INFOSYS LIMITED

CORPORATE POLICY STATEMENT ON INVESTOR RELATIONS

As Adopted by the Board of Directors
On May 15, 2015, 2015

1. PURPOSE

Infosys Limited (together with its subsidiaries, the "Company") is committed, consistent with legal and regulatory requirements, to providing timely, orderly, consistent and credible material information to the investing public, market analysts, the media and other third parties.

The purpose of this Corporate Policy Statement on Investor Relations (the "Policy") is to provide clear guidelines and procedures for receiving external requests for, and making disclosure of, material information in order to promote the Company's goal of providing accurate and timely communications on a broadly disseminated basis to ensure compliance with laws and regulations. This Policy governs communications by our employees and directors with media personnel, members of the investment community including analysts, institutional and individual stockholders, and others who are not bound to us by a duty of confidentiality and/or do not have a "need to know" the information.

2. POLICY

As a publicly held company, the Company is subject to certain obligations imposed by the Securities and Exchange board of India ("SEBI") under SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "SEBI Regulations"), the U.S. federal securities laws and the listing rules of the New York Stock Exchange ("NYSE") regarding the disclosure of information to the public. Premature or otherwise unauthorized disclosure of internal information relating to the Company could adversely affect the Company's ability to meet its disclosure obligations under the SEBI Regulations and the U.S. federal securities laws. In addition, unauthorized disclosure could cause competitive harm to the Company and in some cases result in liability for the Company.

The SEBI Regulations require the Company to formulate a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the SEBI Regulations.

Further, the Securities and Exchange Commission's ("SEC") Regulation FD (Fair Disclosure) ("Regulation FD") prohibits the selective disclosure of material nonpublic information to certain Enumerated Persons (as defined below). The Regulation FD is intended to eliminate situations in which a company may disclose important nonpublic information to securities analysts or selected institutional investors, before disclosing the information to the general public.

Schedule A of SEBI Regulations and Regulation FD requires that, whenever the Company (or a person acting on its behalf) intentionally discloses material nonpublic information to certain specified persons (including broker-dealers, analysts and securityholders), the Company must **simultaneously** disseminate the information to the public in a manner consistent with Schedule A and Regulation FD.

Examples of activities affected by this Policy include:

- Earnings releases and related conference calls.
- Speeches, interviews and conferences.
- Responding to market rumors.

- Reviewing analyst reports.
- Referring to or distributing analyst reports on the Company.
- Analyst and investor visits.
- Postings on the Company's websites.
- Social media communications, including through corporate blogs, employee blogs, chat boards, Twitter, Facebook, LinkedIn, YouTube and any other non-traditional means of communication.

If the Company learns that it (or certain persons acting on its behalf) has unintentionally disclosed material nonpublic information, the Company must promptly publicly disseminate the information no later than 24 hours after discovering the unintentional disclosure or at the opening of trading on the National Stock Exchange of India Limited ("NSE"), Bombay Stock Exchange India Limited ("BSE") and NYSE, whichever is later.

Likewise the SEBI Regulations requires the Company to promptly disclose unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

Further, all information, whether material or immaterial, provided to outsiders by Infosys' employees and directors must be accurate and consistent with these responsibilities.

The Company's General Counsel and Chief Compliance Officer, in consultation with the Company's investor relations department shall have the authority to make materiality and distribution determinations covered by this Policy with respect to the information disclosed about the Company. The General Counsel and Chief Compliance Officer or his/her designees, in each case, together with the Company's investor relations department have the authority to interpret and enforce this Policy. All questions about this Policy should be directed to the General Counsel and Chief Compliance Officer. The General Counsel and Chief Compliance Officer or his/her designee, in each case, together with the Company's investor relations department must pre-approve any deviation from the policies and procedures outlined in this Policy.

i. WHAT IS MATERIAL NONPUBLIC INFORMATION OR UNPUBLISHED PRICE SENSITIVE INFORMATION? Information should be regarded as "**material" AND "price sensitive"** if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security or where the fact is likely to have a significant effect on the market price of the security. Either positive or negative information may be material.

Information is "**nonpublic**" or "**Unpublished**" until it has been widely disseminated to the public (through, for example, a filing with the NSE, BSE or SEC, press conference or release) or is accessible to the public on a non-discriminatory basis and the public has had a chance to absorb and evaluate it. Unless you have seen material information publicly disseminated, you should assume the information is nonpublic.

