

virtusa

Virtusa Supplier Guidelines

October 16, 2023

Document Revisions

| No. | Ver. No. | Release Date | Prepared by | Reviewed by | Approved by | Reasons for New Release |
|-----|----------|--------------|---------------|--|--|-------------------------|
| 1. | 1.0 | 04-20-14 | Z. Marcelline | Harshaa De Silva | Denver De Zylva (Director–Shared Services) | New policy published. |
| 2. | 1.1 | 04-21-16 | Z. Marcelline | Harshaa De Silva | Denver De Zylva (Vice President–Shared Services) | Reviewed and revised. |
| 3. | 1.2 | 07-12-17 | Z. Marcelline | Harshaa De Silva | Denver De Zylva (Vice President–Shared Services) | Reviewed and revised. |
| 4. | 1.3 | 10-11-17 | Z. Marcelline | Harshaa De Silva | Denver De Zylva (Vice President–Shared Services) | Reviewed and revised. |
| 5. | 1.4 | 06-27-20 | Z. Marcelline | Denver De Zylva (Senior Vice President–Shared Services) | Paul Tutun (Vice President–General Counsel and Assistant Secretary) | Reviewed and revised. |
| 6 | 1.5 | 06-05-21 | Z. Marcelline | Denver De Zylva (Senior Vice President–Shared Services) | Kiran Aidhi (Vice President–HR) Madhu K (Senior Vice President–IT) Paul Tutun (Executive Vice President–General Counsel and Assistant Secretary) | Reviewed and revised. |
| 7 | 1.6 | 03-27-23 | Z. Marcelline | Denver De Zylva (Senior Vice President–Shared Services) | Paul Tutun (Vice President–General Counsel and Assistant Secretary) | Reviewed and revised. |
| 8 | 1.7 | 10-16-23 | Z. Marcelline | Denver De Zylva (Senior Vice President–Shared Services) Paul Tutun (Vice President–General Counsel and Assistant Secretary) | ESG Committee | Reviewed and revised. |



Virtusa Goods and/or Services Provider Requirements Guide

Virtusa Corporation is a global information technology services company with headquarters in Massachusetts and offices in North America, Europe, and Asia.

Virtusa, with an Engineering First Philosophy, has adopted a purpose-driven approach to future proof our businesses and supply chain with accountability and responsibility for our sustainability/ESG footprint with transparency. We do so, by enabling our clients, suppliers, investors and teams to have a purpose, with a passion for people and the planet.

Anchored on our core corporate values of passion, innovation, respect, and leadership (PIRL), we utilize technology to achieve more while minimizing resource use, reaffirming our commitment to sustainability/ESG.

Virtusa has policies governing sustainability, environment, health and safety, climate change, energy, water, waste, and corporate social responsibility. Our management systems are certified/aligned with the following standards:

- ISO 22301 Business Continuity Management System
- ISO 27001for Information Security Management System
- ISO 14001 for Environment Management System
- ISO 45001 for Occupational Health and Safety Management System
- ISO 41001 Facilities Management System
- ISO 50001 Energy Management System
- Foreign Corrupt Practices Act of 1977
- Bribery Act 2010 (UK)

Virtusa evaluates suppliers as part of the initial selection process as well as part of the continuous evaluation process to ensure potential suppliers are operating responsibly. Along with commercial and quality expectations, environmental stewardship is an important assessment criterion. A preferred supplier to Virtusa will demonstrate strong performance in all these areas. Virtusa is an equal opportunity company and welcomes offers from suppliers regardless of race, gender, or ethnic group.

While Virtusa aims to minimize the burden placed on suppliers as part of evaluations, Virtusa may require inputs in a timely manner such as to respond to our supplier engagement surveys and accept site visits or audits. Failure to respond to the supplier engagement surveys may affect your supplier status.

