



Sustainability report

2023-2024

virtusa
Engineering First

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CEO's message

[GRI: 2-22]

Dear stakeholders,

In a world facing growing sustainability challenges, Virtusa is committed to creating meaningful impact through purposeful action. At Virtusa, we don't just solve business problems—we engineer with purpose, guided by our core values of PIRL: passion, innovation, respect, and leadership, as well as our long-term vision. By embedding sustainability into our strategy, operations, and culture, we ensure that our actions drive resilience, inclusivity, and meaningful progress for a better tomorrow. This includes reducing our environmental footprint, fostering inclusive communities, and driving innovation. I am pleased to share our FY2024 sustainability report, which reflects our ongoing efforts in environmental sustainability, equitable communities, and creating opportunities for all.

We consistently prioritize adapting to achieve measurable outcomes while addressing the significant impacts of climate change, resource scarcity, and social inequality on our business and society. This year, we achieved a key milestone by validating our emissions reduction targets through the Science Based Targets initiative (SBTi), aligning us with global climate goals to achieve net-zero emissions by 2040.

While emerging regulations, access to low-carbon energy, and supply chain risks can impact our sustainability goals, especially our emissions reduction targets, they also present opportunities for innovation, market differentiation, and long-term value creation. By turning these challenges into drivers of progress, we continue to deliver meaningful impact and inspire others to join us in building a sustainable future.

We are proud to share some of our recent achievements:

- **Renewable energy use:** Increased renewable energy usage to 28%, reducing emissions by 15%.
- **Talent transformation:** Invested in a Virtual Gamified Induction program that provides new hires with an immersive and interactive induction experience.
- **Water stewardship:** Joined the CEO Water Mandate to enhance sustainable water management and align with global goals.
- **Supply chain engagement:** We partnered with a leading sustainability assessment platform to track supplier contributions to our SBTi Scope 3 reduction targets.
- **Inclusive workplace:** Recognized as a Great Place to Work® in eight countries, including India, the U.S., and the U.K.

Looking ahead, we are committed to achieving 100% renewable energy usage by 2030. These milestones reflect our vision for a resilient future powered by sustainable innovation and inclusivity.

I sincerely thank our incredible teams, partners, and stakeholders. Your support and commitment drive this transformative journey. Let's continue to innovate, inspire, and shape a more sustainable future for all.



Yours sincerely,

Santosh Thomas
Chief Executive Officer

A stylized handwritten signature in blue ink, appearing to read 'Santosh', with a long horizontal line extending from the end.

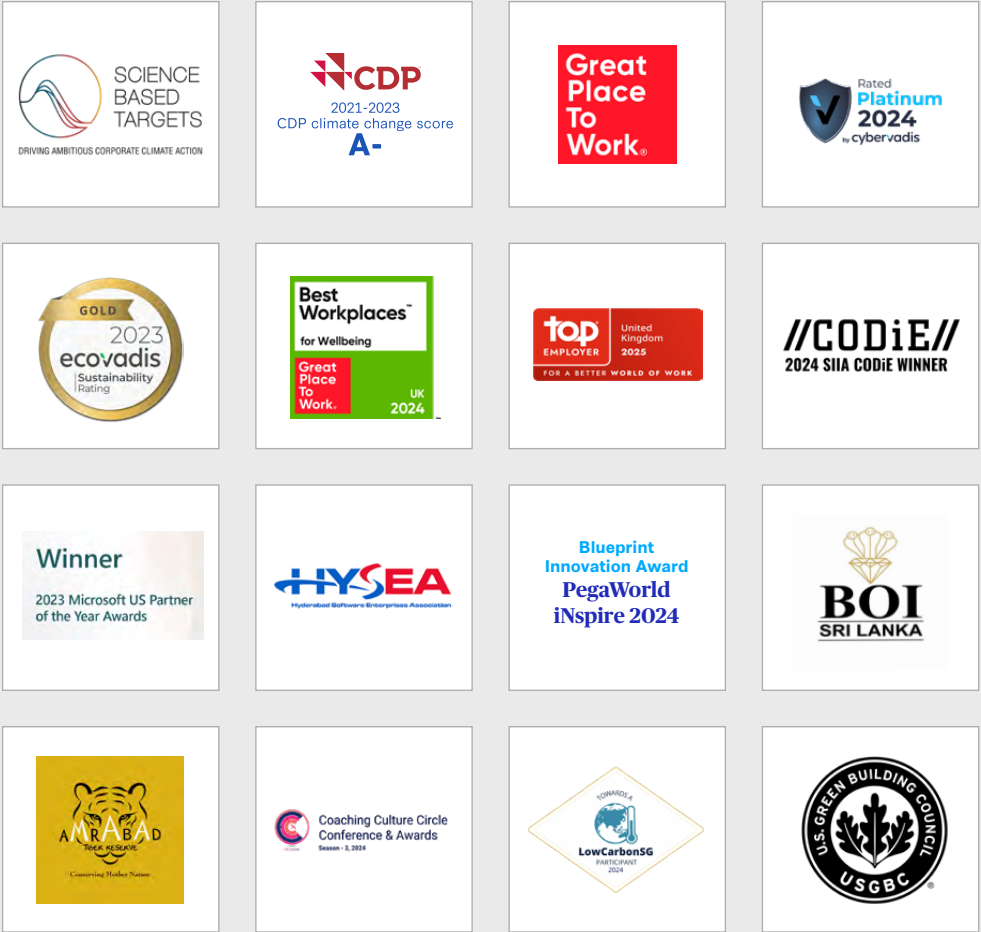


Awards and recognitions



Our commitment to sustainability, innovation, and employee well-being has earned us prestigious awards and global recognition for excellence in environmental practices, workplace culture, and technological advancements, as follows:

- Science Based Targets initiative (SBTi) approved Scopes 1, 2, and 3 net-zero targets
- CDP climate change score of “A-” (leadership band) for 2021-2023
- Great Place to Work in Australia, Canada, India, Singapore, Sri Lanka, the UAE, the U.K., and the U.S.
- CyberVadis Platinum medal
- EcoVadis Gold medal in 2023 and 2024: Top 5% of 130,000+ companies globally
- U.K.’s Best Workplaces for Wellbeing in 2023 and 2024
- America’s Most Cybersecure Companies by Forbes: Virtusa ranked 3rd in 2023
- SIIA CODiE Award finalist for Best Healthcare Technology Solution
- Microsoft U.S. Partner of the Year Award for Azure Modernizing Applications
- HYSEA ESG Award 2023 for Health and Wellbeing initiatives
- Recognized with Blueprint Innovation Award at PegaWorld iNspire 2024
- Most Outstanding Exporter in Services Award by the Board of Investment of Sri Lanka (BOI)
- Best Rural Development and Environmental Sustainability Award for the Solar Harmony Borewells initiative at Amrabad Forest Reserve, near Hyderabad
- Innovative and Impactful Coaching Practices winner at the Coaching Culture Circle Conference and Awards for the second time
- Virtusa Singapore achieved LowCarbonSG certification
- Virtusa Hyderabad received LEED Platinum certification for Operations and Maintenance from the U.S. Green Building Council (USGBC), adding to its LEED Gold certification for New Construction.



Goals and performance





Environmental goals

[TCFD: Metrics and targets]

- Our emission reduction targets are validated by the Science Based Targets initiative (SBTi).
- *Indicates a revised target. In FY24, we revised our renewable energy (RE) target from 2040 to 2030 to align with our SBTi goals.

Table: Performance on environmental goals

Target	Base year	Target year	Target %	FY24 status
Near-term				
Science Based Target: Reduce Scopes 1 and 2 (market-based) greenhouse gas (GHG) emissions (absolute target)	2019	2030	75%	48%
Science Based Target: Reduce Scope 3 greenhouse gas (GHG) emissions from purchased goods and services, capital goods, business travel, and employee commuting (absolute target)	2019	2030	42%	59%
Obtain energy from renewable sources*	2023	2030	100%	28%
Reduce per employee water usage	2017	2035	40%	78%
Engage with vendors to switch 20% of their fleet to EVs (electric vehicles) each year	2023	2030	100%	27%
Ensure organic waste generated at owned campuses in India is recycled	2023	2026	100%	71%
Increase recycling of paper waste	2023	2026	90%	55%
Reduce plastic usage (food packaging, plasticware, pens)	2023	2026	100%	59%
Long-term				
Science Based Target: Reach net-zero GHG emissions across the value chain	2019	2040	90%	55%



Social goals

Table: Performance on social goals

Target	Base year	Target year	Target %	FY24 status
Near-term				
Increase gender diversity in workforce	2021	2026	40%	33%
Increase gender diversity in hiring	2021	2026	55%	38%
Increase supplier diversity	2022	2026	58%	42%



About Virtusa





Organizational details

[GRI: 2-1]



Legal name:
Virtusa Corporation



Nature of ownership and legal form:
Privately owned by EQT AB



Location of headquarters:
Massachusetts, United States



23 Countries, 49 Locations



30,000 World-class professionals



270 Active clients



1.7 Billion FY24 Revenue

Our global presence





Vision

We believe that engineering plays a vital role in making the world a better place, and putting Engineering First can spark change. By harnessing the power of innovative solutions, technical expertise, and a commitment to sustainable transformation, we aim to engineer a better future for all by bringing every idea to life. Whether it's pushing the boundaries of technology, solving complex problems, or designing groundbreaking products, we are dedicated to empowering the world through technology to make a lasting impact.

Mission

Our mission is to drive lasting business transformation by putting Engineering First. We firmly believe that no two clients are alike, and by understanding what makes you “uniquely you,” we can create the best-fit solution for you. By engineering cutting-edge technological innovations and leveraging industry-wide partnerships, we are dedicated to empowering businesses to thrive in the digital age and overcome any challenges that come their way. Our commitment to sustainable transformation means that we work tirelessly to provide the resources and expertise necessary for all businesses to not only succeed but flourish well into the future.

PIRL values



Passion

Inspire our global teams to deliver extraordinary results.



Innovation

Apply intellectual curiosity to reimagine better business outcomes for our clients.



Respect

Protect our environment, honor our diversity, and treat everyone with dignity.



Leadership

Lead by example, thinking and acting with agility.

Sustainability mission

Virtusa, with an Engineering First philosophy and rooted in our PIRL values—passion, innovation, respect, and leadership—has embraced a purpose-driven approach to future-proof our businesses and supply chain with accountability and responsibility for our sustainability footprint with transparency.

We do so by enabling all our stakeholders—customers, suppliers, investors, and teams—to have a purpose and a passion for people and the planet.

Future-proofing our value chain

[GRI: 2-6]

Virtusa Corporation is a global provider of digital engineering and technology services and solutions for Forbes Global 2000 companies in the financial services, healthcare, communications, media, entertainment, travel, manufacturing, and technology industries worldwide. At Virtusa, digital engineering is at the heart of everything we do. We are 30,000 builders, makers, and doers who partner with customers to reimagine enterprises and creatively build solutions to the most pressing business challenges; these solutions move them to the forefront of their industries.

Services and solutions

At Virtusa, we don't just provide solutions and services; we combine logic, creativity, and curiosity with building, solving, and creating. Everyday, we help clients engage with new technology paradigms, creatively building solutions that solve their most pressing business challenges and move them to the forefront of their industry. Detailed information on our service offerings is available on our website, www.virtusa.com.

We operate in an industry that sees constant change due to the emergence of new technologies. For example, there has been a recent rise in technologies, such as AI, cloud, and robotic process automation. As such, our service offerings incorporate emerging technologies where they align with our business strategy.

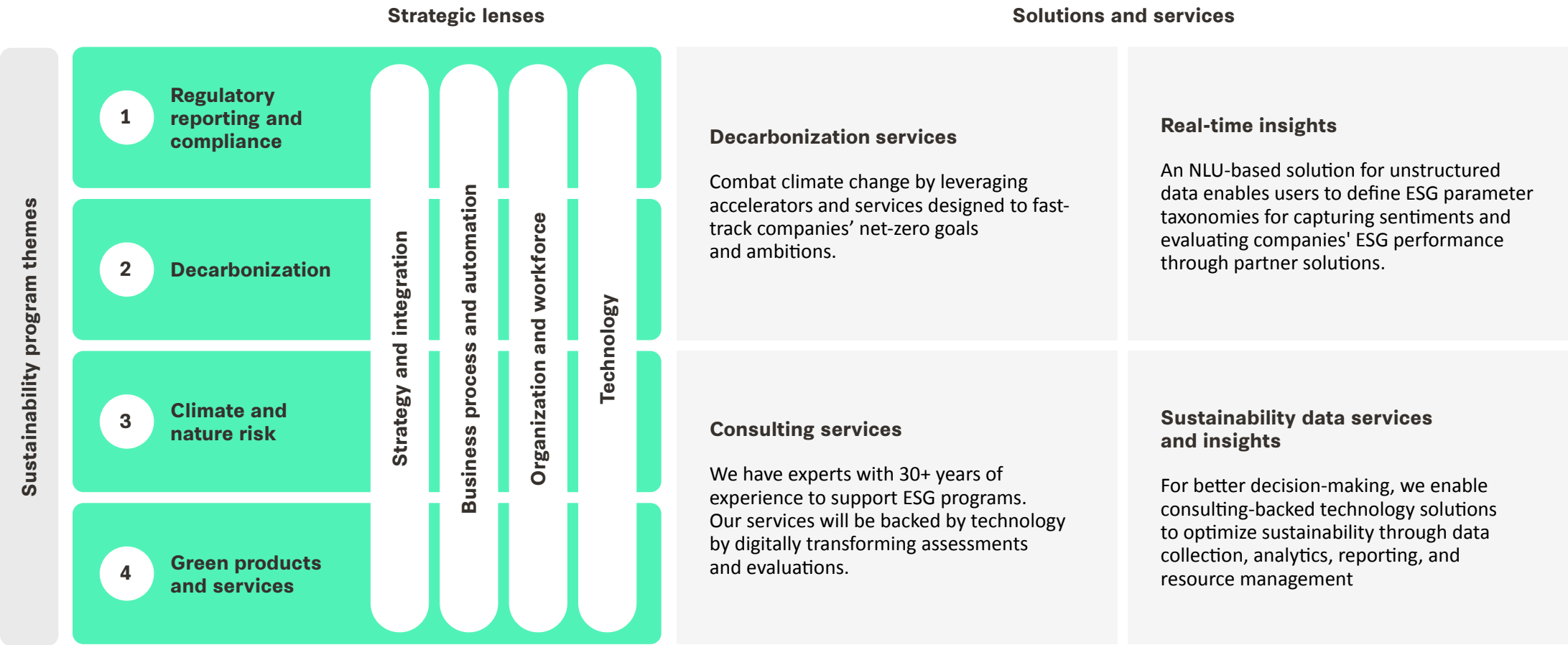
In FY23, we introduced a new line of sustainability service offerings to support the transition to a low-carbon economy through innovative technology. In FY24, we further enhanced our offerings, focusing on four areas: regulatory and compliance reporting, decarbonization, climate and nature risks and sustainability interventions in products and services.

These offerings are based on our winning partnerships within ESG/sustainability, cloud, and data domains and draw from our deep expertise in digital engineering, data, analytics, and regulatory reporting. We help our clients meet their sustainability goals and assess and measure critical KPIs through digital transformation, platform modernization, and data and analytics. We have partnered with data analytics providers like Expert.ai, Cognite, Infozech, Power BI, and Tableau to bring the best analytical solutions for structured and unstructured data across banking and financial services (BFS) and non-BFS. Our cloud-native partners include AWS, GCP, Azure, Pega, and Salesforce, enabling us to leverage and integrate partner ecosystems throughout the value chains of our clients' businesses. These service offerings are detailed in the image that follows.





Virtusa's sustainability offerings





Our clients

We serve clients across North America, Europe, Asia Pacific, and the Middle East. During the fiscal year that ended on March 31, 2024, 74% of our revenue was generated in North America, 16% in Europe, and 10% in the rest of the world.

Supplier base

We have a large supplier base (approximately 1,970 suppliers in FY24) that provides goods and services to support our operations across the following categories—workplace and facilities, transport, IT and telecommunications, food services, and security services. We engage with our suppliers on sustainability through multiple channels. For detailed information on our supply chain, see ["Supply chain engagement" on page 67](#).

Employees and other workers

For breakdowns related to employee data, see ["People data" on page 94](#).

Sustainability governance

Role of the highest governance body in overseeing the management of impacts

[\[GRI: 2-12, 2-14; TCFD: Governance\]](#)

In FY24, we changed the name of our ESG (environmental, social, and governance) committee to the sustainability committee. This new name better represents our broader focus on sustainability, which includes environmental, social, and governance topics. Our sustainability committee is overseen by the company's board of directors and various senior executives. These members comprise two board directors—the audit committee chairperson and our CEO. Additionally, executive team members, namely the chief financial officer, chief people officer, compliance officer and general counsel, and global head of sustainability and facilities, are also part of the sustainability committee.

The sustainability committee's purpose is to support Virtusa's sustainability commitments, including our response to climate change. It is responsible for overseeing and managing the embedding of sustainability into the business strategy and the developing, implementing, and overseeing sustainability-related communications. It serves as the ultimate decision-making body for the company's sustainability programs and policies.

The sustainability committee has the mandate to assist the organization's leadership in:

- Embedding sustainability into the business strategy
- Developing, implementing, and monitoring interventions and related policies for sustainability
- Engaging with stakeholders by overseeing communications concerning sustainability
- Monitoring and assessing development and improving the organization's understanding of sustainability
- Disclosing sustainability-related reports and information to internal and external stakeholders on a timely basis

With regard to climate change, the sustainability committee engages in the following activities:

- Reviewing and guiding strategy, significant plans of action, risk management policies, annual budgets, and business plans
- Setting performance objectives and monitoring the implementation of performance objectives
- Overseeing major capital expenditures, acquisitions, and divestitures
- Monitoring and overseeing progress against goals and targets for addressing climate-related issues
- Assessing climate-related risks and opportunities

In FY24, our sustainability committee signed off on Virtusa's greenhouse gas (GHG) emissions targets, which were submitted to the Science Based Targets initiative (SBTi) for approval. The committee also approved the FY23 sustainability report, which followed the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB) standards for software and IT services, and the Task Force on Climate-related Financial Disclosures (TCFD) recommendations.

The sustainability committee tracks progress on sustainability goals mainly through the quarterly update.

Apart from the sustainability committee, EQT AB—our parent company—actively provides guidance on our climate change program and sustainability strategy.

For example, one of the annual KPIs EQT AB track is whether a portfolio company has a sustainability champion on the board, and training is provided to ensure accountability. In addition, EQT AB collaborates/provides guidance on the following: (1) Purchase of EACs/RECs, (2) Virtusa's OGSM (objective, goals, strategies, and measures) for our sustainability program, (3) Virtusa's sustainability service offerings, (4) Setting SBTi targets in alignment with EQT AB's commitment to ensuring 100% of the EQT AB portfolio companies will have their own SBTs validated by 2030, 10 years faster than required by SBTi.

Delegation of responsibility for managing impacts

[GRI: 2-13, 2-18]

While our sustainability committee has the highest level of responsibility for assessing and managing our sustainability strategy, the executive team members in the committee are responsible for implementing aspects of our sustainability program as appropriate for their roles. They are also responsible for updating the board and the sustainability committee every quarter or as and when important matters arise.



Santosh Thomas
Chief Executive Officer

As an executive board director and a member of the board-level sustainability committee, the CEO is responsible for ensuring that Virtusa's sustainability commitments are integrated into the overall business strategy and that the company meets its sustainability communications targets. For example, in FY24, the CEO approved and signed Virtusa's endorsement of the CEO Water Mandate, a collaboration between the UN Global Compact and the Pacific Institute focused on water stewardship. This initiative integrates water sustainability goals into leadership efforts across the supply chain and direct operations. Additionally, the CEO actively addresses climate-related matters, including assessing risks and opportunities as part of the sustainability committee. The CEO is also responsible for reviewing and approving our sustainability policy and its sub-policies, including the environmental responsibility policy. These policies outline various climate-related requirements related to climate issues, such as energy management, emissions reduction, water conservation, and resource consumption.



Amit Bajoria
Chief Financial Officer

The CFO assesses and monitors Virtusa's climate strategy, including reviewing and approving targets related to emissions reduction, energy reduction, and efficiency. The CFO oversees the development, implementation, and success of these targets. One of the CFO's responsibilities is to address climate-related risks and opportunities within the organization. This involves working closely with relevant teams across the company to develop mitigation and adaptation strategies that align with the environmental sustainability goals. The CFO facilitates the preparation of regular reports regarding the sustainability progress for the board. By working closely with cross-functional teams, the CFO ensures that Virtusa successfully addresses the challenges of climate change while simultaneously driving value creation and managing risks, aligned with our environmental sustainability goals. For example, in FY24, the CFO approved renewable energy investments for our Navalur campus and facilitated the purchase of energy attribute certificates for our facilities globally.



Paul Tutun

Compliance Officer/General Counsel

Compliance officer/general counsel: The compliance officer/general counsel is responsible for administering the ethics and compliance program. He also provides inputs and approvals for sustainability disclosures, including our CDP response and sustainability report.



Lori Mullane

Chief People Officer

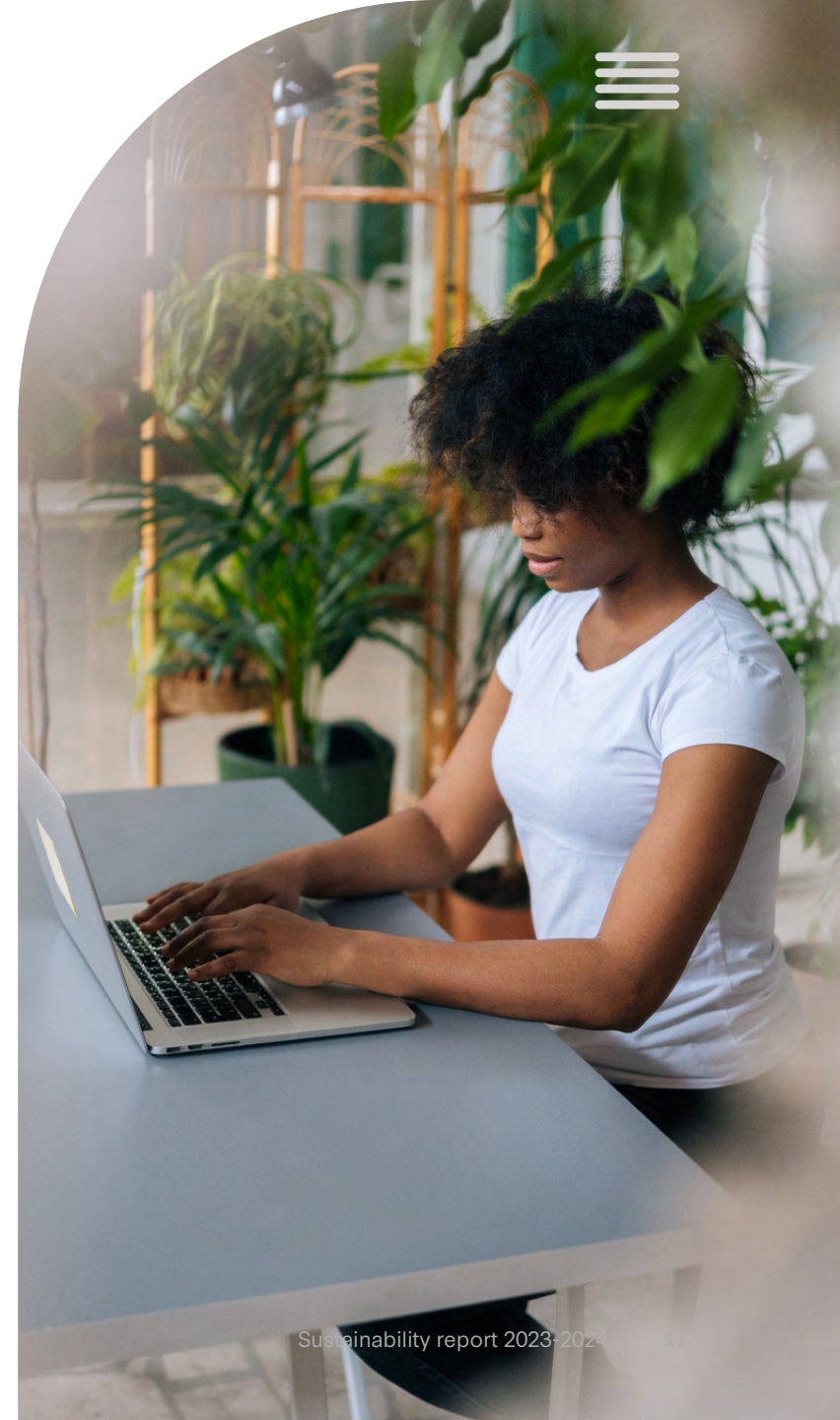
Chief people officer: The CPO spearheads the global human resources (HR) organization, focusing on attracting and retaining world-class talent. As a result, the CPO is responsible for all aspects of talent management, including labor practices and our diversity program. Function-specific and location-based human resources leaders are responsible for the implementation of various components of the programs.