Financial information is particularly sensitive. For example, nonpublic information about the results of the Company's operations for even a portion of a quarter or the portion of the business might be material in helping an analyst predict the Company's financial results for the quarter. Other examples of information that would normally be regarded as "material" include the following, although the list is not exhaustive:

- Financial results, financial condition, projections or forecasts;
- Known but unannounced future earnings or losses;

- Significant corporate events, such as a pending or proposed acquisition or joint venture;
- Plans to launch new products or features or significant product defects;
- Significant developments involving business relationships with customers, suppliers or other business partners;
- The status of the Company's progress toward achieving significant goals;
- New investments or financings or developments regarding investments or financings;
- Changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
- Events regarding the Company's securities (such as repurchase plans, stock splits or changes in dividends, changes to the rights of securityholders, public or private sales of additional securities or information related to any additional funding);
- Bankruptcies, receiverships or financial liquidity problems;
- Pricing changes;
- Positive or negative developments in outstanding litigation, investigations or regulatory matters; or
- Known but unannounced changes in the members of the senior management, Board of Directors or the key managerial personnel.

When in doubt, you should assume that the information is material and nonpublic. If you have any questions as to whether information should be considered "material" or "nonpublic," please consult the General Counsel and Chief Compliance Officer.

ii. DISCLOSURE POLICY. Company personnel should not disclose internal information about the Company with anyone outside the Company, except as required in the performance of regular duties for the Company. The only persons authorized to speak on behalf of the Company to securities analysts, broker-dealers, securityholders and any other Enumerated Persons (as described below) are the Company's Chief Executive Officer, Chief Operating Officer, Chief Financial Officer or the senior investor relations officer ("IRO") (each an "Authorized Spokesperson").

At various times, any one of the Authorized Spokespersons may designate others (the "Designated Officers") in writing to speak on behalf of the Company and/or respond to specific inquiries when necessary due to the unavailability of an Authorized Spokesperson or due to the specific nature of the request. While others may be designated in writing from time to time to speak on behalf of the Company, it is essential that the Legal Department/ IRO have knowledge of the information being disseminated by those individuals to facilitate the Company's compliance with other applicable legal and regulatory requirements in its external communications.

To the extent practicable, Authorized Spokespersons must contact the General Counsel and Chief Compliance Officer or the IRO before having conversations with any Enumerated Persons in order to review as much of the substance of the intended communication as possible, including slides and other prepared materials.

Pre-written speeches, written statements, presentations and other external communications should, to the extent practicable or appropriate, be reviewed by the Legal Department and the IRO (or his or her designee).

ii. ENUMERATED PERSONS SUBJECT TO REGULATION FD DISCLOSURE REQUIREMENTS. Regulation FD prohibits selective disclosure to certain specified persons, including:

- Broker-dealers and persons associated with them, including investment analysts.
- Investment advisers, certain institutional investment managers and their associated persons.
- Investment companies, hedge funds, and affiliated persons.

The persons noted above are collectively referred to as "Enumerated Persons".

Selective disclosure is also prohibited if made to any securityholder under circumstances in which it is reasonably foreseeable that the securityholder would purchase/hold/ sell the Company's securities on the basis of the information. In some cases disclosure of material nonpublic information to any group can result in a possible Regulation FD violation and non compliance with Schedule A of the SEBI Regulations if the information is not widely disseminated.

Communications in the ordinary course of business with customers, suppliers or strategic partners, as well as communications with the press or news organizations, rating agencies, or the government, are not covered by the regulation.

3. PROCEDURES

Any time an Authorized Spokesperson determines to disclose or discuss nonpublic Company information with anyone who is or might be an Enumerated Person, the Authorized Spokesperson should consult with the General Counsel and Chief Compliance Officer and the investor relations department to determine whether the information is material. If the determination is made that the information to be disclosed is material, the information must be disclosed through a press release or current report on Form 6-K or both before or at the same time that the information is disclosed to the Enumerated Person. The public disclosure may either disclose the material information or, if it is issued prior to disclosure to the Enumerated Person, may disclose that a conference call and/or webcast will be held to disclose the information. The public must be given adequate advance notice of any conference call and/or webcast and the means of accessing it.

i. DAY-TO-DAY COMMUNICATIONS. Inquiries from analysts, securityholders and other Enumerated Persons in any department other than the Investor Relations Department and the offices of any of the Authorized Spokespersons must be forwarded to the IRO. **Under no circumstances should any attempt be made to handle these inquiries without prior authorization from an Authorized Spokesperson, the General Counsel and Chief Compliance Officer or the IRO.**

Planned conversations must include at least one Authorized Spokesperson and should, if practicable, include a second person. It should be determined in advance whether it is intended that any material nonpublic information be disclosed. If so, the material nonpublic information should be disclosed prior to or simultaneously with the planned conversation by the issuance of a press release or the filing or furnishing of a report on a Form 6-K or both.

ii. PRESS RELEASES. The Company will issue press releases from time to time to disclose information that management believes is important or of use to the public, whether or not the information is material. The Authorized Spokespersons or the Designated Officers will designate the appropriate officer to prepare press releases to be issued by the Company. All press releases will be reviewed and approved by the Authorized Spokespersons or the Designated Officers.

