



Virtusa ESG Report

2020-21

virtusa

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CEO's message

[GRI: 102-14]

Dear Stakeholders,

FY21 was a challenging year. The world continued to suffer from a global pandemic where too many livelihoods were destroyed, and too many loved ones were separated. It brought into focus the need to run businesses in a way that takes care of our people and our planet.

At Virtusa, we are fortunate that our culture has always valued environmental, social, and governance (ESG) responsibilities. Throughout the pandemic, as always, the safety of our employees and their loved ones was our paramount concern. The digital infrastructure and business continuity processes that we have invested in over the years enabled us to quickly move 98% of our billable workforce to work from home and continue our business operations seamlessly. We also instituted a safe return-to-office (R2O) policy framework for work that needed to be performed on-site. To ensure the well-being of our team members, we put multiple initiatives in place, including a 24x7 COVID-19 Care digital portal and call center to assist team members and their families with medications, vaccinations, and pre-and post-COVID-19 care. We created an active plasma donor database of Virtusans and provided enhanced medical insurance policies, leave plans, as well as wellness

and counseling programs. We also developed R2O apps in a short period of time that we are enhancing to meet evolving health and safety protocols.

Amidst the many challenges, we upheld our commitment to our clients, and invested in helping with their ESG initiatives. Our digital engineering service offerings (automation, cloud-first, mobile-enablement) are designed to contribute to ESG benefits. Along with environmental and climate benefits, our focus on diversity and equality with solid HR policies and security processors enables good governance, increasing transparency that strengthens our clients' supply chain. Focusing on quality ESG data, Virtusa aspires to be a leading IT digital services company with a robust ESG differentiator platform and innovative products and services to attract investors, clients, and talent.

While ensuring that our business is resilient to the challenges brought about by the pandemic, we have not lost sight of the climate emergency. In light of this, we invested \$1 million to ensure that the currently available roof spaces in our three owned campuses in Hyderabad and Navalur were deployed to produce solar energy, thereby increasing our renewable energy footprint from 12% to 20%. What's more, we now include climate change in our annual enterprise risk assessments to reflect better the impact and opportunities it presents. We are also in the process of aligning our emissions reduction targets with Science-Based Targets/net-zero.

We are excited about doing our part for humanity and the planet we share. We recently set up an ESG Committee to oversee our corporate ESG strategy as we continue to support the 10 UN Global Compact Principles and the UN Sustainable Development Goals (SDGs). Our embrace of the climate challenge that faces us, our care for each other during the pandemic, and our continued vigilance on governing with diversity and responsibility give us the hope and motivation to take our ESG program to the next level.

Sincerely,

Santosh Thomas

CEO and Executive Director

Our mission

[GRI: 102-16]

We apply domain and technology innovation to accelerate business outcomes for our clients.

- Enabling our clients to create distinctive experiences, transform their businesses, grow revenue, and deliver efficiencies.
- We are an innovative global firm that attracts, develops, inspires, and retains exceptional talent.
- We strive to be socially conscious and responsible corporate citizens.

Our values

[GRI: 102-16]

Passion

To inspire our global teams to deliver extraordinary results

Innovation

Apply intellectual curiosity to reimagine better business outcomes for our clients

Respect

Protect our environment, honor our diversity and treat everyone with dignity

Leadership

Take personal responsibility when things go awry and always ascribe success to the team



**Who
we are**



Our global presence

			
25 49	24,736	229	\$1.3B
Countries	Locations	World-class Professionals	Active Clients
			FY21 Revenue



*Includes 14 virtual offices

About us

[GRI: 102-1, 102-2, 102-3, 102-4, 102-5, 102-6, 102-7, 102-10]

Virtusa Corporation is a global provider of digital business transformation, digital engineering, and information technology (IT) outsourcing services that accelerate our clients' journey to their digital future. Virtusa serves Global 2000 companies in banking, financial services, insurance, healthcare, telecommunications, media, entertainment, travel, manufacturing, and technology industries.

Headquartered in Massachusetts, we have offices throughout the Americas, Europe, Middle East, and Asia. We view our operations and manage our business as one operating segment. Historically, we have supplemented organic revenue growth with acquisitions such as Polaris Consulting and eTouch Systems. Our corporate structure spans multiple jurisdictions, with Virtusa Corporation incorporated in Delaware and its operating subsidiaries organized in India, Sri Lanka, the United Kingdom, Hungary, Germany, Singapore, Austria, Malaysia, Sweden, Switzerland, Mexico, the Netherlands, Australia, the United Arab Emirates, Qatar, Japan, and Canada.

We serve clients across North America, Europe, Asia, Australia, and New Zealand. During the fiscal year ended March 31, 2021, 74% of our revenue was generated in North America, 17% in Europe, and 9% in the rest of the world.

Significant changes

In February 2021, Baring Private Equity Asia and its affiliated funds (BPEA) successfully completed the acquisition and privatization of Virtusa Corporation. In conjunction with the closing, Virtusa is no longer listed on the NASDAQ stock exchange and will operate as a privately-held company.

Our services

[GRI: 102-2]

We help our clients compete by accelerating their most strategic digital and cloud transformation initiatives by providing multi-disciplinary agile teams of consultants, designers, engineers, and sophisticated gamified tools. Our broader service offerings are listed on the next page. Detailed information on our service offerings is available on our website, www.virtusa.com.





Our service offerings

Consulting & design services

- UI/UX design
- Business capability modeling
- Customer journey mapping
- IT strategy and architecture
- Accelerated solution design
- Operational process design
- DevOps design
- Product design

Cloud services

- Strategy and assessments
- Migration
- Cloud native engineering
- Data and analytics
- SaaS applications
- Open innovation platform
- Security
- Managed cloud



Digital engineering services

- Distributed agile
- Application platform engineering
- Content and customer experience
- Digital process automation
- Intelligent automation
- Analytics, insights, and data
- AI and machine learning
- Industrial Internet of Things (IIoT)
- Enterprise applications - SAP, Microsoft, Oracle, Pega

Managed services

- Application support and management
- Infrastructure management services
- Knowledge process outsourcing
- Digital process outsourcing (Bots)
- Independent validation (QA/testing)



Detailed information on our service offerings is available on our website, www.virtusa.com.

Awards and recognition

Won Google Cloud 2020 Specialization Partner of the Year for Cloud Migration Award

Virtusa was recognized for the company's unique expertise and success in migrating enterprise customers to Google Cloud.

Won 2021 Pega Partner Innovation Awards for delivery excellence and client innovation

The awards recognize partners that demonstrate an extraordinary ability to accelerate client success through digital transformation (DT) using Pega's industry-leading customer engagement and intelligent automation solutions.

Named a Top Employer for 2021 in the UK and Middle East

Virtusa was recognized by the Top Employer Institute for the 11th consecutive year in the United Kingdom and appeared in the rankings for the first time in the Middle East.

Winner in the 2020 Candidate Experience Awards by Talent Board

Virtusa was named a winner in the 2020 Candidate Experience (CandE) Awards by Talent Board for the North America, Europe, Middle East, and Asia Pacific regions.

Finalist in the Application Innovation 2020 Microsoft Partner of the Year Award

Virtusa was honored among a global field of top Microsoft partners for demonstrating excellence in innovation and implementation of customer solutions based on Microsoft technology.

Won 2020 Pega Partner Award for Excellence in Digital Transformation

Virtusa was recognized for the development and implementation of Pega's intelligent automation solutions that increased operational efficiency for a mutual major healthcare client.

Named SIIA CODiE Award Finalist for Best Healthcare Technology Solution

Virtusa's vLifeTM Platform was named a 2020 SIIA CODiE Award finalist in the Best Healthcare Technology Solution category.



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Note: MSCI and ISS ratings as at February 2021.

Our ESG commitment

A-

CDP supplier engagement rating

88.10

Average Net Promoter Score (NPS)

Silver medal

EcoVadis ESG ratings assessment

B

CDP climate change score

498

Perfect 10/10 Client Delight Index (CDI) scorecards

*All data is for FY21.

Our ESG program

[GRI: 103-1, 103-2]

We aim to reduce our environmental footprint, demonstrate ethical maturity and respect all. Premised on our core corporate values of passion, innovation, respect, and leadership (PIRL), we believe in doing more and better, with less. Accordingly, we leverage unique and industry-leading tools to increase “right first time” and reduce “cycle time” by aggressively measuring and improving quality and reuse at the source. By doing so, we effectively reduce the environmental footprint of the products and services offered to clients.

Responsibility for our ESG program lies with the chairman and CEO at the board level. At the officer level, our chief financial officer (CFO) reports to the board on our ESG program. As such, the CFO reviews our environmental performance on a quarterly basis.

Our global head of facilities and sustainability reports directly to the CFO and is responsible for managing our climate strategy through target setting and reducing our environmental footprint as well as communicating with internal and external stakeholders. Facilities teams in each geographic location are responsible for implementing the strategy.

Our Sustainability Policy and its sub-policies (EHS Policy, Energy Policy, Climate Change Policy, Waste Policy, Water Policy, and Social Responsibility Policy) were formulated in 2013. In FY21, we combined the Energy Policy, Climate Change Policy, Waste Policy, and Water Policy into a single Environmental Responsibility Policy. We also formulated our Human Rights Policy in FY21.

Our ESG program is based on seven core elements, as shown on the following page.



Sustainability Framework

ESG	Area	Framework/Guidance	SDGs and UNGC Principles
E	Environment (Code Green)	- ISO 14001:2015 (EMS) - ISO 50001:2011 Guidance (Energy) - ISO 14064 Guidance (Climate Change) - Greenhouse Gas (GHG) Protocol	    Environment: UNGC Principles 7, 8 and 9
S	Health and Safety	- ISO 45001:2018 - Five-S	  Human Rights: UNGC Principles 1 and 2
S G	Business Continuity Management	ISO 22301:2012	
S G	Information Security	- ISO 27001:2013 - General Data Protection Regulation (GDPR)	
S G	Labor Standards and Diversity	- SA 8000 Guidance - Modern Slavery Act 2015 (UK) - Equality Act 2010 (UK) - United Nations Convention on the Rights of Persons with Disabilities (UNCPRD) - UN Guiding Principles on Business and Human Rights (UNGPs)	   Human Rights: UNGC Principles 1 and 2 Labour Standards: UNGC Principles 4, 5 and 6
G	Anti-Bribery and Corruption	- Foreign Corrupt Practices Act 1977 - Bribery Act 2010 (UK)	 Anti-Corruption: UNGC Principle 10
E S	Management Engagement and Social Impact	- ISO 26000 Guidance - Companies Act 2013 section 135 (India)	   

E Environment **S** Social **G** Governance

Note on certifications:

- ISO 45001:2018 and ISO 14001:2015: 17 technology centers in Australia, India, Singapore, Sri Lanka, the UK, and the US are certified.
- ISO 22301:2012: 18 technology centers in India, Sri Lanka, the UK, the US, and Hungary are certified.
- ISO 27001:2013: 21 technology centers in India, Sri Lanka, the UK, the US, Singapore, Hungary, and Sweden are certified.

Goals and performance

[GRI: 103-2]

Goal	Baseline Year	Target Year	Target %	FY21 Status
Short Term				
Reduce energy consumption	2016	2022	40%	44%*
Increase paper waste recycling	2020	2022	90%	100%*
Achieve zero e-waste to landfill compliance	2020	2022	100%	90%
Medium Term				
Reduce Scope 1 and Scope 2 (market-based) emissions (absolute target)	2019	2025	25%	46%*
Reduce Scope 1 and Scope 2 (market-based) emissions (intensity target)	2016	2030	40%	67%*
Obtain energy from renewable sources	2016	2030	40%	12%
Reduce Scope 3 emissions from business travel by 30%	2019	2030	30%	91%*
Reduce per employee water usage	2016	2035	40%	80%*
Long Term				
Reduce Scope 1 and Scope 2 emissions	2019	2050	70%	N/A

Table: Goals and performance

Notes:

- * - Indicates targets that have steep reductions due to the work from home policies and travel restrictions in FY21. As the GHG Protocol does not provide a mechanism to report on such emissions, we have not included it in our formal reporting but estimate emissions from remote work to be approximately 6,345.5 MTCO₂.
- N/A - Indicates not applicable as a short or medium-term target is in progress.



Images: Solar panel installations in parking areas of our Hyderabad campuses

External initiatives

[GRI: 102-12, 102-13]

United Nations Global Compact

We joined the United Nations Global Compact (UNGC) in 2008, and we practice the 10 Principles through our management approach to sustainability and sustainable business. Highlights of our engagement with the UN Global Compact include the following:

- On the steering committee of Network Sri Lanka since 2010.
- On the board of Network Sri Lanka since 2011.
- Opted for a Participant engagement level in 2017/2018.
- Joined the PAN India UN Global Compact Network in 2020.
- Member of the Climate Action Work Group and Diversity Workgroup of Network Sri Lanka.

Carbon Disclosure Project

We have been responding to the CDP Climate Change program since 2016 and to the CDP Supply Chain program since 2011.

