August 9, 2023

Dear Sir/ Madam,

Subject: Disclosure under Regulation 30 read with Schedule III Part A Para A Clause 20 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

This is to inform that the Securities and Exchange Board of India (SEBI) has issued an administrative warning vide their letter dated August 3, 2023. The letter was received through the NSE on August 8, 2023.

The letter mentioned that, from an examination of the Structured Digital Database (SDD) maintained by INFY under SEBI (Prohibition of Insider Trading) Regulations, 2015, the following was observed -

There were certain entries which were logged with a delay in the SDD. It was submitted by INFY that during FY2020-21 due to the ongoing Covid -19 pandemic, most of the workforce was working from their respective homes and not from the office premises. Therefore, it was logistically difficult to coordinate and maintain these records. While the information pertaining to UPSI during such period was available within INFY, it seems that updating of such information in the SDD system was delayed.

As a good governance practice, INFY is now in the process of internal due diligence in exercising completeness of SDD records.

The response of INFY that the delay in updating the SDD was due to the pandemic has not been accepted. A review of the SDD should have been carried out on a periodic basis, which would have ensured that such information was logged properly.

The above violations have been viewed seriously by SEBI. Therefore, the Company Secretary was warned, and henceforth advised to be careful with respect to the maintenance of SDD.

There is no impact on financial, operation or other activities of the listed entity pursuant to the above-mentioned administrative warning letter.

This will also be hosted on the Company’s website, at www.infosys.com

This is for your information and records.

Yours Sincerely,
For Infosys Limited

A.G.S. Manikantha
Company Secretary