

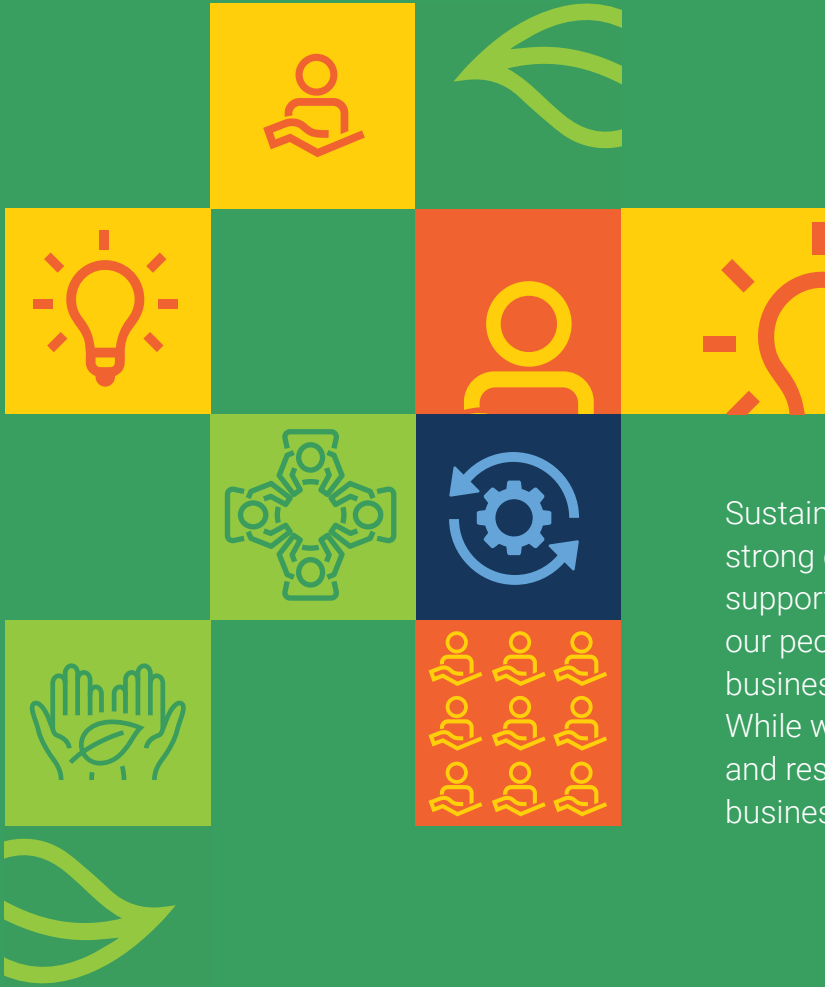


VFS.GLOBAL

SUSTAINABILITY REPORT 2020

Progressing towards
Sustainable Performance





Sustainability at VFS Global means operating ethically, maintaining a strong culture of security, safety & governance, being socially responsible, supporting our communities, protecting the environment and developing our people. We remain focused on integrating sustainability across our business to enhance our operations and create value for all stakeholders. While we keep up with the changing market needs by staying agile and resilient, the one aspect that defines the way VFS Global conducts business is '**Sustainability**'.



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VFS Global Network



as on 31 December 2020

01.

VFS Global Sustainability Report 2020

STRATEGY

1.1 Letter From The CEO

1.2 Business Model

1.3 Governance

1.4 Materiality Matrix

1.5 Sustainable Development Goals



1.1 | Strategy

Letter From The CEO



Zubin Karkaria
Chief Executive Officer
VFS Global Group



This report is an important step in our sustainability and ESG leadership journey, and I am excited to travel that path with you.

**As on 31 December 2020*

Welcome to the VFS Global Sustainability Report 2020, which will give you an overview of how our business practices are aimed towards sustainable and responsible development.