External initiatives

We subscribe and/or endorse the following initiatives:

- Biodiversity Sri Lanka Resource Efficiency Pledge
- Carbon Disclosure Project
- Central Environmental Authority of Sri Lanka E-waste Management Program
- Greenhouse Gas (GHG) Protocol
- Leadership in Energy and Environmental Design (LEED)®
- UN Sustainable Development Goals
- United Nations Global Compact (UNGC)
- UNGC Business for Peace (B4P)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

Memberships

We are members of the following organizations:

- American Chamber of Commerce, India
- American Chamber of Commerce, Sri Lanka
- Biodiversity Sri Lanka (BSL)
- Green Building Council of Sri Lanka (GBCSL)
- Indian Green Building Council (IGBC)
- Information Technology & Services Industry Association of Andhra Pradesh (ITsAP)
- National Association of Software and Services Companies (NASSCOM)
- Cyberabad Security Council (SCSC)
- Sri Lanka Association of Software and Service Companies (SLASSCOM)

Sustainable Development Goals

We are committed to supporting the UN Sustainable Development Goals. We have identified Goals 3, 5, 8, 12, 13, and 16 as high priority and Goals 4, 6, 7, 9, 15, and 17 as moderate priority.

Listed below are the Sustainable Development Goals that we are reporting on.



Goal	Sections
Goal 3: Good health and well-being	Social - Health and safety (pages 39-41)
Goal 4: Quality education	- Social - Learning and development (pages 37-38) - Social - CampusReach and DigitalReach (page 43)
Goal 5: Gender equality	- Governance - Board of directors (page 48) - Social (pages 35-36)
Goal 6: Clean water and sanitation	- Our ESG Commitment - Goals and performance (page 13) - Environment - Water (pages 26, 31)

Table: Reporting on UN Sustainable Development Goals

Goal	Sections
Goal 7: Affordable and clean energy	• Our ESG Commitment - Goals and performance (page 13) • Environment - Emissions and Energy (pages 25, 30)
Goal 8: Decent work and economic growth	• Social (pages 33-41) • Social - Digital for Good (page 42) • Governance - Supply chain management (pages 58-59)
Goal 9: Industry, innovation, and infrastructure	• Social - Digital for Good (pages 42-46)
Goal 12: Responsible consumption and production	• Our ESG Commitment - Goals and performance (page 13) • Environment - Waste (pages 26, 31)
Goal 13: Climate change	• Our ESG Commitment - Goals and performance (page 13) • Environment - Emissions (pages 25, 29)
Goal 15: Life on land	• Social - OutReach (page 46)
Goal 16: Peace, justice, and strong institutions	• Governance (pages 47-59)
Goal 17: Partnerships for the goals	• Our ESG Commitment - External initiatives (page 14) • Social - Digital for Good (pages 42-46)

Table: Reporting on UN Sustainable Development Goals



Stakeholder engagement

[GRI: 102-40, 102-42, 102-43, 102-44]

Groups that can impact our operations and, in turn, are impacted by our operations have been identified as our stakeholders. The stakeholder groups we engage with include clients, investors, employees, academia, suppliers, governments, NGOs, and local communities. Clients, investors, and employees have the greatest impact on our operations. Stakeholder engagement is an essential aspect of our sustainability program as it provides input on important topics for our stakeholders. The following table lists the channels of engagement we use with each stakeholder and the key concerns for each stakeholder group.

Stakeholder	Engagement Mode	Key Concerns
Clients	- Request for proposal - Client visits and meetings - Client Delight Index (CDI) - Net Promoter Score (NPS) - Client initiated surveys and audits - ESG report - Media interactions	- Business value - Business continuity - Corporate governance and ethics - Labor and human rights - Environmental responsibility
Investors	- Quarterly investor calls - Investor presentations and events - Media interactions	- Revenue growth - Profit margins - Transparency - ESG performance
Employees	- Internal support group framework - Open door policy - Social media - Internal service group survey - Onboarding survey 5-month survey and 18-month survey - Exit survey	- Career growth - Compensation - Learning and development - Work/Life balance - Safe work environment - Transparency

Stakeholder	Engagement Mode	Key Concerns
Academia	- Centers of Excellence - Curriculum development and advice - Internship program - Career guidance and awareness - Mentoring for final year projects - Industrial visits - Career fairs - Social media - Media interactions	- Internship opportunities for students - Curriculum advice
Suppliers	- Supplier survey - Supplier guidelines - Supplier awareness sessions - Media interactions	- Business opportunities - Ethical business practices
Governments	- Membership in sustainability associations - Collaborations with government bodies on sustainability through our Virtusa Foundation programs - Media interactions	- Corporate governance and ethics - Environmental responsibility - Health and safety - Development of IT industry in India/Sri Lanka
NGOs and Local Communities	- Media interactions - Conferences and public fora on sustainability - Membership in sustainability associations - Community outreach programs through the Virtusa Foundation	- Ethical business practices - Responsible corporate citizenship - Job opportunities - Community development and IT solutions for projects

Table: Stakeholders and engagement mechanisms

We did not undertake an engagement process specifically to prepare the report but have utilized the existing mechanisms. Our response to the stakeholder concerns is covered in the Client engagement and Talent engagement sections as well as throughout this report under the relevant topics.

Client engagement

Our experienced account managers are responsible for developing strong working relationships across the client organization, working day-to-day with clients and our service delivery teams to understand and address client needs. Clients also contribute to innovation and improvement as their ideas and experiences are incorporated into our body of knowledge. We also seek regular informal and formal client feedback, which is qualitatively and quantitatively analyzed. For example, the Client Delight Index (CDI) is a key performance measure that has board-level visibility. Client feedback is collected each quarter from stakeholders identified for each account, and a consolidated report is published for each advanced technology center. The CDI helps us to identify areas of client engagement that may need attention. Internally, all negative responses require action plans from our teams, ensuring that any problems are corrected. The survey can be customized depending on the project or project phase. The average CDI for FY21 was 9.25 compared to a target CDI of 8.8. In addition, we also gather information on the Net Promoter Score (NPS), which is reviewed at the board level on a quarterly basis. The average NPS for FY21 was 88.10.

We also undergo periodic audits by clients where we have to demonstrate compliance with the applicable statutory, regulatory, and client requirements. These audits provide an opportunity to review our policies and processes and how they measure up to client expectations.

Talent engagement

[GRI: 102-41, 103-1, 103-2, 103-3, 402-1]

We maximize employee engagement through multiple platforms, including mobile-enabled and AI-powered surveys. We also study talent trends in the labor force through predictive analytics on turnover and performance. We engage and interact with all our employees to optimize individual career paths and foster team culture through regular company-wide updates from senior management, team member sessions at the regional, local, and account levels, as well as regular town hall sessions. We use a digital platform called RAVE for acknowledging each other on a real-time basis on good work performed by our team members. Yammer is another social, digital business platform that we widely use to interact and share ideas and information, which strengthens collaboration while driving transparency.

Employees also have the opportunity to provide feedback through pulse-check surveys conducted periodically during their career (e.g., onboarding survey, 5-month survey, 18-month survey, and exit survey).

While we recognize the right to collective bargaining, none of our team members are covered by a collective bargaining agreement or are represented by a labor union. This is partly due to the open communication and cordial relations maintained with employees, which includes an open-door policy and transparent and open communication channels that we encourage across all levels. With regards to notice on operational changes, we comply with local laws and regulations about such matters.

About this report

[GRI: 102-54, 102-56]

This report has been prepared in accordance with the GRI Standards: Core option. This report also forms our 12th Communication on Progress (COP) to the United Nations Global Compact and documents our progress in implementing the UNGC Principles in our operations. In addition, this is our first report to align with Sustainability Accounting Standards Board (SASB) Communications “Software & Information Technology (IT) Services” and to be externally assured by Messrs. Ernst and Young.

Report quick facts

[GRI: 102-50, 102-51, 102-52, 102-53]

Reporting period: April 2020 to March 2021

Date of the previous report: December 2020

Reporting cycle: Annual

Contact point for questions:

Denver De Zylva

Senior Vice President (Level II)

Email: DDeZylva@virtusa.com

Questions and feedback on the report:

Email: sustainability@virtusa.com



Materiality and reporting boundary

[GRI: 102-45, 102-46, 102-47, 102-49, 103-1]

A complete list of subsidiaries that comprise our reporting boundary is provided on page 152 of our 2020 Form-10K (Exhibit 21.1: Subsidiaries of Virtusa Corporation). Since we manage our business as one operating segment, aspects related to economic, labor practices, human rights, governance and ethics, and customer privacy, and corporate social responsibility activities are reported for all entities. Environmental data is reported only for our technology centers in India, Sri Lanka, Singapore, Sweden, and Southborough, Massachusetts, including technology centers from eTouch Systems. Note that the center in Albany was removed from the boundary as it has been phased out.

Material Aspects	Virtusa Corp.	Polaris Consulting	eTouch Systems
Economic			
Environment			
Labor and Decent Work			
Human Rights			
Governance and Ethics			
Customer Privacy			
Social Responsibility			

Material and fully reported	Reported with constraints

Note:
In the fiscal year 2020, Polaris Consulting merged with Virtusa India. At present environmental data are reported for Polaris Consulting India heritage companies.

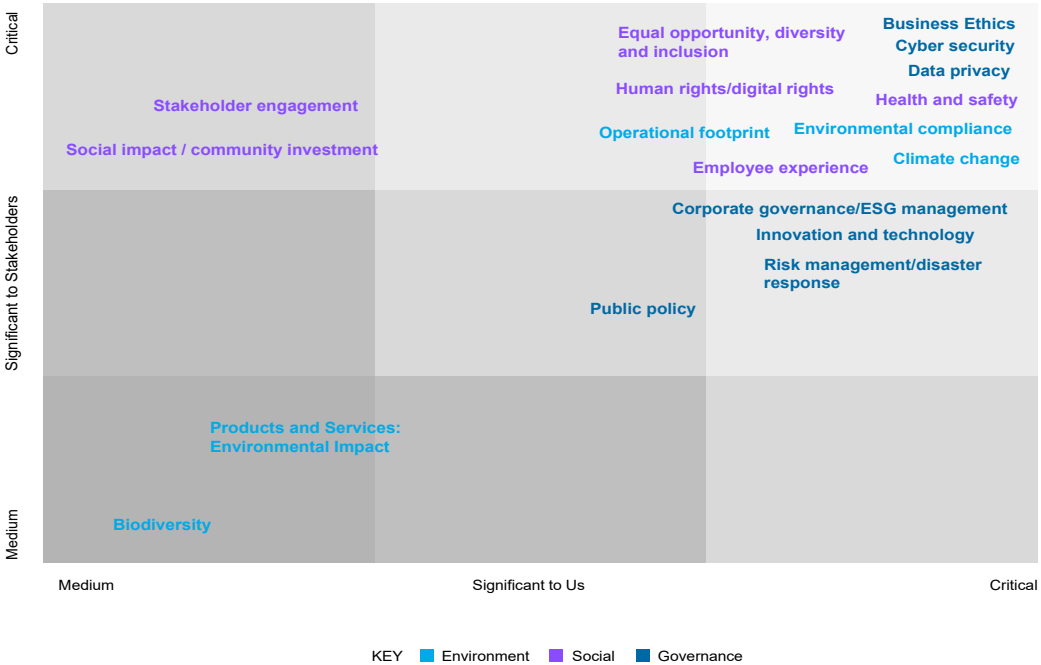
In order to determine the report content, we used the matrix on this page to identify the issues and aspects most material to our stakeholders and us. While most aspects have remained the same, we have seen an increased focus on human rights, climate change, diversity, and data privacy and cybersecurity through requests for proposals. Also, the COVID-19 pandemic has increased focus on health and safety. As a result, these aspects were given more weight when developing the matrix.

The topics deemed most important to Virtusa include ethics and compliance [GRI 205], data privacy and cybersecurity [GRI 418], client satisfaction, labor practices [GRI 402], equal opportunity and diversity [GRI 405], health and safety [GRI 403], learning and development [GRI 404], human rights [GRI 406, GRI 408, GRI 409], environmental and climate change management [GRI 302, GRI 303, GRI 305, GRI 306, GRI 307], and indirect economic impacts [GRI 203]. There have been no significant changes from previous reporting periods in the list of material topics and topic boundaries. We have made every effort to submit a comprehensive report with regard to dimensions of scope and boundary for the reporting period.

Restatements

[GRI: 102-48]

- External initiatives and memberships: We no longer have membership in IFC SheWorks.
- Total number of full-time employees for FY18 has been corrected to 20,491 from 20,489.
- Scope 3 emissions: The total direct and indirect greenhouse gas emissions table on page 55 of our 2019/2020 corporate citizenship report lists Scope 3 emissions for FY18 as 12,832.642 MTCO2. This should be 17,944.782 MTCO2 to reflect the recalculation done using DEFRA emissions factors with radiative forcing. As a result, the total emissions for FY18 should be 33,249.498 MTCO2.



Environment

B

CDP climate change score

47%

Water used was recycled in FY21

ISO 14001:2015

Certified environmental management system

12%

Energy obtained from renewable sources

*All data is for FY21.

Our strategy and approach

[GRI: 102-11, 103-1, 103-2, 103-3].

We are committed to adhering to the Precautionary Principle as defined in the Rio Declaration and aim to consistently reduce the environmental impact of our business operations and services. Our commitment to reducing our environmental footprint and adhering to all environmental regulations is set out in our Environment, Health and Safety Policy, and the Environmental Responsibility Policy.