Denver De Zylva

Global Head of Sustainability and Facilities

Global head of sustainability and facilities: Our global head of sustainability and facilities reports directly to the CFO and is responsible for managing our climate strategy through target setting, reducing our environmental footprint, and communicating with internal and external stakeholders. The global head of sustainability and facilities provides quarterly briefings on Virtusa's climate strategy and performance to the sustainability committee and CFO via consolidated reports and presentations. He also provides updates to the board when required. Currently, he is responsible for managing Virtusa's SBTi Net-Zero emissions alignment plans. The facilities teams in each geographic location are responsible for implementing the strategy. They also ensure Virtusa's ISO14001 and ISO 50001 certifications. Online dashboards provide insights into resource usage and environmental footprint, enabling course correction at any time. The global head of sustainability and facilities also plays an active role in value chain engagement, where he consistently engages with clients, investors, and other stakeholders to future-proof the business by positively impacting our sustainability footprint. This also includes supporting internal and external activities for private and public partnerships. For example, he represents Virtusa on the UN Global Compact Network Sri Lanka board and is also a board advisor to their Water and Ocean Stewardship working group. As a member of the Sri Lanka Association of Software and Service Companies (SLASSCOM) ESG committee, he helps to formulate the ESG strategy for the IT industry in Sri Lanka.





Strategy, policies, and practices

Policy commitments

[GRI: 2-23]

We have the following policies in place to ensure responsible business conduct:

Policies	Intergovernmental instruments	Approved by	Links
Business continuity management policy	Not applicable	Chief risk officer	Internal policy
Code of business conduct and ethics	Not applicable	Board	https://www.virtusa.com/about/corporate-compliance
Energy policy	Not applicable	Global head of sustainability and facilities	Internal policy
Enterprise data privacy policy	Not applicable	Chief risk officer	Internal policy
Environment, health and safety policy	Not applicable	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance
Environmental responsibility policy	Precautionary approach	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance
Equal employment opportunity policy	Not applicable	VP, human resources	Internal policy
Foreign Corrupt Practices Act policy	Not applicable	Compliance officer	Internal policy
Grievance policy	Not applicable	VP, human resources	Internal policy
Harassment-free workplace policy	Not applicable	VP, human resources	Internal policy
Human rights policy	• Universal Declaration of Human Rights • ILO Declarations on the Fundamental Principles and Rights at Work • ILO Minimum Age Convention No. 138 • The 10 Principles of the UN Global Compact • UN Guiding Principles on Business and Human Rights	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance



Policies	Intergovernmental instruments	Approved by	Links
Information security management policy	Not applicable	CEO	Internal policy
Modern anti-slavery and human trafficking policy	Not applicable	Chief people officer	Internal policy
Modern Slavery Act statement	Not applicable	Global head of sustainability and facilities	https://www.virtusa.com/about/corporate-compliance
Plastics policy	Not applicable	Global head of sustainability and facilities	https://www.virtusa.com/about/corporate-compliance
Social responsibility policy	Not applicable	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance
Supplier code of conduct	• Bill of Rights • ILO Declarations on the Fundamental Principles and Rights at Work • ILO Minimum Age Convention No. 138	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance
Sustainability policy	Not applicable	Sustainability committee/CEO	https://www.virtusa.com/about/corporate-compliance
U.K. anti-corruption policy (Bribery Act 2010)	Not applicable	Compliance officer	Internal policy





Embedding policy commitments through our sustainability framework

[GRI: 2-24]

Our sustainability strategy is embedded in and implemented through our sustainability framework, which is based on seven core areas. The framework was developed based on the sustainability areas deemed most material to us and our stakeholders. As such, the framework helps us identify the sustainability areas our business strategy needs to focus on. Where applicable, we have obtained certification for each area, such as ISO 14001 for environmental management and ISO 27001 for information security. If an area is not certified, we follow the guidance for such certification. The core areas are backed by appropriate policies and training.

In order to get a better understanding of how our sustainability efforts support the UN Sustainable Development Goals, we have mapped each SDG to the most relevant core area.



ESG	Area	Framework/guidance	SDGs
E	Environment	ISO 14001:2015 Environmental management Systems ISO 50001:2018 Energy Management Systems ISO 14064 Guidance (Greenhouse gases) ISO 14007:2019 Guidance on Environmental Management Greenhouse Gas (GHG) Protocol LEED (Leadership in Energy and Environmental Design)	   
E S	Health/safety facility management	ISO 45001:2018 Occupational Health & Safety Management ISO 41001:2018 Facility Management 5S Methodology	 
S G	Business continuity management	ISO 22301:2019 Business Continuity Management System	
S G	Information security and data privacy	ISO 27001:2022 Information Security Management System ISO 27701:2019 Privacy Information Management System General Data Protection Regulation (GDPR) (EU)	
S G	Human rights, labor standards, and diversity	SA 8000 Guidance Modern Slavery Act 2015 (UK) Equality Act 2010 (UK) UN Convention on the Rights of Persons with Disabilities (UNCRPD) UN Guiding Principles on Business and Human Rights	  
S G	Anti-bribery and corruption	Foreign Corrupt Practices Act 1977 Bribery Act 2010 (UK) ISO 37000:2021 Guidance on Governance of Organizations	
E S	Corporate engagement and social impact, corporate social responsibility (CSR)	ISO 26000 Guidance on Social Responsibility Companies Act 2013 section 135 (India)	   

Certifications

- ISO 14001: 2015**
17 (93%) technology centers in Australia, India, Singapore, Sri Lanka, the U.K., and the U.S. are certified.
- ISO 45001: 2018**
17 (93%) technology centers in Australia, India, Singapore, Sri Lanka, the U.K., and the U.S. are certified.
- ISO 41001: 2018**
11 (89%) technology centers in India and Sri Lanka are certified.
- ISO 22301: 2019**
14 (90%) technology centers in India, Sri Lanka, Sweden, the U.K., and the U.S. are certified.
- ISO 27001: 2022**
18 (93%) technology centers in India, Mexico, Poland, Singapore, Sri Lanka, Sweden, and the U.S. are certified.
- ISO 50001: 2018**
3 (51%) technology centers in India (Hyderabad campus and Capital, CHN: Navalur) are certified.
- ISO 27701: 2019**
15 (91%) technology centers in India, Singapore, Sri Lanka, Sweden, and the U.S. are certified.

Legend:

E Environment **S** Social **G** Governance



Communication of policy commitments

Employees

We maintain a comprehensive set of policies on our internal policies portal, emPower. In addition, we have the following training on corporate policies:

Code of business conduct and ethics (the “Code”)	All employees and contractors are required to complete mandatory onboarding training on Virtusa’s code of business and ethics (the Code) upon joining the company, which covers information on our anti-bribery and anti-corruption policies. All employees and contractors are also required to sign an acknowledgment document stating they have read and understood the Code. Additionally, we have an annual training and recertification requirement for 5% of specifically identified team members, including management and those engaging with third parties. Apart from completing mandatory training, employees who interact with the government or perform finance, procurement, human resources, or business functions receive training regularly. This training is provided to ensure they are aware of the types of corruption and bribery, the risks of engaging in corrupt activity and bribery, the company’s anti-corruption policy, and ways of reporting suspected corruption and bribery.
Information security	All employees are required to undergo our Security First information security training and assessment upon joining Virtusa and to repeat the training and assessment annually. In addition, specifically identified team members must complete the cybersecurity awareness training and undergo role-based privacy training, as required. Information security best practices are likewise shared with employees through email, intranet portal, and awareness sessions. In addition, phishing simulations are conducted periodically to assess employee awareness, and focused training is provided to those who fall prey to the simulated exercise.
Data privacy	All employees are required to undergo our data privacy training module and assessment upon joining Virtusa and to repeat the training and assessment annually. Data privacy best practices are also shared with employees through email, intranet portal, and awareness sessions.
Secure software development	Mandatory training on secure software development is essential for our technical team. Since many vulnerabilities are from code, this training helps our developers and testers gain a strong understanding of secure software development, allowing them to build products with minimal risk of security breaches.
Anti-harassment	All employees are required to complete mandatory training through the Code of Conduct training and Prevention of Sexual Harassment training.
Environment, health, and safety	All employees undergo Safety First training at onboarding and must renew the certification annually. The training covers ergonomics, health and well-being, emergency preparedness and fire safety, climate action and energy conservation, and waste reduction and sorting.

For information on completion rates for mandatory training, see ["Governance data" on page 96](#).



Processes to remediate negative impacts and reporting mechanisms

[GRI: 2-16, 2-25, 2-26]

Our commitment is to maintain a workplace where everyone feels secure and supported. We strive to foster a safe, prompt, and confidential environment for our employees and stakeholders to feel comfortable sharing work-related concerns, including issues with ethics and compliance, human resources, and company processes without fear of retaliation. Individuals can seek guidance or report potential violations of our Code or policies through multiple channels, including the following options:

- Report directly to their line manager, human resource business partner, or leadership team members
- Report complaints anonymously and in a protected manner through Virtusa’s confidential and anonymous concern hotline at <https://www.openboard.info/VRTU/> by using one of the two following methods:
 - Secure web form submission tool using a secure and encrypted web form
 - Secure hotline at (U.S./domestic) 1-844-403-4964 and (international) 402-999-0449
- Submit a complaint online via our company website on our corporate compliance page: <https://www.virtusa.com/about/corporate-compliance>
- Contact Virtusa’s general counsel and compliance officer
- Report concerns involving accounting, internal controls, or auditing matters to the audit committee of the board of directors

Virtusa provides all its employees with information regarding our confidential and anonymous concern hotline as part of our annual ethics and compliance communication plans. Reports may be made anonymously and are handled to protect the reporting person’s confidentiality, subject to applicable laws, rules, regulations, or legal proceedings.

Our general counsel, who also serves as our compliance officer, oversees the management of reports submitted through the web-based tools and hotline (to which the audit committee also has access). All matters raised through these channels are investigated and reviewed by our general counsel and may include the engagement of external counsel and other advisors as needed. Any accounting-related issues are promptly escalated to the chairperson of the audit committee. The general counsel provides quarterly hotline reports and updates to the audit committee, including the reported complaints and actions to address them.

Virtusa takes allegations of discrimination and harassment seriously. Our human resources team handles these matters in accordance with our harassment-free workplace policies. Upon receiving a complaint, we initiate a timely and impartial investigation while prioritizing confidentiality within reason. When misconduct is confirmed, prompt corrective action is taken to address the issue, which may include disciplinary measures, up to and including termination of employment, to ensure the matter is resolved.

The company expressly forbids any retaliation against any party, who, in good faith, raises concerns or reports instances of alleged misconduct, discrimination, or harassment. Retaliation against individuals who report such concerns will not be tolerated, and those involved may face disciplinary action, including possible termination. We encourage any employee who believes that they have experienced retaliation to promptly report it to human resources, our general counsel and compliance officer, or any member of Virtusa’s executive leadership team.

For breakdowns of whistleblower reports, see ["Governance data" on page 96](#).





Compliance with laws and regulations

[GRI: 2-27, 206-1, 418-1; SASB: TC-SI-520a.1]

We are committed to upholding the highest standards of ethical conduct in our business operations. To ensure compliance with all laws and regulations, we integrate them into our comprehensive risk assessments and due diligence procedures across all functional areas. For example, within our environmental initiatives, we continually monitor compliance with current regulations through our ISO 14001 certification process.

During the reporting period, there were no monetary or non-monetary sanctions for non-compliance with laws and regulations related to our business operations, including providing services, anti-competitive behavior, anti-trust, monopoly practices, and environmental regulations. Furthermore, we received no law enforcement requests for user information, experienced no significant data breaches, and encountered no performance issues, service disruptions, or customer downtime.





Stakeholder engagement

[GRI: 2-29]

Virtusa defines stakeholders as those groups that our operations can influence and that can, in turn, affect us. We identify and classify stakeholders based on impact, influence, legitimacy, and urgency, which inform the nature of our stakeholder engagement activities. The stakeholder groups we engage include clients, investors, employees, academia, suppliers, governments, non-governmental organizations (NGOs), and trade associations. Clients, investors, and employees have the most significant impact on our operations. The following table lists examples of engagement channels we utilize with our stakeholder groups:

Stakeholder	Engagement mode
Clients	• Client visits and meetings • Annual account-level client feedback survey • Quarterly project-level client feedback survey • Client-initiated surveys and audits • Sustainability report • Media interactions
Investors	• Investor presentations and events • Investor portal for financial information and relative announcements • Sustainability report • Investor questionnaires • Media interactions

Stakeholder	Engagement mode
Employees	• Surveys (e.g., onboarding survey, five-month survey, and exit survey) • Internal support group framework • Open-door policy • Employee pulse checks • Social media
Academia	• Centers of excellence • Curriculum development and advice • Internship program • Career guidance and awareness • Mentoring for final-year university projects • Industrial visits/career fairs • Social media and media interactions

Stakeholder	Engagement mode
Supplier	• Supplier code of conduct • Sustainability assessment • Supplier survey • Supplier awareness sessions • Media interactions
Governments	• Membership of sustainability associations • Collaborations with government bodies on sustainability through our Virtusa Foundation programs • Media interactions
NGOs and trade associations	• Media interactions • Conferences and public forums on sustainability • Membership in trade associations • Surveys • Community outreach programs through the Virtusa Foundation



Client engagement

Clients are one of our most significant groups of stakeholders, and they play an integral role in the development of our sustainability program. Virtusa’s experienced account managers are at the forefront of this, responsible for developing strong, growing relationships and working every day with our clients and service delivery teams to understand and address client needs. Clients contribute to innovation and improvement in our business, as their ideas and experiences are incorporated into our body of knowledge.

We seek regular client feedback in the form of surveys (conversational and written) conducted by an independent third party on a quarterly and annual basis.

The results are then qualitatively and quantitatively analyzed:

- **Annual account customer satisfaction survey (ACSAT):** ACSAT is aimed at the senior client stakeholders to measure the health of the account relationship and capture the residual sentiment/experience with Virtusa. It covers elements beyond satisfaction, such as stickiness, business value, future capabilities, and positioning, by taking inputs on feedback and feedforward aspects.
- **Project-level customer satisfaction survey (PCSAT):** PCSAT is a key performance measure for operational-level client stakeholders. Client feedback is collected each quarter from project-specific stakeholders, and a consolidated report is published at a business unit level. The results help us identify areas of client engagement that may need attention.

Internally, all negative responses require action plans from our teams to ensure that identified problems are corrected. We also undergo periodic client audits, which allow us to demonstrate compliance with the applicable statutory, regulatory, and client requirements. These audits enable us to review our policies and processes to determine whether they meet client expectations.

Talent engagement

[GRI: 2-30, 402-1]

We aim to recruit, enable, and retain the best talent globally, and employee engagement plays a pivotal role in achieving this strategy. Virtusa engages and interacts with all employees to optimize everyone’s potential and foster team culture. Employees are engaged through platforms, such as mobile-enabled and AI-powered surveys (e.g., pulse-check survey, onboarding survey, five-month survey, 18-month survey, and exit survey), which gives them the opportunity to provide periodic feedback to us. Team members can engage with leadership at leadership updates at the regional, local, and account levels, as well as at town hall sessions. We also engage our workforce through digital platforms, including RAVE and Viva Engage. These allow employees to interact, acknowledge each other’s work in real time, and share ideas, strengthening collaboration and transparency.

Virtusa recognizes the right to freedom of association through collective bargaining agreements (CBAs) in accordance with the guidelines and compliance frameworks set out by governments in the countries where we operate. Besides our team members in Spain, our employees are not covered by CBAs. This is partly due to the open communication and cordial relations we maintain with employees through avenues, such as our open-door policy and employee surveys.

Additionally, we provide notice regarding any operational changes in compliance with local laws.





Reporting practices

Entities included in sustainability reporting and material topics

[GRI: 2-2, 3-1, 3-2, 3-3]

Since we manage our business as one operating segment, aspects that are related to economics, labor practices, human rights, governance and ethics, data privacy and information security, and corporate social responsibility activities are reported for all Virtusa entities. Environmental data includes all physical offices in North America, Europe, Asia, Australia, and New Zealand, except for locations added through acquisitions in FY24.

In FY24, we acquired three companies to strengthen our domain expertise and grow our professional services teams: Factor Creative LLC, a well-known full-service creative agency; BRIGHT, a major elite partner of ServiceNow and Splunk; and ITMAGINATION Sp. z o.o., a technology consultancy. These acquisitions expanded our operations into the U.S. Canada, Bulgaria, and Poland. Note that these entities are included in our financial statements for FY24.

We conduct an annual materiality assessment to determine the most important topics to cover in our sustainability report. Based on this assessment, we develop a materiality matrix that highlights the most important issues for us and our stakeholders. Over the last few years, through requests for proposals, investor questionnaires, and certification audits, we have seen an increased interest in cybersecurity and data privacy, human rights, climate change, diversity, health and safety, environmental impact of products and services, as well as supply chain management. As a result, these aspects were given additional weightage while developing the FY24 materiality matrix.

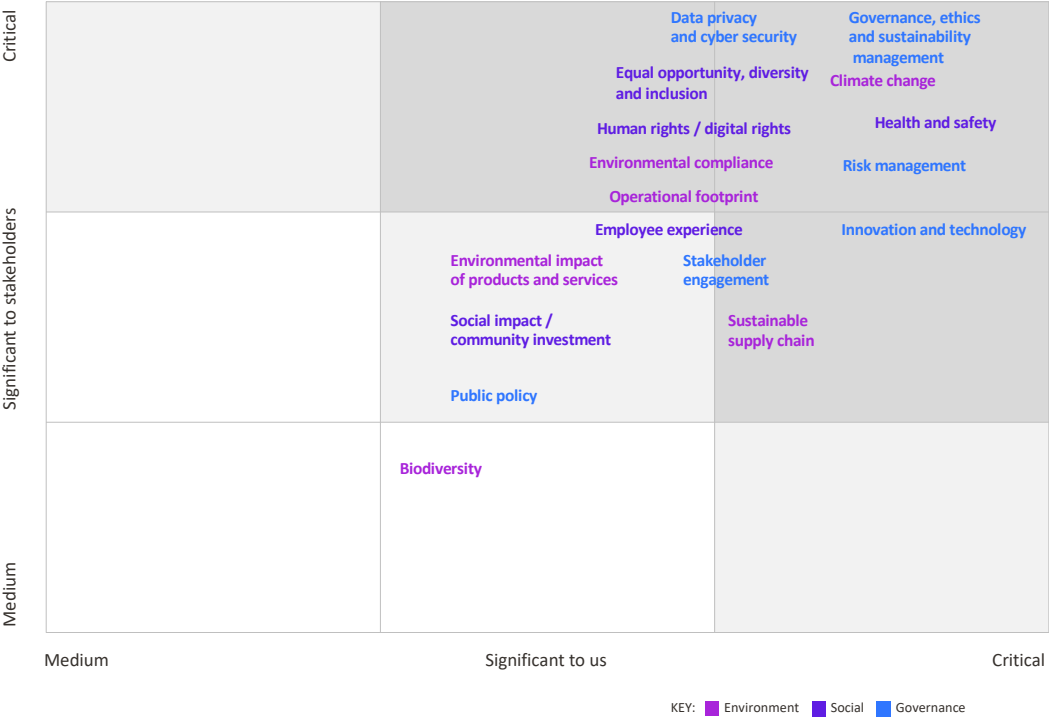
Based on the FY24 assessment, the most material topics for Virtusa are as follows:

- **Environment:** Environmental compliance/justice, climate change, operational footprint, water and effluents, environmental impact of products and services, and biodiversity
- **Social:** Equal opportunity, diversity and inclusion, health and safety, human rights/ digital rights, social impact/community investment, talent attraction, retention and development (employee experience), stakeholder engagement

- **Governance:** Corporate governance, ethics, and sustainability management, data privacy and cybersecurity, innovation and technology, public policy and risk management, and sustainable supply chain

In the FY24 materiality matrix, some topics have been consolidated under broader umbrella categories. For instance, child labor and human trafficking are grouped under human rights, while energy, water, and waste are included within the operational footprint. Aside from these adjustments, there are no significant changes to topic boundaries compared to previous reporting periods.

We have made every effort to submit another comprehensive sustainability report in FY24 regarding the dimensions, scope, and boundary for the reporting period.





Restatements of information

[GRI: 2-4]

FY23 sustainability databook - page 7: The Scope 3 emissions breakdown pie chart showed the total Scope 3 emissions value as a separate element, which resulted in a distorted presentation.

The correct values should be:

- Purchased good and services: Increases from 28% to 62%
- Capital goods: Increases from 2% to 5%
- Fuel and energy-related activities: Increases from 4% to 9%
- Upstream transportation and distribution: No change, remains as 0%
- Business travel: Increases from 8% to 19%
- Employee commuting: Increases from 3% to 6%

This restatement does not have a significant impact on other reported data.

External assurance

[GRI: 2-5]

Since 2022, we have been obtaining external assurance of our sustainability report to ensure accuracy and transparency in our reporting.

We detail our sustainability progress based on the following frameworks:

- Global Reporting Initiative (GRI)—in accordance (pages 113-123)
- Sustainability Accounting Standards Board (SASB) standards for Software & Information Technology (IT) Services (page 109)
- Task Force on Climate-related Financial Disclosures (TCFD) recommendations (pages 77-85)

The report is externally assured by Messrs. Ernst and Young.

Environment





Our strategy and approach

[TCFD: Metrics and targets]

We are committed to following the precautionary principle as defined in the Rio Declaration to reduce the environmental impact of our business operations and services. Our commitment to reducing our environmental footprint and complying with all environmental regulations is outlined in our environment, health, safety, and environmental responsibility policies. We launched our environmental management system in 2008 as a proactive response to climate change. We have ISO 14001:2015 certification for 17 delivery centers, covering 89% of our headcount.

The sections that follow provide information on our management approach to environmental impacts. For performance data and data computational methods, see ["Sustainability databook" on page 85](#)

Emissions and energy reduction

[GRI: 302-5]

To drive our GHG emissions reduction, we focus our efforts where we can have the most significant impact. Our strategy for reducing emissions includes investing in energy efficiency projects and renewable energy (RE), cloud migration, reducing the footprint of data centers, and exploring sustainable travel options.

Energy-efficient buildings

We have developed build-out guidelines that set the energy and resource efficiency standards for all office spaces and new build-outs. In FY24, we continued to invest in improving the energy management of our buildings. For instance, at our Capital campus in Hyderabad, we upgraded old chillers with Energy Star 5 (chillers), which are expected to save 95,500 kWh of energy annually.

We are currently working towards achieving the LEED Zero certification for our Navalur campus in India.

FY24 highlights

- 28% of energy from renewable sources in FY24
- 15% decrease in total Scopes 1 and 2 GHG emissions (market-based) from the previous year
- 50% of water recycled

Committed to net-zero emissions by 2040

In June 2024, the SBTi validated our 1.5°C aligned near- and long-term GHG emissions reduction targets.

“Climate science demands rapid, deep emissions cuts to achieve global net-zero and prevent the devastating impacts of climate change. Virtusa’s net-zero targets reflect this urgency and set a clear example for its peers to follow.”

