

virtusa

Virtusa Sustainability/ ESG Policy

October 16, 2023

Document Revisions

No.	Ver. No.	Release Date	Prepared by	Reviewed by	Approved by	Reasons for New Release
1.	1.0	03-20-14	Asitha Dias	Denver De Zylva (Director–Shared Services)	Paul Tutun (Vice President–General Counsel and Assistant Secretary)	New policy published.
2.	1.1	06-16-16	Z. Marcelline	Denver De Zylva (Vice President–Shared Services)	Paul Tutun (Vice President–General Counsel and Assistant Secretary)	Reviewed and revised.
3.	1.2	07-18-17	Z. Marcelline	Denver De Zylva (Vice President–Shared Services)	Paul Tutun (Vice President–General Counsel and Assistant Secretary)	Reviewed and revised.
4.	1.3	01-25-19	Z. Marcelline	Denver De Zylva (Vice President–Shared Services)	Paul Tutun (Vice President–General Counsel and Assistant Secretary)	Reviewed and revised.
5.	1.4	07-29-20	Z. Marcelline	Denver De Zylva (Senior Vice President–Shared Services)	Paul Tutun (Vice President–General Counsel and Assistant Secretary)	Annual reviewed with no changes.
6.	1.5	07-01-21	Z. Marcelline	Denver De Zylva (Senior Vice President–Shared Services)	Paul Tutun (Executive Vice President–General Counsel and Assistant Secretary)	Updated to include ISO 45001 and UN Guiding Principles on Business and Human Rights.
7.	1.6	09-09-22	Z. Marcelline	Denver De Zylva (Senior Vice President – Shared Services) Paul Tutun (Executive Vice President–General Counsel and Assistant Secretary)	ESG Committee	Annual review.



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8.	1.6	10-16-23	Z. Marcelline	<div>Denver De Zylva (Senior Vice President – Shared Services)</div> <div>Paul Tutun (Executive Vice President– General Counsel and Assistant Secretary)</div>	ESG Committee	Annual review.





Virtusa Sustainability/ESG Policy

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.

We are also committed to supporting the UN Sustainable Development Goals through our ESG program.

The Virtusa ESG Committee is responsible for overseeing the corporate Sustainability strategy. As a member of the ESG Committee, the CEO is responsible for the implementation, review, and approval of this policy.

This policy works in concert with its sub-policies and the policies listed below:

- Environment, Health, and Safety Policy in line with ISO 45001
- Environmental Responsibility Policy in line with ISO 41001 and ISO 14001 which addresses climate change, emissions, water, and waste management in line with ISO 14064, and CDP Reporting
- Energy Policy in line with ISO 50001
- Business Continuity Management Policy in line with ISO 22301
- Information Security Management Policy in line with ISO 27001
- Human Rights Policy in line with SA 8000 and the UN Guiding Principles on Business and Human Rights
- Code of Business Conduct and Ethics
- Foreign Corrupt Practices Act Policy and the U.K. Anti-Bribery Act Policy in line with the Foreign Corrupt Practices Act of 1977 (FCPA) and the UK Bribery Act 2010
- Social Responsibility Policy in line with ISO 26000 guidance





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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 are expected to follow these policies, including participating in appropriate training and awareness activities.

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

Santosh Thomas
Chief Executive Officer
October 16, 2023

(Next date of review: October 16, 2024)

