

VIRTUSA Consulting & Services Limited UK

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR 2023/ 2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“**Modern Slavery Act**”).

This statement sets out the steps that Virtusa Consulting & Services Limited UK, for itself and its affiliated entities has taken, and continues to take measures to ensure that modern slavery, including human trafficking, child labour, forced labour, workplace abuse and domestic servitude (“**Modern Slavery**”) is not taking place within our supply chain or business.

Virtusa is committed to putting in place effective systems and controls to safeguard against any form of Modern Slavery within the business or parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and conducting its business ethically in compliance with applicable laws, rules and regulations.

Our Organisation

Virtusa provides IT services and business solutions to Global 2000 companies and software vendors in banking and financial services, insurance, telecommunications, technology and media, information and education industries. Virtusa operates in North America, Europe, Middle East, India, Sri Lanka, South-East Asia, Japan, Australia and New Zealand, with a workforce of approximately 36,500.

Our Policies

Virtusa operates the following internal policies to ensure that we are conducting our business in an ethical manner:

- 1) **Whistleblowing policy** – This policy sets out guidance on how our employees can raise concerns about malpractice or wrong-doing at work. It aims to encourage openness so that concerns can be raised internally without fear of repercussions to the employee.
- 2) **Code of Business Conduct and Ethics** – This code sets out Virtusa commitment to conducting our business ethically, and the standard of conduct expected of our employees and directors.
- 3) **Anti-Slavery and Human Trafficking Policy** – This policy reflects Virtusa commitment to ensuring transparency in our business and our approach to tackling Modern Slavery throughout our supply chains. The policy sets out the roles and responsibilities of Virtusa employees if they suspect any instances of Modern Slavery, and how to act up on these.
- 4) **Recruitment Policy** – This policy sets out Virtusa recruitment policy, including conducting eligibility ‘right to work’ checks for all employees in order to safeguard against human trafficking or forced labour. We conduct job rotations so that no employee is restricted to one particular assignment for a long period of time.
- 5) **Human Rights Policy** –In-line with our commitment to adhering to the UN Guiding Principles on Business and Human Rights, this Policy prohibits the use of child labour and any form of forced labor, bonded labor, servitude, human trafficking, and modern slavery in our business operations and supply chain.
- 6) **Supplier Guidelines** – Sets out the standards and practices that our suppliers are required to uphold in the areas of human rights, labor, environment, and business ethics. These include complying with all applicable laws and regulations, ensuring that they are not complicit in human rights abuses, ensuring that child labor and forced or compulsory labor are not used in any operations, and providing safe working conditions for employees

All these policies are reviewed on a yearly basis and are securely stored on our Policy Portal.

Possible Risks Identified

- 1) Human rights issues in cobalt supply chains since cobalt is used for rechargeable batteries: Is my phone powered by child labour? - Amnesty International
- 2) Forced labor in electronics industry: Forced Labor is the Backbone of the World's Electronics Industry - FreedomUnited.org

Our Suppliers

Virtusa contracts with a number of suppliers that hold international quality standards accreditations. The central procurement and finance team at Virtusa conduct a full audit on our suppliers which includes conducting due diligence before allowing them to become a preferred supplier. We conduct an online search to ensure that our supplier organisations have never been convicted of offences relating to Modern Slavery.

All contracts with our suppliers contain an indemnity clause against Modern Slavery and we require that suppliers acknowledge and comply with the Modern Slavery Act. Virtusa intends to communicate our commitment to addressing the issue of Modern Slavery with its supply chains, contractors and business partners at the outset of any business relationship and reinforced as appropriate thereafter.

Training

Virtusa intends to carry out regular training for all Managers within its business and all employees within its Human Resources function, on its Anti-Slavery and Human Trafficking policy, the risk of Modern Slavery within its supply chains and how to identify and address this risk. The training will cover the importance of complying with the Anti-Slavery and Human Trafficking policy and the consequences of breaching this. All employees of Virtusa Consulting & Services Limited UK undergo the Code of Conduct training modules on a yearly basis.

Our performance indicators

Virtusa has not received, to date, any reports or concerns regarding slavery and human trafficking within our supply chains or business. We intend to continuously improve our awareness and performance of Modern Slavery issues within our business, and we shall use the following performance indicators to measure how effective our steps have been:

- If there have been no reports received from employees in relation to Modern Slavery in any of Virtusa operations;
- Providing training to key personnel in the business on the risks of Modern Slavery and how to address these;
- The completion of supplier audits to try to eliminate risks of Modern Slavery in our supply chains.

Approval for this statement

This statement was approved by the Board of Directors.

Name

Eranga Pathirage

Signature



Date 30th October 2023