Our environmental management system, internally branded as Code Green, was initiated in 2008 as our response to climate change. Code Green aims to manage significant environmental impacts such as emissions, resource use, and waste through three pillars: operating energy efficient facilities that reduce our environmental footprint, reducing the environmental footprint of software developed for clients, and utilizing energy efficient technologies.

Our Global Head of Facilities and Sustainability is responsible for managing our climate strategy and reports directly to the CFO on all matters related to our environmental footprint. The facilities management teams in each location manage day-to-day activities related to environmental management such as tracking emissions, energy and water usage, recycling activities, ISO 14001 certification, and other aspects of environmental reporting.

We also participate in various forums on climate change and the environment to promote sustainable business. These include engagements with Biodiversity Sri Lanka and the UN Global Compact Climate Action Work Group. We have received limited assurance under ISAE3000 from Ernst & Young for our Scopes 1, 2 and 3 emissions calculations.



Green facilities

- Reducing emissions
- Energy efficiency
- Resource efficiency
- Waste management



Green delivery

- DevOps, digital process and test automation
- Low code engineering
- Code quality and reuse



Green tech

- Green UI
- Virtualization
- Green IT architecture
- Internet of Things (IoT)
- Cloud technology

Managing impacts

Emissions

[GRI: 103-2, 103-3, 305-1, 305-2, 305-3, 305-4, 305-5]

Our strategies for reducing Scope 1 and 2 emissions include investing in energy efficiency projects and renewable energy. As a result, in FY21 we invested in solar power for three of our campus facilities in Hyderabad and Navalur, which will provide approximately 2,389 MWh annually, increasing renewable energy use to 20% from 12%. Traditionally, emissions from the use of energy at our offices have accounted for 45%-55% of our emissions. The work from home policies followed in FY21, however, resulted in a 67% reduction in Scopes 1 and 2 (market-based) emissions compared to the FY17 baseline. As the GHG Protocol does not provide a mechanism to report on such emissions, we have not included it in our formal reporting but estimate emissions from remote work to be approximately 6,345.5 MTCO₂. For the calculation method used to arrive at this number, please see the section on data calculation methods.

Scope 3 emissions from business travel (both air and road) were also reduced in FY21 due to the COVID-19 lockdowns and travel restrictions. However, Scope 3 emissions from capital goods increased due to increased investment in laptop computers to support working from home.

Energy

[GRI: 103-2, 103-3, 302-1, 302-3, 302-4]

While our energy management system is not certified for ISO 50001, we seek to comply with it in our energy management practices. We rely on resource efficiency to reduce energy consumption at our offices as mandated by our build-out guide. Resource efficiency initiatives include improvements to lighting and HVAC systems so that 99% of lighting in facilities in India and Sri Lanka have been converted to LED. For example, we achieved a 54% reduction in energy consumption per employee at our Sri Lanka facility from Q1 FY09 to Q4 FY20 from 279 kWh to 128 kWh. In addition, we estimate that improvements made to HVAC systems at our Hyderabad Campus and DLF facility in FY21 will help us reduce energy consumption by 64,934 kWh per year.

We ensure that our office equipment is energy efficient as well. Our IT equipment is rated Energy Star version 5.0 or higher, with some equipment being rated Energy Star version 8.0. We also rely on virtualization and cloud computing to reduce hardware resources and associated energy. For example, we were able to obtain resource efficiencies and associated emissions reductions by shifting collaboration from a disparate mix of on-prem technologies to Microsoft Office 365 on cloud with consolidated Microsoft Teams, achieving nearly 100% adoption. We have also moved 70% of our IT infrastructure to the cloud.

Due to the work from home policy in FY21, energy consumption per employee reduced by 62% from 147 kWh in FY17 to 55 kWh in FY21.

Water

[GRI: 103-2, 103-3, 303-1, 303-2; SASB: TC-SI-130a.2]

We seek to be responsible for our water consumption, especially since 70%-75% of operations are located in locations of water stress. As a services company, our operations are not water-intensive, and water is used mainly for drinking, hygiene, cooling towers, and landscaping. Only the Navalur Campus uses fresh water for cooling towers as the Hyderabad campuses have air cooled chillers.

Sources of water include ground water, private suppliers, and the municipal water supply. We believe that our operations do not affect water sources significantly as the sources are not in designated protected areas nor have high biodiversity value. Water sources with Total Dissolved Solids (TDS) of less than 1,000 mg/L are considered freshwater.

Strategies for water management include retrofitting with sensor taps, use of sewage treatment plants (STPs), water purification through reverse osmosis, and rainwater harvesting. While most of our leased facilities use STPs, a few facilities, such as Colombo, discharge wastewater into municipal sewers. At our three campuses in Hyderabad and Navalur, wastewater is treated in STPs and used for flushing and landscaping. In FY21, 10,641.59 kL of water was recycled, which accounted for 47% of total use. Rainwater harvesting pits are used to recharge the ground water table. Currently, we have capacity for 484 kL and plan to implement capacity for an additional 155 kL. We have reverse osmosis plants at two campuses to purify drinking water.

The water management initiatives implemented at our three campuses make them “zero discharge” facilities.

Waste

[GRI: 103-2, 103-3, 306-2]

We have processes for managing e-waste, paper, plastic, and organic waste. We hand over e-waste to a certified vendor for recycling and work with relevant state authorities to ensure e-waste is handled in a responsible manner. For example, we are one of 14 companies to sign an MOU with the Central Environmental Authority (CEA) of Sri Lanka to properly and effectively manage e-waste. We were also the first IT company in Sri Lanka to receive a scheduled waste management license from the CEA.

We purchase farmed paper and all departments are encouraged to use paperless forms, notifications, and reports wherever possible. Wastepaper is handed over to a certified vendor for recycling.

In both India and Sri Lanka, we had over plastic waste for recycling. For example, in India, we partner with the Wealth out of Waste program and donate paper and plastic for recycling. As a result, 2014 kg of paper and 686 kg of plastic was prevented from going to landfill in FY21.

We have implemented organic waste management processes at our campuses in India. Consequently, 251 kg of organic waste was prevented from going to landfills in FY21.

Data computational methods

[GRI: 305-2, 305-3, 305-4, 305-5]

Environmental data is only gathered and monitored for our technology centers in India, Sri Lanka, Singapore, Sweden, and Southborough, Massachusetts, which account for 85% of our total headcount. We follow the guidelines set by the Greenhouse Gas (GHG) Protocol to calculate Scope 1 and Scope 2 emissions. We have used FY17 (April 2016 to March 2017) as our baseline year. From FY19, we used DEFRA emission factors to calculate Scope 3 emissions whereas in previous years we used the World Resources Institute (2015) GHG Protocol tool for mobile combustion. Details of emission factors used in FY21 are given below.

Location	Emission Factor	Unit	Reference
Purchased electricity			
India	0.830	tCO2/MWh	CEA CO2 Baseline Database for the Indian Power Sector (2019) - Table B (page 28)
Singapore	0.4085	kgCO2/kWh	Singapore Energy Statistics 2020 - Energy Transformation Chapter 02, Energy Market Authority (EMA)
Sri Lanka	0.4694	kgCO2/kWh	Sri Lanka Energy Balance (2018) - Table 9.1: Average Emission Factor (page 97)
Sweden (location-based)	11.89	gCO2/kWh	European Residual Mixes 2019, Association of Issuing Bodies
Sweden (market-based)	50.22		
United States (location-based)	488.9	lbs CO2/MWh	US EPA Emission Factors for Greenhouse Gas Inventories (April 2021)
United States (market-based)	522.34	lbs CO2/MWh	2020 Green-e® Residual Mix Emissions Rates (2017 Data) - NYUP Adjusted System Mix
Calculation method for emissions from work from home	(1) Per day energy intensity per home remote worker = Energy Intensity by Region x Regional ratio of increment to baseline (2) Energy Consumption for the year = Average remote workers x (5 days x 48 weeks) x Per day energy intensity per home remote worker (3) Estimated emissions from remote work = Energy consumption for the year x Average grid emission factor Assumption: All employees work 5 days/week and 48 weeks annually. Source: Estimating Energy Consumption & GHG Emissions for Remote Workers - White Paper by Anthesis		

Location	Emission Factor	Unit	Reference
Company owned vehicles			
Small - Diesel	0.13721	Kg CO2e/pkm	DEFRA 2020 emission factors
Large - Diesel	0.20419		
Large - Petrol	0.27807		
Air travel			
Long-haul, to/from UK	0.19085	kg CO2e/pkm	DEFRA 2020 emission factors with radiative forcing
Short-haul, to/from UK	0.15553		
Domestic, to/from UK	0.2443		
Other locations	0.18181		
Long-haul, US	0.16101	kg CO2e/per mile	US EPA Emission Factors for Greenhouse Gas Inventories (April 2021)
Medium-haul, US	0.131		
Short-haul, US	0.20601		
Road travel			
Average car	0.1714	kg CO2e/per vehicle km	DEFRA 2020 emission factors
Average local bus	0.10471	kg CO2e/per passenger km	
Capital goods			
Computers	0.53	kg CO2e/£	DEFRA Environmental reporting guidelines: including Streamlined Energy and Carbon Reporting and greenhouse gas reporting (March 2019)
Printers	0.53		
Furniture	0.48		
Insulated wires and cables	0.62		
T&D Loss			
Electricity: India	0.18379	kg CO2/kWh	DEFRA 2015 emission Factors
Electricity: Singapore	0.00859		
Electricity: Sweden	0.00142		
Electricity: United States	0.03595		

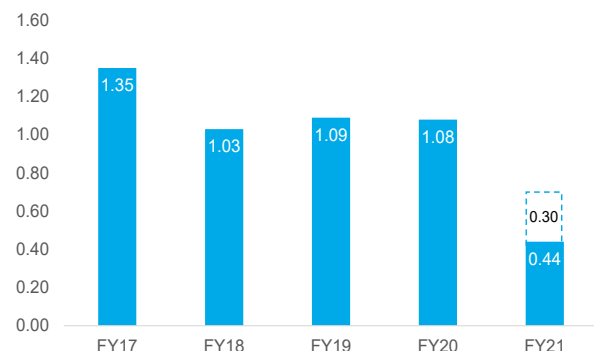
Table: Sources for emission factors used in FY21

Performance data

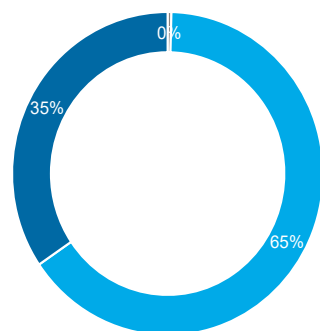
Emissions

[GRI: 305-1, 305-2, 305-3, 305-4, 305-5]

Emissions per employee

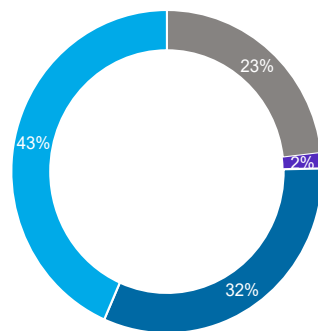


Emissions breakdown



■ Scope 1: Fuel (Diesel)
■ Scope 2 (Market-based): Grid power
■ Scope 3: Travel, capital goods and transmission and distribution losses

Scope 3 breakdown



■ Air travel
■ Road travel
■ Capital goods
■ Transmission and distribution losses

	FY21	FY20	FY19	FY18	FY17
Scope 1: Fuel (Diesel)	57.193	216.607	244.431	166.808	412.151
Scope 2: Grid power	9,489.156	17,497.998	17,784.435	15,137.908	192,82.219
Scope 3: Business travel + capital goods + T&D losses	5,031.057	15,183.384	19,504.461	17,944.782	6,781.382
Total GHG emissions	14,577.406	32,897.989	37,533.327	33,249.498	26,475.752

Table: Total direct and indirect greenhouse gas emissions by weight (metric tonnes CO2e)

	FY21	FY20	FY19	FY18	FY17
Emissions from air travel	1,165.158	12,447.962	17,797.223	16,579.665	7,804.566
Emissions from road travel	76.963	1,374.541	1,707.238	1,365.117	1,038.628
Capital goods	1,605.783	1,360.881	-	-	-
Transmission and distribution losses	2,183.153	-	-	-	-
Total Scope 3 emissions	5,031.057	15,183.384	19,504.461	17,944.782	8,843.194

Table: Breakdown of Scope 3 emissions (metric tonnes CO2e)

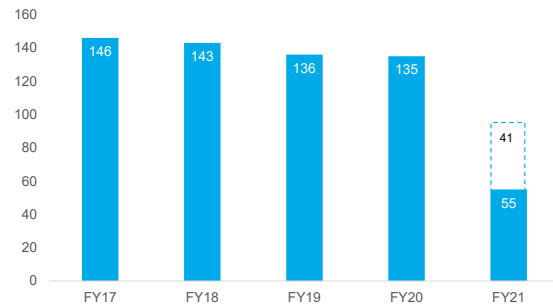
Notes:

- There was a drastic reduction in emissions in FY21 due to the work from home policies and travel restrictions. As the GHG Protocol does not provide a mechanism to report on such emissions, we have not included it in our formal reporting but estimate emissions from remote work to be approximately 6,345.5 MTCO2.
- We started calculating emissions from capital goods in FY20 and from transmission and distribution losses in FY21 so data is not available for prior years.

