Virtusa Social Responsibility Policy

March 5, 2019
# Document Revisions

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<td>03-20-14</td>
<td>Asitha Dias</td>
<td>Denver De Zylva (Director–Shared Services)</td>
<td>Paul Tutun (Vice President– General Counsel and Assistant Secretary)</td>
<td>New policy published.</td>
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<td>2.</td>
<td>1.1</td>
<td>06-16-16</td>
<td>Z. Marcelline</td>
<td>Denver De Zylva (Vice President– Shared Services)</td>
<td>Paul Tutun (Vice President– General Counsel and Assistant Secretary)</td>
<td>Reviewed and revised.</td>
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<td>3.</td>
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<td>07-18-17</td>
<td>Z. Marcelline</td>
<td>Denver De Zylva (Vice President– Shared Services)</td>
<td>Paul Tutun (Vice President– General Counsel and Assistant Secretary)</td>
<td>Reviewed and revised.</td>
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<td>4.</td>
<td>1.3</td>
<td>01-25-19</td>
<td>Z. Marcelline</td>
<td>Denver De Zylva (Vice President– Shared Services)</td>
<td>Paul Tutun (Vice President– General Counsel and Assistant Secretary)</td>
<td>Reviewed and revised.</td>
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Virtusa Social Responsibility Policy

We define social responsibility as

- Protecting the environment and the safety of people
- Directing business in a socially responsible and ethical manner
- Supporting human rights
- Engaging, learning from, respecting, and supporting the communities and cultures with which we work

All employees and contractors of Virtusa and its subsidiaries will adopt the social responsibility principles described in this policy into their day-to-day work activities

Business principles and fair operating practices

We are committed to

- Maintaining the highest standards of integrity and corporate governance practices to maintain excellence in its daily operations and to promote confidence in our governance systems
- Conducting our business in an open, honest, and ethical manner
- Measuring, auditing, and publicly reporting performance on corporate social responsibility (CSR) programs
- Advising our partners, contractors, and suppliers of this policy and working with them to achieve consistency
- Recognizing the importance of protecting all our human, financial, physical, informational, social, and environmental resources
- Working against corruption in all its forms as set out in the Virtusa Anti-Corruption Policies

Stakeholder affairs

We are committed to

- Engaging with stakeholders clearly, honestly, and respectfully
- Engaging in timely and meaningful dialogue with all stakeholders, including shareholders, customers, and employees, indigenous peoples, governments, regulators, and landowners, among others.
Environment, health, and safety

We will manage the environment, health, and safety aspects in accordance with the Virtusa Environment, Health, and Safety Policy.

Human rights

We are committed to respecting human rights in accordance with the Universal Declaration of Human Rights and will follow the framework laid down in the UN Guiding Principles on Business and Human Rights (UNGP) as applicable to our business operations and supply chain.

We will

- Not tolerate human rights abuses and will not engage or be complicit in any activity that solicits or encourages human rights abuse
- Work with governments and agencies to support and respect human rights within our sphere of influence
- Always strive to build trust, deliver mutual advantage, and demonstrate respect for human dignity and rights in all relationships we enter, including respect for cultures, customs, and values of individuals and groups
- Uphold the abolition of child labor
- Not use or tolerate the use of forced, bonded, or indentured labor, slavery, or human trafficking in our business or supply chain
- Ensure that human rights are not violated in our physical security procedures
- Be sensitive to and support the needs of vulnerable groups such as minorities, women, children, the differently abled, and indigenous peoples

Employee affairs

We are committed to

- Ensuring that employees are treated fairly, with dignity and consideration for their goals and aspirations, and that diversity in the workplace is embraced
- Applying fair labor practices, while respecting the national and local laws of the countries and communities where we operate
- Providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment
Diversity

We will

• Not allow any harassment of employees by other employees, regardless of their working relationship
• Ensure that all employees enjoy a work environment free of discrimination and harassment. In the same manner, this will be extended to persons operating at or associated with Virtusa and its subsidiaries
• Ensure that the existing members of staff, suppliers, job applicants, and workers are treated fairly in an environment that is free from any form of discrimination

Community involvement and development

We are committed to

• Following a collaborative, consultative, and partnership approach in our community investment programs
• Integrating community investment considerations into decision-making, practices, and assisting with local capacity building to develop mutually beneficial relationships with communities
• Providing employment and economic opportunities in the communities where we operate

Note: If required, detailed sub-policies can be implemented for different geographies to comply with community development/CSR activities required by law for that region.

This policy will be

• Communicated to all employees, internal and external interested parties, and will be prominently displayed at all the designated areas
• Reviewed on an annual basis or when operating circumstances require it

All employees and contractors working on behalf of Virtusa or its subsidiaries are expected to follow these policies, including participating in appropriate training and awareness activities.

Kris Canekeratne
Chairman and Chief Executive Office
March 5, 2019