

## **TO ALL STOCK EXCHANGES**

## BSE LIMITED NATIONAL STOCK EXCHANGE OF INDIA LIMITED NEW YORK STOCK EXCHANGE

February 28, 2019

Dear Sir/ Madam,

**Sub: Disclosure statement** 

Please find enclosed the disclosure statement titled "Inadvertent Trading by designated person".

This information 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



## **Inadvertent Trading by designated person**

Infosys Limited ("Infosys" or "the Company") today notified the stock exchanges of the occurrence of an inadvertent trade by a designated person of Infosys Limited during open trading window period.

On February 13, 2019, it was brought to the attention of the Compliance Officer of Infosys Limited that Kiran Mazumdar-Shaw, Lead Independent Director of the Company, had inadvertently, through her portfolio management services, sold 1,600 shares of Infosys Limited without obtaining preclearance of trade ("Trade"). The Trade occurred when the trading window was open.

The Trade was carried out by the portfolio manager without the knowledge of Ms. Mazumdar-Shaw. In portfolio management services, the investor does not generally monitor the day-to-day investment decisions. In this case as well, Ms. Mazumdar-Shaw had given no instruction to conduct the Trade and she also had no knowledge of the Trade having occurred. The portfolio manager unilaterally took the decision to conduct the Trade.

The Audit Committee of the Company's Board of Directors, which is responsible for review of compliance with the Insider Trading Policy of the Company was notified of this matter. Based on Ms. Mazumdar-Shaw's submission, the Audit Committee believes, that this was an inadvertent Trade made without intent to violate the Infosys Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"). However, the Audit Committee has determined that there was a violation of the Infosys Insider Trading Policy and the PIT Regulations and therefore imposed on Ms. Mazumdar-Shaw, a penalty of Rs. 9,50,000 which amount shall be payable to a charitable organization of her choice. In accordance with the PIT Regulations and the Infosys Insider Trading Policy, Infosys will also be notifying the SEBI of this event.