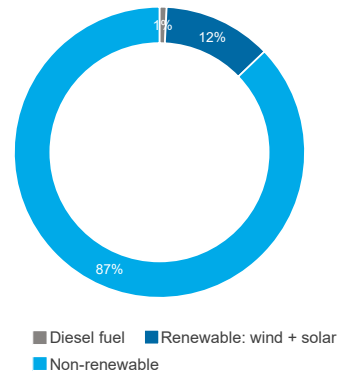
Energy

[GRI: 302-1, 302-3, 302-4; SASB: TC-SI-130a.1]

Energy per employee



Energy breakdown



	FY21	FY20	FY19	FY18	FY17
Fuel from non-renewable sources - diesel fuel	408.042	2,923.421	3,298.930	2,251.304	5,562.503
Electricity from renewable sources - wind	5,967.0180	11,330.143	10,629.511	12,609.409	12,696.167
Electricity from renewable sources - solar	225.2952	-	-	-	-
Electricity from non-renewable sources	44,843.9399	81,450.889	83,732.882	76,573.979	73,807.182
Total energy consumption	51,444.2948	95,704.452	97,661.323	91,434.692	92,065.852

Table: Direct and indirect energy consumption in Gigajoules

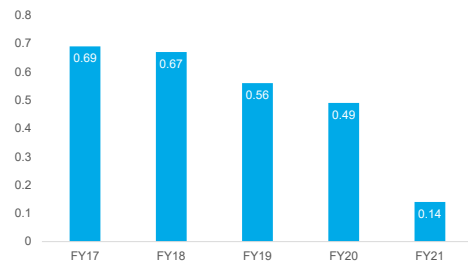


Image: Solar panel installation in parking areas of our Hyderabad Capital facility.

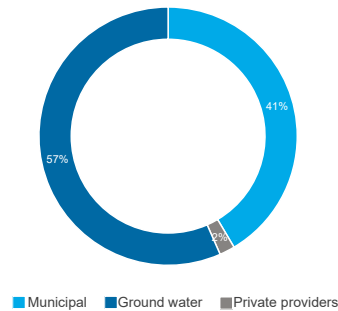
Water

[GRI: 303-5, 303-3; SASB: TC-SI-130a.2]

Water per employee



Water sources breakdown



	FY21	FY20	FY19	FY18	FY17
Municipal water	9,456.000	35,344.840	-	-	-
Ground water	12,904.000	44,595.800	-	-	-
Private providers	440.000	9,419.000	-	-	-
Total water used	22,800.000	89,359.640	98,525.120	108,217.960	106,757.000
Total water recycled	10,641.590	50,650.800	44,709.000	47,460.000	45,218.000
Percentage recycled	46.674	56.682	45.378	43.856	42.356

Table: Water used by source and water recycled (in kiloliters)

Waste

[GRI: 306-2]

	FY21	FY20	FY19	FY18	FY17
Electronic waste					
E-waste recycled	4,542.000	10,960.710	6,181.000	4,995.000	10,269.420
Paper waste					
Paper used	1,256.580	9,340.560	15,648.300	16,183.900	18,994.000
Paper recycled	2,014.000	8,079.210	8,516.600	8,969.500	10,184.000
Percentage recycled	100%	86%	54%	55%	54%
Plastic waste					
Plastic recycled	686.000	847.500	1,040.000	-	-
Organic waste					
Organic waste composted	102.000	9,036.000	-	-	-

Table: Waste recycled in kilograms

Notes:

- We are able to track water usage only at seven facilities, which account for 69% of our real estate and recycling data is available only for the three campuses.
- In FY21, water consumed in areas of water stress amounted to 17,293 kiloliters (76% of total water consumed).
- We started tracking water withdrawal by source only in FY20, so this breakdown is not available for previous years.
- The amount of paper recycled is greater than the amount used in FY21 as paper from FY20 was also recycled in FY21.
- There was a reduction in water used, water recycled, waste and waste recycled due to the work from home policies followed in FY21.

Social

24,736

Full-time employees

1,906

Net new employees

34

Average training hours per employee

ISO 45001:2018

Certified health and safety management system

*All data is for FY21.

People data

[GRI: 102-7, 102-8, 404-1, 405-1; SASB: TC-SI-330a.1, TC-SI-330a.3]

	FY21	FY20	FY19	FY18
North America	3,060	3,170	3,124	2,532
Europe	693	834	832	434
Asia Pacific and Middle East	20,983	18,826	17,789	17,525
Total	24,736	22,830	21,745	20,491

Table: Total number of full-time employees by region

	FY21	FY20	FY19	FY18
Management	13%	13%	12%	13%
Professional	33%	33%	33%	33%
Total	29%	29%	29%	27%

Table: Percentage of women by level

	FY21	FY20	FY19	FY18
Permanent cadre	24,736	22,830	21,745	20,491
Contract/outourced/other	2,271	2,619	2,366	1,997

Table: Employees by category

	FY21	FY20	FY19	FY18
Tier 0	14.2	28.3	13.6	3.6
Tier 1	22.1	37.8	17.9	5.4
Tier 2	27.2	37.8	22.1	6.3
Tier 3	33.0	43.8	26.5	7.1
Tier 4	52.6	80.8	114.2	21.5

Table: Average training hours by employee

Tier 0 - Top Management/Senior Management; Tier 1 - Manager Level; Tier 2 - Middle Management; Tier 3 - Entry Level Middle Management;
Tier 4 - Executive/Engineer Level

Our strategy and approach

[GRI: 102-8, 103-1, 103-2, 401-1]

Our aim is to recruit, retain, and grow the best talent globally. As of March 31, 2021, we had 24,736 team members, an increase from 22,830 on March 31, 2020. Our strategy includes the following:

- Diversity, equality, and inclusion
- Equipping our workforce for tomorrow
- Employee wellness and safety
- Empowering local communities

Topics material to our people management strategy includes labor and human rights, diversity and inclusion, training and skill development, and health and safety. As such, our people management programs contribute to the achievement of Sustainable Development Goals 4, 5, and 8.

The global head of human resources is responsible for all labor practices with responsibilities cascaded down to location-based human resources leaders. Within locations, separate teams focus on specific areas, such as recruitment, training, career development, and compensation and benefits. The human resources team is also responsible for employment related compliance and investigating any violations related to human resources policies and procedures.



Diversity and inclusion

[GRI: 102-17, 103-1, 103-2, 103-3, 406-1, 408-1, 409-1]

Policies

Consistent with our PIRL values, we value a diverse workforce. We hire locally where we can create strong communities and provide opportunities for diverse candidates. Our diversity program is based on a well-defined governance framework around human rights and equal opportunity.

- Human Rights Policy: Sets out our commitment to complying with the Universal Declaration of Human Rights following the UN Guiding Principles on Business and Human Rights (UNGPR) as applicable to our business operations.
- Equal Employment Opportunity Policy: Prohibits any form of discrimination based on 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. We also have geo-specific policies against discrimination to ensure compliance with legal requirements. All employees are required to complete mandatory training on these policies through Code of Conduct training and Prevention of Sexual Harassment training.
- Grievance Policy and Grievance Policy Guidelines: Sets out the procedure for reporting complaints related to discrimination, new work practices, and other violations of human rights. The main channel of communicating grievances is through the line manager, human resources team members, and leadership team members. Complaints regarding harassment are

covered by our harassment-free workplace policies and are handled by the human resources team. In some geographies, there are specific committees to handle grievances.

- Discrimination and Harassment Free Workplace Policy: Virtusa takes allegations of discrimination and harassment seriously. When a complaint is received, the allegation is promptly investigated in a fair and expeditious manner. The investigation will be conducted to maintain confidentiality to the extent practical under the circumstances. Where it is determined that such inappropriate conduct has occurred, prompt action is taken to eliminate the conduct and impose corrective action, including discipline, up to and including termination of employment, to resolve the situation. Any retaliation against an individual who has complained about any form of discrimination or harassment or who has participated in an investigation of such complaint is similarly unlawful and is not tolerated. If any employee believes that he or she has been subjected to retaliation for having brought a complaint or participated in an investigation of harassment or discrimination, that employee is encouraged to report the situation as soon as possible to Human Resources or any member of the Executive Committee at Virtusa.
- 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.

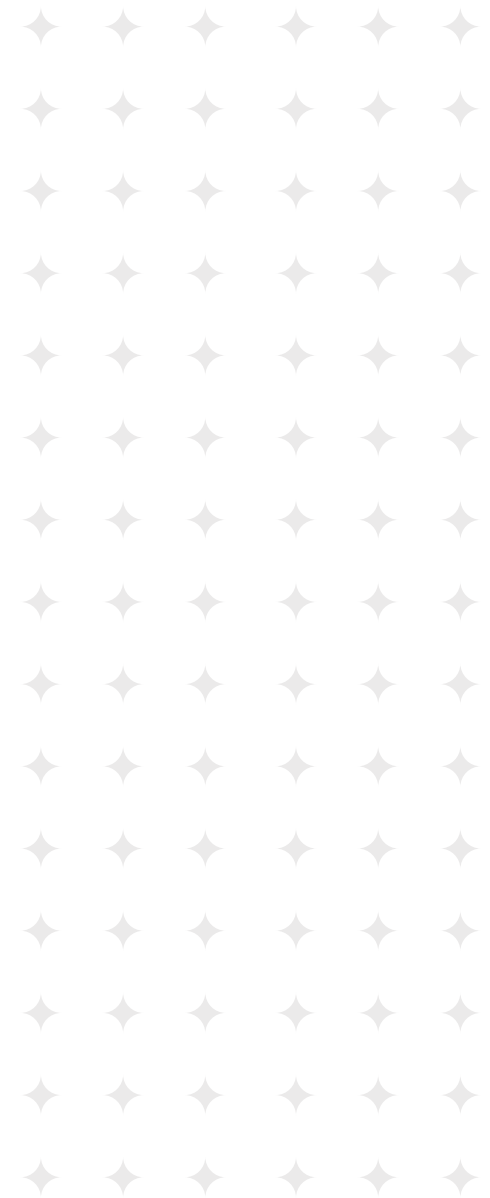
As a digital engineering services company, child labor, forced and bonded labor, slavery, and human trafficking are not significant risk factors in our operations. However, we are aware of these threats and have policies and procedures to ensure that our business and supply chain are not complicit in such human rights abuses. As such, our Human Rights Policy and Supplier Guidelines prohibit the use of child labor, forced and bonded labor, and modern slavery. We have also implemented the Anti-Slavery and Human Trafficking Policy in April 2017 to address the issues of modern slavery and human trafficking specifically.

Progress on diversity

In line with our objective of being an employer of choice globally by enabling a culture of diversity, equality, and inclusion (DEI), our target is to have a gender-balanced workforce with 40% women by FY26. Virtusa's DEI philosophy is to be an Inclusive Equal Opportunity Employer with zero bias to create a better life experience for our employees and stakeholders. To achieve these targets, our plans for early 2022 include the following:

- Formalize target-based goal setting with leaders and manager sponsorship and accountability in our focus areas of gender, persons with disabilities, and supplier diversity.
- Institute a DEI council to drive programs to achieve stated goals.
- Create awareness and institutionalize a culture of inclusion through training and roll-out policies that promote DEI.
- Add Employee Resource Groups (ERG) across geographies. One such ERG that Virtusa already has is Women of Virtusa: This ERG provides extensive programs on career development, recreation, work-life balance, and environment and safety for female employees to support career growth. This program is a global initiative with chapters in different geographies. A second initiative offers women the opportunity to initiate a new career track after taking a break (such as family reasons).

Concerning enablement and accessibility, we aim to ensure that digital platforms and the office environment adhere to global accessibility standards so that all our team members may have a seamless experience. All the major digital platforms we have selected are certified as accessible, and new software evaluations include accessibility as a criterion for selection. We have also engaged an independent assessor to certify our time entry app, our most used digital journey. The Virtusa Facilities Design and Build Guide mandates accessibility features such as wheelchair access regarding office space.



Talent management

[GRI: 103-1, 103-2, 103-3, 404-3]

All employees have regular performance appraisals that drive career development, compensation, and promotions. Our performance philosophy is embedded in the achievement of business goals, competency assessments (behavioral and technical), and employee engagement in senior managers. 360° assessments are conducted for leadership (managers and above), and the input supports individual development plans and promotions. All leaders at the manager level and above are also assessed for behavioral indicators using the Harrison Assessment Test.

Programs such as REPS (real-time engagement and performance scores), AI-powered surveys, talent-trend predictive analytics, and Engineering IQ (EIQ) programs enable an ecosystem where high-performing talent thrives.

Our compensation practices are similarly carefully tailored to the 3Ps—pay for person, pay for position, and pay for performance. We link both our base salary and our variable pay to performance and benchmark regularly so that employees can be confident that our compensation is equitable and aligned with the market. We know that pay is only one way to reward employees. Compensation is, therefore, only a part of our human capital story, which includes:

- Paid reskilling, education, and development opportunities
- Multiple training programs under the Thrive Leadership and Learning Academy
- Regular opportunities for job rotations and opportunities to work directly with clients
- Enabling non-moderated employee communication across all levels of the organization
- Providing high-quality benefits, opportunities, and packages

Learning and development

[GRI: 103-1, 103-2, 404-2]

We offer multiple development and reskilling opportunities for our team members so that they are able to adapt to the rapidly changing technological landscape. We also focus on social learning through digital platforms to enable our team members to collaborate and mentor each other in new technologies. In FY21, we were able to deliver an average of 34 hours of training to our team members. In-line with our digital and cloud transformation growth strategy, certifications have gained momentum. We currently have over 1,000 technology professionals certified on Cloud AWS/GCP and Azure. We also evolved the GOLD (Global One Leadership Development) Program in partnership with reputed training organizations to coach and build leaders who can manage large scale and strategic programs for the company. Our endeavor to create ICF certified coaches within the organization has commenced with the first cohort of 19 coaches.