Susan Jenny Ehr
Interim Chief Executive Officer
SBTi

Renewable energy (RE)

In line with our SBTi targets, we revised our RE goal in FY24 to achieve 100% energy from renewable sources by 2030. We also expanded our investments in RE through power purchase agreements (PPAs), RECs, and green tariffs. We continue to explore RE options, especially for our India and Sri Lanka offices, which have the largest energy footprints. For example, we plan to invest in RECs in FY25 when we cannot obtain RE directly.

Energy-efficient IT devices

We ensure that our office equipment is energy-efficient. Per our procurement guidelines for IT hardware, all devices, including laptops, servers, endpoints, and networks, must comply with the standards set by the Electronic Product Environmental Assessment Tool (EPEAT) ecolabel from the Green Electronics Council (GEC). Our IT equipment is rated EPEAT™ Gold, ENERGY STAR® 8.0 (laptops) and EPEAT™ Gold, ENERGY STAR®6.1 (desktops).

Responsible travel

- Installation of 23 EV chargers across India and Sri Lanka
- Promotion of carpooling and bike pooling amongst employees that saved 6,457,971 MtCO2 emissions since FY18
- Working with our travel partners to better understand our carbon footprint per trip and further improve our travel policy to reduce business travel and strategies to adopt low-carbon travel



Investments in renewable energy

- On-site solar at our campuses in India accounted for 1,731.21 MWh in FY24
- Two offices in Sweden and one in Germany obtain electricity from 100% renewable sources through green tariffs
- Signed a PPA to obtain 1 MW of renewable energy annually for the Navalur campus
- Obtained RECs/EACs for our facilities globally in FY24, which accounted for 3,549.17 MWh

Water

[GRI: 303-1, 303-2; SASB: TC-SI-130a.2]

As a digital engineering and consulting company, Virtusa's operations are not water intensive. However, we understand the importance of responsible water use, particularly given that 73% of our operations are in areas experiencing water stress (according to our FY24 analysis).

We mainly use water for drinking, hygiene, cooling towers, and landscaping. As of FY24, 50% of our water used is recycled. Freshwater is only used for cooling towers at our Navalur campus, while our Hyderabad campuses use air-cooled chillers. Our operations do not affect water sources significantly, as the sources are neither in designated protected areas nor have high biodiversity value. Water sources with total dissolved solids (TDS) that measure less than 1,000 mg/L are considered freshwater.

Strategies for water management include:

- Retrofitting with sensor taps
- Using sewage treatment plants (STPs)
- Conducting water purification through reverse osmosis
- Undertaking rainwater harvesting

While most of our leased facilities use STPs, a few facilities, including Colombo, discharge wastewater into municipal sewers. At our three campuses in Hyderabad and Navalur, wastewater is treated in STPs and used for flushing and landscaping. We use rainwater harvesting pits to recharge the groundwater table, and by the end of FY23, the pits had a total capacity of 612.49 kiloliters. We have reverse osmosis plants that purify water for drinking at two campuses. Through water management initiatives at our Hyderabad and Navalur campuses, our goal is to transform them into zero-discharge facilities.



Engagements on water

In FY24, we joined the CEO Water Mandate, a collaboration between the UN Global Compact and the Pacific Institute. The Mandate commits businesses to continuously improve six areas of water stewardship—direct operations, supply chain and watershed management, collective action, public policy, community engagement, and transparency. We are also part of the UN Global Compact Network Sri Lanka water stewardship working group. As working group members, we focus on operationalizing six commitment areas, including conducting a water footprint assessment and reporting outcomes in the UN Global Compact Communication on Progress (COP).

Waste

[GRI: 306-2]

We have processes for managing electronic waste (e-waste), paper, plastic, and organic waste. E-waste, paper, and plastic (India and Sri Lanka) are handed over to a certified vendor for recycling. We also work with relevant state authorities to ensure e-waste is handled responsibly. For example, our e-waste vendor in Tamil Nadu has been audited by Perry Johnson Registrars Inc., a global full-service registrar with multiple international accreditations. We purchase farmed paper, and all departments are encouraged to use paperless forms, notifications, and reports where possible. We are also investing in printers with greater efficiency and piloting the rollout of a universal printer solution, which provides alerts on print counts to reduce paper consumption further. We have also implemented organic waste management processes at our campuses in India.



Plastics policy

In FY24, we developed a plastics policy to complement our existing environmental waste policies. The policy sets out our commitment to reducing the use of plastics, especially single-use plastic.

Data centers

[GRI: 302-4, 302-5; SASB: TC-SI-130a.3]

Over the years, we have consistently followed a stringent elimination, modernization, and consolidation strategy to ensure effective and sustainable data center management. This strategy has enabled us to centralize the organization’s shared IT operations and equipment for storing, processing, and disseminating data and applications for internal and external clients.

Virtusa continues to use the following measures to ensure our data centers’ efficient and sustainable management:

- **Migrating to the cloud:** With our “cloud first” strategy, we were an early adopter of cloud strategy. Virtusa has migrated 100% applications (production) to the cloud, with over 75% of core workloads migrated to the cloud. Beyond servers, we have continuously focused on reducing/migrating other supporting security hardware and infrastructure to the cloud.
- **Consolidating data centers:** Virtusa has optimized resource use by consolidating data centers, which minimizes the use of devices with a high energy footprint (like servers and HVAC units).
- **Replacing legacy hardware:** By continuously focusing on replacing End of Sale/End of Life (EOS/EOL) devices, such as servers and HVAC units across data centers, and implementing energy-efficient infrastructure, Virtusa has modernized 95% of legacy systems.
- **Continual optimal restructuring:** Virtusa continually restructures the data center space to reduce HVAC impact.
- **Reducing physical server and network units:** We continue reducing our hardware footprint by digitalizing the server and network infrastructure. As a result, we have achieved 100% virtualization of server infrastructure to reduce our physical footprint.
- **Monitoring performance and faults:** Each data center device is monitored 24/7 for effective performance. This is supported by the implementation of 24/7 alert management systems to identify, repair, and replace faulty hardware.
- **Partnering:** We have partnered with Schneider Electric for efficient E2E power management.
- **Monitoring compliance:** Virtusa continuously monitors governance compliance with its internal controls, policies, and procedures.



Data center strategies

- Avoided 105.76 MTCO2e by switching to the cloud in FY24
- Decommissioned 368 servers and 17 network devices, saving 2,544,342 kilowatt-hours per year
- Reduced data center real estate space globally by 60%

Biodiversity impact

[GRI: 304-3]

In FY24, we conducted a basic city-level assessment using the Integrated Biodiversity Assessment Tool (IBAT) to determine if any of our offices are located near biodiversity-protected areas. The assessment found that we do not have any direct operations that intersect with biodiversity. While Colombo is a Ramsar wetland city, we don't have any offices near wetland parks.

While biodiversity has little material impact on us, we have invested in multiple restoration projects due to biodiversity's crucial role in maintaining the balance of natural ecosystems.

Kanneliya-Dediyagala Nakiyadeniya Biosphere Reserve restoration project

In FY24, we continued supporting the LIFE to Our Forests program. In partnership with Biodiversity Sri Lanka (BSL), this project aims to restore 10 hectares of degraded land in the Kanneliya Forest Reserve, a UNESCO biosphere reserve. Phase III has been built on the success of Phase II (2018-2022), which led to vigorous plant growth and the appearance of new species of butterflies, dragonflies, and birds at the restoration site.

Phase III outcomes:

- The rise in faunal and floral species is significant; among these, 42 species are endemic, and 29 are listed as vulnerable in the National Red List. Several new species were also identified, including eight butterfly species, six amphibian species, two reptile species, and seven frugivorous bird species.
- BSL initiated the development of a biodiversity credit accrual system to benefit private sector investors and influence policymakers on green investments.
- BSL launched a university-based research program to generate valuable data for future restoration initiatives.



Contributions to national and international targets

- United Nations Strategic Plan for Forests 2017-2030
- The Bonn Challenge
- Convention on Biological Diversity (CBD), post-2020 global biodiversity framework
- United Nations Framework Convention on Climate Change (UNFCCC)
- UN Sustainable Development Goals (SDGs)
 - Goal 13: Climate Action
 - Goal 15: Life on Land
 - Goal 17: Partnerships for the Goals
- Nationally determined contributions (NDCs) to the UNFCCC
- National Biodiversity Strategies and Action Plan (NBSAP)

Certifications

Awarded the Preferred by Nature's Ecosystem Restoration Standard in 2024, which comprehensively verifies restoration efforts to ensure they achieve their intended ecological and community benefits. The Standard covers social and environmental criteria, field verification, stakeholder engagement, sustainability, and monitoring.



Restoring water bodies

We have invested in two projects to restore water bodies.

The first project is to restore the Ranglal Kunta lake in Hyderabad, India, a vital water source for nearby communities. However, urbanization and encroachments have resulted in degradation. Restoration includes cleaning the lake area, dewatering and desilting the lakebed, stone pitching the central bund and the inlet points, bund formation with pathway, repairs to the weir and sluice, inlet and outlet works, wetland construction, and landscaping and beautification.

The second project is to restore the Alli Kulam community-driven pond in Chennai. The pond, which is 0.66 acres and 210 meters, will be restored to increase the percolation rate and groundwater table.

Moreover, there are plans to build fences and bunds to prevent encroachment and plant trees to boost greenery and attract birds.

Contributions to national and international targets

- UN Sustainable Development Goals
 - Goal 6: Clean Water and Sanitation
 - Goal 11: Sustainable Cities and Communities
 - Goal 13: Climate Action
 - Goal 14: Life Below Water
 - Goal 15: Life on Land
 - Goal 17: Partnerships for the Goals





LIFE to Our Mangroves project

Virtusa has partnered with Biodiversity Sri Lanka in the LIFE to Our Mangroves project, which aims to restore 10 hectares of degraded mangrove forest in the Anavilundawa Ramsar Wetland Sanctuary. Often referred to as “the lungs of the sea,” mangrove ecosystems provide critical services for global biodiversity, including carbon sequestration and coastal protection. Although mangroves account for less than 2% of marine environments, they provide 10% to 15% of global carbon burial services. About 21 real mangrove species and several mangrove-associated floras, representing one-third of the diversity of mangrove species worldwide, are found in Sri Lanka.

The restoration is being done with guidance from the Department of Wildlife Conservation (DWC), and all project activities will follow the standards set by the International Union for Conservation of Nature (IUCN) for nature-based solutions.



Contributions to national and international targets

- UN Sustainable Development Goals
 - Goal 1: No Poverty
 - Goal 13: Climate Action
 - Goal 14: Life Below Water
 - Goal 15: Life on Land
 - Goal 17: Partnerships for the Goals
- Nationally determined contributions (NDCs) to the UNFCCC
- Blue Carbon Initiative

International recognition

LIFE to Our Mangroves contributes to Sri Lanka’s goal of increasing mangrove cover by 50% by 2030. The United Nations recognized the country’s effort to restore 10,000 hectares of mangroves as a 2024 World Restoration Flagship.





Solar Harmony Borewells initiative

Virtusa’s installation of 10 solar-powered borewells in the Amrabad Tiger Reserve is a significant step towards ensuring a reliable water supply for the reserve’s wildlife in the deep forest areas. It will also provide water for the local Chenchu tribal community. The reserve, part of the Nallamala Forest track, is renowned for its rich biological diversity and is home to Telangana’s largest tiger population.

In addition, Virtusa donated a baling machine designed to compress plastic bottles left behind by visitors at the tiger reserve. Once the bottles are crushed, the plastic can be sent to a recycling facility for processing.

Contributions to national and international targets

- UN Sustainable Development Goals
 - Goal 12: Responsible Consumption and Production
 - Goal 15: Life on Land
 - Goal 17: Partnerships for the Goals

Awards

Virtusa won the Best Rural Development and Environmental Sustainability Project Award from the Nirmaan Organization





Miyawaki plantation at leading universities in India

Virtusa carried out a large-scale Miyawaki plantation drive at the Gandhi Institute of Technology and Management (GITAM) University and Guru Nanak University, planting over 11,500 native saplings. Spread across 3.1 acres of land in Hyderabad, 8,000 saplings at GITAM University and 3,500 at Guru Nanak University were planted through the widely known Miyawaki method. The Miyawaki method, a Japanese afforestation technique, fosters rapid growth, enhances biodiversity, and improves soil stability. The 50 native species selected for this plantation drive are expected to grow over seven feet within two years, creating a dense, self-sustaining ecosystem that will benefit the local environment.

Similar plantation drives were conducted at the KPR Institute of Engineering and Technology and K.S.R. College of Engineering in Coimbatore and Tiruchengode, where 5,500 and 4,500 saplings were planted, respectively.

Contributions to national and international targets

- UN Sustainable Development Goals
 - Goal 13: Climate Action
 - Goal 15: Life on Land
 - Goal 17: Partnerships for the Goals



Social





Our strategy and approach

We believe in putting our people first. Virtusa gives everyone equal opportunities, creating a positive employee experience and supporting individual growth. We are committed to achieving 40% gender parity in our workforce by 2026 and emphasize local hiring to create stronger, more diverse communities. As of March 31, 2024, we had 30,000 Virtusa team members across the business, a decrease from last year.

Our chief people officer is ultimately responsible for all labor practices, with responsibilities cascaded down to local human resources (HR) leaders. Within locations, separate teams focus on specific areas, such as recruitment, training, career development, compensation, and benefits. The location-level human resources teams are also responsible for employment-related compliance and investigations of any violations related to HR policies and procedures.

Topics material to our people management strategy include labor and human rights, diversity and inclusion, training and skills development, and health and safety.



Social strategy focus areas

- Creating inclusive and equal opportunities for all
- Providing reskilling opportunities to equip our workforce for the future
- Investing in employee wellness and safety

Supports Sustainable Development Goals

- Goal 4: Quality Education
- Goal 5: Gender Equality
- Goal 8: Decent Work and Economic Growth





Our policies

[GRI: 2-23, 2-24]

Consistent with our PIRL (passion, innovation, respect, and leadership) values, we have a well-defined governance framework for human rights and equal opportunity designed to carry out our hiring, staffing, and career development processes fairly and without bias.

Human rights policy: This policy sets out our commitment to comply with the Universal Declaration of Human Rights and follow the UN Guiding Principles on Business and Human Rights (UNGPs) as applicable to our business operations. The policy also provides information on the whistleblower procedure to report any concerns.

Equal employment opportunity policy: This policy prohibits any form of discrimination based on race, color, religion, creed, national origin, ancestry, sex, age, qualified mental or physical disability, sexual orientation, genetic carrier status, veteran status, military service, any application for any military service, and other areas, as protected by law. We also have geo-specific policies against discrimination to ensure compliance with legal requirements. All employees are required to complete mandatory training on these policies through the Code of Conduct training and Prevention of Sexual Harassment training upon joining.

Grievance policy and grievance policy guidelines: These determine our procedure for reporting complaints related to discrimination, new work practices, and other human rights violations.

Discrimination and harassment-free workplace policy: This policy sets our commitment to maintaining a workplace free of discrimination and harassment. We also have geo-specific discrimination and harassment-free workplace policies to ensure compliance with legal requirements. For example, in India, there is a separate prevention of sexual harassment policy to comply with legal requirements. In FY19, we updated our Code of Conduct training to include a component on harassment and acceptable behavior in the workplace.

As Virtusa is a digital engineering services company, child labor, forced and bonded labor, slavery, and human trafficking are not significant risk factors in our direct operations. However, we are aware of these threats and have policies and procedures to ensure that our business and supply chain are not complicit in such human rights abuses. As such, our human rights policy and supplier code of conduct prohibit the use of child labor, forced and bonded labor, and modern slavery. In 2017, we implemented an anti-slavery and human trafficking policy, which specifically addresses the issues of modern slavery and human trafficking.



Talent management

[GRI: 404-3]

We nurture high-performing talent through personalized employee success journeys. In FY24, based on our talent transformation agenda, we created a hybrid career landscape for tech resources to provide a clear growth path from campus to CXO. A comprehensive career framework outlines our organization’s career paths, job levels, responsibilities, and desired skills to clarify how employees can progress within their chosen career paths and the skills they need for advancement.

We introduced technology service lines and the home manager concept to aid team members in their competency development by providing a home for all associates beyond their current deployments and a home manager as a mentor and career coach for all in service lines. Further, guilds enable engagement and knowledge sharing. The tech career path provides avenues to move within track or across tracks to broaden employee skills and experiences.

All employees have regular performance appraisals that drive career development, compensation, and promotions. Our performance philosophy is embedded in achieving business goals, competency assessments (behavioral and technical), and employee engagement for senior managers. We conduct 360-degree assessments for leadership (managers and above), and the inputs from these assessments support individual development plans and promotions. Utilizing the Harrison Assessment Test, we also assess the behavioral indicators of all leaders at the manager level and above.



Unique onboarding process

In-line with our commitment to leverage technology to enhance the employee experience, we invested in an innovative Virtual Gamified Induction program in FY23. The program helped us to successfully engage new hires with technology solutions and gamification elements, offering an immersive and interactive induction experience. Following the program’s success in India, we are exploring the possibility of implementing it globally.



Gamified performance management

Our compensation practices are tailored to the **three P's: pay for person, pay for position, and pay for performance**. We link our base salary and our variable pay to individual performance and company performance. We benchmark regularly, and employees can be confident that our compensation is fair and aligned with the market. Pay is only one way to reward employees, and we provide a holistic compensation package that includes:

- Paid reskilling, education, and development opportunities
- Multiple training programs under the Thrive Leadership and Learning Academy
- Regular opportunities for playing stretch roles, job rotations, and opportunities to work directly with clients
- Non-moderated employee communication across all levels of the organization
- High-quality benefits, opportunities, and packages

We have a clear policy for the company component of the bonus program; the policy is available on our internal portal for easy reference.



REPs

Real-time engagement and performance scores (REPs) is an innovative performance management system that provides real-time performance feedback. REPs captures outcomes, activities, and achievement data from all our digital platforms to provide transparent feedback on self-development, organizational citizenship, and team performance.

RAVE

RAVE is a 360-degree recognition and appreciation portal that allows employees to thank, recognize, and reward their colleagues' contributions. It incorporates gamification and badges to enhance employee recognition and morale.





Diversity and inclusion

Our diversity strategy is augmented by investments in technology and security systems to enable our teams to work remotely regardless of geographical or social boundaries. By doing so, we have helped individuals and teams with diverse backgrounds and experiences collaborate globally. Furthermore, we are committed to creating an equal opportunity workplace and community — growing women into leadership roles with coaching and training in leadership and flexible work options.

Our diversity council is responsible for governance and oversight of our diversity programs, goals, and performance. Our diversity charter reaffirms our commitment to initiatives, such as increasing gender diversity in our workforce, from 31% female in FY22 to 40% female by FY26. For performance against our diversity goals, see ["Social goals" on page 9](#).

Employee resource groups (ERG) across geographies are designed to support employees. Additionally, we also provided scholarships to underserved women students in universities and engineering institutes. For example, in 2023, for International Women's Day, we gave 25 scholarships worth LKR 2.5 million to female students in Sri Lanka and 48 scholarships worth INR 15 million to female students in India.

Accessibility support

Virtusa ensures that our digital platforms and office environment adhere to global accessibility and enablement standards to provide all our team members with an accessible working environment.

All our major digital platforms are certified as accessible, and we have included accessibility as a criterion for selecting and evaluating new software. The Virtusa Facilities Design and Build Guide requires our offices and facilities to have accessibility features, such as wheelchair access.

Women of Virtusa (WoV)

WoV is an employee resource group that supports women's careers through their stages of life. It provides extensive programs on career development, recreation, work-life balance for female employees to support career growth. This program is a global initiative with chapters in different geographies.

Vision

It enables female employees to have successful, long-lasting careers at Virtusa.

Mission

- To promote a sense of belonging for a long tenure with Virtusa
- To help female employees balance professional and personal lives
- To help female employees interact with successful professionals to build networks and skill sets
- To promote and provide resources for awareness on a healthy lifestyle
- To ensure women have access to clear career and developmental paths for high engagement at Virtusa

Through WoV, Virtusa has created an ecosystem for women to learn, share, exchange ideas, and build leadership skills, thereby supporting their growth and thriving with us.



Learning and development

[GRI: 404-2]

We are committed to ensuring the professional development of our team members, whether they want to improve their technical skills, enhance their leadership abilities, or develop expertise in a particular area. By integrating AI-driven digital tools, diverse learning formats, and strategic partnerships, we align skill development with overall business strategy and provide personalized skilling journeys for our team members.

In line with our aim to fulfill 75% of positions from within the organization, we invest in external licenses, partnerships with training providers, certification programs, and domain training to offer a wide range of learning opportunities. For example, we encourage our team members to get industry certifications and reimburse the cost, with approximately 300 certifications currently covered by the policy. Internal domain certifications are also available and cover domains such as banking, finance, capital markets, insurance, healthcare, wealth management, telecommunication, etc. Overall, 7,000 team members obtained certification on a diverse range of topics in FY24.

The fact that many of our training sessions are conducted by team members showcases the learning culture at Virtusa. Employees who want to act as trainers are trained in facilitation and receive additional recognition. They also get opportunities to conduct external tech talks and training for university students.

Overall, our learning and development programs contribute to the achievement of UN SDG 4 (Quality Education) and UN SDG 8 (Decent Work and Economic Growth).

The learning and development differentiator



360-degree coverage
Provides technical, domain, communication, etc., with hands-on exposure



Personalized
Customizes the learning according to the various scenarios through a personalized learning platform



Future ready
Futuristic approach with proactive measures on training



Learning catalog: Overall, learning programs are divided into seven categories

1. High demand catalog

Upskilling to ensure redeployment at the earliest

2. Higher education program

- Full-time MTech sponsored degree by Virtusa where employees can learn without quitting the job
- Opportunity to learn in a business setting
- Make a positive impact by integrating, learning, and solving a real problem
- Receive alumni status from a prestigious institution and build a flourishing network
- Develop a holistic sense of workplace and culture

3. Communication training

- Opportunity to polish and hone communication skills
- Increase in confidence and ability to stand out amongst the crowd

4. Finishing school

- Improving resource readiness and direct alignment with the project needs
- Skill refreshment with interview readiness

5. Futuristic learning

Training on topics/skills that are in sync with the industry's changing dynamics will help you remain relevant in the near future

6. Hackathon

- Employee identified as hackathonist/hackathon champion and given priority deployment
- Opportunity to work with cutting-edge technologies
- Specialized technical and communication training

7. Release framework training

- Deployment before release
- Blended learning mode: Self and instructor-led
- Resume update with one on one connect
- Hands-on exposure

Employee growth platforms



Virtusa Thrive Academy: This platform provides domain, process, leadership, and behavioral training offerings based on business requirements.



Virtusa Evolve: Our digital internal talent marketplace allows employees to apply for positions aligned with their career goals, including job rotations and onsite opportunities.



Skill Compass: This AI-powered skill management platform enables specialization by grouping skills into clusters and offers personalized and meaningful learning recommendations.

Edge Mobility: This tool streamlines the talent process, from demand prioritization to sourcing internal and external talent, automating key aspects of talent management.



Occupational health and safety

[GRI: 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8]

Our comprehensive occupational health and safety (OHS) management system is certified to ISO 45001:2018. It covers 17 delivery centers, which account for 89% of our headcount. It encompasses all operational aspects, including delivery of services, employee welfare, and contractor well-being. This scope remains consistent across work conducted remotely or within the office premises.

Our environment, health, and safety (EHS) policy sets our commitment to safeguard the well-being of all our stakeholders, employees, and contractors.

