

POLICY

HR accessibility
policy and multi-year
accessibility plan

HR customer service
accessibility

ONTARIO



HR accessibility policy and multi-year accessibility plan

Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”), and the Accessibility for Manitobans Act (the “AMA”) all public and private sector organizations must meet the requirements of accessibility standards established by the Ontario Integrated Accessibility Standards Regulation (the “Regulation”) and Manitoba’s Accessible Employment Standard Regulation (collectively “the “Regulations”). This policy reflects the accessibility standards established by the Regulations in the areas of Employment, Information and Communications, Transportation and Public Spaces for Polaris Consulting & Services Inc. Canada (“Polaris”) and Virtusa Canada Inc. (“Virtusa”, and together with Polaris, the “Company”).

This policy has been drafted in accordance with the Regulations and addresses how the Company strives to achieves accessibility through meeting the requirements in the AODA, the AMA and the Regulations. In all circumstances, the Company will comply with applicable laws within each jurisdiction in which it does business. To the extent the law of the province in which you are employed has different or additional requirements, the Company will follow and comply with the applicable law. Please check with our Human Resources if you have any questions.

Policy statement and organizational commitment

The Company is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the Ontario Human Rights Code, the AODA, the AMA, and the Manitoba Human Rights Code.

The Company shall use every effort to ensure that we comply with our obligations under the Regulations in a timely manner.

This Policy applies to all of the Company's Representatives in the Province of Ontario and Manitoba (with the exception of the Accessible Employment section, which applies only to employees). For the purposes of this Policy, "Representative" means employees, volunteers, others that provide goods or services on the Company's behalf and all those who are involved in the development of the Company's policies, practices and procedures.

Policy detail:

Accessibility policy and multi-year accessibility plan

This Accessibility Policy and Multi-Year Accessibility Plan outlines a phased-in strategy to comply with the current and future requirements of the AODA, the AMA and/or the Regulations. The Company will report on the progress and implementation of the plan in accordance with the timelines imposed by the AODA and the AMA, post the information on our website and will provide it in alternative formats upon request. This Accessibility Policy and Multi-Year Accessibility Plan will be reviewed at least once every five years.

Training

The Company provides three types of training related to accessibility: accessible customer service training (as further detailed in the Accessible Customer Service Policy); integrated standards accessibility training; and training on the Ontario Human Rights Code or Manitoba Human Rights Code (as applicable) as it relates to individuals with disabilities. This training will be provided to all Representatives as soon as practicable. Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures. The training provided will be appropriate to the duties of the individual. We shall maintain a record of the dates when training was provided, the number of individuals to whom it was provided to and a summary of content of the training.

Commitment to accessible Information and communications

Accessible Formats and Communication Supports The Company will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. The Company will notify the public about the availability of accessible formats and communication supports. When asked, the Company will provide information about the Company and its services, communications made available to the Company's customers and the public (including this policy), and any publicly available emergency procedures, plans or public safety information in accessible formats or with communication supports.

The Company will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons. The

Company will consult with the person making the request to determine the suitability of any accessible format or communication support provided. If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, we shall, upon request, provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Website accessibility

Except where not practicable, the Company ensures that its current internet website(s), web content (backdated to 2012) and web-based applications conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5).

Feedback regarding accessibility

The Company encourages persons with disabilities to provide comments on the services they receive, including feedback regarding the accessibility of those services and the Company's feedback process itself.

Feedback may be delivered to the Company by telephone, mail, email, or other means available to the person.

The following feedback channels can be used:

- By telephone 508-389-7300
- By email USHR@virtusa.com
- In writing or through electronic or audio recording to
132 Turnpike Road, Suite 300, Southborough, MA 01772

All feedback will be reviewed for possible improvement in the Company's services and accessibility to its services. Feedback will be directed to the most appropriate Company employee for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within ten business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further with respect to the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with the Company's commitment to accessible information and communication supports, described above.

Accessible employment

The Company has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

For clarity, this portion of the policy applies only to employees and does not apply to volunteers and other non-paid individuals.

Recruitment

The Company shall notify employees and applicants about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, the Company shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability, except where to do so would cause undue hardship.