In addition, press releases of a financial nature and other material releases as determined by the Chief Financial Officer shall also be reviewed by the Legal Department, and financial releases by independent auditors. The Authorized Spokespersons or the Designated Officers will also designate the "Key Contact"

for follow-up inquiries on the press releases. Alternatively, the Authorized Spokespersons or the Designated Officers may, at their discretion, determine that the Company's press release represents its sole response to inquiries on the matter.

If a director, member of management or employee of the Company learns of information that causes him or her to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, such person should report that information to the Legal Department or the IRO.

The Chief Financial Officer, another Authorized Spokesperson or a Designated Officer will supervise the transmission of financial press releases through the appropriate communication channels. These duties may include:

- Transmission of press release to the stock exchanges.
- Transmission of financial press releases to the Company's investment bankers/analysts.
- Coordinating the transmission of financial press releases on a national wire service.
- Following confirmation of the transmission of a financial press release on a national wire service, the representatives of the local media may be contacted to inform them of the press release and, if appropriate, transmit a copy to them.

iii. CONTACT WITH FINANCIAL ANALYSTS, INVESTORS, REPORTERS AND NEWSCASTERS. Direct contact with financial analysts, investors or reporters will be limited to Authorized Spokespersons, Designated Officers and the IRO. The Authorized Spokespersons, Designated Officers and the IRO shall tell analysts, investors and reports that the Company will not comment on forward-looking statements or information.

Authorized Spokespersons, Designated Officers and the IRO may, subject to the limits described above, discuss the Company's technology, product and markets, as well as corporate issues such as headcount and facilities, provided that such persons shall limit their discussions to the specific areas of interest for which they have been designated. Authorized Spokespersons, Designated Officers and the IRO may discuss financial results of operations for completed quarters, following the public disclosure of the results, but shall not disclose any material information regarding nonpublic results, the Company's internal projections or other matters.

The IRO or another member of the investor relations department should be present in all such meetings along with the Authorized Spokesperson or Designated Officer. The IRO or another member of the investor relations department should minute the key points discussed in all the meetings and bring to the notice of the Chief Executive Officer or Chief Operating Officer or Chief Financial Officer of any material non-public information discussed in such meetings. Where it is not possible for the IRO or another member of the investor relations department to be present at such meetings, the meeting must be recorded or minutes of the meeting must be obtained. Such transcripts or records of proceedings of meetings with analysts and other investor relations conferences shall be made available on the Company's website promptly upon conclusion of the meetings or conferences. Additionally, the Chief Executive Officer or Chief Operating Officer or Chief Financial Officer in consultation with the General Counsel and Chief Compliance Officer and the IRO may require the IRO to disseminate the information to the general public through press releases or a report on Form 6-K so that members of the investing public will have equal opportunity to access the information.

The Company has adopted a "silent" period of 4 weeks before the earnings releases are due. During this period, no representatives of the Company will meet with any analysts, investors, reporters or newscasters. During the cooling-off period, the Company will continue to issue press releases and communicate with the media regarding its business, products or operations, provided that such releases or communications do not contain or discuss financial information or results that have not previously been publicly disclosed. During

the cooling-off period, the Authorized Spokespersons and Designated Officers can discuss information that we have previously publicly disclosed so long as it does not serve to "update" any previously-disclosed projections about our expected financial performance

iv. ANNUAL REPORTS, QUARTERLY REPORTS, COMPANY LITERATURE. The Company will provide an annual report of its financial condition and related business performance in a timely manner following the fiscal year-end. Interim reporting of the Company's financial and business performance will be provided quarterly (for all quarters other than the fourth quarter of each fiscal year) between annual reports.

Adequate advance public notice must be given of any quarterly earnings conference calls and/or webcasts. Notice shall include a press release issued to all major news wires and a posting on the Company's website with information including the date, time, telephone number and webcast URL for the earnings call. The press release must also state the period, if any for which a replay of the webcast will be available. Also, a copy of the release must be provided to the stock exchanges prior to issuance.

A quarterly earnings conference call and/or webcast must be open to analysts, media representatives and the general public. Any such conference call must be recorded and kept by the Company for at least one year. The Company will make certain that the date of the conference call and the oral forward-looking statement safe harbor legend is recited at the beginning of the call or webcast and included in the recording so that the date of the information discussed in the call or webcast is unmistakable to listeners of the archived material. This practice reinforces the historical nature of the information discussed in the call or webcast.

In addition, the Company will conspicuously include on its archive site the forward-looking statement safe harbor language for written communications as the archived webcast becomes a written communication. Web replay of such a call must be available for at least one year after the conference call.