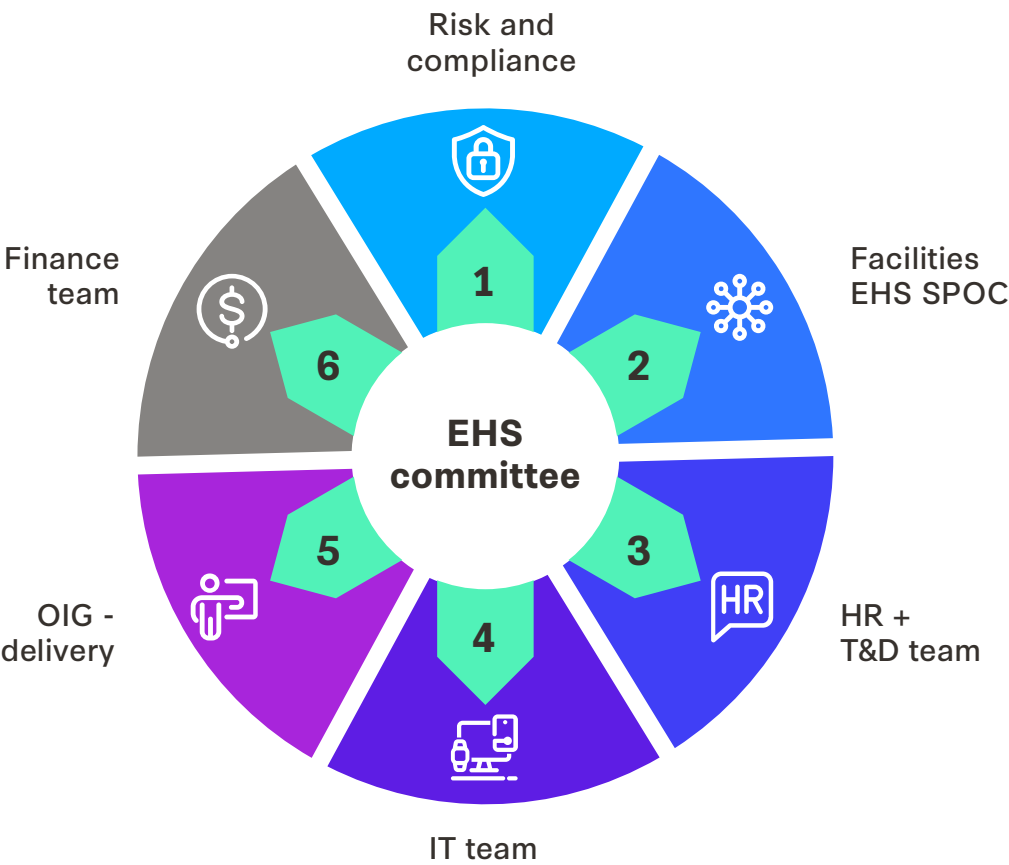
In each location, a facilities team member is designated to oversee the management of the OHS program. This responsibility aligns with the EHS committee, which convenes monthly to assess EHS matters, including progress on OHS objectives. The outcomes of these EHS committee meetings are reported biannually at management review meetings (MRMs).

We periodically engage with contractors to elicit their concerns and inputs surrounding OHS. This engagement occurs through scheduled vendor performance review meetings. Employees and contractors are encouraged to report OHS concerns without fear of retaliation. Incidents and near-misses are recorded for correction, root cause analysis (RCA), and corrective action.

How to report OHS concerns

Concerns can be reported directly to:

- Facilities team or HR partner
- ServiceNow (corporate ticketing tool)
- Corporate social media (Viva Engage)
- Microsoft Teams to connect with appropriate individuals



Risk and incident management

Ergonomics, work-life balance, and employee transport were traditionally significant risks for our operations. However, the COVID-19 pandemic has expanded the range of significant risks to include the well-being of our employees working remotely.

OHS risk assessments are carried out biannually or as needed (e.g., when a change affects the work area or work pattern). Internal audits are scheduled biannually and reported to leadership through management review meetings. An accredited third-party certifying body conducts annual recertification. The location-specific HR teams record and report OHS-reportable incidents to the relevant authorities. The EHS team investigates and records work-related incidents, accidents, and near-misses.

Training on OHS

All employees undergo environment, health, and safety (EHS) training (Safety First) during onboarding and are required to renew the certification annually. The team members responsible for implementing health and safety procedures are provided additional training and certifications. For example, the emergency response team (ERT) members receive fire safety and first-aid training. The relevant facilities team members have National Examination Board in Occupational Safety and Health (NEBOSH) certification.

We also provide health and safety training to contractors, including housekeeping, security, and drivers, periodically and in contractors' native languages whenever possible. We engage with contractors to understand their OHS-related concerns and inputs through periodic vendor performance review meetings.



Employee wellness

Virtusa operates in an environment that does not involve construction, hazardous materials, or work. All retrofits and repairs are outsourced and assigned to licensed personnel in accordance with safety regulations. We have medical rooms at our larger technology centers in Asia and have special arrangements with medical service providers for on-demand and on-site visits.

We have multiple initiatives to support wellness and work-life balance, such as flexible work arrangements, insurance, time off,

and health and safety awareness. Health and safety awareness is created through emails and presentations on work-related and non-work-related health risks. Topics covered include ergonomics and eye strain, mental health concerns, and non-communicable diseases.

With an increased focus on personal financial management, we also provide opportunities for our team members to get advice on managing their finances.



Office environment

- Monitoring indoor air quality (IAQ), ambient noise, and lighting levels at offices
- Use of ergonomic best practices
- Nursing rooms and childcare facilities



Work practices

- Flexible work hours and work-from-home policies
- Paid maternity leave
- Disha diversity hiring program for women on a career break
- Mom-to-Mom networking program
- Upskilling program for female employees returning from maternity leave



Leave and time off

- Leave of absence/long-term authorized no pay (on a case-by-case basis)
- Child adoption leave
- Leave for military service
- Leave for dependent care
- Paternity leave as sanctioned by the legal requirements



Medical benefits

- Personal medical and hospitalization insurance
- Life insurance with top-up options
- Parents and in-laws' insurance (employee's contribution)
- Awareness sessions, medical and eye check-up clinics, etc.
- Medical consultations and counseling services through telemedicine apps

Governance





Ethics and compliance

[GRI: 2-23]

Our core values—PIRL (passion, innovation, respect, and leadership), coupled with our ethics and compliance program—form the cornerstone of our business philosophy and provide the ethical standards by which we interact with our clients, contractors, and each other. Our ethics and compliance program is enforced through our code of business conduct and ethics, anti-bribery and corruption policies, and whistleblower reporting procedures, which apply to all employees, contractors, personnel, and agents across the globe. It reflects our commitment to uphold the highest standards of ethical conduct and our dedication to honesty and integrity, which have always been at the core of Virtusa’s organizational belief system.

Our compliance officer, who is also the general counsel, has overall responsibility for administering the ethics and compliance program.



Code of business conduct and ethics and anti-bribery and corruption policies

[GRI: 2-23, 2-24]

Our written code of business conduct and ethics (Code) serves as a comprehensive framework guiding our commitment to integrity and ethical conduct. Most importantly, the company enforces the Code and its policies to ensure that team members treat everyone with respect, fairness, and professionalism. Upon joining Virtusa, all employees, contractors, and directors are required to acknowledge that they have read, understood, and will comply with the Code.

Our anti-bribery and corruption program aligns with the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act 2010. Our policies expressly prohibit any forms of bribery, corruption, or money laundering and reaffirm our commitment to adhering to anti-bribery legislation wherever we conduct business. To ensure accountability, any employee engaging a third party is required to conduct due diligence checks, including a thorough corruption risk assessment. Our finance and administrative systems and processes are controlled to ensure the continuous observance of anti-corruption measures in all our transactions. We have an internal audit function as well as external accounting firms, which test our controls or areas of risk and report their findings to our audit committee on a quarterly basis.

For information on complaint handling mechanisms, see "[Processes to remediate negative impacts and reporting mechanisms](#)" on page 23.



Code of business conduct and ethics

Our code of business conduct and ethics covers the following:

- Anti-bribery
- Corruption prevention
- Money laundering prevention
- Corporate opportunity
- Conflict of interest
- Stewardship of company assets
- Confidentiality
- Fair dealing
- Accuracy in record-keeping
- Responsible political contributions
- Transparent public disclosures
- Whistleblower/anonymous reporting procedures



Political contributions

Our Code prohibits political contributions made on behalf of the company unless approved by the compliance officer. Directors or employees may not, without the compliance officer's approval, use any of the company's funds for political contributions of any kind to a political candidate or holder of any national, state, or local government office.

Gifts and entertainment

While entertaining clients and business partners in the ordinary course of business is not prohibited, accepting or giving any gifts that can improperly influence business relationships is forbidden to prevent conflicts of interest. Directors and employees must also comply with laws, as applicable in each geography of operation, that govern the acceptance of business courtesies.

Furthermore, directors and employees are required to obtain prior authorization from the compliance officer before giving anything of more than nominal value to any government employee to determine if permissible under applicable laws.





Governance risk management

[GRI: 205-1; SASB: TC-SI-550a.2]

Our enterprise risk assessment covers multiple areas, such as legal, regulatory, reputational, client behavior, and climate change-related risks. For climate change-related risk assessment, see ["Disclosures based on TCFD framework" on page 77.](#)

Corruption risk assessment

Our compliance officer assesses various factors to determine the due diligence required for any activity or engagement that Virtusa may pursue. Corruption risk is assessed in accordance with all applicable U.S. and foreign laws, including the FCPA and the U.K. Bribery Act 2010. It considers factors like high-risk countries, the size and significance of the engagement, the company's initial involvement with vendors and third parties, and connections to government and government agencies. We conduct an annual country risk assessment to classify each country from a risk perspective, based on the relative Transparency International ranking of each location in which we operate. We also work with external counsel, outside accountants, and other advisors to accomplish the following:

- Examine fraud risk
- Conduct vendor background and reference checks
- Scrutinize relationships
- Analyze payment terms
- Assess compliance with employment law
- Evaluate tax implications
- Consider immigration matters
- Perform a general risk assessment
- Maintain ongoing compliance monitoring for existing locations

Components of governance risk management



Corruption risk assessment
Assesses risks under U.S. FCPA and U.K. Bribery Act 2010



Internal audit reviews
Covers adequacy of risk management and control and governance processes



Data privacy risk assessment
Personal data processing for employees, contractors, vendors, and clients



Business continuity risk assessment
Risk assessment at company, contract, asset, services, and geographic location levels



Internal audit reviews

The primary role of an internal audit is to assess the adequacy of the company's risk management and control and governance processes as designed and represented by management. The internal audit involves an independent assessment by a reputable accounting firm to test controls and areas of risk. Their findings are reported to the audit committee, providing an unbiased evaluation. The internal audit approach encompasses various levels of risk identification at the entity level, business process level, and fraud risk. The audit program scope covers annual control assessments for financial reporting and selected business processes (IT, strategy, compliance, HR, finance, sales and delivery, etc.) periodically.

The findings are reported to the audit committee as follows:

- **Business process reviews:**
Covers quarterly reporting of review results, recommendations, and action plans for selected business processes. The focus on monitoring the implementation of action plans demonstrates our commitment to addressing identified gaps or risks.
- **Internal controls over financial reporting:**
Covers annual reporting of review results regarding internal controls related to financial reporting.

Data privacy risk assessment

The privacy management team conducts annual data protection impact assessments for all critical business functions, client accounts, and applications to assess privacy controls. This ensures the appropriate processing of personal data in compliance with applicable data protection regulations in the locations of our operations. The team conducts a mandatory privacy impact assessment for all new processes, solutions, or changes to existing ones.

We follow Privacy by Design (PbD) principles (e.g., "Lead with privacy as the default setting") and embed privacy into the design so that the introduction of new processes, solutions, or changes in the existing processes or solutions are reviewed by the privacy management team and signed off by the data protection officer. Additionally, all processing activities, conducted by third parties are reviewed by the data privacy management team as part of due diligence.

Business continuity risk assessment

Our business continuity management system (BCMS), which is integrated into our enterprise risk management process, is certified to ISO 22301:2019, Security and resilience—business continuity management systems.

The BCMS team carries out annual BCM risk assessments, in line with ISO 22301, at the company, contract, asset, services, and geographic location levels. These risk assessments can happen more frequently, such as during client, external, and internal audits to safeguard against risks related to people, processes, technology, infrastructure, and services.

Our comprehensive business continuity plans define how to ensure continuity of critical services during crisis events that can disrupt our business as usual (BAU) operations. Every risk has an owner who is accountable for mitigation plans. In addition, a crisis response plan is in place, covering various crisis events, such as civil unrest, fires, floods, food poisonings, mass casualties, pandemics, terror attacks, active shootings, bomb threats, cyberattacks, critical IT infrastructure failures, power interruptions, mass attrition, nuclear emergencies, tsunamis, and earthquakes.

The plans outline the processes for managing crisis events and the risk owners' associated responsibilities. The BCMS team and the Virtusa leadership are responsible for invoking and revoking the appropriate crisis response process in consideration of and in consultation with relevant stakeholders. The scenarios are also listed under the crisis response plans, which are tested periodically to validate their effectiveness and to make continual improvements.



Information security

[GRI: SASB: TC-SI-230a.2]

Security governance at Virtusa

Virtusa is unwavering in its commitment to security governance, recognizing its central role in safeguarding its operations and upholding the trust of its clients. Our approach to security governance is comprehensive and multi-faceted.

Information security management system (ISMS)

Virtusa has established a robust information security management system (ISMS), drawing upon industry-leading practices and standards, such as ISO 27001, HITRUST, CIS Benchmarks, National Institute of Standards and Technology (NIST), and client-specific security requirements. Our ISMS forms the bedrock of our security governance, ensuring the protection of sensitive data and adherence to stringent security protocols.

Information security forum (ISF)

Our information security forum (ISF) serves as the apex body for overseeing the implementation of the ISMS. Chaired by our chief information officer (CIO), the ISF brings together key stakeholders, including the chief information security officer (CISO), business information security officer (BISO), business heads, the compliance officer/general counsel, the data protection officer (DPO), and leaders of shared service functions. This forum convenes annually to review the effectiveness, suitability, and adequacy of our ISMS. The ISF’s recommendations are informed by technological advancements, changes in the business landscape, strategic objectives, and evolving regulatory requirements. This ensures that our security measures are dynamic and aligned with the latest threats and challenges.



Information security

Responsibility

- Chief information security officer (CISO)
- Business information security officer (BISO)
- Information security forum (ISF)

Certifications and audits

- ISO 27001: 2022 (information security management system)
- SOC 1 and SOC 2
- HITRUST
- NIST
- PCI DSS
- Client-specific requirements



Defense-in-depth strategy

At Virtusa, we believe in a proactive and multilayered approach to security. Our “defense in depth” strategy involves deploying a diverse set of security measures at various levels of our infrastructure. This forward-looking approach acknowledges the limitations of any single security measure and reinforces our defenses on multiple fronts.

Our governance framework is built on the foundation of three lines of defense:

First line	Second line	Third line
The first line of defense rests with the business and process owners who are responsible for activities that create or manage risks. This includes making calculated risk decisions and owning the design and execution of controls to address these risks.	An independent function housed within our business information security organization (BISO) complements the first line of defense. It brings specialized expertise, process excellence, and management oversight alongside the first line to ensure effective risk management and control implementation.	The security assurance team (SAT) operates as the third line of defense. SAT’s role is to validate the effectiveness and efficiency of processes and controls implemented across the organization. Their independent reports inform functional heads and facilitate the necessary corrective actions to address identified security gaps.

Certification and external audits

Virtusa’s commitment to security is further reinforced by our external certifications and audits, which help to validate our commitment and enhance client confidence in our security framework.

We did not have instances of client data breaches/loss of client data that had any material impact during the reporting period that ended on March 31, 2024.

	ISO 27001 (Information security management system) certified technology centers. ISO 27001 certified since 2008
	ISO 22301 (Business continuity management system) certified technology centers
	Entity level SOC 1 and SOC 2 attestation on security, availability, processing integrity and confidentiality principles
	Health Information Trust Alliance (HITRUST) certification for healthcare SBU
	Client-specific payment card industry data security standards (PCI DSS) certified environments

Data privacy

[SASB: TC-SI-230a.2]

We have a robust global privacy program led by our DPO, who is part of our legal and strategy function. The DPO oversees data privacy, governance, and compliance and is supported by a dedicated privacy management team. They are supported by a cross-functional privacy working group that includes key stakeholders from information security, legal, human resources, and other groups. The DPO also acts as a point of contact for data subjects and the supervisory and regulatory authorities.

Our privacy practices are governed by the website privacy policy, which covers data collected from visitors to our corporate website, clients, visitors to our facilities, and employment candidates, as well as the enterprise data privacy policy that details the privacy practices for handling personal data. Virtusa also has an established global workforce privacy notice, which governs the personal data collected from employees and contract staff. We also have a well-defined and documented procedure for handling data breach management, covering relevant stakeholders' roles and responsibilities, identifying and reporting a breach, guidelines on severity, its associated impact, and actions by various stakeholders, including the obligations.

Our privacy regulatory baselining framework is continually monitored and tracked by the privacy management team for any update to existing or new

privacy laws and regulations leveraging the OneTrust DataGuidance subscribed platform.

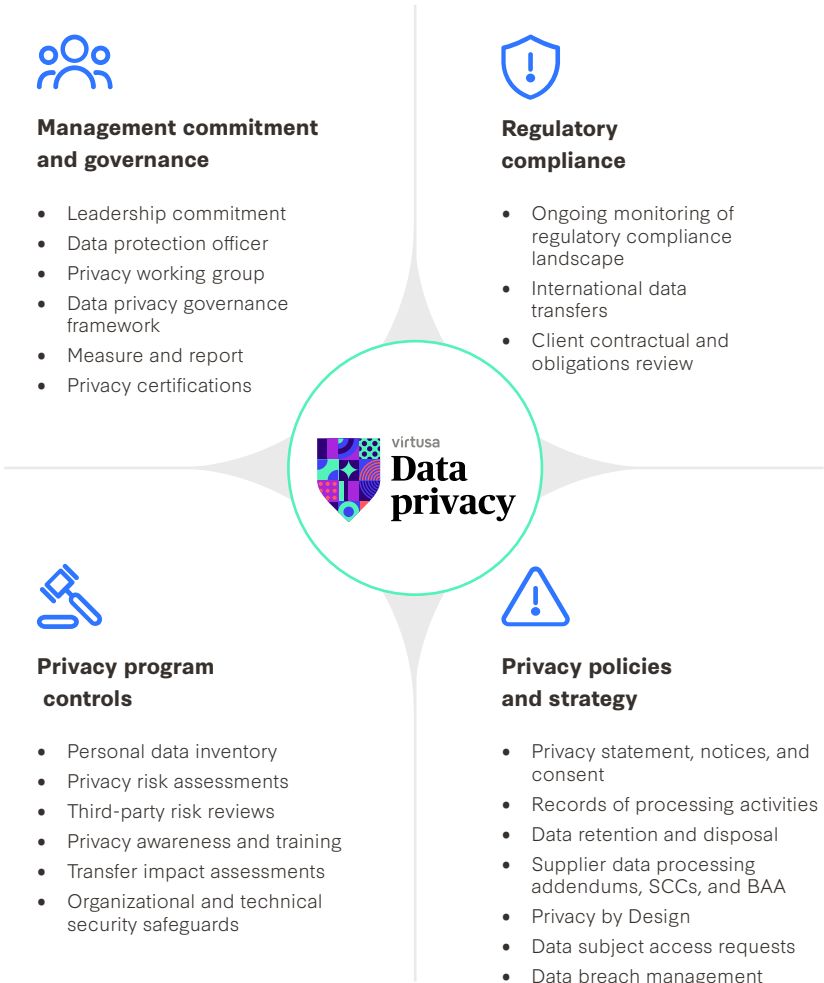
Virtusa's global privacy program is accredited with the TRUSTe Enterprise Privacy certificate from TrustArc and is certified for ISO27701:2019 certification. Additionally, as part of ISO27001 certification, HiTrust, and SOC 2 attestation, privacy controls are reviewed annually on adherence to international standard requirements. The privacy practices are aligned with the NIST Risk Management Framework and are assessed and validated annually.

Data privacy

Responsibility:
Data protection officer (DPO)

Certifications and audits:

- ISO 27701:2019 (Privacy Information Management System)
- TRUSTe Enterprise Privacy Certificate
- Aligns with the NIST Risk Management Framework





Measures to ensure information security and data privacy

[SASB: TC-SI-230a.2, TC-SI-550a.2]



Security risk management

We have a robust security risk management framework to assess and address information security (InfoSec) and cyber risk. Our approach aligns with industry-leading standards, including ISO/IEC 27001 and NIST frameworks, which guide our practices in managing and mitigating security risks. We safeguard sensitive information and maintain system integrity by proactively identifying, assessing, and addressing potential security threats. Our comprehensive risk management framework includes regular security assessments, incident response planning, and ongoing employee training to tackle security threats effectively.

External penetration program

The penetration testing program is governed by our threat assessment policy and threat assessment procedure and is administered by the office of the chief information security officer. External penetration testing is performed by a qualified service provider once every fiscal year. Penetration testing service providers are rotated to optimize the program. The program assures that our external infrastructure is hardened to industry standards and ensures that the safeguards are effective.

Data loss prevention

Industry-accepted data loss prevention (DLP) solutions were implemented in our DLP program to ensure that business-critical information—including client information, financial information, personally identifiable information, and personal health information—is not disclosed to external parties, unless authorized for business purposes.

The DLP program is jointly administered by the chief information security officer’s office and the information technology team.



Software compliance

We have a robust software compliance framework based on ISO/IEC 19770-1. Periodic assessment of our compliance is evaluated using an independent consulting firm.

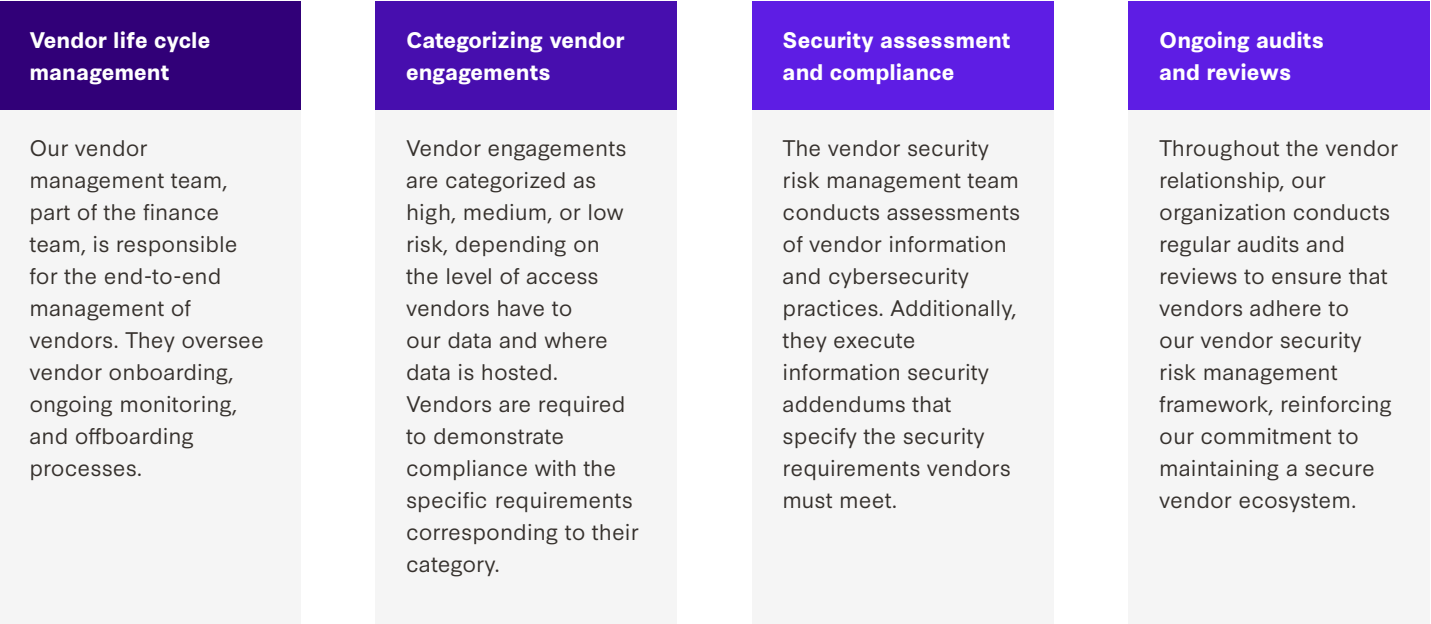
Periodic auditing

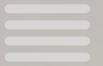
Our security assurance team (SAT) conducts periodic audits of the information technology infrastructure and the information security framework based on risks and requests. SAT reports are provided to the head of enterprise cloud and infrastructure services for taking correction and corrective actions. The overall security posture and the critical security metrics are presented to our board.

