

VIRTUSA Consulting & Services Limited UK

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT **FOR FINANCIAL YEAR 2024/2025**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“**Modern Slavery Act**”).

This statement sets out the steps that Virtusa Consulting & Services Limited UK, for itself and its affiliated entities has taken, and continues to take measures to ensure that modern slavery, including human trafficking, child labour, forced labour, workplace abuse and domestic servitude (“**Modern Slavery**”) is not taking place within our supply chain or business.

Virtusa is committed to putting in place effective systems and controls to safeguard against any form of Modern Slavery within the business or parts of its business and supply chains, especially where there is a risk of slavery and human trafficking taking place, and conducting its business ethically in compliance with applicable laws, rules and regulations.

Our Organisation

Virtusa provides IT services and business solutions to Global 2000 companies and software vendors in banking and financial services, insurance, telecommunications, technology and media, information and education industries. Virtusa operates in North America, Europe, Middle East, India, Sri Lanka, South-East Asia, Japan, Australia and New Zealand, with a workforce of approximately 36,500. As a digital engineering services provider, we do not own manufacturing facilities or handle raw materials. As such, our primary suppliers provide goods and services to support our operations across the following categories: workplace and facilities; transport; IT and telecommunications; food services; and security services.

Governance

We work to make sure our policies, governance and due diligence processes take account of human rights risks so that we can properly manage and mitigate them. Human rights risks, including those related to modern slavery, are integrated into our risk management framework.

Our Human Resources Vice-President works closely with the Board of Directors to ensure the details captured under our Modern Slavery and Human Trafficking Statement remain relevant. The Modern Slavery and Human Trafficking Statement is updated on a yearly basis to ensure accuracy and compliance with local legislation.

Our Policies

Virtusa operates the following internal policies to ensure that we are conducting our business in an ethical manner:

- 1) **Whistleblowing policy** – This policy sets out guidance on how our employees can raise concerns about malpractice or wrong-doing at work. It aims to encourage openness so that concerns can be raised internally without fear of repercussions to the employee.
- 2) **Code of Business Conduct and Ethics** – This code sets out our commitment to conducting our business ethically, and the standard of conduct expected of our employees and directors.
- 3) **Anti-Slavery and Human Trafficking Policy** – This policy reflects our commitment to ensuring transparency in our business and our approach to tackling Modern Slavery throughout our supply chains. The policy sets out the roles and responsibilities of Virtusa employees if they suspect any instances of Modern Slavery, and how to act up on these.
- 4) **Recruitment Policy** – This policy sets out Virtusa recruitment policy, including conducting eligibility ‘right to work’ checks for all employees in order to safeguard against human trafficking or forced

labour. We conduct job rotations so that no employee is restricted to one particular assignment for a long period of time therefore severing the potential risk of any of our employees being involved in any activities which would be contradictory to the purpose of this statement.

- 5) **Human Rights Policy** – In-line with our commitment to adhering to the UN Guiding Principles on Business and Human Rights, this Policy prohibits the use of child labour and any form of forced labour, bonded labour, servitude, human trafficking, and modern slavery in our business operations and supply chain.
- 6) **Supplier Guidelines** – These set out the standards and practices that our suppliers are required to uphold in the areas of human rights, labor, environment, and business ethics. Suppliers must comply with all applicable laws and regulations and respect human rights in accordance with the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and ensure that they are not complicit in human rights abuses including child labour, forced, bonded, or indentured labour, slavery, and human trafficking.

Possible Risks Identified

We have identified the following as areas of possible risk within our business and supply chain:

- Human rights issues in cobalt supply chains since cobalt is used for rechargeable batteries (Is my phone powered by child labour? - Amnesty International)
- Forced labour in electronics industry (Forced Labor is the Backbone of the World's Electronics Industry - FreedomUnited.org)
- Services such as janitorial/cleaning services (Are you funding modern slavery in the UK? - STOP THE TRAFFIK)

Our Suppliers

Virtusa contracts with a number of suppliers that hold international quality standards accreditations. The central procurement and finance teams at Virtusa conduct a full audit on our suppliers which includes conducting due diligence before allowing them to become a preferred supplier. We conduct an online search to ensure that our supplier organisations have never been convicted of offences relating to Modern Slavery.

All contracts with our suppliers contain an indemnity clause against Modern Slavery and we require that suppliers acknowledge and comply with the Modern Slavery Act. Virtusa intends to communicate our commitment to addressing the issue of Modern Slavery with its supply chains, contractors and business partners at the outset of any business relationship and reinforced as appropriate thereafter. Should any of our suppliers be found to be in violation of any of the terms stated in this document, we will take appropriate action, which may include terminating the contract and blacklisting the supplier.

In addition, we have engaged a leading sustainability rating company to conduct sustainability performance assessments of our supply chain partners for top 200 of suppliers based on spend. This assessment will include 360° Watch Findings that comprise public information about companies' sustainability practices.

Training

Virtusa intends to carry out regular training for all Managers within its business and all employees within its Human Resources function, on its Anti-Slavery and Human Trafficking policy, the risk of Modern Slavery within its supply chains and how to identify and address this risk. The training will cover the importance of complying with the Anti-Slavery and Human Trafficking policy and the consequences of breaching this. All employees of Virtusa Consulting & Services Limited UK undergo the Code of Conduct training modules on a yearly basis.

Our performance indicators

Virtusa has not received, to date, any reports or concerns regarding slavery and human trafficking within our supply chains or business. We intend to continuously improve our awareness and performance of

Modern Slavery issues within our business, and we shall use the following performance indicators to measure how effective our steps have been:

- If there have been no reports received from employees in relation to Modern Slavery in any of Virtusa operations;
- Providing training to key personnel in the business on the risks of Modern Slavery and how to address these; and
- The completion of supplier audits to try to eliminate risks of Modern Slavery in our supply chains.

Approval for this statement

This statement was approved by the Board of Directors.

Name

Chandrasekhar Chenniappan **Vice-President – HR**

Signature

A handwritten signature in blue ink, appearing to read "C. Chandrasekhar", is positioned below the signature label.

Date 1st April 2025