This document is not a guarantee of engagement but sets forth our business objectives for your clarity. Our expectations from suppliers are as follows:





Business Ethics

Virtusa is committed to conducting its business in an honest and ethical manner and has zero tolerance for corruption or any other activity that violates anti-corruption laws in any place we conduct business. Our Ethics and Compliance program is enforced through our Code of Business Conduct and Ethics (“Code”) and anti-bribery and corruption policies. It sets out the ethical standards that govern our interactions with external parties including suppliers. All suppliers (and their employees and contractors) must comply with the Code, which is available on our website at <https://www.virtusa.com/about/corporate-compliance>.

All suppliers must adhere to Code, including the following:

- Understand and comply with all applicable laws.
- Compete ethically for our business and not give or accept bribes.
- Divulge all potential conflicts of interest prior to contract.
- Keep accurate financial records to support the audit of any Virtusa invoices.
- Comply with anti-money laundering and counter-terrorist financing laws wherever they do business, and do not engage in or assist any third parties with these crimes.
- Not offer gifts or entertainment that could secure any improper business advantage and be perceived as bribes.
- Not give or offer, directly or indirectly, anything of value such as money, shares, goods, or service to a third party (public or private sector), which could be regarded as influencing any business decision or for obtaining improper advantage in connection with our business.
- Have processes in place to ensure that resources and material are ethically sourced and do not negatively impact human rights or the environment.
- Comply with all applicable anti-bribery and anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010.
- Conduct business in compliance with applicable anti-trust or fair competition laws in all jurisdictions they do business in, including those related to information sharing with competitors as well as avoiding agreements and practices that restrict competition (i.e., price fixing, market allocation, and abuse of a dominant market position).
- Comply with all applicable international trade controls (export controls and economic sanctions laws and regulations).

Virtusa encourages a culture of transparency and encourage all to speak up about legal and ethical concerns. Suppliers must report suspected violations of these standards by any person including its own employees, contractors, sub-contractors, or suppliers) as outlined and enforced in our Code. Suppliers, their employees, and sub-contractors can report any concerns to their Virtusa point of contact or utilize one of the following reporting options:

- By e-mail using a web-based submission tool <http://www.openboard.info/VRTU/>
- To the Whistleblower Hotline at (US/Domestic) 1-844-403-4964 & (International) 402-999-0449

Any reported violation will be kept confidential to the maximum extent allowed under applicable laws. Such reports may be made anonymously by using the methods set forth above. Virtusa expressly forbids any retaliation against any employee or third party who, acting in good faith, reports suspected misconduct.





Human Rights and Labor

Virtusa is committed to respecting human and labor rights as set out in our **Human Rights Policy, Equal Employment Opportunity Policy**, and other labor policies. We expect our suppliers to maintain similar standards with regards to human and labor rights.

Suppliers should:

- Comply with all applicable laws and regulations in all our jurisdictions of operation.
- Respect human rights in accordance with the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work to ensure that they are not complicit in human rights abuses.
- Provide a written employment agreement containing terms and conditions of employment to all employees.
- Ensure that child labor is not used in any operations or in the supply chain, and at a minimum, adhere to ILO Convention No.138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour. As such, suppliers should abide by the legally specified minimum age requirements for geography of operation, or in the absence of such laws, the ILO Minimum Age Convention No. 138.
- Ensure that all forms of forced, bonded, or indentured labor, slavery, or human trafficking are not used in any operations and in the supply chain.
- Provide a safe and healthy work environment for all employees and comply with all relevant health and safety laws and regulations, as applicable.
- Provide a workplace free from discrimination, harassment, or abuse with regards to 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 protected by law.
- Comply with legal requirements related to wages and working hours.
- Suppliers and their agents should not confiscate any identity or immigration documents, such as passports unless required by law.
- Not engage in or condone corporal punishment and actions that cause physical harm for any wrong committed be it of any quantum.
- Comply with all applicable rules and laws related to conflict minerals. I.e., minerals obtained from areas of conflict that affects its mining, such as tantalum, tin, tungsten, and gold (TG3))
- Ensure that business and supply chain operations do not adversely impact the human rights and environmental rights of local communities.
- Respect the rights of all workers to join or not join an association of their choice and to bargain or not bargain collectively in accordance with local laws.