Vendor security risk management

At Virtusa, our vendor security risk management policy outlines the security obligations, controls, and best practices that vendors must adhere to when providing services to our organization. All vendors go through our vendor life cycle management and are audited periodically to ensure that vendors adhere to our vendor security risk management framework, reinforcing our commitment to maintaining a secure vendor ecosystem.

Image: Components of vendor security risk management





Business continuity management system

Virtusa has a robust business continuity management framework aligned and certified for ISO 22301:2019 (Security and resilience—business continuity management systems). The BCMS program is strengthened rigorously with continual improvements in line with ISO 22301:2019, ISO 27001, ISO 45001, HITRUST, NIST, industry best practices, and client contractual requirements.

The program is managed by a dedicated BCMS team comprised of trained and certified professionals. The BCMS team collaborates with the stakeholders from internal functions and delivery units and is under the supervision of the BCM head, who reports to the chief risk officer. Our BCM management forum, consisting of officers and leaders from all internal services and delivery, oversees the program at the organizational level. In line with the ISO 22301 requirements, Virtusa maintains plans and processes for business continuity, disaster recovery, and crisis management at the operational level.

Business continuity management

Responsibility:

- Chief risk officer (CRO)
- Business continuity management head

Certification:

- ISO 22301:2019 (Security and resilience—business continuity management systems).



Our board





Governance structure and composition

[GRI: 2-9, 2-11, 2-17, 405-1]

Virtusa’s board of directors is responsible for establishing internal controls and a corporate governance structure, which includes overseeing the management of the company’s risks and the implementation of the company’s corporate governance policies and code of ethics. The board of directors’ role in overseeing the management of the company’s risks is accomplished primarily through management’s reporting processes, including receiving regular reports from members of senior management on areas of material risks to the company. These areas include operational, financial, legal, regulatory, and sustainability matters. They also cover strategic and reputational risks and assessments and prioritization of such risks.

Our board of directors oversees management recommendations and associated timelines to identify and assess the severity of enterprise risks, determine their prioritization, and develop action plans to mitigate them. According to their respective charters, the standing committees of our board of directors also represent a key element of enterprise risk management.

Committees of the board of directors

The board of directors has the following standing committees: the Audit, Risk and Finance Committee (Audit Committee) and the Nomination and Remuneration Committee (NRC). These committees are ultimately subject to the oversight and direction of the full board of directors and report directly to the board of directors.

Audit, Risk and Finance Committee (Audit Committee)

- Focuses on risks and issues related to accounting, internal controls, financial and tax reporting, and cybersecurity
- Monitors the company’s compliance with legal and regulatory requirements and overall risk management, including conflicts of interest, related person transactions, and adherence to standards of ethical conduct

Nomination and Remuneration Committee (NRC)

- Identifies and oversees risks and issues associated with our executive compensation policies and practices
- Determines and makes recommendations to the board of directors regarding the hiring, assessment, promotion, and compensation of the executive officers, as well as the compensation and composition of the board of directors

Composition of the board

As of March 31, 2024, our board of directors consisted of seven directors: 14% female, 86% racially/ethnically diverse (100% diverse overall)

- One non-executive, independent board chair
- One executive, non-independent director
- One non-executive, independent director
- Two non-executive, non-independent directors (sponsor directors)
- Two non-executive, non-independent directors (investor directors)





Nomination and selection of the highest governance body

[GRI: 2-10]

The board of directors is responsible for selecting its members. The NRC leads the nomination and selection process for appointing directors and identifying the candidates in consultation, as needed, with strategic advisors. Once the candidates have been identified, the NRC recommends prospective director candidates for the board's consideration and reviews the candidates' qualifications with the board.

In identifying prospective director candidates, the NRC may consider all facts and circumstances that it deems appropriate or advisable, including the skills of the director candidate, the depth and breadth of business experience or other background characteristics, their independence, and the needs of the board. The board retains the ultimate authority to select a candidate as a director or to fill any vacancy.

We do not have a formal diversity policy. However, as part of its evaluation of director candidates, and in addition to other standards, the NRC may consider whether each candidate, if selected, assists in achieving a diverse mix of board members. The profiles of our directors are available on our company website at: <https://www.virtusa.com/board-of-directors>.

Conflicts of interest

[GRI: 2-15]

Please see the conflicts of interest section of our code of business conduct and ethics, which is available on our website: <https://www.virtusa.com/about/corporate-compliance>.

For disclosures of other board memberships held by our board of directors, please see our board of directors' profiles on our company website: <https://www.virtusa.com/board-of-directors>.

Remuneration policies and process

[GRI: 2-18, 2-19, 2-20, 2-21]

The NRC is responsible for establishing and administering our policies governing our executive officers' compensation. The NRC reviews all compensation components for our executive officers, including salaries, bonuses, and equity incentive. Our executive compensation program is designed to motivate and reward our executive officers' contributions and performance and to encourage attraction and retention. Emphasis is placed on pay-for-performance results, which reward our executives when the company achieves certain financial and business goals or creates shareholder value, resulting in reduced executive compensation in the event that we do not achieve our business and shareholder value goals.

The NRC conducts an annual review and approval of corporate goals and objectives relevant to the compensation of our executive officers, evaluates the executive officers' performance, considering those goals and objectives, and determines and recommends the compensation level for each executive officer to the board of directors for approval based on this evaluation.

Our executive compensation program contains a mix of the following compensation elements: base salary, annual incentive awards, and long-term incentives to create a competitive compensation package for our executive management team. The NRC uses its judgement and experience to determine the appropriate compensation mix for each executive officer. When evaluating the compensation of our executive officers, the NRC considers several factors, including the company's performance, the competitiveness of salaries, bonuses, and comparable incentive awards within the talent market, the executive's past compensation at the company, and their overall total compensation. The NRC also receives input from our chief executive officer regarding the compensation for his direct reports.

The director's compensation is reviewed and approved annually by the NRC. The company's executive officers do not receive additional compensation for their service as directors, and directors affiliated with our sponsor are not separately compensated for their board service.

Supply chain engagement





Supply chain engagement

[GRI: 2-24, 204-1, 205-2, 308-1, 414-1]

Our goal is to work with suppliers who demonstrate strong sustainability performance and support our sustainability ambitions and targets, such as achieving our net-zero targets. With this in mind, we have implemented policies and processes to minimize sustainability risks in our supply chain. A substantial part of FY24 was spent formulating a strategy to enhance supplier engagement and track supplier contributions to achieving our SBTi targets. After selecting a leading sustainability ratings platform, we are in the process of engaging the top 200 suppliers by spend. The platform enables our suppliers to directly report the emissions of the products and services provided to Virtusa, thus increasing the accuracy of reporting and disclosing their environmental targets. The platform also provides a carbon module, which enables us to monitor our suppliers' carbon emissions.

Other methods of supplier engagement are described below:

- **Onboarding engagement:** We engage with our supply chain at onboarding to ensure that all new suppliers meet our sustainability requirements. All new vendors, apart from government entities, tax authorities, and those with approved exceptions, are required to register on our supplier portal at <https://www.virtusa.com/suppliers>. At onboarding, suppliers must confirm that they will adhere to all relevant laws and regulations, including those on ethics and labor, by accepting our policies, namely the supplier data privacy policy addendum, the anti-corruption and anti-bribery policy, the information security policy, the supplier code of conduct, and other relevant policies. As a result, almost all targeted suppliers have contracts that include clauses on ethics requirements. In FY24, 84% of suppliers were onboarded through the supplier portal. The registration process for government entities, tax authorities, and other special cases is managed by our procurement team.
- **Supplier sustainability survey:** Our existing survey covers environmental management, labor, health and safety, business ethics, and supply chain management. In FY24, we shared the sustainability survey with 195 facilities suppliers across India and Sri Lanka. Overall, 177 suppliers responded to the survey, equaling an engagement rate of 91% compared to 78% in FY23. In addition, we engage with suppliers and contractors, as required, throughout the relationship to continuously improve our procurement process, identify hazards, and assess and control occupational health and safety risks.

Our policy is to build relationships with local suppliers at all locations of operations unless the supplier is not able to meet our expected service levels. For details on spending on local suppliers, see "[Table: Proportion of spending on local suppliers by location](#)" on page 97. There have been no significant changes to our supply chain during the reporting period.

Accountability for executing our procurement strategy begins with our local and regional procurement teams and ultimately resides with our chief financial officer.

Supplier code of conduct

The supplier code of conduct outlines the standards that suppliers are required to uphold in the areas of human rights, labor, environment, and business ethics. This includes the commitment to abide by all relevant laws and regulations, avoiding human rights, child labor, and forced or compulsory labor, and ensuring safe working conditions for employees. Additionally, we expect our suppliers to be environmentally conscious and uphold ethical business practices.

Our contracts include requirements for compliance with laws and regulations on ethics and labor. For instance, as a standard procedure, suppliers are asked to confirm their compliance with the U.S. Foreign Corrupt Practices Act (FCPA) when engaging in business with us.

Procurement process and management

Risk assessment is built into multiple touchpoints in the vendor relationship, starting from the vendor assessment stage. Our comprehensive vendor evaluation/risk assessment process varies depending on the type of service or product and includes evaluations for aspects such as user safety or climate change impact. For example, IT equipment must meet EPEAT standards for energy efficiency.

Because Virtusa is an IT consulting company, information security and data privacy are high-risk areas, and as such, the vendor registration process contains evaluations for vendor adherence to information security, data privacy, and business continuity standards for applicable products and services. As part of the evaluation process, checklists are used to assess risks with a rating level of low, medium, and high.

During service provision, checkpoints are made to ensure that suppliers adhere to laws and regulations that are tailored to the specific service area. For example, vendors are required to ensure that employees performing work on our behalf are competent and use the correct health and safety equipment and procedures. Transport providers are required to undergo vehicle inspections, and drivers are required to provide police reports. Food service providers are required to submit themselves for inspections conducted by the public health inspector (PHI).

While on-site audits are limited due to the nature of our business, in some geographies, such as India, applicable suppliers are required to undergo audits on labor practices to ensure compliance with legal requirements. For example, we ensure compliance with the Contract Labour (Regulation and Abolition) Act (CLRA), 1970 (India). We engage experienced external compliance partners to conduct these online vendor audits. The areas assessed during these audits include privacy, compliance with legal requirements for documentation, and workplace conditions, such as minimum wage requirements. Due to the remote work policy that has been in effect for the past few years, many of the contractors were not retained. The last audits conducted in FY21 covered 100% of the 58 eligible suppliers. With the increase in return to office (RTO), this number may change.





Partnerships





Membership in associations

[GRI: 2-28]

We are members of the following organizations:

- American Chamber of Commerce in Sri Lanka
- Biodiversity Sri Lanka (BSL)
- CEO Water Mandate
- Ceylon Chamber of Commerce (CCC)
- Society for Cyberabad Security Council (SCSC)
 - Secretary general since 2019
- National Association of Software and Services Companies (NASSCOM)
- Hyderabad Software Enterprises Association (HYSEA)
- Sri Lanka Association of Software and Service Companies (SLASSCOM)
 - Member of the ESG Committee
- United Nations Global Compact (UNGC) member since 2008
 - Network Australia
 - Network India
 - Network Singapore
- Network Sri Lanka
 - Member of the Steering Committee since 2010
 - Board member since 2011
 - Business and Human Rights Working Group
 - Member of the Climate Emergency Task Force (CETF)
 - Member and board advisor to the water stewardship working group
- Network U.K.
- Network USA

Partnership highlights for FY24

Biodiversity Sri Lanka (BSL)

As a patron member, we actively support BSL initiatives. As such, we continued supporting Phase III of the LIFE to Our Forests program. We also signed up for the LIFE to Our Mangroves project, which supports Sri Lanka’s UN World Restoration Flagship award-winning efforts to expand mangrove forests by over 50%.

SLASSCOM ESG committee

We developed an “ESG Starter Kit” that was rolled out to 300+ companies so that leadership teams and employees of software and IT organizations in the SLASSCOM network could start their sustainability journey. The starter kit focused on how to drive sustainability in the software industry.

CEO Water Mandate

In early 2024, we joined the CEO Water Mandate in line with our commitment to achieving sustainable water management.



UN Sustainable Development Goals

Virtusa is committed to supporting the UN Sustainable Development Goals. We identified Goals 3, 5, 8, 12, 13 and 16 as high-priority and Goals 4, 6, 7, 9, 15 and 17 as moderate priority based on materiality to our business.

Listed below are the Sustainable Development Goals that are relevant to our reporting.

Sustainable Development Goals	Sections
Goal 3: Good Health and Well-Being	Occupational health and safety
Goal 4: Quality Education	- Learning and development - Advancing STEM education
Goal 5: Gender Equality	- Diversity and inclusion - People data
Goal 6: Clean Water and Sanitation	- Water - Environmental performance data
Goal 7: Affordable and Clean Energy	- Environmental goals - Environment - Environmental performance data
Goal 8: Decent Work and Economic Growth	- Social - Supply chain management - People data
Goal 9: Industry, Innovation, and Infrastructure	Engineering for good
Goal 12: Responsible Consumption and Production	- Environmental goals - Waste - Environmental performance data
Goal 13: Climate Action	- Environmental goals - Environment - Environmental performance data
Goal 15: Life on Land	Biodiversity impact
Goal 16: Peace, Justice and Strong Institutions	Governance
Goal 17: Partnerships for the Goals	Partnerships

Engineering for good

[GRI: 203-1]



Virtusa believes that our technology can create a positive social impact in our communities. The Virtusa Foundation formalizes our corporate social responsibility (CSR) strategy and manages all CSR initiatives under one umbrella. Our CSR strategy focuses on:

- Contributing to the advancement of science, technology, engineering, and mathematics (STEM) education at the university level and technology incubation with academic institutions
- Empowering marginalized communities by supporting education and access to healthcare
- Conserving sites deemed important for the environment, biodiversity, or national heritage
- Using our digital engineering expertise to develop technical solutions for non-governmental organizations (NGOs)





Advancing STEM education

We have multiple programs through which we collaborate with universities to help the next generation of IT professionals become workforce-ready and contribute to the industry's growth in the countries where we operate. These programs include Campus Reach and the Digital Discoverer Program (DDP).

In India and Sri Lanka, we have created Centers of Excellence (CoEs). We also help develop STEM curriculum and train faculty, provide training and mentoring for students, and provide access to certifications for students, sponsorships and internships, organize codefests and hackathons.



Engineering First residency program

The Engineering First residency program empowers young tech specialists to learn while providing cutting-edge solutions to top clients. 680 Tier 4 (engineer level) team members were selected and divided into 17 tracks, such as microservices, .NET with React JS, GCP, AWS, Selenium, PEGA, Salesforce, etc.

The selected team members go through three months of training on:

- Capstone projects to give live, hands-on experience
- Agile training and hackathons to introduce agility
- Communication assessment and training
- Self-storytelling session
- Resume building and interview preparation

In addition, a residency batch of 25 pre-trained individuals:

- Augment existing and new programs from day one
- Complete client-specific training and readiness programs
- Complete sample assignments, coding challenges, and necessary certifications

Reach in Sri Lanka (FY23)

- Digital Discoverer Program (DDP) was offered to 15 universities, with 5,000 students receiving training
- Set up Virtusa innovation incubators (labs) at two universities
- Two hackathons with 110 teams and 400 participants

Reach in India (FY23)

- Jatayu Ideathon: This event is for our CoE partner colleges to find innovative solutions for real-world business use cases. The ideathon received over 26,000 registrations from 100+ partner colleges
- Student internships: Provided internships to 1,850 CoE students, where students worked on live business use cases, gaining corporate exposure
- Helped 3,094 interns to complete certifications successfully



Community engagement

Supporting education and empowerment

Project/organization	CSR avenue
Education support	We carried out the following initiatives to support education: • Donated 6,000 school kits and 1,500 stationery kits • Donated 228 computers to four schools in Chennai to set up computer labs • Built a chemistry lab and carried out renovations to expand classrooms for a school dedicated to supporting children from low-income families • Sponsored the education of 100 children with disabilities • Supported an orphanage by constructing classrooms for children and accommodations for the warden and support staff • Constructed teachers’ quarters for two schools serving students from low-income families and donated two electric buses and a charging station. The buses will be used to provide transportation to approximately 240 students per day
Support for young adults/graduate education	We carried out the following initiatives to support education: • Provided scholarships to 100 students through Center of Excellence (CoE) colleges • Donation to support vocational training for young adults with developmental disabilities • Set up a computer lab for the low-income students from schools, colleges, and graduates to train them in computer skills





Supporting access to healthcare

Project/organization	CSR avenue
Support for hospital	Carried out structural building work and provided medical supplies to the MenTseeKhang Sowa-Rigpa Medical College and Hospital in Bangalore
Access to water	Installed 500 LPD air-to-water plants at nine schools in Chennai, Krishnagiri, and Hyderabad

Supporting our communities

Project/organization	CSR avenue
Plantation drives	- To mark World Environment Day, we carried out a sapling plantation drive at the Sundaravana urban forest near the Somasundarapalya Lake in Bangalore. The area was a wasteland before residents planted thousands of saplings to transform it into an urban forest - Carried out plantation drives at Solai Vanam urban forest in Chennai and Saraswathi Shishu Mandir school in Telangana
Support for flood victims	Provided funds to aid flood victims in Chennai
Preservation of historical sites	Provided funding to complete fencing at the Byramjee Jeejeebhoy Parsee Charitable Institution, a heritage building in Mumbai



Disclosures based on TCFD framework





[GRI 201-2]

This section details our responses to the Task Force on Climate-Related Financial Disclosures (TCFD) framework. Information in this section is based on Virtusa’s 2024 CDP climate change response and specific sections of our FY24 sustainability report.

Topic	Recommended disclosure	Response and references	Further information
Governance: Disclose the organization’s governance around climate-related risks and opportunities.	a. Describe the board’s oversight of climate-related risks and opportunities. b. Describe management’s role in assessing and managing climate-related risks and opportunities.	In FY22, Virtusa’s board set up a sustainability committee to develop and execute our sustainability strategy. The sustainability committee is overseen by the board of directors and includes high-level positions within the organization: • Two board directors: chief executive officer and audit committee chairperson • Executive team members: chief financial officer, chief people officer, compliance officer/general counsel, and global head of facilities and sustainability The sustainability committee’s purpose is to support Virtusa’s sustainability commitments, including our response to climate change. It is responsible for overseeing and managing the embedment of sustainability into our business strategy and the approval of sustainability-related communications. The committee is the ultimate decision-making body for Virtusa’s sustainability programs and policies. The board is guided on climate change through our independent director on the board and the chairperson of the sustainability committee. In FY22, the sustainability committee was responsible for the approval of the sustainability objectives, goals, strategies, and measures (OGSM) that set out our sustainability strategy from 2021 to 2030. We’re currently reviewing and updating the OGSM. In FY24, the committee signed off on Virtusa’s GHG emissions targets, which were submitted to the Science Based Targets initiative (SBTi) for approval, in addition to approving the FY23 sustainability report, which adhered to the Global Reporting Initiative (GRI) “with reference” approach, the Sustainability Accounting Standards Board (SASB) Software and IT Services sector standards, and the TCFD recommendations. Apart from the sustainability committee, our management company, EQT AB, actively provides guidance on our climate change program and strategy. For example, EQT Partners monitors whether a portfolio company has a sustainability champion on the board, and training is provided to ensure accountability. In addition, EQT AB collaborates/provides guidance on the following: (1) Purchase of EACs/RECs, (2) Virtusa’s OGSM for our sustainability program, (3) Virtusa’s sustainability service offerings, (4) Setting SBTi targets in alignment with EQT AB’s commitment to ensuring 100% of the EQT AB portfolio companies will have their own SBTs validated by 2030, 10 years faster than required by SBTi. Climate-related risks are integrated into Virtusa’s enterprise risk management process. The risks impacting our company and the controls that are already in place or proposed are presented to the executive team and board of directors as needed (quarterly, if possible; annually, at a minimum) by the chief financial officer.	Sustainability report: • Governance • Board of directors 2024 CDP climate change response: • (4.1.1) Board-level oversight of environmental issues • (4.3.1) Highest senior management-level positions or committees with responsibility for environmental issues



Topic	Recommended disclosure	Response and references	Further information
Strategy: Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.	a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	We use our enterprise risk management and its subcomponent, business continuity management systems (BCMS), to determine which climate-related risks and opportunities could have a substantive strategic or financial impact. Any climate-related risk that has the potential to have a financial impact of at least 1 million USD on net profit is considered substantive. In addition, anything that impacts our ability to continue operating as normal is considered as having substantive financial or strategic impact, especially if the risk would affect the following aspects: 1. Employee health and safety 2. Client delivery 3. Infrastructure and operating margins As a digital engineering company, Virtusa has identified climate-related risks and opportunities to our direct operations that have the potential to have a substantive financial or strategic impact over the following time horizons: • Short-term: 1-3 years • Medium-term: 3-10 years • Long-term: 10-30 years Risks include: 1. Acute physical risk, such as the increased prevalence and severity of cyclones and flooding in India and Sri Lanka (short-term), which have been considered in previous risk analyses and will be included in the new climate scenario analysis 2. Emerging regulation risks, including evolving carbon pricing schemes, such as those which could be implemented by the nationally determined contributions (NDCs) in India (medium-term) 3. Chronic physical risks and their impacts, such as resource shortages; for example, droughts lead to water shortages, which pose a risk to our operations, including data center operations (long-term) We have also identified potential material opportunities, including: 1. Cost and resource efficiency, which we aim to realize through investing in renewable energy, migration to the cloud, energy-efficient lighting, and HVAC systems (short-term) 2. Development of new products or services through R&D and innovation, which we realize through developing our sustainability-related services for clients, leveraging advanced technologies and partnerships (medium-term)	2024 CDP climate change response: (2.2.2) Process(es) for identifying, assessing and managing environmental risks and/or opportunities (2.4) Define substantive effects on your organization (3.1, 3.1.1) Environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future (3.6, 3.6.1) Environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future • (5.3.1) Describe where and how environmental risks and opportunities have affected your strategy



Topic	Recommended disclosure	Response and references	Further information
	b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning. c. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Climate-related risks and opportunities have: 1. Impacted our strategy in products and services, upstream and downstream value chain, investment in R&D, and operations 2. Influenced our financial planning through our revenues, direct and indirect costs, capital expenditures and allocation, acquisitions and divestments, and access to capital, assets, and liabilities. For example, in recent years, we have seen more clients and investors requesting information on our sustainability performance that we disclose to CDP. Clients who requested data from us on sustainability performance accounted for approximately 64% of our revenue in FY24, so failure to show leadership in climate change management could impact our revenue in the short and medium terms (1-10 years). In January 2023, we committed to the SBTi's Net-Zero Standard and submitted 1.5°C aligned targets later that year: a near-term target and a net-zero target, which received approval from the SBTi in June 2024. To support our transition to a low-carbon economy, we are in the process of selecting a vendor to assist with our climate scenario analysis and develop a transition plan that aligns with a 1.5°C world. These efforts are part of our sustainability objectives, goals, strategies, and measures (OGSM), which outline our sustainability strategy from 2021 to 2030.	2024 CDP climate change response: (3.1, 3.1.1) Environmental risks identified which have had a substantive effect on your organization in the reporting (3.6, 3.6.1) Environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future • (5.1.1) Details of the scenarios used in your organization's scenario analysis • (5.1.1) Details of the outcomes of your organization's scenario analysis • 5.2) Organization's strategy includes a climate transition plan • (5.3.1) Where and how environmental risks and opportunities have affected your strategy • (5.3.2) Where and how environmental risks and opportunities have affected your financial planning