We aim to fulfill 75% of positions from within the organization, supported through all the leadership programs available across locations. Overall, our learning and development programs contribute to the achievement of Sustainable Development Goals 4 and 8.



Learning interventions

Launchpad

An emerging talent training program aimed at building and nurturing talent in-line with Virtusa skill demands. Selected campus hires undergo training at a Virtusa facility over 5-6 weeks.



Mandatory training programs

Mandatory training programs to meet audit, regulatory, and client requirements. Employees are required to successfully complete all mandatory trainings within the defined timelines.



GOLD

Co-designed and conducted through a partnered delivery model with the National Training Laboratory (NTL), the intervention focuses on developing 65 HiPo leaders as change agents and is part of our mission to “grow leaders from within.”

EDP

A 360-degree Leader and Leadership Development intervention conducted in partnership with Korn Ferry Hay Group to build leadership agility, through continuous coaching and feedback.



STEP+

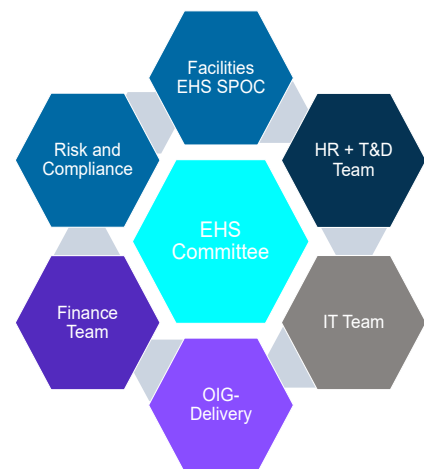
The Sales Talent Enhancement program is a competency development program that aims to enhance the techno-functional, domain, and client experience building capability of team members of our sales team.

Health and safety

[GRI: 103-1, 103-2, 103-3, 403-1, 403-4, 403-8]

Governed by the Environment, Health, and Safety (EHS) Policy, our occupational health and safety (OHS) management system is certified for ISO 45001:2018 and covers all activities that are part of our operations, and all employees, including contractors performing work on behalf of Virtusa or one of its subsidiaries.

In each location, we have a member from the facilities team responsible for managing the facility’s health and safety program under the guidance of the EHS Committee, which meets periodically to evaluate EHS matters, including progress on OHS objectives. While contractors are not represented in the committee, their concerns are reported to the committee through a documented process. Results of the EHS committee meetings are reported to the management bi-annually at the management review.



As per our EHS policy, employees and contractors are encouraged to report OHS concerns and are protected from retaliation. OHS concerns can be reported directly to the facilities and human resources teams or through Incidentreporting@virtusa.com. An online ticketing system and social media (Yammer) and Microsoft Teams are also available as alternatives to connect with the responsible parties.

Risk and incident management

[GRI: 403-2, 403-6, 403-7]

Guided by ISO 45001, we conduct health risk assessments bi-annually or when an alteration to the work area, work pattern, or other changes occur. A quality check of the assessments is carried out by a trained internal auditor, and by external auditors during recertification audits. To ensure continuous improvement of the OHS system, the implementation of the system is evaluated by the top management and guided on the way forward.

The EHS team investigates and records work-related accidents, and if there is a reportable incident, reports to the relevant authorities in compliance with legal requirements. We have incident response plans for incidents such as civil unrest, fire, flood, food poisoning, pandemics, terror attacks, tsunamis, and earthquakes. The business continuity management system (BCMS) team is responsible for invoking the correct incident response plan for the situation. These plans are periodically tested to confirm the validity of the process.

Ergonomics, work-life balance, and employee transport were traditionally significant risks for our operations. The COVID-19 pandemic has expanded the range of significant risks to include pandemic management measures at our offices and ensuring the well-being of our employees while working remotely.

Training

[GRI: 403-3, 403-5]

All employees undergo EHS training at onboarding, and from FY21, are required to renew the certification annually. We also launched a one-time training to address health and safety measures for pandemics. In addition, emergency response team members are provided with fire safety and first aid training, and facilities team members responsible for implementing health and safety procedures are provided with additional training and certifications as needed. We also provide health and safety training to contractors, including housekeeping, security, and drivers twice a month.

Employee wellness

[GRI: 403-6, 403-7]

We operate in a safe industry that does not involve any construction or other hazardous work. All retrofits and repairs are carried out by licensed personnel in accordance to safety regulations. We have medical rooms at our larger ATCs in Asia and have special arrangements with medical service providers to visit on demand. If required, transport is made available for employees to access medical care.

To ensure that our office locations provide a suitable work environment, we monitor air quality, noise, and lighting levels and have enforced health and safety procedures in line with COVID-19 guidelines mandated by the health authorities for each geography, including social distancing guidelines and the use of face coverings. We have health screening surveys for employees who need to visit our offices, along with a Pandemic Playbook that provides information on the procedures they should follow when in the office. In addition, we regularly communicate OHS best practices on work-related health risks such as ergonomics and vision impairment as well as non-work related health risks, such as mental health and communicable diseases via email communications and social media, and by hosting special health campaigns.

Apart from making the physical work environment safe, we seek to provide work arrangements that support our team members, such as flexible work hours and work-from-home, paid maternity leave, leave of absence (on a case-by-case basis), child adoption leave, leave for military service, and support for those caring for dependents. Paternity leave is available as sanctioned by the legal requirements of the applicable geography. All our employees are provided with personal medical and hospitalization insurance.

The COVID-19 pandemic drastically changed work patterns, with work from home becoming the practice for most of our team members, and 98% of our delivery team working from home. We implemented policies that would support remote work such as reimbursement for data. We also moved to remote onboarding and offboarding of new employees and existing employees.

As different parts of the world are affected by the COVID-19 pandemic, employee health and wellness continues to be our priority, and we continue to provide the following measures:

- 24x7 COVID-19 Care digital portal and call center for team members to request support for themselves and their families.
- 24x7 assistance with transport, medication, food, help in procuring hospital beds, ambulances, oxygen cylinders, for pre- and post-COVID care in hospitals, homes, and quarantine centers. For example, in Sri Lanka, we partnered with hospitals so that employees diagnosed with COVID-19 could obtain treatment at Intermediate Care Centers (ICC) if needed.
- Parts of our facilities in Chennai and Hyderabad were converted to makeshift COVID-19 isolation centers supported by Virtusa staff and with medical expertise from renowned hospitals.
- Created an active plasma donor database of Virtusans to support plasma requirements.
- Enhanced medical insurance policies and a COVID-19 Leave Plan.
- Assistance with vaccinations and access to telemedicine apps so that team members can easily obtain medical advice. For example, we partnered with regional medical institutions, wellness vendors, and corporate hospitals across pan-India so that employees and their families could get vaccinated. As this program was part of the employee benefits, team members could get the cost of vaccination reimbursed.
- Initiatives and social media campaigns to keep team members motivated and engaged, including tips on health and well-being, motivational messages, training, technical talks, online quizzes and photography competitions, online events related to festivals, online yoga and counseling sessions, art and coding competitions for kids, and musical events.

Image: Isolation center at Hyderabad Capital facility.



Digital for good

Empowering local communities

[GRI: 103-1, 103-2, 103-3, 203-1]

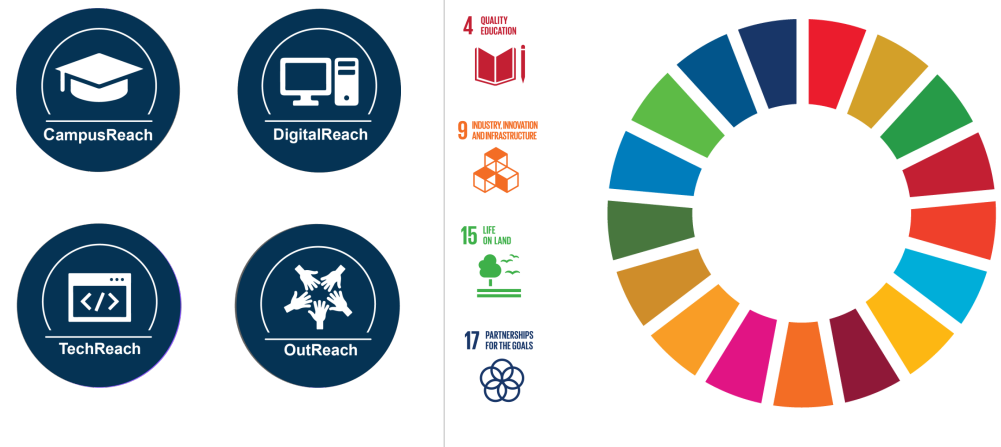
Our Advanced Technology Centers in India and Sri Lanka help contribute to these countries' economic development through job creation. The Polaris and eTouch acquisitions increased our footprint in India with the addition of 10 locations. In Sri Lanka, we are the largest IT service company and contribute to the development of the IT industry (one of the top five export revenue earning industries for the country).

We provide indirect economic benefits through our corporate social responsibility (CSR) projects. This includes contributing to the advancement of STEM education at the university level in the countries we operate in, creating a more digitally inclusive society, and using our digital engineering expertise to develop technical solutions for non-governmental organizations.

We believe that technology can create a positive social impact in our communities. Virtusans have a strong culture of volunteerism and offer their time, knowledge, and skills to drive our CSR projects, which fall under four pillars: CampusReach, TechReach, DigitalReach, and OutReach.

The Virtusa Foundation has been set up to formalize our social responsibility strategy and bring all our CSR initiatives under one umbrella. While most of our CSR projects focus on technology, we carry out other projects, such as those that empower marginalized communities and help in environmental conservation.

Four pillars to support Global Goals



CampusReach

CampusReach is an industry-academia partnership designed to support the next generation of IT professionals to be workforce ready and contribute to its growth. In India and Sri Lanka, Virtusa has created “Centers of Excellence” (COEs), where we partner with colleges to develop IT curricula, support and train their faculty, and award sponsorships. These COEs focus on skills like Java, JS Angular, Data Science, Big Data, Talend, Cloud (AWS and GCP), CRM, specialized testing, BPM, front-end engineering and Adobe CQ, directly improving quality of hires, and ensuring team members are project-ready faster. We have established 33 COEs at 25 colleges throughout India. In addition, we started a five-year master’s in technology program specializing in full stack engineering across three prestigious institutes in India: VIT University (Vellore), Chitkara University (Chandigarh) and Sri Krishna College of Engineering and Technology (Coimbatore).

In the United States, Virtusa has been a sponsor for STEM initiatives in the local universities. The STEM curriculum looks at integrating science, technology, engineering, and mathematics in an interdisciplinary and applied approach.

CampusReach supports Goal 4 (Quality Education) and Goal 17 (Partnerships for the Goals) of the Sustainable Development Goals.

	FY21	FY20	FY19	FY18	FY17
Internships	340	374	429	232	328
Career guidance sessions	25	53	28	33	34
TechTalks	150	33	13	33	30
Industrial visits	0	17	6	20	9
Convocations and freshers’ day	13	26	17	22	0

Table: CampusReach data

DigitalReach

Through DigitalReach, we aim to create a digitally inclusive society by IT-enabling communities. For example, we helped to set up over 70 IT labs in rural schools in India and Sri Lanka with a reach of 7,000+ students. This model was adopted by the Sri Lanka Association of Software and Services Companies (SLASSCOM) for a country-wide program. DigitalReach support is not limited to schools. For example, we set up a fully equipped Digital Learning Center (DLC) to provide IT training for ex-combatants in Sri Lanka. Approximately 20,000 training hours were provided so that the ex-combatants could gain the skills needed to obtain jobs and integrate into society. Digital Reach supports Goal 4 (Quality Education) and Goal 17 (Partnerships for the Goals) of the Sustainable Development Goals.

In FY21, we continued to support digital literacy through donations to the following NGOs.

Project/ Organization	Description
Computer Shiksha	A nonprofit organization that works towards computer literacy among underprivileged children.
Yathindra Educational Trust	Donated 12 laptops and 10 tabs to Yathindra Educational Trust for use at a school that provides education to students from marginalized communities.
Oxfam India	Provided donations to support Oxfam’s project aimed at reducing school drop-out rates among underprivileged students impacted by the COVID-19 pandemic and also increasing their digital literacy.
Black Girls Code	An organization that aims to introduce programming and technology to a new generation of coders.