When making offers of employment, The Company will notify successful applicants of the Company's policies for accommodating employees with disabilities.

Employee notification

The Company shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability:

1. As required to new employees as soon as practicable after they begin their employment.
2. Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible formats and communication support

In addition, and where an employee with a disability requests it, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace.

The Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan

If an employee requires reasonable accommodation in the workplace due to a disability, the Company will work with the employee to prepare an individual accommodation plan ("IAP") outlining, among other things, any accommodation measures that will be implemented. The IAP will be provided to the employee in a format which takes into account the employee's disability.

The IAP process will be kept as confidential as possible. No information, including the personal health information provided by employees, will be released to other team members without the permission of the employee, except as where required for reasonable operational purposes: those who are informed will be advised on a "need to know" basis only (e.g., direct supervisor of the employee).

The IAP process is as follows:

- Employee advises their Reporting Manager or their HRBP that they require an accommodation due to a disability. If the employee advises their Manager, the Manager is responsible for contacting Human Resources to engage this IAP Process.
- Employee participates in the development of the IAP with Human Resources. The employee may request to Human Resources the participation of one (1) representative from the workplace to participate in this process with the employee. © 2024 Virtusa Corporation. All Rights Reserved.
- Employee provides Human Resources with information and documentation regarding the employee's functional limitations and advises how the Company may be able to

accommodate the disability. The Company will consider the employee's proposals however, ultimately it is up to the Company to determine what, if any, reasonable accommodations will be provided, based on the documentation submitted by the employee and the Company's operational needs.

- The Company can, at its discretion, request an evaluation by an outside medical or other expert, at the Company's expense, to assist in assessing potential options to accommodate the employee.
- Human Resources documents the accommodation requirements in the IAP, including any workplace emergency response information that may be required.
- Within one (1) week of finalizing the IAP, the Company will provide the employee with a copy of the IAP in a format which takes into account the individual's disability. A copy is placed in the employee's file and a copy will be provided to the employee's direct supervisor.
- Human Resources takes responsibility for ensuring the plan of action outlined in the IAP is in place.
- Each IAP is reviewed in January of each year or when the Company receives information suggesting that the employee's disability-related needs have changed.
- If the Company determines that accommodation is not required or if the Company cannot accommodate the employee without undue hardship, the employee will be provided with the reasons for this decision.

Return to work process

After an employee has been absent from work due to a disability, the Company works with the relevant parties to successfully re-integrate the employee back to work. The Return to Work process is documented in the IAP, and may include the following:

1. A Gradual Return to Work schedule
2. Ergonomic assessments (e.g. chair, desk, computer, etc.)
3. Restrictions (e.g. no heavy lifting, etc.)
4. Time off to attend doctor or specialist appointments
5. Other accommodations, as specified by the doctor (e.g. exercising at desk, etc.)
6. To return to work, the employee must provide proper documentation from their providers. Human Resources will review these documents to determine clearance to return to work

Performance management, career development and advancement and redeployment

The Company will take into account the accommodation needs and/or individual accommodation plans of employees when:

1. Using performance management processes
2. Providing career development and advancement information
3. Redeploying employees.

Workplace emergency response information

The Company shall provide individualized Workplace Emergency Response Information to employees who have a disability:

1. If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability
2. If the employee who receives individual Workplace Emergency Response Information requires assistance and with the employee's consent, the Company shall provide the workplace emergency information to the person designated by the Company to provide assistance to the employee
3. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
4. Review the individualized Workplace Emergency Response Information when the employee moves to a different location within the Ontario or Manitoba organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

If you are a person with a temporary or permanent disability, and require assistance in the event of an emergency, please contact Kristen Daly (kdaly@virtusa.com or 508-389-7313) so that the Company can provide you with a personalized workplace emergency response plan, with your input and consent.

Public spaces

The Company shall incorporate accessibility into the Company's public spaces that are newly constructed or redeveloped on and after January 1, 2017. We will ensure that we follow the requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). We shall also provide, within our contractual obligations and capabilities, restoration and maintenance of the Company's public spaces by ensuring our Multi- Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in the Company's public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

Accessible customer service

The Company remains committed to servicing all individuals, including customers with disabilities. The Company's commitments are detailed in the Customer Service Accessibility Policy, which is available on our Policy Portal.