Topic	Recommended disclosure	Response and references	Further information
Risk management: Disclose how the organization identifies, assesses, and manages climate-related risks	a. Describe the organization's processes for identifying and assessing climate-related risks. b. Describe the organization's processes for managing climate-related risks. c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Climate-related risks are integrated into Virtusa's enterprise risk management process. The risk assessment is managed under our business continuity risk assessment, guided by ISO 22301, and reported to the chief risk officer, who reports to the chief financial officer. Risks impacting our company and the controls in place or proposed are presented to the executive team and the board of directors as needed (quarterly if possible and at a minimum annually). Virtusa's climate-related risk management system covers all value chain stages and the short-term, medium-term, and long-term time horizons. In FY24, Virtusa also used the Integrated Biodiversity Assessment Tool (IBAT) to assess the proximity of biodiverse and/or protected areas to our offices. Virtusa last conducted a climate risk assessment in March 2023. Current regulation, emerging regulation, legal, reputation, acute physical risks, and chronic physical risks are all risk types that are considered relevant to our business and are always included in our climate-related risk assessment. Technology and market risk types are also relevant and are sometimes included in our risk assessment. 1. Enterprise risk assessment: Our risk management team conducts enterprise risk assessments at a company-wide level annually to obtain a good understanding of the company's associated risks. They evaluate potential impacts, the likelihood of occurrence, and the effectiveness of the existing risk mitigation strategy. Along with the relevant functional team, they develop plans to monitor, manage, and mitigate these risks. 2. Virtusa performs a comprehensive business continuity risk assessment. Our business continuity management system (BCMS) is certified for ISO 22301. Once risks have been identified, the business continuity management team carries out risk assessments at both the company-level and asset-level for direct, upstream, and downstream operations. Climate-related risks and opportunities are assessed based on their magnitude, likelihood, and exposure to determine if they have the potential to have a substantive financial or strategic impact on our operations. In addition, assessments are carried out frequently (more than once a year) through engagements, such as: • Client and other external audits • Business continuity internal audit exercises • Risk inputs received from business continuity forums and other industry sources	2024 CDP climate change response: • (4.1.2) Individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues • (2.4) Define substantive effects on your organization • (2.2.2) Process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities



Topic	Recommended disclosure	Response and references	Further information
		Once risks have been assessed and determined to have a substantive financial or strategic impact on Virtusa's operations, one of the following routes is taken to manage the identified risks: • Company-level: The BCMS plans define how to recover operations disrupted by physical climate risks, such as extreme weather events. This risk is considered at the company level, but we also undertake significant advanced planning at the contract, asset, and geographic location levels as we have operations in multiple geographies. • Asset-level: We conduct site-specific assessments using the risk management framework. Every risk has an owner who is accountable for mitigation plans. Climate change has consistently emerged as a substantial environmental aspect in our assessments per Section 6.1.2 of the ISO 14001 standard.	
Metrics and targets: Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Virtusa uses a range of metrics to measure and manage climate-related risks and opportunities, including our greenhouse gas (GHG) emissions and energy figures, water usage, and performance-related metrics for remuneration. Our sustainability team is responsible for monitoring these metrics and presenting to leadership to track progress against our sustainability OGSM. In accordance with our sustainability OGSM, in January 2023, we committed to the SBTi's Net-Zero Standard and submitted 1.5°C aligned targets later that year. In June 2024, we received approval from the SBTi for the following targets: • Near-term targets: Virtusa has committed to reduce absolute Scopes 1 and 2 GHG emissions by 75% by FY2030 from a FY2020 base year. Virtusa has also committed to reduce absolute Scope 3 GHG emissions from purchased goods and services, capital goods, business travel, and employee commuting by 42% within the same timeframe. • Long-term targets: Virtusa has committed to reduce absolute Scopes 1, 2 and 3 GHG emissions by 90% by FY2040 from a FY2020 base year. Virtusa tracks additional climate-related metrics, including renewable energy coverage, energy per square foot per month, and kiloliters of water consumption per employee per month. GHG emissions data is externally assured by Messrs. Ernst and Young in accordance with ISAE 3410 and ISAE 3000 (Revised) to ensure accuracy and compliance with the GHG Protocol standards.	Sustainability report: • Environment • Environmental performance data 2024 CDP climate change response: • (4.5.1) Details on the monetary incentives provided for the management of environmental issues • (7.54.1) Targets to increase or maintain low-carbon energy consumption or production • (7.54.2) Other climate-related targets, including methane reduction targets • (7.52) Additional climate-related metrics relevant to your business • (7.53.1) Absolute emissions targets and progress made against those targets • (7.54.3) Details of your net-zero targets



Topic	Recommended disclosure	Response and references	Further information
	a. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	We calculate our GHG inventory—Scopes 1, 2 (location—and market—based), and 3—using the GHG Protocol and Defra Environmental Reporting Guidelines, IEA CO2 Emissions from Fuel Combustion, and Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities. FY24 emissions figures (in metric tons CO2e): • Scope 1: 1,065.555 • Scope 2: 10,186.424 (location-based) • Scope 2: 7,852.590 (market-based) • Scope 3: 42,969.849 • Scope 3: 52,081.754 (with emissions from remote working)	Sustainability report: • Environment performance data • Data computational methods 2024 CDP climate change response: • (7.2) Standard, protocol, or methodology you have used to collect activity data and calculate emissions • (7.6) Organization’s gross global Scope 1 emissions in metric tons CO2e • (7.7) Organization’s gross global Scope 2 emissions in metric tons CO2e • (7.8) Organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions



Topic	Recommended disclosure	Response and references	Further information
	c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Virtusa has set several targets: 1. Reduce absolute Scopes 1 and 2 GHG emissions by 75% by FY2030 from a FY2020 base year 2. Reduce absolute Scope 3 GHG emissions from purchased goods and services, capital goods, business travel, and employee commuting by 42% within the same timeframe by FY2030 from a FY2020 base year 3. Reduce absolute Scopes 1, 2, and 3 GHG emissions by 90% by FY2040 from a FY2020 base year 4. Obtain 100% energy from renewable sources by 2030 5. Reduce per-employee water usage by 40% by 2035 from our base year of 2017 6. Encourage our cab service providers to adopt targets for EV utilization and switch 20% of their fleet provided to Virtusa to EVs year on year	Sustainability report: • Environmental goals and performance • Data computational methods 2024 CDP climate change response: • (7.54.1) Targets to increase or maintain low-carbon energy consumption or production • (7.54.2) Other climate-related targets, including methane reduction targets • (7.52) Additional climate-related metrics relevant to your business • (7.53.1) Absolute emissions targets and progress made against those targets. • (7.54.3) Details of your net-zero targets

Sustainability databook





Environmental performance data

Emissions

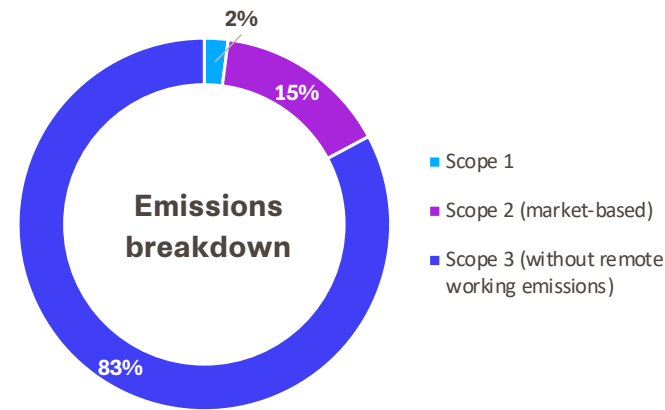
[GRI: 305-1, 305-2, 305-3, 305-4, 305-5; TCFD: Metrics and Targets]

Emissions	FY24	FY23	FY22	FY21	FY20
Scope 1	1,065.555	1,045.602	82.667	57.193	216.607
Scope 2 (market-based)	7,852.590	9,480.965	8,164.353	9,489.156	17,497.998
Scope 3 (without remote working emissions)	42,969.849	51,974.517	10,170.471	5,031.057	15,183.384
Total emissions	51,887.994	62,501.084	18,417.491	14,577.406	32,897.989
Remote working	9,111.905	9,923.439	5,477.547	4,472.512	-
Total emissions (with emissions from Scope 3 remote working)	60,999.899	72,424.523	23,895.038	19,049.918	32,897.989

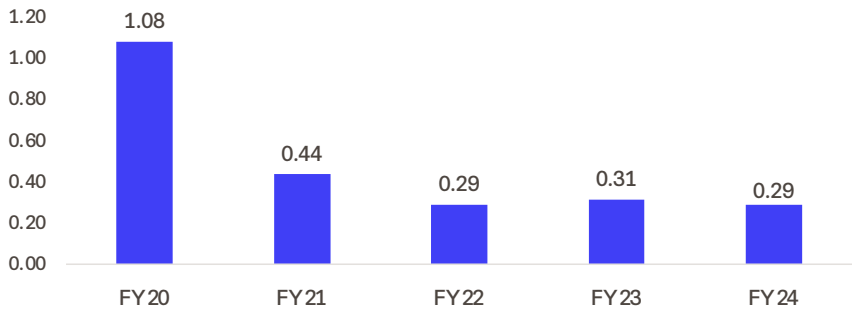
Table: Total direct and indirect greenhouse gas emissions (metric tons CO2e)

Notes:

- **Scope 1:** In FY23, we expanded our Scope 1 reporting to include emissions from natural gas and refrigerants. This has contributed to an increase in Scope 1 emissions in FY23. In FY24, we further enhanced our Scope 1 to include wastewater treatment.
- **Scope 3:** Since FY23, there has been a significant increase in Scope 3 emissions due to the inclusion of emissions from purchased goods and services, as this category contributes to more than 50% of our total Scope 3 emissions. Further, we expanded our Scope 3 inventory in FY24 to include emissions from WTT from the company-owned fleet, business travel by bus, and leased assets.
- **Emissions intensity:** The emissions intensity (market-based), measured in terms of MTCO2e emissions per employee (full-time, contract, and others) per annum, has decreased to 0.29 MTCO2e units per employee from the previous year's 0.31 MTCO2e.



Emissions per employee - market-based



Out of scope emissions – biogas production

Biogas production (m3)	Emissions (MT CO2e)
492.012	0.000

Table: Greenhouse gas emissions from biogas production (metric tons CO2e)

Notes:

- Our campus in Navalur started producing biogas from food waste for internal consumption in June 2023.
- The CO2 portion of biogas emissions are reported as part of the ‘Outside of Scopes’ as labeled by the GHG Protocol Corporate Accounting and Reporting Standard because the Scope 1 impact of these fuels has been determined to be a net ‘0’ (since the fuel source itself absorbs an equivalent amount of CO2 during the growth phase as the amount of CO2 released through combustion).



Scope 1 emissions breakdown

Scope 1 emissions	FY24	FY23	FY22	FY21	FY20
Diesel fuel for backup electricity	123.827	160.287	51.524	30.233	216.607
Natural gas	236.034	237.478	-	-	-
Company-owned vehicles	11.161	14.143	31.143	26.960	-
Refrigerant refills	694.527	633.694	-	-	-
Wastewater	0.006	-	-	-	-
Total Scope 1 emissions	1,065.555	1,045.602	82.667	57.193	216.607

Table: Breakdown of Scope 1 emissions (metric tons CO2e)

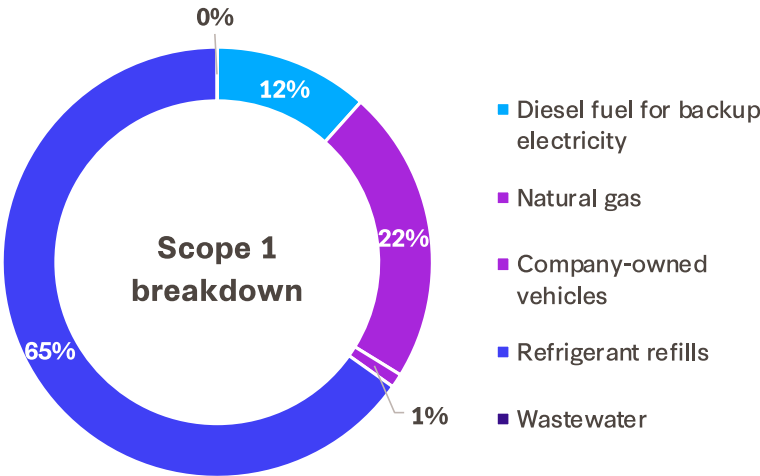
Other emissions - Scopes 1 and 2 breakdown

Emissions	FY24	FY23	FY22	FY21	FY20
CO2	1,063.292	1,042.919	82.667	57.192	-
CH4	0.374	0.383	0.008	0.005	-
N2O	1.883	2.300	0.333	0.273	-

Table: Scope 1— other emissions (metric tons CO2e)

Emissions	FY24	FY23	FY22	FY21	FY20
CO2	10,137.952	9,480.413	-	-	-
CH4	5.107	5.009	-	-	-
N2O	43.365	39.208	-	-	-

Table: Scope 2— other emissions (metric tons CO2e)



Notes:

- We started calculating other emissions from Scope 1 only in FY21 and other emissions from Scope 2 only in FY23.



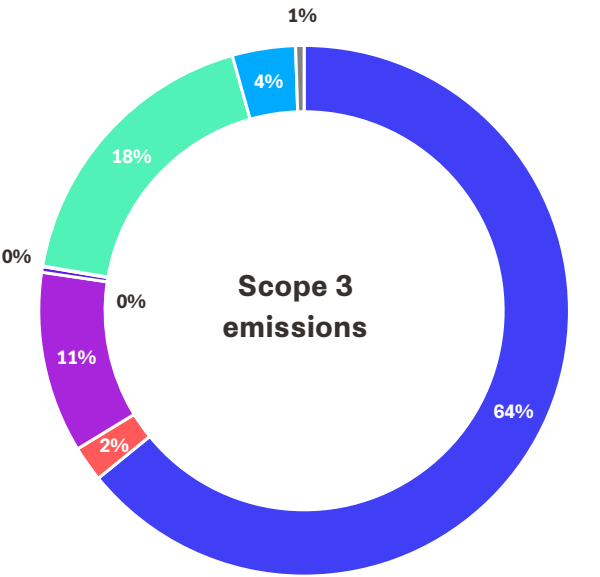
Scope 3 emissions breakdown

Scope 3 emissions	FY24	FY23	FY22	FY21	FY20
Purchased goods and services	27,555.306	31,960.627	-	-	-
Capital goods	929.247	2,741.600	5,571.988	1,605.783	1,360.881
Fuel and energy-related activities	4,742.312	4,346.640	1,971.945	2,183.153	-
Upstream transportation and distribution	147.182	116.619	122.288	-	-
Waste generated in operations	17.179	0.651	0.149	-	-
Business travel	7,702.482	9,547.780	2,419.849	1,165.158	12,447.962
Employee commuting	1,655.304	3,260.600	84.252	76.963	1,374.541
Leased assets	220.837	-	-	-	-
Total Scope 3 (without emissions from remote working)	42,969.849	51,974.517	10,170.471	5,031.057	15,183.384
Remote working	9,111.905	9,923.439	5,477.550	-	-
Total Scope 3 (with emissions from remote working)	52,081.754	61,897.956	2,504.101	1,242.121	13,822.503

Table: Breakdown of Scope 3 emissions (metric tons CO2e)

Notes:

- We have been expanding our reporting boundary on Scope 3 categories since FY20. As a result, the data for these emissions categories are available only from the year of reporting. Since FY23, there has been a significant increase in Scope 3 emissions due to the inclusion of emissions from purchased goods and services, as this category contributes to more than 50% of our total Scope 3 emissions
- Fuel and energy-related activities: Comprise of T&D loss, WTT-Diesel, WTT-Natural Gas, WTT-Electric Power
- Business travel:
 - Comprise of air travel, rail travel, bus travel, and accommodation
 - Emissions from business travel reduced significantly in FY21 and FY22 due to the COVID-19 lockdowns. Since FY23, with the increase in business travel, emissions have increased for this category



- Purchased goods and services
- Capital goods
- Fuel and energy related activities
- Upstream transportation and distribution
- Waste generated in operation
- Business travel (air travel, rail travel, bus travel and accomodation)*
- Employee commuting*
- Leased assets



Energy

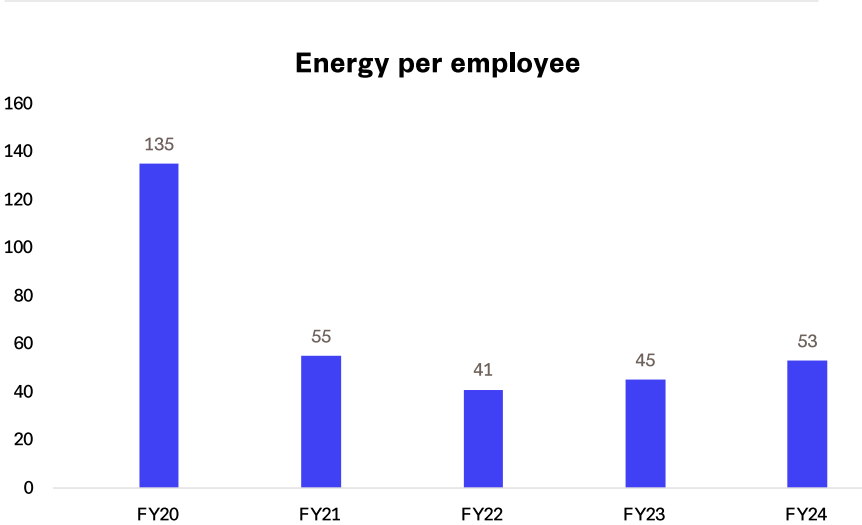
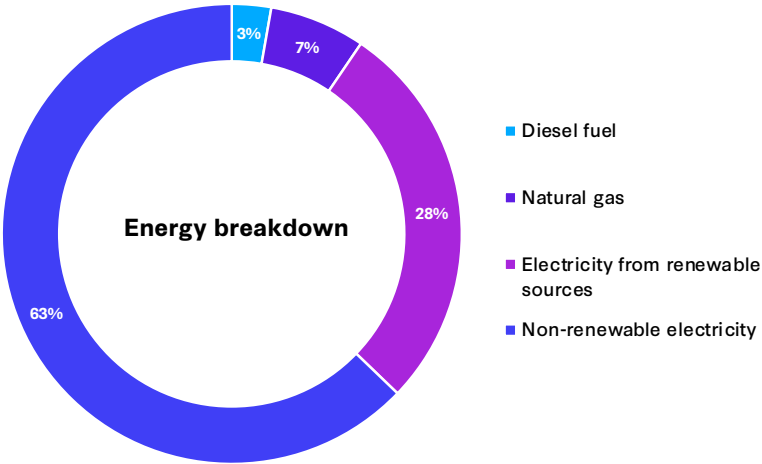
[GRI: 302-1, 302-2, 302-3, 302-4; 302-5; SASB: TC-SI-130a.1; TCFD: Metrics and Targets]

Energy	FY24	FY23	FY22	FY21	FY20
Diesel fuel for backup electricity	1,904.641	2,426.216	695.403	408.042	2,923.421
Natural gas	4,645.048	4,682.952	-	-	-
Electricity from renewable sources	19,102.870	6,366.330	9,740.050	6,192.313	11,330.143
Electricity from grid (non-renewable)	43,322.213	52,581.452	39,538.980	45,069.235	81,450.889
Total energy consumption	68,974.772	66,056.951	49,974.432	51,669.590	95,704.452

Table: Direct and indirect energy consumption in Gigajoules (GJ)

Notes:

- Sources of renewable energy are solar, RE-mix, and Energy Attribute Certificates (EACs)/Renewable Energy Certificates (RECs).
- Energy consumption of grid electricity and natural gas data have been estimated for sites that do not receive utility bills.
- Electricity consumption increased between FY22–FY24 due to R20 in FY23.
- The total consumption of energy has increased by 4.4% due to the increase in R20 during the reporting year.
- The energy intensity, measured in terms of energy per employee (full-time, contract, and others), has increased to 53 MWh units per employee per month from the previous year’s 45 MWh as a result of the increase in energy consumption in office due to increased R20 during the reporting year.





Water

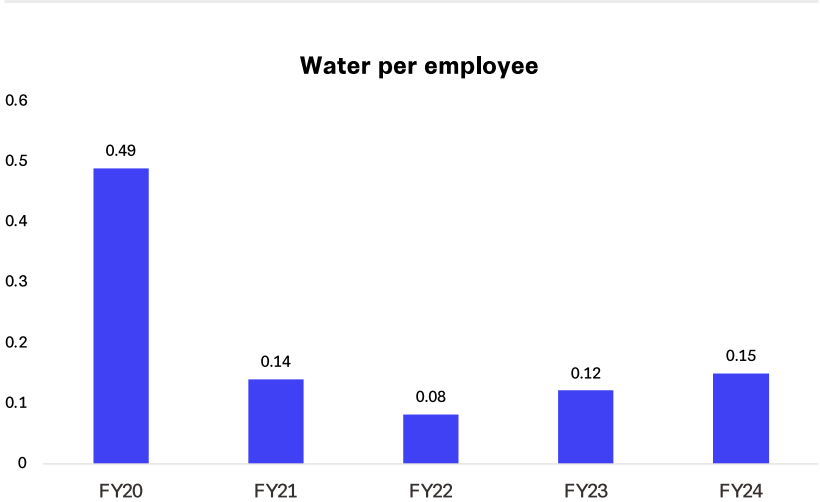
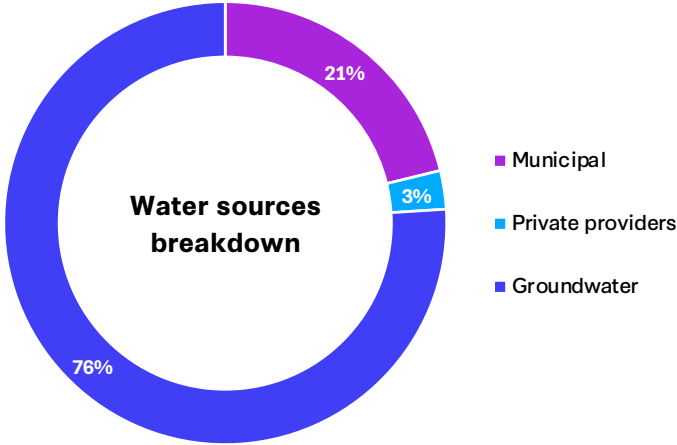
[GRI: 303-3, 303-4, 303-5; SASB: TC-SI-130a.2; TCFD: Metrics and Targets]

Water sources	FY24	FY23	FY22	FY21	FY20
Municipal	11.463	9.995	7.143	9.456	35.345
Private providers	1.523	1.295	0.537	0.440	9.419
Groundwater	41.129	25.344	13.907	12.904	44.596
Total water used (withdrawn/consumed)	54.115	36.634	21.587	22.800	89.360
Total water recycled*	26.901	18.588	11.113	10.642	50.651
Recycled (%)	50%	51%	51%	47%	57%

Table: Water by source and water recycled (in thousand cubic meters (m³))

Notes:

- We are able to track water usage only at seven facilities, which account for 69% of our real estate, and recycling data is available only for the three campuses.
- In FY24, water consumed in areas of water stress amounted to 46,816.44 kiloliters (87% of total water consumed).
- There was a reduction in water used and water recycled due to the work-from-home policies followed in FY21 and FY22.
- Virtusa’s water withdrawal is equal to the total water consumption.