Table: DigitalReach donations for FY21

TechReach projects

Sahana

Disaster management system

RMS

Rehabilitation Management System

Akura

Open source school management system

Arambaya

Rehabilitation Management System Phase II

Multimedia Scoreboard

Software to operate first multi-purpose/multimedia scoreboard in Sri Lanka

Clean Chennai App

Scalable app for the Clean Chennai initiative

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Disaster response app

Dakshas Healthcare Portal

Tech-based, AI-enabled platform that helps NGO map patient requirements and monitor needs against the treatment provided

United Way Management Portal

Portal to onboard and manage projects and donors

Life Commitment Biodiversity Survey Portal

Platform to collate information on biodiversity conservation projects

TechReach

To date, TechReach has been our most successful initiative in terms of reach and recognition. Through TechReach, we use our digital engineering and consulting expertise to contribute to projects of social benefit. We have partnered with government and nongovernmental organizations to develop software solutions. TechReach started with the development of the Sahana disaster management system in response to the 2004 Tsunami and has been used for disaster management around the world, including the United States, Sri Lanka, Japan, Pakistan, and the Philippines. Sahana went on to win the Free Software Foundation Award for Projects of Social Benefit in 2006 and was a finalist in the US Secretary of State Award for Corporate Excellence in 2008.

Recent TechReach projects include the Dakshas Healthcare Portal developed to help marginalized patients to obtain nonemergency medical treatment and the project management portal developed for United Way, an NGO that works with underprivileged communities.

OutReach

Through OutReach, we carry out community outreach activities. These include donations and volunteering. While some of these projects are continuing projects, others are one-time activities. OutReach projects carried out in FY21 are described below.

Project/Organization	Description
Massachusetts COVID-19 Relief Fund	Donation to the Massachusetts COVID-19 Relief Fund, which supported those most impacted by COVID-19, focusing on essential frontline workers and vulnerable populations such as the homeless.
DCU for Kids	Putting Green Sponsorship. DCU Kids strive to improve the quality of life for children in need by funding enrichment, development activities, mentoring and education programs, medical research, and providing scholarships.
Brave of Heart Fund	Donation to the Brave of Heart Fund, which provides charitable grants to eligible family members of frontline healthcare workers and volunteers who lost their lives to COVID-19.
Massachusetts Special Olympics	Donation to the Massachusetts Special Olympics, a global organization that serves athletes with intellectual disabilities.
American Cancer Society	Donation to the American Cancer Society.
Westborough Food Pantry	Donation to the Food Pantry, which aims to treat clients with dignity and respect, while fulfilling the requirements of partner agencies.
SHE Shuttles	Virtusa sponsored the launch of SHE Shuttles, an initiative by the Government of Telangana to provide transport to women professionals in the IT Corridor of Hyderabad. The shuttles are equipped with a well-monitored surveillance system with CCTV, a female security guard, and a smart app with a panic button for every passenger.
Donation of office and computer equipment	When our office at Albany closed down, we donated the used office and computer equipment to the Rise High Program, the YMCA, and Shenendehowa and Ichabod Crane School Districts. The equipment included computer monitors and cabling, whiteboards, laptop bags and backpacks, and stationery.

Table: OutReach projects for FY21

Project/Organization	Description
Hampden County Sheriff's Department First Responder Recovery Home	Donation to the First Responder Recovery Home set up by the Hampden County Sheriff's Department. The Home aims to help front-line personnel who were diagnosed with COVID-19 but could not safely go home to recover.
Mothers Without Borders	Donation to Mothers Without Borders, which aims to provide orphaned and abandoned children with safe shelter, food and clean water, education, and access to caring adults.
Kanneliya Forest Restoration	In 2018 Virtusa signed an MOU with Biodiversity Sri Lanka to partner in the LIFE forest restoration program, to restore 10 hectares of degraded land in the Kanneliya Forest Reserve to a functional protected forest. The project is now in its third year and is carried out under the guidance of the Forest Department Sri Lanka and the technical expertise of the International Union for Conservation of Nature (IUCN).
Sparsh Hospice	Donation to help develop a new 70-bed palliative care facility.
Pudumai Penn Foundation	Sponsored and donated to the education of first-generation female students. The Pudumai Penn foundation aims to help young Indian women become empowered economic and social contributors.
National Center for Divyang Empowerment	Donated low-floor bus and electric cart for transporting wounded war veterans for their IT training programs.
COVID-19 relief campaigns	Provided donations to two NGOs to help with COVID-19 relief measures: Nirmaan Educational Society and Gurunanak Educational Society. These donations would help with obtaining medical equipment, food, and care for communities affected by COVID-19.

Table: OutReach projects for FY21



Images: Low-floor bus and e-cart donated for use of war veterans

Governance

18

Policies on compliance and ESG

8

Mandatory trainings on compliance and ESG

ISO 27001:2013

Certified information security management system

ISO 22301:2012

Certified business continuity management system

*All data is for FY21.

Corporate governance

Board of directors

[GRI: 102-18, 102-22, 102-23, 405-1]

Virtusa's board of directors is responsible for establishing internal controls as well as a corporate governance structure, which includes overseeing the management of the company's risks, as well as the implementation of the company's corporate governance policies and code of ethics. The board of directors' role in overseeing the management of the company's risks is primarily accomplished through management's reporting processes, including receiving regular reports from members of senior management on areas of material risk to the company, including operational, financial, legal and regulatory, and strategic and reputational risk, and assessments and prioritization of such risks. Our board of directors provides oversight of the recommendations of management and associated timeline to identify and assess the severity of enterprise risks, the prioritization of such risks, and the development of any action plans to mitigate such risks. The standing committees of our board of directors, pursuant to the respective charters, also represent a key element of enterprise risk management.

The board of directors has the following standing committees: Audit, Risk & Finance Committee, and the Nomination & Remuneration Committee (NRC). Our Audit, Risk & Finance Committee focuses on risks and issues related to accounting, internal controls, financial and tax reporting and cyber security issues. The audit committee also monitors compliance with ethical standards, including conflicts of interest, related party transactions and adherence to standards of ethical conduct. The NRC identifies and oversees risks and

issues associated with our executive compensation policies and practices as well as risks and issues associated with director independence, related party transactions, and the implementation of corporate governance policies and our code of ethics. These committees are ultimately subject to oversight and direction of the full board of directors and report directly to the board of directors on these matters.

Our board of directors currently consists of seven directors, including the board chair. The seventh director is our chief executive officer, who acts as the vital link between the board of directors and other members of our management team. Our board of directors is 14% female and 86% ethnically diverse (100% diverse overall).

For more information on our board of directors, please refer to our company website Virtusa.com / About us / Board of Directors:

<https://www.virtusa.com/board-of-directors>.

ESG Oversight

[102-18]

Both the full board and its committees oversee our ESG program and related topics. At the executive level, we have formulated an ESG Committee to implement the core components of our ESG program.



Policies and certifications



Policies

- Code of Business Conduct and Ethics
- Anti-Bribery and Corruption Policy
- Foreign Corrupt Practices Act Policy
- Business Continuity Management Policy
- Information Security Management Policy
- Intellectual Property
- UK Tax Strategy Policy
- Recruitment Policy
- Harassment-Free Workplace Policy
- Virtusa Human Rights Policy
- Privacy Policy
- Grievance Policy
- Sustainability Policy
- Environment, Health and Safety Policy
- Environmental Responsibility Policy
- Social Responsibility Policy
- Supplier Guidelines
- Modern Anti-Slavery and Human Trafficking Policy

Certification

- CMMI Level 5
- ISO 22301:2012
- ISO 45001:2018
- ISO/IEC 27001:2013
- ISO 14001:2015
- SOC 1 and SOC 2
- 5S Methodology



Ethics and compliance

[GRI: 102-16, 102-17, 103-1, 103-2, 307-1; SASB: TC-SI-520a.1]

Our core values, PIRL (passion, innovation, respect, and leadership) remain consistent. Coupled with our Ethics and Compliance program, they form the cornerstone of our business philosophy and provide the ethical standards by which we work with our clients, our contractors, and with each other. Our Ethics and Compliance program is enforced through our Code of Business Conduct and Ethics, anti-bribery and corruption policies, and whistleblower reporting procedures, which apply to all employees, contractors, and directors globally. We believe the conduct of our employees, contractors, and directors is fundamental to good business, important to our clients, and crucial to protect Virtusa's name and brand.

Our compliance officer, who is also the general counsel, has overall responsibility for administering the Ethics and Compliance program. During the reporting period, there were no monetary or nonmonetary sanctions for noncompliance with laws and regulations related to our business operations, including the provision of services, anti-competitive behavior, and environmental regulations.

Code of Business Conduct and Ethics

[GRI: 102-16, 103-1, 103-2]

Our written Code of Conduct ("Code") is a reaffirmation of the company's commitment to conducting its business with honesty and integrity, and in compliance with all applicable laws and regulations, as well as our own Code. The Code covers anti-bribery and provides guidelines and ethical standards with respect to corruption, money laundering and illicit finance, corporate opportunity, conflict of interest, company assets, confidentiality, fair dealing, accuracy of records, political contributions, public disclosures and whistleblower/anonymous reporting

procedures. All employees, contractors, and directors are required to confirm in writing at the beginning of their service with the company that they have read, understood, and will comply with the Code.

A copy of the Code is made available to all directors, officers, and employees on the company's website at <https://www.virtusa.com/about/corporate-compliance>. It may also be accessed internally on our V+ platform or requested through the compliance officer or human resources department.

Anti-bribery and corruption policies

[GRI: 103-1, 103-2, 103-3]

Our Anti-Bribery and Corruption program is implemented through the Foreign Corrupt Practices Act Policy and the Anti-Bribery and Corruption Policy. We do not tolerate bribery or corrupt business practices. Our policies set a zero-tolerance approach to acts of bribery and corruption and reaffirm our commitment to complying with all relevant anti-bribery legislation wherever we do business. The policies apply to all employees and third parties performing duties on behalf of the company.

The policies cover bribery and corruption, facilitation payments, business gifts, hospitality and business entertainment, political and charitable donations, interaction with third parties, and due diligence. Any employee engaging a third party must undertake appropriate due diligence checks, including a corruption risk assessment. Our finance and administrative systems are regulated to ensure that anti-corruption practices are maintained in all transactions performed within.

Political contributions

Our Code prohibits political contributions unless approved by the compliance officer. Directors or employees may not, without the compliance officer's approval, use any of the company's funds for political contributions of any kind to a political candidate or holder of any national, state, or local government office.

Gifts and entertainment

While entertaining clients and business partners in the ordinary course of business is not prohibited, accepting or giving any gifts that can improperly influence business relationships is prohibited. Directors and employees must also comply with laws that govern the acceptance of business courtesies as applicable in each geography of operation. Furthermore, directors and employees are required to consult with the compliance officer before giving anything of more than nominal value to any government employees.

Training on ethics and compliance

[\[GRI: 102-17, 205-2\]](#)

Virtusa Corporation is committed to helping our employees understand the expectation to act honestly and ethically, upholding the company's core values.

- We maintain a comprehensive set of policies on our internal V+ platform that clearly establishes and communicates the standards in which we hold employees accountable and how they may seek guidance.
- All employees and contractors are required to complete a mandatory code of conduct training/certification upon joining Virtusa, which also includes the Anti-Bribery and Corruption policies. We also have an annual recertification requirement for 5% of specifically targeted team members, including management and those engaging with third parties. Apart from the mandatory training, employees who interact with the government or perform finance, procurement, human resources, or business functions receive training regularly. This training is provided to ensure they are aware of the types of corruption and bribery, the risks of engaging in corrupt activity and bribery, the company's anti-corruption policy, and how they may report suspected corruption and bribery.



Reporting procedures

[GRI: 102-17, 103-2, 103-3]

We recognize that our high ethical standards are essential in securing our employees, investors, and key stakeholders' trust. We make available a safe, prompt, and confidential environment where employees and others can feel comfortable sharing their ethics questions and compliance concerns without fear of retaliation. We provide several ways to seek guidance or report potential violations:

- Speak directly to their reporting manager or human resource business partner.
- Report complaints anonymously and in a protected manner by using one of the following methods:
 - Web-based submission tool at <https://www.openboard.info/VRTU/>
 - Calling the Whistleblower Hotline at (US/Domestic) 1-844-403-4964 and (International) 402-999-0449.
 - Submitting a complaint online via our company website [Virtusa.com/About/Corporate Compliance](https://Virtusa.com/About/Corporate%20Compliance).
- Contact Virtusa's general counsel and compliance officer.
- Report concerns involving accounting, internal controls, or auditing matters to the audit committee of the board of directors.

We use global anonymous reporting tools, which are available 24x7 and designed to protect the confidentiality of all complainants. The compliance officer handles complaints received through web-based tools and the hotline. Any accounting related issue is directed to the chairperson of the audit committee as soon as reasonably practicable following receipt of the complaint.

We have a strict nonretaliation policy to protect those who act in good faith and report suspected misconduct. Any person who participates in any such retaliation is subject to disciplinary action, including termination.



Risk management

[GRI: 102-18; SASB: TC-SI-550a.2]

Our chief risk officer is responsible for risk management, which includes monitoring risks and providing updates to the chief strategy officer (CSO), who reports any risks to the executive team and the board. The chief risk officer receives inputs from several teams such as internal audit, business continuity management, legal, information security, and data privacy. Risks considered include legal, regulatory, reputational, client behavior, extreme weather, and climate change-related risks.

Our risk management system focuses on enterprise risk management and its subcomponents, such as data privacy and business continuity management.