HR customer service accessibility policy

Purpose

The purpose of this Policy is to establish how Virtusa Corporation and its affiliates and subsidiaries Polaris Consulting & Services Inc. Canada ("Polaris") and Virtusa Canada Inc. ("Virtusa", and together with Polaris, the "Company") will provide access to goods or services to the public and other third parties that do business with the Company ("Customers") with disabilities in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is compliant with the Accessibility for Ontarians with Disabilities Act 2005 ("AODA"), the Accessibility for Manitobans Act ("AMA") and their regulations, specifically, the Ontario Integrated Accessibility Standards Regulation, and the Manitoba Accessible Customer Service Standard Regulation (collectively the "Regulations").

This policy applies to all of the Company's Representatives in the Province of Ontario and Manitoba. For the purposes of this Policy, "Representative" means employees, volunteers, others that provide goods or services on the Company's behalf and all those who are involved in the development of the Company's policies, practices and procedures.

Policy statement:

The company recognizes the importance of:

- Providing goods, services or facilities in a manner that respects the dignity and independence of persons with disabilities
- Integrating the provision of goods, services or facilities to persons with disabilities with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities. Giving persons with disabilities an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities. Communicating with a person with a disability in a manner that takes into account the person's disability.

Standards

Communication

The Company's Representatives will communicate with Customers with disabilities in a manner that takes into account their disabilities. We will consider how a Customer's disability may affect the way that the Customer expresses, receives or processes communications and, where possible, ask the Customer how to best communicate with the individual.

Assistive devices

Assistive devices that may be used by individuals with disabilities are welcome on the Company's premises that are open to the public or other third parties. The Company will take steps to ensure that its representatives are familiar with commonly used assistive devices.

Service animals

The Company welcomes guide dogs or other animals that serve individuals with disabilities in those areas of the Company's premises that are open to Customers and will permit the Customer to keep the service animal with them, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, the Company will provide the Customer with an alternative method of obtaining, using or benefitting from its goods or services.

Support persons

The Company welcomes persons who support individuals with disabilities to accompany them onto the Company's premises open to the public or other third parties. The Company will ensure that Customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the customer.

Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by the Company to Customers with disabilities becomes temporarily unavailable, in whole or in part, the Company will provide advance notice of the disruption on its telephone message, website, at the entrance to its premises or by the service or facility, as is reasonable in the circumstances, at a reasonable time in advance of the disruption and during the disruption. If the disruption is unexpected, the notices will be provided as soon as the anticipated disruption becomes known to the Company. The notices will:

- Explain the reason for and anticipated length of the disruption
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

Training

The Company will ensure that all of its Representatives will be trained on:

- The purpose of the AODA or AMA (as applicable) and the Regulations and an overview of Customer Service Standard under the Regulations;
- How to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- How to use equipment or devices available on the Company's premises, if any, or otherwise provided by the Company that may help with the provision of goods, services or facilities to a person with a disability;
- The policies and procedures created by the Company in accordance with the Customer Service standards under the Regulations and AODA; and
- How to help a person with a disability who is having difficulty accessing the Company's goods or service

This training will also be provided on an ongoing basis, as soon as practicable, whenever the Company's policies change with respect to customer service accessibility for individuals with disabilities. The Company will keep a log of all of the training it will provide documenting who was trained, on what and when.

Feedback regarding accessible customer services

The Company invites feedback on the way that it provides goods or services to individuals with disabilities, including how it provides opportunities for feedback. Those who wish to provide such feedback are encouraged to do so:

- In person
- By telephone
- In writing or
- By delivering an electronic text by email.

All feedback will be directed to the Human Resources team via the below channels:

- By telephone 508-389-7300
- By email USHR@virtusa.com
- In writing or through electronic or audio recording to
132 Turnpike Road, Suite 300, Southborough, MA 01772

Availability of this policy

This Customer Service Accessibility Policy is available to customers on request.

A copy of this policy will be posted on the Company’s corporate website and our Policy Portal.

Upon request, the Company will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person’s accessibility needs due to disability and at no cost. In doing so, the Company will consult with the person making the request in determining the suitability of the format or communication support.

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