Waste

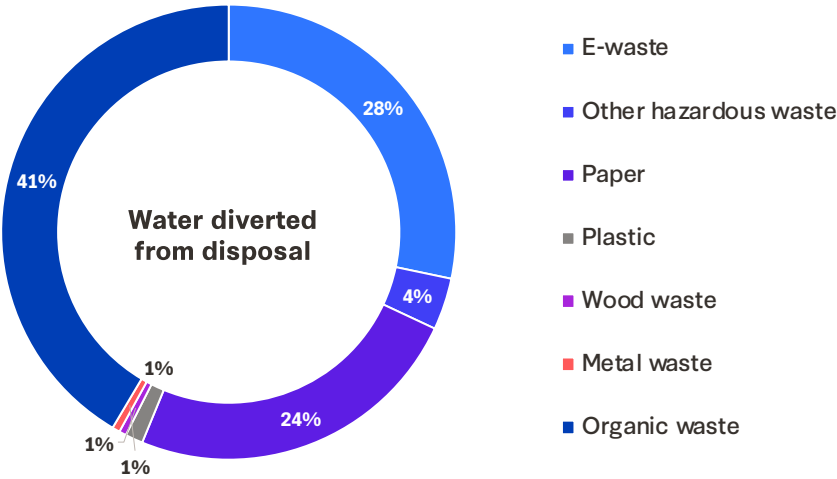
[GRI: 306-4; TCFD: Metrics and Targets]

Waste types	FY24	FY23	FY22	FY21	FY20
Hazardous waste					
E-waste	13,135.140	21,241.000	-	4,542.000	10,960.710
Other hazardous waste*	1,710.310	-	-	-	-
Total hazardous waste recycled	14,845.450	21,241.000	0.00	4,542.000	10,960.710
Non-hazardous waste					
Paper issued	20,555.610	4,272.040	2,969.980	1,256.580	9,340.560
Paper recycled	11,255.640	6,446.500	5,898.240	2,014.000	8,079.210
Paper recycled (%)	55%	100%	100%	100%	86%
Plastic recycled	584.560	619.000	1,105.760	686.000	847.500
Wood waste recycled	236.300	-	-	-	-
Metal waste recycled	254.100	-	-	-	-
Organic waste composted	19,258.030	5,514.080	0.000	102.000	9,036.000
Total non-hazardous waste recycled	31,588.630	12,579.580	7,004.000	2,802.000	17,962.710
Total waste recycled	46,434.080	33,820.580	7,004.000	7,344.000	28,923.420

Table: Waste diverted from disposal (in kilograms)

Notes:

- Other hazardous waste: Batteries, R6 chemical plastic cans, and other hazardous materials are reported under this category.
- During FY24, 17.50 MT of waste was disposed to landfill, this includes soiled paper waste (9.30MT), food waste (8.01MT), and plastic waste (0.19 MT).



Carpooling and bikepooling

Carpooling and bikepooling	FY24	FY23	FY22	FY21	FY20
Carpooling - Kilometers travelled	1,818,482	1,819,902	-	-	16,066,836.00
Emissions saved by carpooling	363.696	363.980	-	-	3,213.370
Bikepooling - Kilometers travelled*	327,634	242,266			-
Emissions saved by bikepooling	65.527	48.453	-	-	-
Total emissions saved	429.223	412.433	-	-	3,213.370

Table: Emissions saved through carpooling and bikepooling (metric tons CO2e)

Notes:

- There is no data for FY21 and FY22 due to the work-from-home policy followed in response to the COVID-19 lockdowns.
- We're unable to disclose legacy data for bikepooling due to a recent system upgrade.



People data

[GRI: 2-7, 2-8, 401-1, 404-1, 405-1; SASB: TC-SI-330a.1, TC-SI-330a.2, TC-SI-330a.3]

	FY24	FY23	FY22	FY21	FY20
North America	2,841	3,137	2,982	3,060	3,170
Europe	780	1,118	937	693	834
Asia Pacific and Middle East	24,304	27,355	27,224	20,983	18,826
Total	27,925	31,610	31,143	24,736	22,830

Table: Total number of full-time employees by region

	FY24	FY23	FY22	FY21	FY20
Management	17%	16%	15%	13%	13%
Professional	32%	36%	34%	33%	33%
Total	33%	32%	31%	29%	29%

Table: Percentage of women by level-permanent cadre

	FY24	FY23	FY22	FY21	FY20
Employee turnover	25%	21%	23%	14%	16%

Table: Voluntary employee turnover

	FY24	FY23	FY22	FY21	FY20
Permanent cadre	27,925	31,610	31,143	24,736	22,830
Contract/outourced/other	2,071	3,580	4,430	2,271	2,619

Table: Information on employees and other workers

	FY24	FY23	FY22	FY21	FY20
Male	2,488	7,515	11,344	5,361	5,001
Female	1,364	3,497	4,967	2,251	2,140
Total	3,852	11,012	16,311	7,612	7,141

Table: New hires by gender

	FY24	FY23	FY22	FY21	FY20
Top management/senior management	15.2	16.9	26.5	14.2	28.3
Manager level	24.0	25.1	32.6	22.1	37.8
Middle management	29.7	43.7	32.4	27.2	37.8
Entry-level middle management	36.7	104.4	33.2	33.0	43.8
Executive/engineer level	71.7	170.1	60.6	52.6	80.8
Average training hours per employee	41.0	74.1	62.5	33.5	57.0

Table: Average training hours by level

	FY24	FY23	FY22
Great Place to Work - Trust Index	79%	79	80
Great Place to Work - % of active respondents	70%	75.4%	59%

Table: Employee engagement



Community outreach

	FY24	FY23	FY22	FY21	FY20
Internships	1,949	2,653	389	340	374
Career guidance sessions	68	35	30	25	53
TechTalks	55	67	78	150	33
Industrial visits	11	4	0	0	17
Convocations and freshers' day	0	14	20	13	26

Table: Campus Reach data

	FY24	FY23	FY22
CSR spend global	633,201.31	568,918.00	434,119.76

Table: Spend on community outreach (in USD)





Governance data

[GRI: 204-1, 205-2, 205-3, 404-1, 406-1]

Our code of business conduct and ethics (“Code”) actively encourages employees to report any suspected violations of our Code, company policies and procedures, as well as potential violations of the law. During our fiscal year ending March 31, 2024, Virtusa Corporation received a total of 41 reports from across the globe. Each of these reports went through a thorough investigation by the company.

In cases where the investigations determined merit in the complaints, Virtusa Corporation took appropriate corrective measures in accordance with its established policies and procedures. Of the 41 matters raised, 37% were submitted anonymously. The majority (66%) were either resolved through the engagement of human resources or closed due to insufficient findings/facts to support them or lack of response to follow-up requests for further information. In 22% of the cases, the findings led to employee terminations. Fiscal years 2021 and 2020 experienced lower reports, which may have been due to the pandemic.

The tables below provide details of the complaints received over the past five fiscal years.

	FY24	FY23	FY22	FY21	FY20
Employee	9	4	4	1	0
Anonymous	15	13	6	2	1
Vendor	3	0	1	0	1
Client	0	0	2	0	1
Ex-employee	6	0	7	0	0
Other	8	5	3	1	0
Total	41	22	23	4	3

Table: Whistleblower complaints by source

	FY24	FY23	FY22	FY21	FY20
HR process	8	7	7	0	1
Code of conduct violations	15	2	7	1	2
Accounting fraud	0	1	1	2	0
Falsification of employee information	14	9	3	1	0
Harassment	1	2	3	0	0
Other	3	1	2	0	0
Total	41	22	23	4	3

Table: Whistleblower complaints by type

	FY24	FY23	FY22	FY21	FY20
Disciplinary/additional training	1	0	1	0	0
Termination	9	9	4	1	1
Benefits granted	0	0	1	0	0
Process change	0	0	1	2	1
Not actionable	18	6	9	1	1
Human resources engagement	9	3	5	0	0
Ongoing investigation - open cases	4	1	0	0	0
Other	0	3	2	0	0
Total	41	22	23	4	3

Table: Whistleblower complaints by type of action taken



Training courses	FY24	FY23	FY22	FY21	FY20
Security First	97%	98%	90%	89%	88%
Code of Conduct	97%	96%	84%	89%	88%
Data Privacy	93%	95%	80%	81%	77%
Prevention of Sexual Harassment (PoSH)	97%	95%	83%	85%	79%
Intellectual Property	96%	93%	80%	88%	88%
Safety First	90%	91%	70%	67%	88%
Virtusa Pandemic Response	98%	95%	81%	67%	-
Cybersecurity Awareness	79%	73%	62%	79%	-

Table: Completion rates for mandatory training

Notes:

- Security First training is a mandatory information security training module and assessment that all employees must complete upon joining Virtusa and repeat annually.
- Code of Conduct training is a mandatory onboarding training to ensure that all employees and contractors understand and comply with the company's policies on anti-bribery and anti-corruption.
- The Data Privacy training is a mandatory training module and assessment that all employees must complete upon joining the company and repeat annually to ensure they understand and comply with data privacy regulations and best practices.
- Safety First training is a mandatory environment, health, and safety training module and assessment that all employees must complete upon joining Virtusa and repeat annually.
- Safety First, Virtusa Pandemic Response, and Cybersecurity Awareness were introduced in FY21.

Region	% Spend FY24	% Spend FY23	% Spend FY22
APAC	99%	91%	88%
EMEA	71%	96%	95%
India	99%	79%	84%
Sri Lanka	69%	69%	68%
USA	98%	99%	99%

Table: Proportion of spending on local suppliers by location





Data computational methods

[GRI: 305-1, 305-2, 305-3, 305-4, 305-5; TCFD: Metrics and Targets]

We follow the guidelines set by the Greenhouse Gas Protocol (GHG Protocol) to calculate Scope 1, Scope 2, and Scope 3 emissions.

Location	Emission factor	Unit	Calculation formula	Reference
Purchased grid electricity (Location-based)				
Australia	651.204	gCO2e/kWh	Emission Factor (gCO2e/kWh) × Consumption (kWh)	CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA)
Canada	118.289	gCO2e/kWh		
Dubai	474.599	gCO2e/kWh		
Germany	348.908	gCO2e/kWh		
Hungary	191.666	gCO2e/kWh		
India	716.35	gCO2e/kWh		
Malaysia	620.321	gCO2e/kWh		
Mexico	407.776	gCO2e/kWh		
Netherlands	312.464	gCO2e/kWh		
Qatar	476.799	gCO2e/kWh		
Singapore	383.29	gCO2e/kWh		
Sri Lanka	505.742	gCO2e/kWh		
Sweden	11.39282	gCO2e/kWh		
United Kingdom	206.2759	gCO2e/kWh		
United States	369.123	gCO2e/kWh		



Location	Emission factor	Unit	Calculation formula	Reference
Purchased grid electricity (Market-based)				
Australia	651.204	gCO2e/kWh	Emission Factor (gCO2e/kWh) × Consumption (kWh)	CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA).
Canada	118.289	gCO2e/kWh		
Dubai	474.599	gCO2e/kWh		European Residual Mix 2021 v1.0, Association of Issuing Bodies (AIB).
Germany	684.03	gCO2e/kWh		
Hungary	319.96	gCO2e/kWh		CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA).
India	716.35	gCO2e /kWh		
Malaysia	620.321	gCO2e/kWh		CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA).
Mexico	407.776	gCO2e/kWh		
Netherlands	438.97	gCO2e/kWh		European Residual Mix 2021 v1.0, Association of Issuing Bodies (AIB).
Qatar	476.799	gCO2e/kWh		
Singapore	383.29	gCO2e/kWh		CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA).
Sri Lanka	505.742	gCO2e/kWh		
Sweden	-	gCO2e/kWh		European Residual Mix 2021 v1.0, Association of Issuing Bodies (AIB).
United Kingdom	365.15	gCO2e/kWh		
United States–WIN Northfield, SBR Suite 300	382.178	gCO2e/kWh		2023 Green-e® Residual Mix Emission Rates (2021 Data), Center for Resource Solutions (CRS)
United States–TAM BBI,TAM Registry One	475.355	gCO2e/kWh		
United States–IND Innovation Center	243.962	gCO2e/kWh		2023 Green-e® Residual Mix Emission Rates (2021 Data), Center for Resource Solutions (CRS)
United States–NYC 225 Liberty	305.24217	gCO2e/kWh		
United States–PIS Corporate Place	244.673	gCO2e/kWh		
United State–Milpitas	370.474	gCO2e/kWh		



Location	Emission factor	Unit	Calculation formula	Reference
Company-owned vehicles				
Large-Diesel	208.63737	gCO2e/km	Emission Factor (gCO2e/ km) × Distance (km)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Diesel generators				
Diesel (Average biofuel blend)	2.51206	kg CO2e/Liters	Emission Factor (kgCO2e/ Liters) × Consumption (Liters)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Natural gas				
Natural gas (Gaseous fuels)	0.18293	kg CO2e/kWh (Gross CV)	Emission Factor (kgCO2e/ kWh) × Consumption (kWh)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Refrigerants refilled				
HCFC-22	1960	kg CO2e/kg	Emission Factor (gCO2e/ km) × Distance (km)	Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR6).
HFC-32	771	kg CO2e/kg		Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR5)
HFC-410a	1924	kg CO2e/kg		
Biogas (Outside of scopes)				
Biogas	0.19902	kg CO2e/kWh	Emission Factor (kgCO2e/ kWh) × Amount of biogas generated (kWh)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK



Location	Emission factor	Unit	Calculation formula	Reference
Wastewater treatment				
UASB (Tier 1)	0.48	kgCH4/kgBOD	Emission Factor (kgCH4/kgBOD) × Amount of BOD (kgBOD)	2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories.
UASB (Tier 1)	0	kgN2O-N/kgN	Emission Factor (kgN2O-N/kgN) × Amount of N (kgN)	
Aerobic system (Tier 1)	0.018	kgCH4/kgBOD	Emission Factor (kgCH4/kgBOD) × Amount of BOD (kgBOD)	
Aerobic system (Tier 1)	0.016	kgN2O-N/kgN	Emission Factor (kgCH4/kgBOD) × Amount of BOD (kgBOD)	
Discharge to aquatic environments other than reservoirs, lakes and estuaries (Tier 2)	0.021	kgCH4/kgBOD	Emission Factor (kgN2O-N/kgN) × Amount of N (kgN)	
Freshwater, estuarine, and marine discharge (Tier 1)	0.005	kgN2O-N/kgN	Emission Factor (kgCH4/kgBOD) × Amount of BOD (kgBOD)	
Purchased goods and services/Capital goods				
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing	0.236	kg CO2e/2021 USD	Emission Factor (kgCO2e/USD) × Expenditure (USD)	Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities - Supply Chain Factors Dataset v1.2, United States Environmental Protection Agency
All Other Business Support Services	0.118	kg CO2e/2021 USD		
All Other Legal Services	0.054	kg CO2e/2021 USD		
All other miscellaneous food manufacturing	0.603	kg CO2e/2021 USD		
All Other Travel Arrangement and Reservation Services	0.103	kg CO2e/2021 USD		
Audio and Video Equipment Manufacturing	0.124	kg CO2e/2021 USD		
Automobile manufacturing	0.279	kg CO2e/2021 USD		
Blind and Shade Manufacturing	0.225	kg CO2e/2021 USD		



Purchased goods and services/Capital goods				
Carpet and rug mills	0.308	kg CO2e/2021 USD	Emission Factor (kgCO2e/USD) × Expenditure (USD)	Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities - Supply Chain Factors Dataset v1.2, United States Environmental Protection Agency
Coffee and tea manufacturing	0.549	kg CO2e/2021 USD		
Computer Terminal and Other Computer Peripheral Equipment Manufacturing	0.183	kg CO2e/2021 USD		
Computer terminals and other computer peripheral equipment manufacturing	0.183	kg CO2e/2021 USD		
Custom Architectural Woodwork and Millwork Manufacturing	0.305	kg CO2e/2021 USD		
Data processing, hosting, and related services	0.148	kg CO2e/2021 USD		
Electronic computer manufacturing	0.112	kg CO2e/2021 USD		
Employment Placement Agencies	0.033	kg CO2e/2021 USD		
Food Service Contractors	0.155	kg CO2e/2021 USD		
General Automotive Repair	0.127	kg CO2e/2021 USD		
General Freight Trucking, Long-Distance, Truckload	1.115	kg CO2e/2021 USD		
Gift, Novelty, and Souvenir Stores	0.163	kg CO2e/2021 USD		
Health and Welfare Funds	0.166	kg CO2e/2021 USD		
Human Resources Consulting Services	0.084	kg CO2e/2021 USD		
Office Administrative Services	0.105	kg CO2e/2021 USD		
Office Equipment Merchant Wholesalers	0.085	kg CO2e/2021 USD		
Office Furniture (Except Wood) Manufacturing	0.305	kg CO2e/2021 USD		
Office supplies (Except paper) manufacturing	0.292	kg CO2e/2021 USD		
Other Accounting Services	0.05	kg CO2e/2021 USD		
Other Commercial and Industrial Machinery and Equipment Rental and Leasing	0.14	kg CO2e/2021 USD		
Other Computer Related Services	0.087	kg CO2e/2021 USD		



Purchased goods and services/Capital goods				
Other electronic component manufacturing	0.167	kg CO2e/2021 USD	Emission Factor (kgCO2e/USD) × Expenditure (USD)	Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities - Supply Chain Factors Dataset v1.2, United States Environmental Protection Agency
Other Grantmaking and Giving Services	0.065	kg CO2e/2021 USD		
Other Management Consulting Services	0.084	kg CO2e/2021 USD		
Other Miscellaneous Durable Goods Merchant Wholesalers	0.147	kg CO2e/2021 USD		
Other Services Related to Advertising	0.129	kg CO2e/2021 USD		
Other Services to Buildings and Dwellings	0.167	kg CO2e/2021 USD		
Outdoor Advertising	0.129	kg CO2e/2021 USD		
Payroll Services	0.05	kg CO2e/2021 USD		
Postal services	0.19	kg CO2e/2021 USD		
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	0.215	kg CO2e/2021 USD		
Refrigeration Equipment and Supplies Merchant Wholesalers	0.147	kg CO2e/2021 USD		
Security Guards and Patrol Services	0.08	kg CO2e/2021 USD		
Security Systems Services (except Locksmiths)	0.08	kg CO2e/2021 USD		
Software Publishers	0.097	kg CO2e/2021 USD		
Switchgear and switchboard apparatus manufacturing	0.24	kg CO2e/2021 USD		
Telephone apparatus manufacturing	0.201	kg CO2e/2021 USD		
Upholstered household furniture manufacturing	0.249	kg CO2e/2021 USD		
Wired telecommunications carriers	0.082	kg CO2e/2021 USD		
Wood Office Furniture Manufacturing	0.305	kg CO2e/2021 USD		



WTT-Electricity

Australia	186.61	gCO ₂ e/kWh	Emission Factor (gCO ₂ e/kWh) × Consumption (kWh)	Greenhouse gas reporting: Conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Germany	109.68	gCO ₂ e/kWh		
Hungary	68.59	gCO ₂ e/kWh		
India	205.12	gCO ₂ e/kWh		
Malaysia	165.91	gCO ₂ e/kWh		
Mexico	115.27	gCO ₂ e/kWh		
Netherlands	82.59	gCO ₂ e/kWh		
Qatar	172.38	gCO ₂ e/kWh		
Singapore	110.55	gCO ₂ e/kWh		
Sri Lanka	116.37	gCO ₂ e/kWh		
Sweden	2.67	gCO ₂ e/kWh		
United Arab Emirates	172.38	gCO ₂ e/kWh		
United Kingdom	60.18	gCO ₂ e/kWh		
USA	112.34	gCO ₂ e/kWh		

WTT-Diesel

WTT-Diesel (average biofuel blend)	56.9038769	gCO ₂ e/kWh	Emission Factor (gCO ₂ e/ kWh) × Consumption (kWh)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
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WTT-Natural gas

WTT-Natural gas	31.69849834	gCO ₂ e/kWh	Emission Factor (gCO ₂ e/ kWh) × Consumption (kWh)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
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Transmission and distribution losses

Australia	32.4	gCO ₂ e/kWh	Emission Factor (gCO ₂ e/ kWh) × Consumption (kWh)	International Energy Agency (IEA) - T&D Loss 2022 - Year 2020;
Germany	15.3	gCO ₂ e/kWh		
Hungary	10.8	gCO ₂ e/kWh		
India	136.4	gCO ₂ e/kWh		
Malaysia	44.1	gCO ₂ e/kWh		
Mexico	45.8	gCO ₂ e/kWh		
Netherlands	10.7	gCO ₂ e/kWh		
Qatar	28.8	gCO ₂ e/kWh		
Singapore	4.5	gCO ₂ e/kWh		
Sri Lanka	51.6	gCO ₂ e/kWh		
Sweden	0.7	gCO ₂ e/kWh		
United Arab Emirates	24.1	gCO ₂ e/kWh		
United Kingdom	16	gCO ₂ e/kWh		
USA	21.3	gCO ₂ e/kWh		

WTT-Fleet

India	41.45	gCO ₂ e/Km	Emission Factor (gCO ₂ e/ Km) × Distance (Km)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
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Upstream transportation and distribution

Average car/fuel unknown km	0.16664	kgCO ₂ e/km	Emission Factor (kgCO ₂ e/ Km) × Delivery Distance (Km)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Courier services	0.257	kgCO ₂ e/2021 USD	Emission Factor (kgCO ₂ e/ USD) × Expenditure (USD)	Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities - Supply Chain Factors Dataset v1.2, United States Environmental Protection Agency



Waste generated in operations					
Paper waste-closed loop	21.28080724	kgCO2e/Tonnes	Emission Factor (kgCO2e/ Tonnes) × Amount of waste generated (Tonnes)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK	
Plastic waste-closed loop	21.28080724	kgCO2e/Tonnes			
E-waste (WEEE-mixed)-open loop	21.28080724	kgCO2e/Tonnes			
Organic waste-composting	8.912421711	kgCO2e/Tonnes			
Hazardous (Batteries)	21.28080724	kgCO2e/Tonnes			
Hazardous (Mineral oil)	6.411	kgCO2e/Tonnes		Greenhouse gas reporting: conversion factors 2024 (Version 1.0) published by DEFRA (Department for Environment, Food & Rural Affairs) UK	

Business travel					
International, to/from non-UK-average passenger	0.1758	passenger.km	Emission Factor (Passenger.km) × Travel Distance (km)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK	
International, to/from non-UK-economy class	0.13464	passenger.km			
International, to/from non-UK-premium economy class	0.21542	passenger.km			
International, to/from non-UK-business class	0.39044	passenger.km			
International, to/from non-UK-first class	0.53854	passenger.km			
National rail	0.035463	passenger.km			
International rail	0.004459	passenger.km			
Local London bus	0.078323	passenger.km			
Average local bus	0.10215	passenger.km			
Passenger car rental	0.143	kgCO2e/2021 USD	Emission Factor (kgCO2e/ USD) × Expenditure (USD)	Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities - Supply Chain Factors Dataset v1.2, United States Environmental Protection Agency	
All Other Support Activities for Transportation	0.208	kgCO2e/2021 USD			
All other traveler accommodation	0.183	kgCO2e/2021 USD			



Employee commuting

Motorbike-Average-BT-Land	0.114	kg CO2e/km	Emission Factor (Passenger.km) × Travel Distance (km)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK
Car-Mini-Petrol	0.13	kg CO2e/km		
Average local bus	0.102	kg CO2e/km		
Average car-Unknown-BT-Land	0.167	kg CO2e/km		
Light rail and tram	0.029	kg CO2e/km		
Taxi-Regular	0.149	kg CO2e/km		
Local London bus	0.078322509	kg CO2e/km		
Passenger car-Average-Unknown	0.167	kg CO2e/km		
London Underground	0.028	kg CO2e/km		
Remote working	Emission factors for Purchased grid electricity (location-based) and natural gas were used for this calculation.	-	Calculated based on working hours, workstation usage, lighting usage, supplemental electric heating/cooling, and grid average GHG emissions factors.	Estimated based to Homeworking Emissions Whitepaper by EcoAct in partnership with Lloyds Banking Group and NatWest Group

Leased assets

India	716.35	gCO2e/kWh	Emission Factor (gCO2e/ kWh) × Consumption (kWh)	CO2 Emissions from Fuel Combustion 2023-Year 2021, International Energy Agency (IEA)
Diesel (Average biofuel blend)	2.512	kg CO2e/Liters	Emission Factor (kgCO2e/ Liters) × Consumption (Liters)	Greenhouse gas reporting: conversion factors 2023 (Version 1.1) published by DEFRA (Department for Environment, Food & Rural Affairs) UK



SASB disclosures

SASB Standards, Technology and Communications Sector
- Software and IT Services Sustainability Accounting Standard, Version 2023-06

Topic	Accounting metric	Category	Unit of measure	Code	Section and page
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	Gigajoules (GJ), Percentage (%)	TC-SI-130a.1	Environmental performance data - P.90
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with high or extremely high baseline water stress	Quantitative	Thousand cubic meters (m³), Percentage (%)	TC-SI-130a.2	Water - P.32 Environmental performance data - P.91
	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion and Analysis	Not applicable	TC-SI-130a.3	Data centers - P.34
Data Privacy and Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	Not applicable	TC-SI-220a.1	Privacy Statement Virtusa (https://www.virtusa.com/privacystatement)
	Number of users whose information is used for secondary purposes	Quantitative	Number	TC-SI-220a.2	Not applicable
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	Presentation currency	TC-SI-220a.3	During the reporting period, there were no monetary losses as a result of legal proceedings associated with user privacy.
	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	Quantitative	Number, Percentage (%)	TC-SI-220a.4	During the reporting period, there were no law enforcement requests for user information.
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	Not applicable	TC-SI-220a.5	Not applicable
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Quantitative	Number, Percentage (%)	TC-SI-230a.1	During the reporting period, there were no significant data breaches or performance issues/service disruptions/customer downtime.
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	Not applicable	TC-SI-230a.2	Information security - P.57-58 Data privacy - P.59 Measures to ensure information security and data privacy - P.60-62



Topic	Accounting metric	Category	Unit of measure	Code	Section and page
Recruiting and Managing a Global, Diverse Skilled Workforce	Percentage of employees that are (1) foreign nationals and (2) located offshore	Quantitative	Percentage (%)	TC-SI-330a.1	People data - P.94-95 Partially reporting due to confidentiality constraints. We are reporting employee data only at a regional level.
	Employee engagement as a percentage	Quantitative	Percentage (%)	TC-SI-330a.2	People data - P.94-95
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Quantitative	Percentage (%)	TC-SI-330a.3	People data - P.94-95 We are reporting employee data only by gender and by type of employment.
Intellectual Property Protection and Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Quantitative	Presentation currency	TC-SI-520a.1	Compliance with laws and regulations - P.24
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	Quantitative	Number, Days	TC-SI-550a.1	During the reporting period, there were no performance issues/service disruptions/customer downtime reported.
	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	Not applicable	TC-SI-550a.2	Governance risk management - P.55-56 Measures to ensure information security and data privacy - P.60-62 Partially reporting due to confidentiality constraints.