Commercial and Quality Aspects

Virtusa expects that suppliers adhere to our commercial process.

Suppliers should:

- Review and abide by the terms of the PO, SLA, or MOU as the case may be in providing the goods or services.
- Be cost effective, consistent, and secure in your delivery.
- Maintain a high standard in the product or service provided.
- Comply with all applicable laws and regulations.
- Have specific Purchase Orders in advance with respect to deliveries.
- Deploy suitable tools and mechanisms to ensure optimization of delivery beyond manual systems and controls.

Information Security

Virtusa is committed to ensuring the security of our data as well as the data entrusted to us by clients, employees and other stakeholders as defined by our **Information Security Policy** and data privacy policies. We expect our suppliers to maintain similar standards with regards to information security and data privacy.

Suppliers should:

- Adhere to all information security requirements specified in **Virtusa Vendor Security Risk Management Policy**.
- Protect any information that Virtusa shares, handle such information in accordance with applicable legal and regulatory requirements, and implement appropriate measures to protect this information against loss, unauthorized access and unauthorized use.
- Report any security incidents related to Virtusa directly to incidentreporting@virtusa.com.





Environmental Stewardship

Virtusa is committed to reducing the environmental impact of our business operations and services as set out in our **Environmental Responsibility Policy** and **Environment, Health, and Safety (EHS) Policy**, and by doing so, to support the transition to a low-carbon economy.

We expect our suppliers to maintain similar standards with regards to environmental stewardship.

Suppliers should:

- Comply with all applicable environmental laws, regulations, and standards.
- Minimize the environmental impact when providing goods and services to Virtusa, such as by demonstrating efforts to reduce emissions from fossil fuels.
- Track and continuously improve on environmental performance, and where possible, align emissions reduction targets in line with the Paris Agreement/SBTi Net Zero. If committed to SBTi Net-Zero, share details of progress against such targets.
- Avoid polluting lakes, rivers, oceans and other waterbodies
- Respect and avoid negative impacts to nationally and internationally protected areas (such as UNESCO Heritage Sites, Biosphere reserves and Ramsar sites) or flora and fauna listed on the IUCN Red List of critically endangered species.
- Collaborate with Virtusa and other stakeholders on climate change mitigation

Supply chain management

Virtusa is committed to minimizing environment, social and governance (ESG) risks in our supply chain. We expect our suppliers to maintain similar standards with regards to their supply chains. We actively seek the support of our suppliers to positively contribute to future proofing both our supply chain as well as their supply chain.

Suppliers should:

- Engage with Virtusa to improve the ESG impacts of products or services such as reducing their environmental footprint.
- Have appropriate due diligence processes, such as vendor audits, in place to identify and minimize negative impacts in supplier’s own supply chain.
- Share sustainability performance data and respond to Virtusa’s supplier engagement surveys





Compliance

Compliance with the supplier guidelines and all other relevant Virtusa standard policies made available on our supplier portal at <https://www.virtusa.com/suppliers> is mandatory for all procurement contracts or other instruments of Virtusa and its subsidiaries.

Failure to comply with these standards of conduct or with applicable laws would result in termination as a supplier to Virtusa and/or to disclose the matter to appropriate authorities, regulators and/or law enforcement bodies. If permitted by applicable law, Virtusa will inform the supplier of the matter and give the supplier a reasonable opportunity to respond, before Virtusa discloses the matter to the relevant authority, regulator, or law enforcement body.

A handwritten signature in black ink, appearing to read "Santosh Thomas", with a long horizontal line extending to the right.

Santosh Thomas
Chief Executive Officer
October 16, 2023

(Next date of review: October 16, 2024)

