# Document Revisions

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1.0</td>
<td>03-20-21</td>
<td>Zaneta Marcelline</td>
<td>Sharmila Sherikar Sanofar Fathima Samantha Iacabucci</td>
<td>Sundararajan Narayanan (Chief People Officer) Paul Tutun (General Counsel)</td>
<td>New policy published.</td>
</tr>
<tr>
<td>2.</td>
<td>1.1</td>
<td>09-09-22</td>
<td>Z. Marcelline</td>
<td>Tracy Smith</td>
<td>ESG Committee</td>
<td>Annual review.</td>
</tr>
</tbody>
</table>
Virtusa Human Rights Policy

Virtusa is committed to respecting the human rights defined in the United Nations Universal Declaration of Human Rights, the International Labour Organization’s Declaration on the Fundamental Principles and Rights at Work and the United Nations 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.

This policy sets out how Virtusa aims to fulfill our responsibility to respect human dignity and rights with regard to our employees, suppliers, 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 supply chain.

The Virtusa ESG Committee is responsible for overseeing the corporate ESG 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.

Equal opportunity

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 Conduct 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.

Diversity and inclusion

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.
Sensitivity: General

Harassment free workplace

We are committed to providing a workplace free of harassment in-line with our Code of Conduct and harassment free workplace policies and will have a zero-tolerance approach to 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.

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 our Data Privacy Policy and Information Security 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 Guidelines. 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.

Stakeholder and community engagement

Where our operations may impact local communities, we are committed to following consultative, and partnership approach to ensure respect for human rights. 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.
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.

Santosh Thomas
Chief Executive Officer
September 9, 2022

(Next date of review: September 9, 2023)