CEO Water Mandate

We follow the CEO Water Mandate guidelines, which cover the following core areas:

Core elements	Description
Our direct operation	Virtusa is committed to sustainable water management across all our direct operations. We implement comprehensive water conservation strategies, track and monitor water consumption, and adopt recycling practices to minimize our water footprint. Our efforts are aligned with legal requirements and industry best practices to ensure compliance and maintain high water quality standards. For detailed information, see "Water" on page 32.
Value chain	At Virtusa, we are committed to reducing sustainability risks throughout our supply chain. Our suppliers undergo an annual sustainability assessment, evaluating their environmental, social, and governance (ESG) practices. Suppliers are required to complete annual sustainability assessments to identify risks; if they fall short, we work with them on improvement plans to meet our standards. Our supplier code of conduct outlines the standards and practices for suppliers to follow regarding human rights, labor, environmental impact, and business ethics. We also require our suppliers to be environmentally conscious and adhere to the highest ethical business practices. Additionally, we emphasize the importance of protecting natural water resources, such as avoiding polluting lakes, rivers, oceans, and other water bodies by following sustainable practices that prevent contamination and preserve aquatic ecosystems for future generations.
Collective actions	Virtusa is a participant to UN Global Compact and follows its principles across all operations. In FY24, Virtusa strengthened its commitment to sustainable water management by signing up and endorsing the CEO Water Mandate, aligning with our environmental stewardship goals. Through this global initiative, we work with industry leaders to drive innovation in water conservation across our operations and supply chain. Virtusa also participates in the water and ocean stewardship working group of the UN Global Compact Network Sri Lanka, where our global head of sustainability and facilities currently serves as the board advisor. This working group aims to: • Take responsibility for water conservation within organizations • Prevent the pollution of surrounding water catchment areas Our involvement in this initiative further strengthens our role in promoting responsible water use and implementing sustainable practices, contributing to global water sustainability efforts.



Core elements	Description
Public policy	Virtusa is committed to addressing water stewardship by implementing a comprehensive water policy that guides our water management strategies, systems, and practices. This policy ensures we comply with all legal requirements, minimize our water footprint, and maintain water quality throughout our operations, including processes and discharges. We have secured the necessary approvals from regulatory bodies and ensure compliance across all our facilities. Virtusa actively promotes responsible water usage, supporting our broader environmental goals. In line with this commitment, we maintain strong relationships with local communities and have had no complaints from officials or stakeholders regarding our water practices. Additionally, Virtusa is updating its water targets to further improve its efforts to reduce water consumption and promote sustainable practices.
Community engagement	Virtusa is committed to making a positive impact through various community engagement initiatives. In FY24, we carried out the following projects: • Restoring water bodies: We invested in two projects to restore the Ranglal Kunta lake in Hyderabad and the Alli Kulam pond in Chennai. • Solar Harmony Borewells project: Virtusa installed ten solar-powered borewells in Amrabad Forest Reserve to ensure a reliable water supply for the reserve's wildlife and the local Chenchu tribal community. • Drinking water for schools: Installed air-to-water plants at nine schools in India. For detailed information, see "Environment" on page 29 and "Engineering for good" on page 72.
Transparency	We track, monitor, and measure data according to the GRI standards and report the data through our annual sustainability report and the CDP climate change disclosure.





UN Global Compact principles

Category	UN Global Compact Principle	Section and page
Human Rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and	Strategy, policies, and practices - P.18-19 Our policies - P.42
	Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Procurement process and management - P.68
Labour Standards	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	Talent engagement - P.26
	Principle 4: Businesses should uphold the elimination of all forms of forced or compulsory labour;	Embedding policy commitments through our sustainability framework - P.20
	Principle 5: Businesses should uphold the effective abolition of child labor; and	Our policies - P.42 Procurement process and management - P.68
	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Communication of policy commitments - P.22 Our policies - P.42
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges;	Environment - P.29-35 Environmental performance data - 86-93
	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility; and	
	Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	
Anti-Corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Ethics and compliance - P.52 Code of business conduct and ethics and anti-bribery and corruption policies - P.53 Governance risk management - P.55 Governance data - P.96-97



GRI content index

GRI 1: Foundation 2021

Virtusa Corporation has reported in accordance with the GRI Standards for the period April 2023 to March 2024.

GRI Standard/Other source	Disclosure	Location	Omission			Remarks
			Requirements omitted	Reason	Explanation	
General disclosures						
GRI 2: General disclosures 2021	2-1 Organizational details	P. 11-12	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.			
	2-2 Entities included in the organization’s sustainability reporting	P.27				
	2-3 Reporting period, frequency and contact point	P.125				
	2-4 Restatements of information	P.28				
	2-5 External assurance	P.28				
	2-6 Activities, value chain and other business relationships	P.13-15				There were no changes to the sector, services, or client offerings during the reporting period.
	2-7 Employees	P.94-95				Partially reporting due to confidentiality constraints.



GRI Standard/Other source	Disclosure	Location	Omission			Remarks
			Requirements omitted	Reason	Explanation	
General disclosures						
GRI 2: General disclosures 2021	2-8 Workers who are not employees	P.94-95				There were no significant changes during the reporting year. Partially reporting due to confidentiality constraints. Virtusa does not employ nonguaranteed hours employees (employees who do not have a guarantee of a minimum or fixed number of working hours). All our employees are either permanent, full-time, part-time, or temporary.
	2-9 Governance structure and composition	P.64				
	2-10 Nomination and selection of the highest governance body	P.65				
	2-11 Chair of the highest governance body	P.64				
	2-12 Role of the highest governance body in overseeing the management of impacts	P.15-16				
	2-13 Delegation of responsibility for managing impacts	P.16-17				
	2-14 Role of the highest governance body in sustainability reporting	P.15-17				
	2-15 Conflicts of interest	P.65				
	2-16 Communication of critical concerns	P.23				



GRI Standard/Other source	Disclosure	Location	Omission			Remarks
			Requirements omitted	Reason	Explanation	
General disclosures						
GRI 2: General disclosures 2021	2-17 Collective knowledge of the highest governance body	P.64				Our board’s composition reflects a balance of knowledge, skills, expertise, and diversity in order to support our business strategy. The profiles of our directors are available on our company website at: https://www.virtusa.com/board-of-directors Our management company, EQT AB, has relevant expertise and actively provides guidance on our climate change program and sustainability strategy. For example, one of the annual KPIs EQT AB tracks is whether a portfolio company has a sustainability champion on the board, and training is provided to ensure accountability. EQT AB oversees climate competency on our board. In addition, the board is guided on climate change through our independent director and chairperson of the sustainability committee.
	2-18 Evaluation of the performance of the highest governance body	P.16, P.65				
	2-19 Remuneration policies	P.65				
	2-20 Process to determine remuneration	P.65				



GRI Standard/Other source	Disclosure	Location	Omission			Remarks
			Requirements omitted	Reason	Explanation	
General disclosures						
GRI 2: General disclosures 2021	2-21 Annual total compensation ratio	P.65				
	2-22 Statement on sustainable development strategy	P. 04				
	2-23 Policy commitments	P.18-19, P.42, P.52-53				Refer to https://www.virtusa.com/about/corporate-compliance
	2-24 Embedding policy commitments	P.20-22, P.42, P.53-54, P.67-68				
	2-25 Processes to remediate negative impacts	P.23				
	2-26 Mechanisms for seeking advice and raising concerns	P.23				
	2-27 Compliance with laws and regulations	P.24				There were no instances of non-compliance with laws and regulations during the reporting period.
	2-28 Membership associations	P.70				
	2-29 Approach to stakeholder engagement	P.25-26				
	2-30 Collective bargaining agreements	P.26				We do not provide reports on the percentage of employees covered by collective bargaining agreements.

Material topics				
GRI 3: Material Topics 2021	3-1 Process to determine material topics	P.27	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.	
	3-2 List of material topics	P.27		



Economic performance						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.27				
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed		201-1	Confidentiality constraints		
	201-2 Financial implications and other risks and opportunities due to climate change	P.78-84				
	201-3 Defined benefit plan obligations and other retirement plans	-	201-3	Confidentiality constraints		
	201-4 Financial assistance received from government					No financial assistance was received from the government during the reporting year.

Indirect economic impacts						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.72-76				
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	P.72-76				
	203-2 Significant indirect economic impacts		203-2	Not applicable		

Procurement practices						
GRI 3: Material Topics 2021	3-3 Management of material topics	P-67				
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	P.67-68, P.96				



Anti-corruption						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.22, P.52-54				
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	P.55-56	205-1 (a)	Confidentiality constraints		Partially reporting due to confidentiality constraints. Operations are assessed at the company level.
	205-2 Communication and training about anti-corruption policies and procedures	P.96				Partially reporting due to confidentiality constraints. Our code of business conduct and ethics and anti-bribery and corruption policies are publicly available on our website. Refer to the strategy, policies, and practices section of this report for additional details.
	205-3 Confirmed incidents of corruption and actions taken	P.96				There were no public legal cases regarding corruption brought against the organization or its employees during the reporting period.

Anti-competitive behavior						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.24				
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	P.24				Operations are assessed at the company level.

Energy						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.30-31				
GRI 302: Energy 2016	302-1 Energy consumption within the organization	P.90				
	302-2 Energy consumption outside of the organization	P.90				At present we don't consider that there are any energy sources outside the organization.
	302-3 Energy intensity	P.90				We report the energy intensity only at a global level.
	302-4 Reduction of energy consumption	P.34, P.90				
	302-5 Reductions in energy requirements of products and services	P.30, P.34, P.90				



Water and effluents

GRI 3: Material Topics 2021	3-3 Management of material topics	P.30, P.32				
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	P.32				
	303-2 Management of water discharge-related impacts	P.32				
	303-3 Water withdrawal	P.91				
	303-4 Water discharge	P.91				
	303-5 Water consumption	P.91				

Biodiversity

GRI 3: Material Topics 2021	3-3 Management of material topics	P.30, P.35				
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	-	304-1	Not applicable		
	304-2 Significant impacts of activities, products and services on biodiversity	-	304-2	Not applicable		
	304-3 Habitats protected or restored	P.35-39				
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	-	304-4	Not applicable		



Emissions

GRI 3: Material Topics 2021	3-3 Management of material topics	P30-31				
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	P.86, P.98-107				
	305-2 Energy indirect (Scope 2) GHG emissions	P.86, P.98-107				
	305-3 Other indirect (Scope 3) GHG emissions	P.86, P.98-107				
	305-4 GHG emissions intensity	P.86, P.98-107				
	305-5 Reduction of GHG emissions	P.86, P.98-107				We report the emissions intensity only at a global level.
	305-6 Emissions of ozone-depleting substances (ODS)	-	305-6	Information unavailable/incomplete		
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	-	305-7	Information unavailable/incomplete		

Waste

GRI 3: Material Topics 2021	3-3 Management of material topics	P.30, P.33				
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts		306-1	Information unavailable/incomplete		
	306-2 Management of significant waste-related impacts	P.33				Waste data is recorded manually at the time of collection/disposal by the facilities teams at each location.
	306-3 Waste generated		306-3	Information unavailable/incomplete		
	306-4 Waste diverted from disposal	P.92				
	306-5 Waste directed to disposal		306-5	Information unavailable/incomplete		



Supplier environmental assessment

GRI 3: Material Topics 2021	3-3 Management of material topics	P67				
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	P67-68				Partially reporting. Currently, we are able to report only the total suppliers screened which includes both new and existing suppliers.
	308-2 Negative environmental impacts in the supply chain and actions taken	-	308-2	Information unavailable/incomplete		

Employment

GRI 3: Material Topics 2021	3-3 Management of material topics	P41				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	P94				Partially reporting
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		401-2	Confidentiality constraints		
	401-3 Parental leave		401-3	Confidentiality constraints		

Labor/Management relations

GRI 3: Material Topics 2021	3-3 Management of material topics	P43-44				
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	P26	402-1 (a)	Confidentiality constraints		



Occupational health and safety

GRI 3: Material Topics 2021	3-3 Management of material topics	P.48				
GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	P.48-50				
	403-2 Hazard identification, risk assessment, and incident investigation	P.48-50				We operate in an environment that does not involve construction or hazardous materials, or work. As per our EHS policy, employees and contractors are encouraged to report OHS concerns without fear of retaliation. This includes removing themselves from work situations that they believe could cause injury or ill health.
	403-3 Occupational health services	P.48-50				
	403-4 Worker participation, consultation, and communication on occupational health and safety	P.48-50				
	403-5 Worker training on occupational health and safety	P.48-50				
	403-6 Promotion of worker health	P.48-50				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	P.48-50				Our suppliers undergo an annual sustainability assessment, evaluating their environmental, social, and governance (ESG) practices. Suppliers are required to complete the annual sustainability assessments to identify risks; if they fall short, we work with them on improvement plans to meet our standards.
	403-8 Workers covered by an occupational health and safety management system	P.48-50				
	403-9 Work-related injuries		403-9	Confidentiality constraints		
	403-10 Work-related ill health		403-10	Confidentiality constraints		



Training and education						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.41, P.43-44				
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	P.96-97				We do not track training data by gender, as training opportunities are open to all employees. Each month, a training calendar is shared with all employees via email, including an enrollment link, ensuring the process is free from gender bias.
	404-2 Programs for upgrading employee skills and transition assistance programs	P.46-47				
	404-3 Percentage of employees receiving regular performance and career development reviews	P.43-45				All Virtusa employees (100%) have regular performance appraisals that drive career development, compensation, and promotions.

Diversity and equal opportunity						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.45				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	P.64, P.94				Partially reporting due to confidentiality constraints.
	405-2 Ratio of basic salary and remuneration of women to men		405-2	Confidentiality constraints		

Non-discrimination						
GRI 3: Material Topics 2021	3-3 Management of material topics	P.23, P. 42				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	P.96				Please refer to https://www.virtusa.com/about/corporate-compliance for our policies on code of business conduct and ethics, anti-bribery and corruption, and whistleblower protection. Three discrimination-related incidents were raised through our reporting channels. Each case was thoroughly investigated in accordance with our policies and procedures. Following the investigations, it was determined no legal discrimination could be supported. Appropriate actions were taken to address the concerns raised, and all three cases have been resolved and officially closed.



Child labor

GRI 3: Material Topics 2021	3-3 Management of material topics	P42, P67				
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	-				Not a significant risk for our operations and suppliers.

Forced or compulsory labor

GRI 3: Material Topics 2021	3-3 Management of material topics	P42, P67				
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	-				Not a significant risk for our operations and suppliers.

Supplier social assessment

GRI 3: Material Topics 2021	3-3 Management of material topics					
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	P67-68				
	414-2 Negative social impacts in the supply chain and actions taken	-	414-2	Information unavailable/incomplete		In FY24, we engaged a leading sustainability ratings platform to assess our supply chain's sustainability risk, covering the areas of environment, ethics, labor and human rights, and sustainable procurement. We are in the process of engaging the top 200 suppliers by spend.

Customer privacy

GRI 3: Material Topics 2021	3-3 Management of material topics	P42, P67				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	P24				

About this report

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards, the Sustainability Accounting Standards Board (SASB) standards for Software & Information Technology (IT) Services, and Task Force on Climate-related Financial Disclosures (TCFD) recommendations.

While Virtusa's previous sustainability reports formed our UN Global Compact (UNGC) Communication on Progress (CoP), readers can now find our CoP questionnaire on the UNGC website, as per the new CoP requirements.

Report quick facts

[GRI: 2-3]

Reporting period:

April 1, 2023 to March 31, 2024
(In alignment with our financial statements)

Date of publication:

January 2025

Date of the previous report:

December 2023

Reporting cycle:

Annual

Point of contact for questions:

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Assurance statement

[GRI: 2-5]



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Independent practitioner’s assurance report to the Board of Directors of Virtusa (Pvt) Ltd on the Sustainability reporting criteria presented in the Sustainability Report FY 2023/24

Scope

We have been engaged by **Virtusa (Pvt) Ltd** to perform a ‘limited assurance engagement,’ as defined by Sri Lanka Standard on Assurance Engagements, here after referred to as the engagement, to report on **Virtusa (Pvt) Ltd’s sustainability reporting information** (the “Subject Matter”) contained in **Virtusa (Pvt) Ltd’s** (the “Entity’s”) **Sustainability Report for the year ended 31 March 2024** (the “Report”).

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by Virtusa (Pvt) Ltd

In preparing the Subject Matter, **Virtusa (Pvt) Ltd** applied the following criteria (“Criteria”):

- **The Global Reporting Initiative's (GRI) Sustainability Reporting Guidelines, publicly available at <https://www.globalreporting.org>**
- **The Sustainability Accounting Standards Board (SASB) Standards, publicly available at SASB's website <https://www.sasb.org/>**
- **Technology & communication sector – Software and IT Services Standard**
- **The Task Force on Climate-related Financial Disclosures (TCFD) Framework, publicly available at TCFD's website <https://www.fsb-tcfd.org/>**

Such Criteria were specifically designed for the purpose of assisting you in determining whether Entity’s sustainability reporting indicators contained in the Entity’s Report is presented in accordance with the relevant criteria; As a result, the subject matter information may not be suitable for another purpose.

Virtusa (Pvt) Ltd’s responsibilities

Virtusa (Pvt) Ltd management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

Ernst & Young’s responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the **International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information**, and the terms of reference for this engagement as agreed with the **Virtusa (Pvt) Ltd on 02 September 2024**. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the **Institute of Chartered Accountants of Sri Lanka (CA Sri Lanka)** and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the subject matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

- Validated the information presented and checked the calculations performed by the organization through recalculation.
- Performed a comparison of the content given in the Report against the criteria given in the selected sustainability standards/frameworks.
- Conducted interviews with relevant organization’s personnel to understand the process for collection, analysis, aggregation and presentation of data. Interviews included selected key management personnel and relevant staff.
- Read the content presented in the Report for consistency with our overall knowledge obtained during the course of our assurance engagement and requested changes wherever required.
- Provided guidance, recommendations and feedback on the improvement of the sustainability reporting indicators to improve the presentation standard.

We also performed such other procedures as we considered necessary in the circumstances.

Emphasis of matter

Sustainability data/information are subject to inherent limitations given their nature and the methods used for determining, calculating and estimating such data. Such inherent limitations are common in Sri Lanka.

We also do not provide any assurance on the assumptions and achievability of prospective information presented in the Entity’s Report.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the sustainability reporting information contained in **the Sustainability Report of Virtusa (Pvt) Ltd for the year ended 31 March 2024**, in order for it to be in accordance with the Criteria.

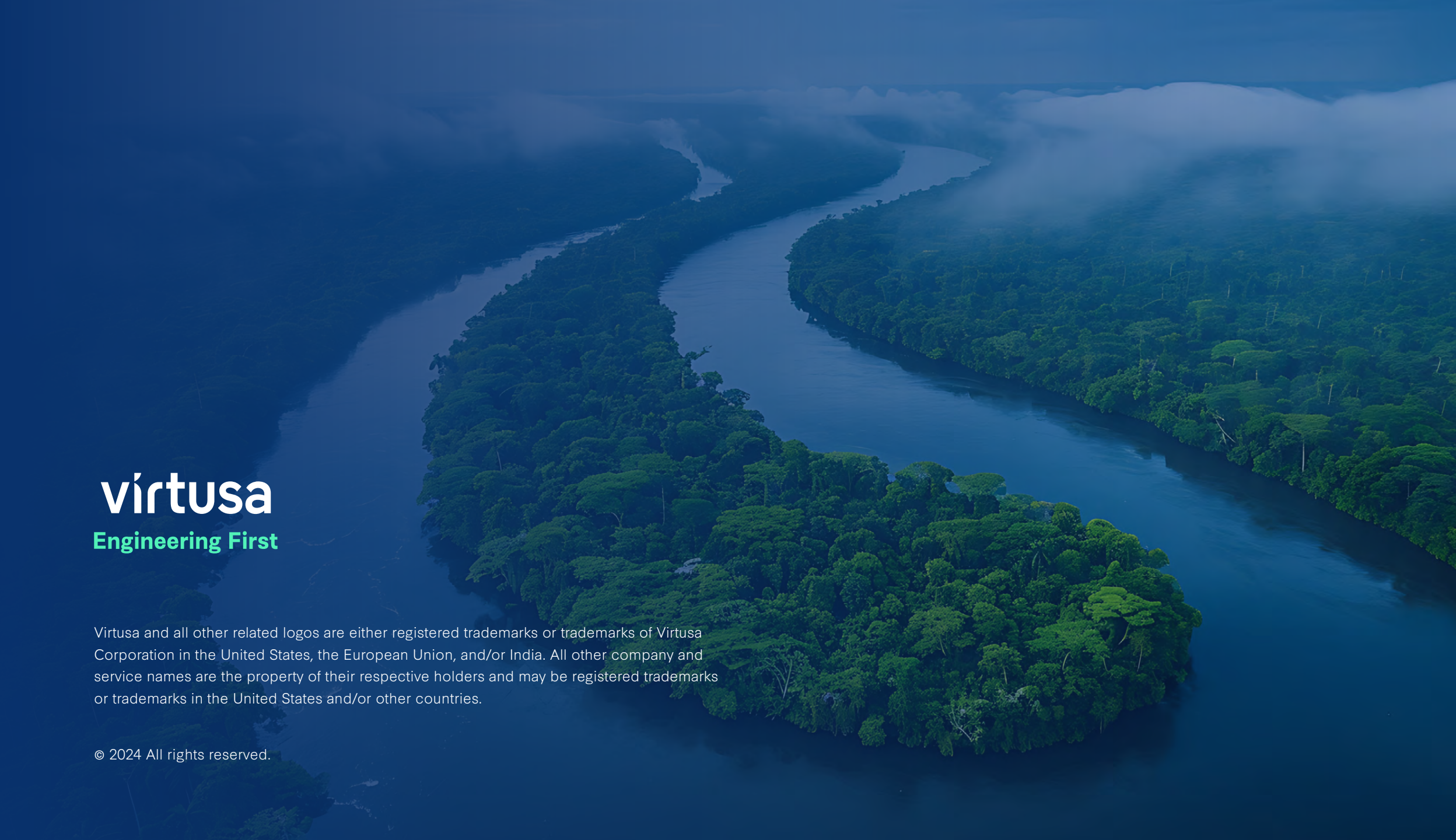
8 January, 2025

Colombo

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