

virtusa

Virtusa Human Rights Policy

May 30, 2025

Document Revisions

No.	Ver. No.	Release Date	Prepared by	Reviewed by	Approved by	Reasons for New Release
1.	1.0	03-20-21	Zaneta Marcelline	Sharmila Sherikar Sanofar Fathima Samantha Iacabucci	Sundararajan Narayanan (Chief People Officer) Paul Tutun (General Counsel)	New policy published.
2.	1.1	09-09-22	Z. Marcelline	Tracy Smith (Vice President-HR)	ESG Committee	Annual review.
3.	1.2	10-16-23	Z. Marcelline	Tracy Smith (Vice President-HR) Rahul Sahay (Senior Vice President-HR) Paul Tutun (Executive Vice President-General Counsel and Assistant Secretary)	ESG Committee	Annual review.
3.	1.2	10-25-24	Z. Marcelline	Tracy Smith (Vice President-HR) Rahul Sahay (Senior Vice President-HR) Paul Tutun (Executive Vice President and General Counsel)	Sustainability Committee	Annual review.
4	1.3	05-30-25	Aqeel Aarif	Paul Tutun (Executive Vice President and General Counsel)	Denver De Zylva (Global Head of Sustainability and Facilities)	Annual review.



Virtusa Human Rights Policy

Vision

Virtusa is committed to respecting the human rights defined in the International Bill of Human Rights, (including the United Nations Universal Declaration of Human Rights), the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and the UN Global Compact Principles. As such, we will follow the Protect, Respect, and Remedy Framework prescribed in the UN Guiding Principles on Business and Human Rights (UNGP) as applicable to our business operations and supply chain.

The focus of our implementation is on the human rights that are most relevant to our operations and supply chain.

This policy sets out how Virtusa aims to fulfill our responsibility to respect human dignity and rights with regard to our employees, suppliers, contractors, clients, and communities. In accordance with our core corporate values of passion, innovation, respect, and leadership (PIRL), we will not tolerate human rights abuses and will not engage or be complicit in any activity that solicits or encourages human rights abuse in our operations or business partners, clients and suppliers. We are committed to complying with all applicable legal requirements related to human rights.

Policy owner

The Virtusa Sustainability Committee is responsible for overseeing the corporate sustainability strategy including human rights-related issues and is responsible for the implementation, review, and approval of this policy.

The appropriate human rights due diligence and training will be carried out to ensure the successful implementation of this policy.

Stakeholders and geographies

Every employee and contractor performing work on behalf of Virtusa or one of its subsidiaries carries a personal responsibility to cooperate with the following objectives.

The scope of this policy covers all Virtusa operations and its subsidiaries.

Our approach

In line with relevant laws and regulations, we are committed to the following:





Equal opportunity, diversity, and inclusion

We are committed to ensuring that employees are treated fairly, with dignity and respect for their goals and aspirations. As such, we aim to provide equal opportunity in all aspects of employment in line with our **Code of Business Conduct and Ethics** and **Equal Employment Opportunity Policy** and will not tolerate discrimination based on race, color, religion, creed, sex (including pregnancy), gender identity, and sexual orientation, marriage and civil partnership, parental status, qualified mental or physical disability, national origin, age, disability, genetic information including family medical history, ancestry, political affiliation, military service, or other non-merit based factors. We also recognize that some groups are vulnerable and are sensitive to the needs of vulnerable groups such as minorities, women, children, the differently abled, and indigenous peoples.

We value and promote a diverse workforce and will ensure that our policies and processes for hiring, staffing and career development advance our culture of inclusion. We aim to provide a work environment where each employee has the freedom to contribute and develop their full potential.

Working conditions

In-line with our **Code of Business Conduct and Ethics**, we comply with applicable legal requirements related to working hours, wages, and benefits.

Harassment free workplace

We are committed to providing a workplace free of harassment and retaliation in-line with our **Code of Business Conduct and Ethics** and harassment free workplace policies. We strive to maintain workplaces free from discrimination, intimidation, harassment, violence, or threats of violence. In addition, we aim to ensure that human rights are not violated in our physical security procedures.

Health and safety

We are committed to ensuring a safe and healthy working environment in line with the **Virtusa EHS Policy** and ISO 14001.

Privacy and data security

We are committed to safeguarding the privacy of information shared with us by our clients, employees, contractors, and suppliers in line with the following policies: **Information Security Policy, Enterprise Data Privacy Policy, Website Privacy Policy, Global Workforce Privacy Notice, AI Security Policy** and **AI Usage Policy**.

Freedom of association

Virtusa recognizes the right of employees to join or not join an association of their choice, and to bargain or not bargain collectively in accordance with local laws and company policies.





Abolition of child labor

We use the ILO definition of child labor “as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.”

We are committed to the abolition of child labor and prohibit the use of child labor in our business operations and supply chain in line with our labor policies and **Supplier Code of Conduct**. We are committed to following ILO Convention No.138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labor. As such, we will adhere to the legally specified minimum age requirements for our geographies of operation. Where no such requirements are available, we will follow the minimum age specified by the ILO Convention No. 138.

Abolition of forced labor and modern slavery

We use the ILO definition of forced labor as “situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.”

We are committed to the abolition of forced labor and prohibit any forms of forced labor, bonded labor, servitude, human trafficking, and modern slavery in our business and supply chain. Our employees, business partners and suppliers must adhere to the guidelines set out in our **Anti-Slavery and Human Trafficking Policy** and **Supplier Guidelines**.

We provide an annual report in compliance with the UK Modern Slavery Act 2015, outlining the measures we take to address modern slavery and human trafficking within our operations and supply chains.

Stakeholder and community engagement

Where our operations may impact local communities, we are committed to following a consultative and partnership approach to ensure respect for human rights. We recognize that stakeholders affected by our decisions have the right to free, prior, and informed consent (FPIC).

We will also partner with governments and agencies to support and respect human rights within our sphere of influence.





Reporting mechanisms

We are committed to providing suitable channels for reporting and resolving any issues related to harassment, discrimination, and violation of human rights in-line with our grievance policies. Any concerns or complaints can be reported to the reporting manager, human resources business partner, or the regional head of Human Resources.

Any concerns can also be reported at <https://www.openboard.info/VRTU/>, or by calling the Whistleblower Hotline at (US/Domestic) 1-844-403-4964 and (International) 402-999-0449.

In-line with our Code of Business Conduct and Ethics, the Company expressly forbids any retaliation against anyone who, acting in good faith, reports suspected misconduct. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

This policy will be

- Communicated to all employees, internal and external interested parties, and will be prominently displayed at all the designated areas.
- Reviewed on an annual basis or when operating circumstances require it.

All employees and contractors working on behalf of Virtusa or its subsidiaries as well as our clients are expected to follow these policies, including participating in appropriate training and awareness activities. Any violation of this policy could result in disciplinary action, up to and including termination. We may also terminate our relationship with other individuals and organizations working on behalf of Virtusa if they breach this policy.

Denver De Zylva
Global Head of Sustainability and Facilities
May 30, 2025

(Next date of review: May 30, 2026)

