

# SUPPLIER CODE OF CONDUCT

## Version History

Version No.	Date	Authorized By
1	Jan 2014	Group Head -Procurement
2	Jan 2016	Group Head -Procurement
3	July 2019	Group Head -Procurement
4	Dec 2021	Group Head -Procurement
5	Mar 2023	Group Head -Procurement
6	Mar 2024	Group Head - Procurement
7.	Apr 2025	Group Head - Procurement

## Message from Group Head - Procurement



Dear Partners,

Our Supplier Code of Conduct serves as a guiding framework for all our suppliers (including their employees and associates) outlining the key principles and expectations we uphold in our business relationship. Our company, Infosys is a strong follower of business integrity, ethics and governance and has absolutely zero tolerance on unethical business practices. We expect our suppliers to conduct their business with utmost integrity, honesty, transparency and adhering to all applicable laws & regulations.

Infosys is committed to environmental sustainability and deeply values ESG principles. We expect our suppliers to minimize their environmental impact by implementing sustainable practices, reducing waste, recycling, and conserving natural resources. We also encourage suppliers to practice and contribute for well-being of the society at large and promote cultural diversity.

The following pages will give a detailed description of the supplier code of conduct, and we seek your commitment and support in practicing the underlying principles thereof for a sustainable supply chain ecosystem.

Best wishes,  
Dhiraj Sethi  
Group Head - Procurement

## Table of Contents

SUPPLIER CODE OF CONDUCT .....	<b>1</b>
1. Introduction.....	4
A. ETHICS AND COMPLIANCE WITH LAWS.....	<b>4</b>
1. Business Integrity and Ethics .....	4
2. Conflict of Interest .....	5
3. Quality & Product responsibility .....	5
4. Fair Business, Advertising and Competition .....	5
5. International Trade.....	5
6. Confidentiality.....	5
7. Intellectual Property Rights .....	5
8. Data Privacy .....	6
9. Conflict Minerals.....	<b>6</b>
10. Information Security .....	6
11. Business Continuity .....	7
12. Insider Trading .....	7
13. Infosys Brand Name and Logo, Media Rights.....	7
14. Third Party engaged by Supplier.....	7
15. Compliance with Laws .....	7
<b>B. LABOR PRACTICES AND HUMAN RIGHTS .....</b>	<b>7</b>
1. Wages and Benefits.....	8
2. Working hours .....	8
3. Child labor.....	8
4. Forced or compulsory labor/Human Trafficking.....	8
5. Human Rights.....	8
6. Non-Discrimination .....	8
7. Freedom of Association and Collective Bargaining.....	9
8. Harassment.....	9
C. HEALTH AND SAFETY.....	<b>9</b>
D. ENVIRONMENT & COMMUNITY .....	<b>9</b>
1. Obligations of Suppliers .....	10
E. REPORTING CONCERNS.....	<b>10</b>

## 1. Introduction

At Infosys our values C-LIFE (Client Value, Leadership by Example, Integrity, Fairness and Execution Excellence) form the bedrock of our endeavors as a responsible business.

We firmly believe that our Suppliers are an integral part of our ecosystem, and we are committed to create an environment where our Suppliers are confident that they are treated with respect. This Supplier Code of Conduct ("Supplier Code") details the expectations that Infosys has from its Supplier and applies to Infosys Limited and its subsidiaries ("Infosys").

The term "Supplier" means any entity or person 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.

- Suppliers of People: Suppliers (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.
- Suppliers of Services: Suppliers who provide essential services (such as catering, food and beverage counters, transportation, construction) at Infosys locations.
- Suppliers of Products: Suppliers 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.

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. Business Integrity and Ethics

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.) as amended from time to time. 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. Suppliers 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 shall promptly disclose such situations to Infosys.

## 3. Quality & Product responsibility

Suppliers shall 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 shall 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 shall adhere to all laws and regulations<sup>1</sup> pertaining to export, re-export, import, or transfer of any controlled technology, product and/or services. Without limitation, Suppliers shall:

- i. adhere to laws and regulations pertaining to commercial transactions with sanctioned/embargoed country or individual or entity.
- ii. disclose any history of violation of export control laws or sanctions.
- iii. disclose any ongoing inquiry or investigation:
  - (a) if information regarding the same is available in public domain; or
  - (b) if such inquiry/investigation has any impact on the engagement with Infosys;
- iv. ensure that Infosys' products and/or services are not used or supplied to any sanctioned/ embargoed country or individual or entity.

## 6. Confidentiality

Suppliers shall 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

Suppliers shall take all steps to adhere to the intellectual property rights of Infosys including but not limited to the

---

<sup>1</sup> Some reference for the regulations can be found in the below links:

<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>  
<https://www.un.org/securitycouncil/sanctions/information>

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<sup>2</sup> also referred to as Personal Data. We expect our Suppliers<sup>3</sup> to adhere to similar standards, when processing such Personal Data, including sensitive personal information.

Where the Supplier is an independent controller, Supplier shall comply with local laws of the land, when processing such personal data. Where the supplier is acting on behalf of Infosys, Supplier shall comply with all obligations under applicable Data Protection Laws and Regulations, and also abide by the obligations under Data Processing Clauses and standard contractual clauses relevant to the processing of personal data, available at <https://www.infosys.com/privacy-statement/data-processing-clauses.html> and ensure adequate measures are implemented to address technical and organizational security measures, data subjects rights, transfer of data and retention of data, including deletion, while processing personal data owned, controlled and managed by Infosys. Supplier shall inform Infosys of any instance of data breach within 48 hours upon discovery of the same to [vendorincident@infosys.com](mailto:vendorincident@infosys.com). Supplier is expected to fully cooperate with Infosys and provide them with reasonable access to data processing facility, for conducting investigations into the reported data breach incident.

