

virtusa

# **Virtusa Sustainability Policy**

May 30, 2025

## Document Revisions

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



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8.	1.6	10-16-23	Z. Marcelline	<b>Denver De Zylva</b> (Senior Vice President – Shared Services)  <b>Paul Tutun</b> (Executive Vice President–General Counsel and Assistant Secretary)	<b>ESG Committee</b>	Annual review.
8.	1.6	10-25-24	Z. Marcelline	<b>Denver De Zylva</b> (Global Head of Sustainability and Facilities)  <b>Paul Tutun</b> (Executive Vice President and General Counsel)	<b>Sustainability Committee</b>	Annual review.
9	1.7	05-30-25	Aqeel Aarif	<b>Paul Tutun</b> (Executive Vice President and General Counsel)	<b>Denver De Zylva</b> (Global Head of Sustainability and Facilities)	Annual review.





# Virtusa Sustainability Policy

## Vision

Virtusa's Engineering First philosophy anchored on our PIRL values—passion, innovation, respect, and leadership—has led us to adopt a purpose-driven approach to future-proof our businesses and supply chain, while ensuring transparency and holding ourselves accountable for our sustainability footprint.

We do so, by enabling all our stakeholders—customers, suppliers, investors, and teams—to have a purpose, with a passion for people and the planet.

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

## Policy owner

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

## Stakeholders and geographies

Every employee and contractor performing work on behalf of Virtusa or one of its subsidiaries carries a personal responsibility to cooperate with the following objectives.

The scope of this policy covers all facilities and buildings of Virtusa and its subsidiaries.

## Transparency and reporting

We are committed to transparent communication of our sustainability initiatives. As such, our emissions data is externally verified, and we report our sustainability progress through the annual publication of our sustainability report and through disclosure platforms such as the UN Global Compact Communication on Progress (CoP).





# Our approach

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

- Environment, Health, and Safety Policy in line with ISO 45001
- Environmental Responsibility Policy in line with ISO 41001 and ISO 14001 which addresses climate change, emissions, water, and waste management in line with ISO 14064, and CDP Reporting
- Energy Policy in line with ISO 50001
- Business Continuity Management Policy in line with ISO 22301
- Information Security Management Policy in line with ISO 27001
- Data Privacy in line with ISO 27701:2019 and General Data Protection Regulation (GDPR) (EU)
- Human Rights Policy in line with SA 8000 and the UN Guiding Principles on Business and Human Rights
- Code of Business Conduct and Ethics
- Foreign Corrupt Practices Act Policy and the U.K. Anti-Bribery Act Policy in line with the Foreign Corrupt Practices Act of 1977 (FCPA) and the U.K. Bribery Act 2010
- Social Responsibility Policy in line with ISO 26000 guidance

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.

**Denver De Zylva**  
Global Head of Sustainability and Facilities  
May 30, 2025

(Next date of review: May 30, 2026)