RIISING TO THE CHALLENGE

VFS Global is the largest visa outsourcing and technology services specialist for governments across the world. With travel continuing to be a key driver in connecting people – be it for business or leisure – and of global economic development, innovation in visa and consular services remains the need of the hour. This was especially so in 2020 as health and safety was of paramount importance. We are convinced that innovation in visa and consular services will become even more important in 2021 and beyond as governments look to lift travel restrictions that have been in place since early 2020 due to the pandemic to catch-up on economic development in a safe and secure manner. VFS Global rose to the challenge during 2020 and offered customers across the globe seamless solutions for visa and passport applications, from doorstep services to online options. We are working on a significant transformation of our operating processes and customer services to cater to changing government requirements and consumer behaviour.

VFS Global is the trusted partner of 64 client governments who we serve across 144 countries through more than 3,400 Application Centres in five continents and have successfully processed over 226 million applications since its inception in 2001*.

MAINTAINING TRUST AND RELATIONSHIPS

VFS Global has maintained its position as an industry leader through the years, owing to the strong relationships we have built with client governments across the globe based on trust and business excellence. This was put to the test in 2020, with the onset of the coronavirus pandemic, and VFS Global's ability to restart operations – a vast majority of which were temporarily suspended as of March 2020 – in an efficient, safe and secure manner, as per client governments requirements and in accordance with the revised health and safety directives of governments of our countries of operations.

The organisation pledges to continue investing in its people, systems and technology to maintain excellence in business and at the same time ensure sustainable development, towards our final goal of continuously enhancing value for our all our stakeholders and for the global community overall. This is our commitment to being Future Ready - prepared for any challenges and ahead of the game every step of the way.

VFS Global has pursued all its necessary certifications to maintain the quality of business operations. We were successfully recertified on ISO9001:2015 in 2020. ISO 9001 is among ISO's best-known standards, and it defines the criteria for meeting a number of quality management principles.

I am also proud to announce that we have completed the annual re-certification process and successfully upgraded ourselves to ISO 45001:2018, which was previously known as the OHSAS 18001: 2007 – Occupational Health and Safety Assessment Series. The certification specifies requirements for an occupational health and safety (OH&S) management system, and gives guidance for its use, to enable organisations to provide safe and healthy workplaces by preventing work-related injury and ill health, as well as by proactively improving its OH&S performance.

To ensure our processes are tightly controlled and in line with the business requirements,

VFS Global had implemented ISAE 3402 back in 2013. We got remotely assessed last year by one of the top four auditing bodies, Ernst & Young, to ensure that controls are being followed even in less than ideal conditions.

With our continued focus on Customer First, VFS Global was also awarded a new certification of ISO 10002:2018, which certifies the customer feedback process for Visa Application Processing services and Identity Management Services for diplomatic missions.

Last but not least, in the last quarter of 2020, VFS Global received its ISO 37001 Certification for 'Anti-Bribery Management Systems'.

RISK MITIGATION

Being in the visa and consular services space, data collection is an inevitable part of our business operations. However, ensuring the data of our customers is handled in a completely safe and secure manner as per stringent client government requirements and in compliance with various international data privacy regulations such as the EU General Data Protection Regulation (GDPR) is a responsibility we take extremely seriously. We are deeply committed to ensuring the highest standards of information security and data privacy in all our business processes.

Compliance and Corporate Risk management are other critical aspects of our business and we have invested significant resources across the years in developing a robust Compliance and Risk framework. This helped us demonstrate resilience during one of our most challenging years in business. In 2020, we strengthened our Compliance, Corporate Risk and Legal functions further by streamlining them under a common Head.

STAYING AGILE

VFS Global has always been an agile and dynamic business capable of adapting to changing business conditions. The year 2020 tested our agility to the maximum extent. Important initiatives were implemented very promptly to ensure the health and safety of our staff and our customers and mitigate the negative impact on our business.

We leveraged our advanced position in technology to provide as many services as possible online or at customers' doorsteps, and the remaining in accordance with both global and local safety standards at the Visa Application Centres.