- Enterprise risk assessment: The internal audit team conducts risk assessment at the company level once a year, which includes an assessment of the external and internal environment in which the company operates. Risks considered include legal, regulatory, reputational, client behavior, and climate change-related risks. The assessments evaluate potential impacts, the likelihood of occurrence, and the effectiveness of the existing risk mitigation strategy.
- Data privacy risk assessment: The data privacy team assesses the privacy risk(s) related to the processing of personal data of the employees, contractors, and vendors for data controller obligations and clients' personal data for data processor obligations. Data Protection Impact Assessments are conducted to assess the privacy controls and ensure the appropriate processing of personal data in accordance with the applicable data protection regulations.
- Business continuity risk assessment: The business continuity management team carries out risk assessments guided by ISO 22301 at the company level as well as contract, asset, and geographic location levels. These assessments are carried out annually as well as at more frequent intervals, such as during client audits, other external audits, and business continuity internal audits. Our business continuity plans define how to recover operations disrupted by acts of nature, attacks, or other events such as extreme weather. We conduct site specific assessments using the risk management framework. Every risk has an owner who is accountable for mitigation plans.

Risks and opportunities due to climate change

[GRI: 201-2]

Physical risks and transition risks stemming from climate change are included in the annual enterprise risk assessment conducted by our internal audit team. This exercise ensures that our business strategy and our ESG strategy are closely aligned. Detailed information on the financial implications and risks and opportunities due to climate change is provided in our CDP response, available through the [CDP website](#).

Information security

[GRI: 103-1, 103-2, 103-3, 418-1; SASB: TC-SI-220a.3, TC-SI-230a.1, TC-SI-230a.2]

A strong cybersecurity program has become imperative for business operations given the increasing frequency and sophistication of cyber threats and attacks. As part of the digital engineering services we provide our clients, we are responsible for ensuring that our clients' data is protected and securely handled, throughout the entire course of business. As part of our information security management system, we have implemented multitier controls to reduce risks from external threats to our business operations and data. Our information security management system is developed based on best practices and industry standards such as ISO 27001, NIST, and client requirements. In addition to compliance to the Virtusa information security management system, we adhere to the information security requirements of clients, which are specific to the engagements.

We have board oversight of our information security program with responsibility cascading to our chief information security officer. Our Information Security Management policy sets out the governance structures, monitoring, and compliance requirements for protecting our data and systems. The chief information security officer's organization monitors and reports any incidents and breaches to the senior leadership, the enterprise risk management team, client representatives, relevant business unit heads, and human resources teams for corrective action. We did not have any instances of client data breaches/loss of client data that had any material impact during the reporting period ending March 31, 2021.

Certification

Our information security management program undergoes an annual audit against ISO 27001:2013 and assessments against HITRUST and SOC 1 and SOC 2 requirements. The ISO 27001:2013 certification covers 21 technology centers in India, Sri Lanka, the UK, the US, Singapore, Hungary, and Sweden to have sufficient security controls to protect the confidentiality, availability, and integrity of the client and Virtusa data accessed, stored, handled, and transmitted. The HITRUST certification assesses adherence to regulatory compliance and risk management for the healthcare and life sciences domain. SOC 1 and SOC 2 define criteria for managing client data based on "trust service principles" - security, availability, processing integrity, confidentiality, and privacy. The enterprise security team ensures that a qualified external third-party agency performs the annual recertification.

Since the original certification in 2008, the external third-party agency has not reported any material or significant observations. The most recent review of ISO 27001 was in September 2021.

Data privacy

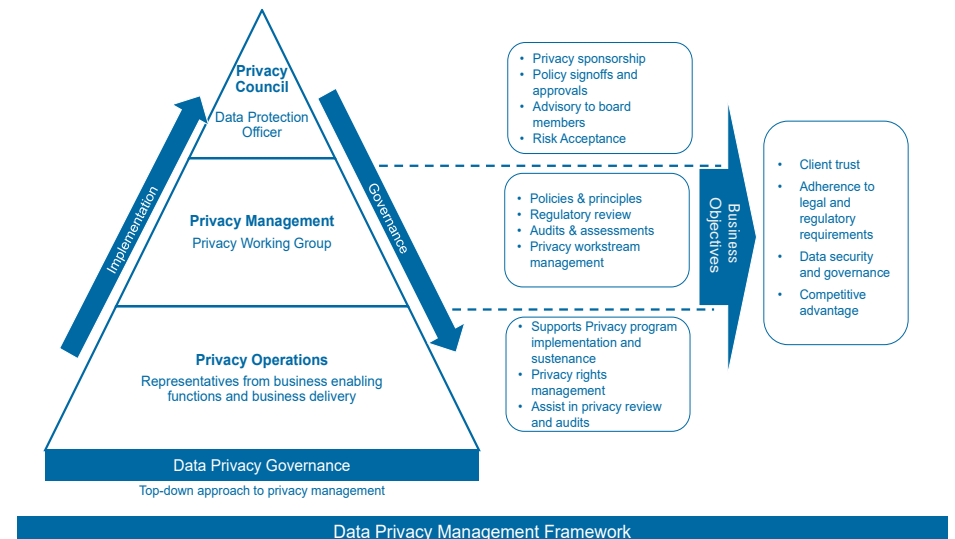
We recognize the importance of privacy to our clients, employees and prospective employees, contractors, and visitors to our offices and website. Accountability for privacy compliance sits at the highest level, with our data privacy organization responsible for maintaining the global privacy program. The program is led by the data protection officer, who is part of the strategy and legal team. He is assisted by a cross-functional Privacy Working Group including key partners drawn from information security, legal, human resource, and other groups.

Our privacy practices are governed by the Website Privacy policy, which covers data collected from visitors to our corporate website, and the Enterprise Privacy policy, which details the privacy practices for handling personal data collected from employees, clients, visitors to our offices, and prospective employees. The Virtusa data privacy management framework aims to demonstrate privacy compliance and safeguards for personal data entrusted to us.

Key elements of our approach to privacy compliance include:

- Harmonizing global data privacy requirements into a company-wide set of guiding privacy principles intended to drive how it handles personal data.
- Publishing and keeping updated privacy statements, internal policies, and guidance documents.
- Monitoring privacy regulatory trends and improving our privacy practices.
- Providing contractual support to ensure that risks associated with any data transfers are covered by appropriate contractual terms; includes assisting the legal team in its efforts to update contract templates and improve privacy-focused contract exhibits.

- Responding to requests from data subjects about their personal data.
- Conducting privacy impact assessments and privacy compliance reviews of internal systems and software data processing activities, website portals, marketing initiatives, and vendor relationships.
- Providing early input to enterprise application development by incorporating privacy checkpoints into formal product development plans as part of the Privacy-by-Design process.
- Assessing privacy compliance on a periodic basis through risk-based audits by the internal audit team.
- Developing and delivering a privacy-focused training and awareness program for all employees.



Training and assessment

All employees are required to undergo our Security First information security training and assessment upon joining Virtusa and repeat the training and assessment annually. In addition, we have introduced cybersecurity awareness training for specifically targeted team members. Periodic awareness of information security best practices is shared with employees through multiple media such as email, intranet portal, awareness sessions, etc. In addition, phishing simulations are conducted periodically to assess employee awareness of phishing and focused training is provided to those who fall prey to the simulated exercise.

Mandatory training on secure software development was introduced for our technical community in FY21. Since most of the vulnerabilities are code-induced, this training ensures that our core team of developers and testers acquire a deep understanding of secure software development and are able to create products that are vulnerability free.

External penetration program

The Penetration Testing program is governed by our Global Penetration Testing policy and is administered by the office of the chief information security officer. External penetration testing is performed by a selected and qualified service provider once every fiscal year. Penetration testing service providers are rotated to optimize the program. The program provides assurance that our external infrastructure is hardened to industry standards and safeguards in place are effective.

Data loss prevention

Industry accepted data loss prevention (DLP) solutions have been implemented to ensure that business-critical information, including client information, financial information, personally identifiable information, and personal health information is not disclosed to external parties. The DLP program is jointly administered by the chief information security officer's office and the information technology team.

Security risk management

The Security Risk Management process has been established to integrate security requirements into the SDLC, enterprise architecture, and acquisition and procurement processes. Security design and architecture review, assessments against industry standards such as OWASP Application Security Verification Standards, ISO 27001, NIST Standards, etc., and application and infrastructure security testing are performed across various stages of system development and supplier lifecycle to identify, assess, and manage security risks in technologies and third-party vendor engagements.

Software compliance

We have a robust software compliance framework based on ISO/IEC SAM standard 19770-1. An independent consulting firm carries out a yearly assessment for different publishers.

Periodic auditing

Our internal audit department (IAD) conducts periodic audits of the information technology infrastructure and the information security framework based on risks and requests. IAD's reports are provided to the global head of information technology and the chief information security officer for review and correction, and updates are provided to the audit committee during quarterly meetings.

Third party due diligence

We understand that the security of our data and systems is not only dependent on our internal processes but also on the actions and processes of third parties that may have access to such data and systems in the course of our business. The Information Security Procedure for Vendor Management sets out the procedures, including onboarding and offboarding procedures, to assess if vendors have in place the appropriate security controls.

Vendors are onboarded, managed, and offboarded by the vendor management team, which is part of the finance team. The enterprise security team provides guidance and sets the security processes to ensure the onboarded vendors meet the basic security requirements in line with the information security policies and procedures of Virtusa and its clients.

Vendors are categorized as high, medium, and low depending on the level of access they have to our systems and have to demonstrate that they meet the level of compliance required for each category. Throughout the vendor relationship, audits and reviews are performed to ensure compliance with our vendor security risk management framework.

Training data

	FY21	FY20
Code of Conduct	89%	88%
Security First	89%	88%
General Data Protection Regulation (GDPR)	81%	77%
Prevention of Sexual Harassment (PoSH)	85%	79%
Intellectual Property	88%	88%
Safety First	67%	-
Virtusa Pandemic Response	67%	-
Cyber Security Awareness	79%	-

Table: Completion rates for mandatory training

Note: Safety First, Virtusa Pandemic Response, and Cyber Security Awareness were introduced in FY21. EHS training was replaced by the Safety First training.

Supply chain management

[GRI: 102-9, 102-10]

We understand that evaluating and minimizing risks in our supply chain is important to ensuring a sustainable supply chain. As such, we have implemented policies and processes and engage with our suppliers to ensure a more sustainable supply chain. We have a large supplier base (approximately 600+ in FY21) that provides goods and services to support our operations across the following categories: workplace and facilities, transport, IT and telecom, food services, and security services. Accountability for executing our procurement strategy begins with our local and regional procurement teams and ultimately resides with our chief financial officer.

Our policy is to depend on local suppliers at all locations of operations unless to do so would be a cost disadvantage. There have been no significant changes to our supply chain during the reporting period.

Supplier Guidelines

Our Supplier Guidelines set out the standards and practices that 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. Also, suppliers are expected to ensure the protection of the environment and follow ethical business practices.

Supply chain engagement

We engage with suppliers through the Supplier Sustainability Survey and Supplier Meet-up. The Survey has been shared with 61% of our facilities suppliers in India and Sri Lanka. We are working to implement the survey for other suppliers as well. The Supplier Meet-up is an annual event for our Tier 1 suppliers, and has been held at our Sri Lanka facilities since 2013. We were not able to have the event in FY21 due to the COVID-19 lockdowns and plan to have a virtual event in FY22 with a larger reach across geographies. In addition to the Supplier Sustainability Survey and Supplier Meet-up, we engage with suppliers as required throughout the relationship. For example, in Sri Lanka, we have contracted with our transport supplier to use hybrid vehicles (cars) as the preferred cab service. In FY20, we collaborated with a transport service provider to increase our electric vehicles fleet for employee transport at the Hyderabad Campus. Overall, we collaborate with our suppliers and contractors to continuously improve our procurement process, identify hazards, and assess and control occupational health and safety risks.

Procurement process and management

Our procurement process includes relevant evaluations of user safety, climate-change impact, and other relevant aspects for products. Risk assessment is built into multiple touchpoints in the vendor management relationship starting from the vendor assessment stage. The requirements to adhere to laws and regulations on ethics and labor are built into the contracts. For example, suppliers are required to confirm compliance with the Supplier Guidelines and Foreign Corrupt Practices Act (FCPA) to proceed with business. As part of the evaluation process, checklists are used to assess risks with a rating level of low, medium, and high. The vendor registration process contains data on vendor adherence to information security, data privacy, and business continuity standards.

During service provision, the checkpoints to ensure suppliers adhere to laws and regulations are tailored to the specific service area. For example, vendors are required to ensure that any employees performing work on our behalf are competent and use the correct health and safety equipment and procedures. Transport providers are required to undergo vehicle inspections, and drivers are required to provide police reports. Food service providers are required to submit themselves for inspections conducted by the Public Health Inspector (PHI). In some geographies, such as India, suppliers are required to undergo audits on labor practices to ensure compliance with legal requirements.

We also engage experienced external compliance partners to conduct vendor audits. Areas assessed during these audits include privacy, compliance with legal requirements for documentation, and workplace conditions such as minimum wage requirements.