#### 9. Conflict Minerals

Suppliers shall comply with all applicable Conflict Minerals rules and regulations and exercise appropriate due diligence while sourcing such minerals. Suppliers shall adopt policies and procedures that are reasonably designed to prevent products or parts that are not responsibly sourced from entering Infosys's supply chain.

#### 10. 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 as applicable:

- a. Ensure that adequate security controls and practices are implemented and maintained effectively to ensure sufficient protection of Confidentiality, Integrity, and availability of i) Services provided to Infosys and ii) Infosys or Infosys' client data processed or stored by the service provider.
- b. Upon becoming aware of any security incident/breach involving Infosys or Infosys' client data, notify Infosys within 48 hours on [vendorincident@infosys.com](mailto:vendorincident@infosys.com)

---

<sup>2</sup> Personally Identifiable Information" and/or "Personal Data" 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.

<sup>3</sup>Some Suppliers providing services or products such as housekeeping services, civil construction, hardware services, architectural services are exempted from data privacy clause, unless any personal data processing is involved.

#### 11. 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.

#### 12. Insider Trading

Infosys complies with SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) 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 or any other public company, the Supplier shall ensure:

- (a) Not to disclose UPSI to anyone inside and/or outside Infosys including family and friends
- (b) Not to trade in the securities (equity /derivatives) of Infosys or such public Company either through self or through Portfolio Investment Servicer provider or through immediate relatives till such UPSI is available in public domain

All Suppliers of Infosys, who are SEBI registered / recognized -financial market intermediary or any person who is required to handle UPSI during the course of engagement with Infosys, shall formulate a code of conduct as required under SEBI PIT Regulations.

#### 13. Infosys Brand Name and Logo, Media Rights

Our logo is the most prominent symbol of our products, platforms, and services. The Suppliers 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.

#### 14. Third Party engaged by Supplier

In event the Suppliers engage any third party to provide services/goods to Infosys, Suppliers 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. Suppliers shall be responsible to monitor compliances by such third party and determine that they are in accordance with the applicable laws and regulations.

#### 15. 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 Suppliers 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 and minimum wages, 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/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. Supplier shall not confiscate or request the workers to surrender any government-issued identification, passports or work permits as a condition of employment unless required as per applicable laws. Workers shall not be required to pay Suppliers recruitment fees or other related fees for their employment.

### 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. Suppliers 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. Suppliers 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 bullying<sup>4</sup> and provides for a grievance mechanism to address any concerns raised by its employees.

### 6. 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. Suppliers shall uphold the dignity of its employees at all times and work towards establishing and reinforcing a positive work culture.

---

<sup>4</sup> 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



## 7. 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.

## 8. 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 & COMMUNITY

Suppliers shall develop, implement, and maintain environmentally responsible business practices. We expect our Suppliers to adhere to Infosys standards on environmental protection and work towards following objectives while transparently reporting on their efforts:

- Energy and Emissions: monitor energy consumption, move to renewable sources of energy and reduce GHG emissions
- Water: reduce the consumption of freshwater, reuse and recycle wastewater
- Waste: segregate waste at source and adopt scientific practices in waste disposal and eliminate single use plastic from their operations. Monitor pollution of air, land, water (and noise pollution) and make necessary efforts to eliminate pollution
- Biodiversity: Protect biodiversity and preserve flora and fauna.

Suppliers shall ensure its operations are in harmony with community stakeholders and shall not infringe upon land, forest and water rights of the community.

## E. MANAGEMENT SYSTEM

Infosys is certified to ISO 9001, 14001, 45001, 27001, 27701, 22301, 20000 and sector specific certifications such as AS9100, 13485, and 15489. Infosys has committed to an ESG vision 2030 and has embraced the requirements of GRI

Standards, SASB (IT sector), TCFD, CDP and PAS 2060. Infosys encourages its supplier organizations (from the origin of service or goods provided) to get certified to applicable industry- specific certifications including ISO certifications and make Sustainability/ ESG disclosures in line with the standard requirements mentioned above. ISO certifications, disclosures on ESG and associated ratings and periodic upgradations to demonstrate robust practices in the respective domains will be among important considerations for long term business relationship with Infosys.

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.

## 1. 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 reserves the right to conduct audits with prior intimation to Suppliers. Without limitation, such audits may include Environmental, Social, Governance (ESG) parameters, Sustainability, Social compliance, Modern Slavery, Information security, Business continuity, applicable Statutory and regulatory compliances and adherence to other contractual commitments (SLAs, quality of delivery etc.).

These audits and assessments may be performed physically at Suppliers' premise, virtually or in hybrid mode (partially physical and partially virtual) by Infosys or by its nominated third party. Suppliers shall support such audits in their organization in line with outlined scope of audit. Adherence to the audit timelines and production of relevant artifacts sought during audit and submission of corrective action with appropriate evidence to all the audit findings within the timelines is mandatory. While Infosys will work with Suppliers to improve compliance, failure to co-operate or comply to the audit requirements may result in appropriate action including but not limited to termination of the services 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 numbers. mentioned in the link.

All matters other than data breach or sexual harassment may be reported on [whistleblower@infosys.com](mailto:whistleblower@infosys.com).

Grievances relating to sexual harassment may be raised in writing to [GRB@infosys.com](mailto:GRB@infosys.com)

All data breach and/or cyber security incidents involving Infosys or Infosys' customer data shall be reported in writing to [vendorincident@infosys.com](mailto:vendorincident@infosys.com) within 48 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.