We even launched an online appointment booking service for COVID-19 testing in collaboration with various medical services partners across the world. As on date, we offer this service across 40* countries. Our Visa Application Centres being the pulse points of all our operations, our sustainability focus remains strongest there. Currently,

about a quarter of our centres use a component of renewable energy source. In line with our commitment to environmental protection, we aim to increase this share by moving further to a renewable or mix energy source wherever possible. We will also be introducing additional measures to lower our carbon footprint across our operations.

RESPONSIBLE BUSINESS PRACTICES

Under the section 'Beyond Compliance', we give you a quick view into our Code of Conduct and our focus on ensuring ethically sound business practices which are in line with international laws such as the UK Modern Slavery Act and other international best practices on anti-harassment and bullying, sexual harassment, and equal opportunity at the workplace irrespective of sexual orientation, religion, race, etc.

VFS Global's commitment to being a responsible corporate citizen through continuously improving our sustainability and ESG (Environmental, Social and Governance) performance remains as strong as ever, and I am sure this report will give you an overview of this commitment.

Zubin Karkaria

May 2021

1.2 | Strategy

Business Model

VFS Global is the world’s largest provider of visa, passport, and consular services.

WHAT WE DO

We support client governments by managing the administrative and non-judgemental tasks related to visa, passport, and consular services including data and visa application processing.

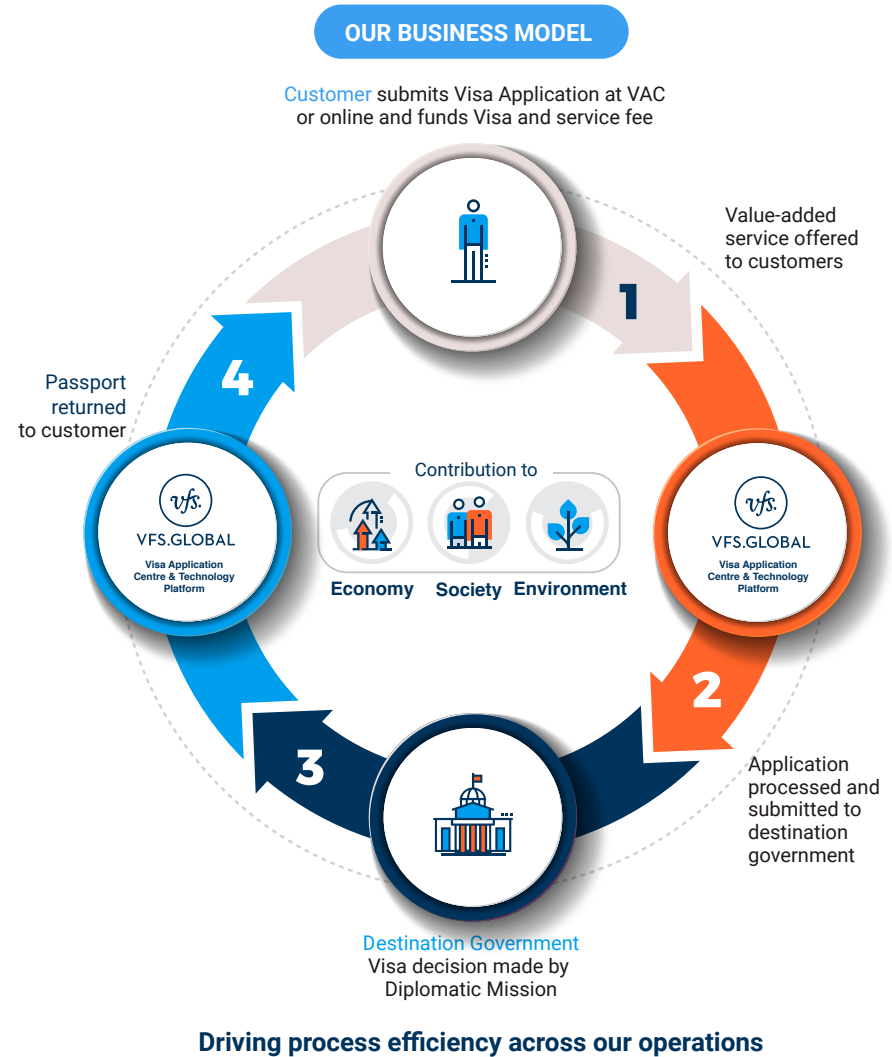
As on 31 December 2020, VFS Global served 64 client governments in 144 countries across five continents. Our 3,482 Visa Application Centres (VACs) processed over 226 million applications since inception in 2001, and over 98 million biometric enrolments since 2007. VFS Global Information Services support business operations globally via 66 contact centres, providing relevant information in 57 languages and 1,920 websites maintained in 58 languages. For individual customers, we provide a secure, efficient one-stop shop for visas, consular and citizen services. For governments, we manage the administrative tasks that enable them to focus entirely on the assessment of applications.

