the compliance status against a compliance framework with a maker checker process built into it.
- The program also enabled the creation of a repository of compliance proofs against self-assessment.
- By consolidating compliance proofs across countries and regulatory areas, Infosys designed an OCR-based technology to scan the proofs and validate if the proofs corroborate the compliance status.
- The OCR technology was combined with a rule engine to test compliance controls around timeliness and accuracy of the compliance proof.

ABAC program

- Infosys develops and manages multiple office facilities and collaborates with multiple vendors / service providers during the various phases of construction. Infosys engages with vendors for infrastructure development and facility maintenance.

Sometimes, services to be obtained include permits, licenses, approvals, marketing activities / expenses, awareness campaigns and liaising with the authorities for filings and reporting requirements.

- To ensure appropriate proof of service by vendors is submitted, reviewed, and approved before payments are released and to ensure that the process of requisitioning, purchasing, receiving, paying for, and accounting for goods and services, covering the entire process from point of order right through to payment, is monitored, Infosys has implemented the following controls by reimagining system logic in procurement systems and use of AI and ML techniques:
 - Traceability of transactions at initial procurement stages through user declaration and OCR technology.
 - Trail of documentation to substantiate various milestones and proofs of services availed.
 - Built-in escalation matrix to ensure timely approval of red flags identified for appropriate resolution and action.
 - Tracking of potential red flag indicators through keyword searches and OCR technology before raising procurement request and payment processing.
 - Periodic assessments of transactions on sample basis considering factors such as high-risk vendors / transactions.
- In addition, digitized self-assessment and certification is also rolled out as part of monitoring and controls.