Image: Virtusa supplier meet-up 2016



UN Global Compact Principles

Category	UN Global Compact Principle	Section and Page
Human Rights	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and	Sustainability framework (page 12) External initiatives (pages 14-15) Social (pages 34-35)
	Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Sustainability framework (page 12) Supply chain management (pages 58-59)
Labour Standards	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	Talent engagement (page 19)
	Principle 4: Businesses should uphold the elimination of all forms of forced or compulsory labour;	Sustainability framework (page 12) Supply chain management (pages 58-59) Diversity and inclusion (page 35)
	Principle 5: Businesses should uphold the effective abolition of child labor; and	Sustainability framework (page 12) Supply chain management (pages 58-59) Diversity and inclusion (page 35)
	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.	Diversity and inclusion (page 35)
Environment	Principle 7: Businesses should support a precautionary approach to environmental challenges;	Environment (pages 25-31)
	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility; and	Environment (pages 25-31) Supply chain management (pages 58-59)
	Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	Environmental stewardship (pages 25-31)
Anti-corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Ethics and compliance (pages 50-52)

SASB Disclosure

SASB Standards, Technology & Communications Sector - Software & IT Services Sustainability Accounting Standard, Version 2018-10.

Topic	Accounting Metric	Category	Unit of Measure	Code	Page
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	Gigajoules (GJ), Percentage (%)	TC-SI-130a.1	30
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	Thousand cubic meters (m³), Percentage (%)	TC-SI-130a.2	31
Data Privacy & Freedom of Expression	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	Reporting currency	TC-SI-220a.3	54
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Quantitative	Number, Percentage (%)	TC-SI-230a.1	54
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	Not applicable	TC-SI-230a.2	54-57
Recruiting & Managing a Global, Diverse Skilled Workforce	Percentage of employees that are (1) foreign nationals and (2) located offshore	Quantitative	Percentage (%)	TC-SI-330a.1	33
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Quantitative	Percentage (%)	TC-SI-330a.3	33
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Quantitative	Reporting currency	TC-SI-520a.1	50
Managing Systemic Risks from Technology Disruptions	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	Not applicable	TC-SI-550a.2	53

GRI content index

GRI STANDARD	DISCLOSURE	PAGE	REMARKS
GRI 101: Foundation 2016			
GENERAL DISCLOSURES			
Organizational profile	102-1 Name of the organization	7	
	102-2 Activities, brands, products, and services	7, 8	Full details are available at: www.virtusa.com
	102-3 Location of headquarters	7	
	102-4 Location of operations	6-7	
	102-5 Ownership and legal form	7	
	102-6 Markets served	6-7	
	102-7 Scale of the organization	6	
	102-8 Information on employees and other workers	33	We report employee data only at a high level as detailed breakdowns are Virtusa confidential information.
	102-9 Supply chain	58-59	
	102-10 Significant changes to the organization and its supply chain	7, 58	
	102-11 Precautionary Principle or approach	24	
	102-12 External initiatives	14-16	
	102-13 Memberships of associations	14	
Strategy	102-14 Statement from senior decision-maker	3	
Ethics and integrity	102-16 Values, principles, standards, and norms of behavior	4, 50-51	
	102-17 Mechanisms for advice and concerns about ethics	35, 50, 52	

Governance	102-18 Governance structure	48	Full details are available at: https://www.virtusa.com/board-of-directors
Stakeholder engagement	102-40 List of stakeholder groups	17-18	
	102-41 Collective bargaining agreements	19	
	102-42 Identifying and selecting stakeholders	17	
	102-43 Approach to stakeholder engagement	17-18	
	102-44 Key topics and concerns raised	17-18	
Reporting practice	102-45 Entities included in the consolidated financial statements	21-22	SEC Filings - 2020 Form 10-K (Page 152 - Exhibit 21.1)
	102-46 Defining the report content and the topic boundaries	21-22	
	102-47 List of material topics	22	
	102-48 Restatements of information	22	
	102-49 Changes in reporting	22	
	102-50 Reporting period	20	
	102-51 Date of the most recent report	20	
	102-52 Reporting cycle	20	
	102-53 Contact point for questions regarding the report	20	
	102-54 Claims of reporting in accordance with the GRI Standards	20	
	102-55 GRI content index	62-68	
	102-56 External assurance	69	

MATERIAL TOPICS			
INDIRECT ECONOMIC IMPACTS			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	21, 42	
	103-2 The management approach and its components	42	
	103-3 Evaluation of the management approach	42	
GRI 203: Indirect Economic Impacts	203-1 Infrastructure investments and services supported	42-46	Reported partially
ANTI-CORRUPTION			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 49-51	
	103-2 The management approach and its components	11-12, 49-51	
	103-3 Evaluation of the management approach	49-51	
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	51-52	
ENERGY			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 24, 25	
	103-2 The management approach and its components	11-12, 24, 25	
	103-3 Evaluation of the management approach	24, 25	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	25, 30	
	302-3 Energy intensity	25, 30	
	302-4 Reductions of energy consumption	25, 30	
WATER AND EFFLUENTS			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 24, 26	
	103-2 The management approach and its components	12-13, 24, 26	
	103-3 Evaluation of the management approach	24, 26	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	26	
Management approach disclosures	303-2 Management of water discharge-related impacts	26	

GRI 303: Water and Effluents 2018	303-3 Water withdrawal	31	Due to the nature of our operations, there is no difference in water withdrawal and consumption
Topic-specific disclosures	303-5 Water consumption	31	
EMISSIONS			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 24, 25	
	103-2 The management approach and its components	11-12, 24, 25	
	103-3 Evaluation of the management approach	24, 25	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	25, 29	
	305-2 Energy indirect (Scope 2) GHG emissions	25, 29	
	305-3 Other indirect (Scope 3) GHG emissions	25, 29	
	305-4 GHG emissions intensity	25, 29	
	305-5 Reduction of GHG emissions	25, 29	
EFFLUENTS AND WASTE			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 24, 26	
	103-2 The management approach and its components	11-12, 24, 26	
	103-3 Evaluation of the management approach	24, 26	
GRI 306: Effluents and Waste 2016	306-2 Waste by type and disposal method	31	
ENVIRONMENTAL COMPLIANCE			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 49-51	
	103-2 The management approach and its components	11-12, 49-52	
	103-3 Evaluation of the management approach	24	
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	50	

LABOR/MANAGEMENT RELATIONS			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 22, 34, 37	
	103-2 The management approach and its components	11-12, 20, 35, 38	
	103-3 Evaluation of the management approach	19	
GRI 402: Labour/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	19	
OCCUPATIONAL HEALTH AND SAFETY 2018			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 34, 39	
	103-2 The management approach and its components	11-12, 34, 39	
	103-3 Evaluation of the management approach	39	
GRI 403: Occupational Health and Safety 2018 Management approach disclosures	403-1 Occupational health and safety management system	39	
	403-2 Hazard identification, risk assessment, and incident investigation	39	
	403-3 Occupational health services	40-41	
	403-4 Worker participation, consultation, and communication on occupational health and safety	39	
	403-5 Worker training on occupational health and safety	40	
	403-6 Promotion of worker health	39-41	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	39-41	
GRI 403: Occupational Health and Safety 2018 Topic-specific disclosures	403-8 Workers covered by an occupational health and safety management system	39	
TRAINING AND EDUCATION			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 34, 37	
	103-2 The management approach and its components	11-12, 34, 37	
	103-3 Evaluation of the management approach	19, 37	

GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	32	We do not track training data by gender as training opportunities are open to all employees.
	404-2 Programs for upgrading employee skills and transition assistance programs	37-38	
	404-3 Percentage of employees receiving regular performance and career development reviews	37	
DIVERSITY AND EQUAL OPPORTUNITY			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 34-36	
	103-2 The management approach and its components	11-12, 34-36	
	103-3 Evaluation of the management approach	19	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	33, 48	We report diversity statistics by gender only.
NON-DISCRIMINATION			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 34-35	
	103-2 The management approach and its components	11-12, 34-35	
	103-3 Evaluation of the management approach	19, 35	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	35	We take allegations of discrimination seriously and investigate all such alleged incidents. We expect all our employees not only to comply with all local laws against discrimination but to take personal responsibility for upholding our core values. Virtusa complies with all local laws that in some countries may require, or give Virtusa the right, to protect or give priority to a particular category of people under certain employment decisions. We do not report the number of alleged incidents and any corrective actions taken as this is Virtusa's confidential information.

CHILD LABOR			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 35, 58	
	103-2 The management approach and its components	11-12, 35, 58	
	103-3 Evaluation of the management approach	35, 59	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	35	
FORCED OR COMPULSORY LABOR			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 35, 58	
	103-2 The management approach and its components	11-12, 35, 58	
	103-3 Evaluation of the management approach	35, 59	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	35	
ASPECT: CUSTOMER PRIVACY			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	11-12, 21, 54-57	
	103-2 The management approach and its components	11-12, 54-57	
	103-3 Evaluation of the management approach	56	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	54	

Assurance statement

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Independent Assurance Report to the Board of Directors of Virtusa (Pvt.) Ltd on the Sustainability Reporting Criteria Presented in the Integrated Annual Report- 2020/21

Scope

We have been engaged by the management of Virtusa (Pvt.) Ltd ("the Company") to perform an independent assurance engagement, as defined by the Sri Lankan Standard on Assurance Engagements, on the sustainability reporting criteria presented in the Integrated Annual Report for the year ended 31 March 2020/21 (the "Report").

- Limited assurance on other information presented in the Report, prepared in accordance with the GRI Standards: Core option.

Criteria applied by Virtusa (Pvt.) Ltd

The sustainability reporting criteria presented in the Report has been prepared in accordance with The Global Reporting Initiative's (GRI) Sustainability Reporting Guidelines, publicly available at GRI's global website www.globalreporting.org.

This Report has been prepared in accordance with the GRI Standards: Core option (the "criteria").

Virtusa (Pvt.) Ltd.'s responsibilities

Virtusa (Pvt.) Ltd.'s management is responsible for selecting the criteria, and for presenting the Report in accordance with the said criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to support the sustainability reporting process of the Report, such that it is free from material misstatement, whether due to fraud or error.

Ernst & Young's responsibilities

Our responsibility is to express a conclusion on the presentation of the Report in accordance with the GRI Standards: Core option based on the evidence we have obtained.

We conducted our engagement in accordance with the Sri Lanka Standard on Assurance Engagements SLSAE 3000: Assurance Engagements other than Audits or Reviews of Historical Financial Information (SLSAE 3000) issued by the Institute of Chartered Accountants of Sri Lanka and the terms of reference for this engagement as agreed with Virtusa (Pvt.) Ltd in the engagement letter dated September 1, 2021.

The standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Report in order for it to be in accordance with the criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our independent assurance conclusion.

Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the Institute of Chartered Accountants of Sri Lanka and have the required competencies and experience to conduct this assurance engagement.

EY also applies Sri Lanka Standard on Quality Control (SLSQC 1), Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

We performed our procedures to provide an independent assurance engagement in accordance with SLSAE 3000.

Procedures performed in the reasonable assurance engagement depend on our judgement, including the assessment of the risks of material misstatement whether due to fraud or error. In making those risk assessments, we have considered internal control relevant to the preparation and presentation of the reasonable assurance indicators in order to design the assurance procedures that are appropriate in the circumstances. Our procedures also included assessing the appropriateness of the reasonable assurance indicators, the suitability of the criteria in preparing and presenting the reasonable assurance indicators within the Report and obtaining an understanding of the compilation of the financial information to the sources from which it was obtained.

Procedures performed in the limited assurance engagement consisted of making inquiries, primarily of persons responsible for preparing the Report and related information and applying analytical and other appropriate procedures. These procedures vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

We also performed the below procedures as we considered necessary in the circumstances:

- Perform a comparison of the content of the Report against the Global Reporting Initiative (GRI) - GRI Standards guideline.
- Interviewing relevant organization's personnel to understand the process for collection, analysis, aggregation and presentation of data.
- Review and validation of the information contained in the Report.
- Check the calculations performed by the organization on a sample basis through recalculation.
- Advice, make recommendations and suggestions on the Sustainability Reporting indicators to improve the presentation standard.
- Independently review the content of the Report and request changes if required.
- Express an independent assurance conclusion on the performance indicators presented in the Sustainability Reporting criteria.

Emphasis of matter

Social, natural and intellectual capital management data/information are subjected to inherent limitations given their nature and the methods used for determining, calculating and estimating such data.

We also do not provide any assurance on the assumptions and achievability of prospective information presented in the Report.

Restricted use

This report is intended solely for the information and use of Virtusa (Pvt.) Ltd and is not intended to be and should not be used by anyone other than the specified party.

Conclusion

Based on our procedures and the evidence obtained, we conclude that:

- Nothing has come to our attention that causes us to believe that other information presented in the Report are not fairly presented, in all material respects, in accordance with the (Company)'s sustainability practices and policies some of which are derived from the GRI Standards: Core option.

5 January 2022
Colombo

Partners: H M A Jayasinghe FCA FCMA, R N de Saram ACA FCMA, Ms. N A De Silva FCA, W R H De Silva ACA ACMA, Ms. Y A De Silva FCA, Ms. K R M Fernando FCA ACMA, N Y R L Fernando ACA, W K B S P Fernando FCA FCMA, Ms. L K H L Fonseka FCA, D N Gamage ACA ACMA, A P A Gunasekera FCA FCMA, A Herath FCA, D K Hulanaramaya FCA FCMA LLB (Lond), Ms. A A Ludowyke FCA FCMA, Ms. G G S Manatunga FCA, A A J R Perera ACA ACMA, Ms. P V K N Sajeerani FCA, N M Sultman ACA ACMA, B E Wijesuriya FCA FCMA, G B Goudian ACA, Ms. P S Paranavitane ACA LLB (Colombo), T P M Ruberu FCA FCCA, C A Yalagala ACMA

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