VFS Global is majority owned by the global investment organisation EQT. The Swiss-based Kuoni and HUGENBLOM Foundation holds a minority stake in VFS Global. EQT is a global investment organisation with offices in Europe, North America and Asia-Pacific and with a 27-year track-record of consistent

investment performance across multiple geographies, sectors, and strategies. EQT AB Group is listed on the Nasdaq Stockholm stock exchange. EQT manages and advises a range of specialised investment funds and other investment vehicles that invest across the world with the mission to generate attractive returns and future-proof companies. EQT funds’ investors do not influence portfolio companies’ decision making or strategies. Nor do they have access to private and confidential business assets or client and customer data.

HOW WE CREATE VALUE

At VFS Global, our aim is to enhance customer experience by making the visa application process and other consular related services as safe, automated, and seamless as possible. Through our global presence and dedicated employees, we create value for all our stakeholders, including the society at large. We are a people business and we have built a strong customer-focused culture. Our team is made up of competent and dedicated staff supported by innovative technology platforms to ensure safety, security, satisfaction, and efficiency. Through our customised services, we help our client governments reduce process complexity while they minimise costs, achieve results and enhance customer experiences.



In everything we do, data privacy and security are paramount. For this reason, VFS Global does not store any customer data beyond the visa application process. In line with our core values of Integrity, Commitment, and Entrepreneurship, we employ strict protocols around the entire application processes as well as around the enrolment and encryption of biometric information.

Keeping in mind the evolving needs of today's consumer, we are focusing on becoming **#FutureReady** by reimagining the customer journey through bringing digital further to the heart of everything we do and focusing on keeping innovation through IT-enabled capabilities at the core. We are focusing on bringing more of the visa application process online including document pre-checks or payments. Catering to the rising demand for online or 'contactless' services in the post-COVID world, we are offering a range of additional optional services such as safe, convenient, expedited application submission through Premium Lounges at our centres and the Visa At Your Doorstep (VAYD) service, through which customers can complete visa application submission and enrol biometrics from the comfort and safety of their homes and offices. Customers can also opt for our courier services for passport returns, for greater convenience and safety. In a largely compliance-driven sector a key point of differentiation for us is also to be agile and lead our industry beyond compliance.



Visa At Your Doorstep (VAYD) service for seafarers on board merchant vessel



VFS Global staff members from the London office flew to two seaports in the Scandinavian region to process mobile biometrics for one of our client governments. In July 2020, biometrics of around 240 crew members on board two merchant vessels were enrolled over three days.

This was the first time VFS Global planned and executed such a unique customised VAYD solution for a client government on board two different merchant vessels. The mobile biometrics kits were accredited by the client government and all COVID safety measures and guidelines were followed during the process.