Auxiliary materials, such as corporate brochures, etc., may be provided as determined appropriate by an Authorized Spokesperson or Designated Officer.

- Preparation of such materials will be coordinated by an Authorized Spokesperson or Designated Officer.

- All the aforementioned material must be approved by an Authorized Spokesperson and legal counsel.

v. PRESENTATIONS. Company personnel must receive approval by an Authorized Spokesperson or a Designated Officer prior to accepting any speaking or audiovisual engagement.

- The Designated Officer must approve the content of such presentations prior to disclosure.

- All employees presenting Company information will retain and provide a complete copy of such presentation to the Authorized Spokespersons and the Designated Officers.

vi. HEADQUARTERS AND/OR FACILITIES VISITS. The Company shall continue conducting visits to its headquarters and/or tours of its facilities for analysts or investors and take care to avoid opportunities where the visitor might gain material, nonpublic information in the process. The IRO should be present during all visits with analysts, investors and fund managers along with the Authorized Spokespersons or the Designated Officers.

vii. ANALYST MEETINGS; INVESTMENT BANKER AND BROKER SPONSORED CONFERENCES AND ROADSHOWS. This Policy will apply to communications between Authorized Spokespersons or Designated Officers and Enumerated Persons at analyst meetings, investment banker and

broker conferences and roadshows (other than roadshows undertaken in connection with certain public offerings of the Company's securities). Prior to the meeting, conference or roadshow, the Company will disclose either through a press release (accompanied by a report on Form 6-K), an open conference call or a webcast, or any combination of these methods, any material information that is not already public and which may be discussed or presented at the meeting, conference or the roadshow.

ix. USE OF SOCIAL NETWORKS. Use of social networks, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Twitter, YouTube and any other non-traditional means of communication, to disclose material nonpublic information is considered selective disclosure and would violate this policy.

x. EARNINGS GUIDANCE TO THE MARKETS. The Company and its employees cannot give earnings guidance in any form (including "soft" or indirect guidance) in nonpublic settings. The Company will use the quarterly earnings call to provide general guidance on the financials for the next quarter. The Company should use a press release or notification to the stock exchanges or the filing or furnishing of a report on a Form 6-K or other specific filings with the SEC to update the market on any material change in the earlier guidance provided by the Company, to the extent that such updates will be provided. Any statements regarding earnings expectations will be limited to press releases, publicly available earnings or conference calls or webcasts.

Whenever the Company has issued any estimate or comment regarding distributable earnings, earnings or other financial measures (which will ordinarily be issued through a press release and the filing or furnishment of a Form 6-K), no employee will comment on those projections during the quarter. In response to any question about such information, Authorized Spokespersons or Designated Officers will say that it is the Company's policy not to comment on projections during the quarter. The Company will not comment on its intention to update these materials.

No Authorized Spokesperson or Designated Officer will provide "comfort" with respect to any earnings estimate or otherwise "walk the Street" up or down. If any analyst inquires as to the reliability of a previously, publicly disseminated projection, the Authorized Spokesperson or Designated Officer should follow the "no comment" policy.

Analyst reports and earnings models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst. A written record should be kept of any comments provided on an analyst's report. Such reports must be promptly forwarded to the IRO or his or her designee. Any review of an analyst report may only be done after obtaining the express approval of the IRO.

No Company employee should distribute (including via a web link) copies of, or refer to, selected analysts' reports to anyone outside the Company without the express approval of the IRO. If approved, any such distribution must include a statement to this effect:

"This report has been prepared and distributed by an unaffiliated third party and is being provided to you simply for your information. The Company makes no statement regarding the report or its contents. You should not regard the statements made in the report as being affiliated with or confirmed or denied by the Company in any way."

xi. RUMORS: NO COMMENT POLICY. Rumors concerning the business and affairs of the Company may circulate from time to time. The Company's general policy is not to comment upon such rumors. When it is learned that rumors about the Company are circulating, Authorized Spokespersons or Designated Officers should state only that it is Company policy to not comment on rumors. If the source of the rumor is found to be internal, the Legal Department should be consulted to determine the appropriate response.

xii. MONITOR TRADING. The trading activity of Company stock will be generally monitored by management for unusual trading activity. In addition, the IRO will monitor the financial and news media for stories about the Company. Unusual trading volume or price swings may indicate the inadvertent disclosure of material information that may need to be remedied by a press release.

xiii. VIOLATION OF THIS POLICY. Any violation of this policy by an employee, officer, director or independent contractor of the Company or any of its subsidiaries shall be brought to the attention of the IRO, the General Counsel and Chief Compliance Officer and the Board of Directors and may constitute grounds for termination of service.