1.3 | Strategy

Governance

At VFS Global, we are committed to sound service delivery and business practices and focus to ensure that our infrastructure, solutions, and management of sustainability and Environmental, Social and Governance (ESG) factors meet the highest standards.

RISK MANAGEMENT AND ACCOUNTABILITY

VFS Global is strongly focused on compliance. In 2020, the compliance, risk and legal functions - three solid pillars of risk management and governance at VFS Global - were consolidated under the new Head Corporate Risk, Legal and Compliance to increase agility and proactive risk management across the organisation.

Our internal audit charter and manual mandates carry out regular internal audits, which provide assurance on the applied risk management process, how the risks are managed and the effectiveness of controls, and complete (accurate) classification/reporting of risks.

Additionally, our client governments audit our processes and operations regularly through the central ministries and through local consular teams from diplomatic missions. In some cases, VFS Global undertakes joint audits with the client government.

In 2020, we onboarded an integrated risk management platform - RSA Archer - to

strengthen our position on enterprise-wide risk management. Eight risk critical business processes including Incident management, Third-party risk management and Audit have been onboarded on this unified enterprise-wide framework. This initiative combines business processes to identify, assess, evaluate, prioritise, manage and monitor risks consistently across the company.

RSA Archer serves as an aggregation point for VFS Global's operational risk management programme, enabling the stakeholders to visually understand, prioritise and manage known risks, and to harness risk intelligence, to reduce the likelihood and negative impact of (unexpected) events, lost opportunities. Enterprise-wide risk registers (risk catalogue) for remaining six key business processes are currently being developed to support this framework.

The overall objective of this initiative is to provide an internal control framework that is adequately designed and operating to ensure that risk is being effectively managed.





Sustainability Governance Structure

OUR SUSTAINABILITY ROADMAP

VFS Global adheres to the 10 core principles of the UN Global Compact in the areas of human rights, labour, environment, and anti-bribery and corruption. Our standards and expectations are set out in the VFS Global Code of Conduct, Human Resources, and Diversity and Inclusion policies.

Our key strategic objectives for sustainability include:

- Continuing to establish robust sustainability processes across the functions
- Tracking and reporting of key performance indicators (KPIs) – including diversity, ethics, anti-bribery and corruption, data protection, business continuity and greenhouse gas (GHG) emissions
- Creating awareness initiatives for employees
- Further developing and improving our sustainability strategy

MONITORING AND REPORTING

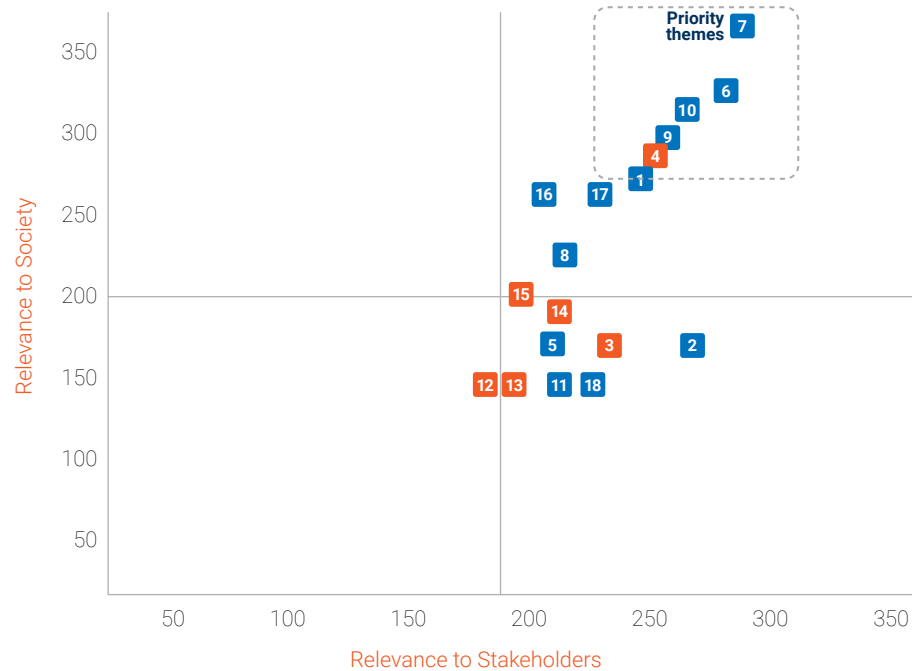
Our Chief Communications Officer (CCO) is responsible for leading and monitoring sustainability performance and reputational indicators, covering legal and regulatory matters, and finance and taxation. The CCO is also responsible for overseeing technical and information security monitoring, and for keeping abreast of political and societal issues, including employee engagement and environmental concerns, in collaboration with respective Department Heads.

The KPI targets, initiatives and achievements as well as the materiality assessment are annually reviewed by the company's Board of Directors.

Our 2020 materiality assessment identified 18 main areas of impact. See Materiality (page 12).

1.4 | Strategy

Materiality



2021 Materiality Matrix

TOPICS

- | | |
|--|---|
| 1 Crisis Management & BCP | 10 Customer Service |
| 2 Information Security | 11 Employee Engagement |
| 3 Enterprise Risk Management | 12 Career Mobility |
| 4 Innovation | 13 Wellness/ Wellbeing |
| 5 IPR | 14 Diversity & Inclusion |
| 6 Statutory Requirements | 15 Community Relations |
| 7 Data Protection | 16 Environmental Concerns |
| 8 Anti-Sexual Harassment at Workplace | 17 Taxation |
| 9 Anti-Bribery & Corruption | 18 Competition Law/ Fair Trading |

■ Existing ■ New

We reviewed and updated our existing materiality assessment in 2020. Six new topics were added that may have significant positive or negative an impact on the business in a post-COVID world, making it a total of 18 topics including industry trends, business requirements and stakeholder priorities.

Our stakeholders – investors, client governments, customers, employees, vendors and non-profit partners - were invited to be a part of the assessment that conducted via an anonymous survey exercise. The stakeholders rated 18 topics basis their relevance and impact on our business. To know more about how we work with our stakeholders, refer to 'People' on page 33.

The topics were then ranked according to their significance to the organisation and to the society, and mapped on a stakeholders matrix, as shown on the top.

Priority themes that emerged from the assessment:

- Data Protection
- Statutory Requirements
- Information Security
- Customer Service
- Innovation
- Crisis Management & Business Continuity Plan (BCP)

As a service company with over 3,000 centres in 140+ countries, we are continuously trying to reduce our environmental footprint. For example, we have defined specific KPIs to report against, and we monitor our annual carbon emissions and water usage. To drive further improvements, we have initiated projects to source renewable energy for our Visa Application Centres and offices, where it is available.

1.5 | Strategy



Sustainable Development Goals

VFS Global is committed to operating a socially responsible business that is beneficial to our stakeholders including the communities in which we operate, and the planet.

In 2015, the United Nations (UN) set out a blueprint for peace and prosperity of people and the planet. Built on decades of developmental work by the countries and the UN, there are 17 Sustainable Development Goals (SDGs) - an urgent call for action by all developed and developing countries.

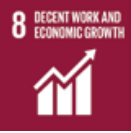


In this report, we have mapped our business activities according to stakeholders' and society's relevance against the SDGs. This ensures we are aligned with the global sustainability priorities.

The table below indicates those goals and targets identified where VFS Global is making a difference and contributing towards the SDGs. Our contribution to the goals is described in the relevant section of the report, with examples of what we are doing.

SDG	Target	Chapter	Examples:
	<p>17.16 Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources</p> <p>17.17 Encourage and promote effective public, public - private and civil society partnerships, building on the experience and resourcing strategies of partnerships</p>	Resilience	<p>We use our knowledge and experience to support the World Travel and Tourism Council's visa facilitation initiatives. See page 08.</p> <p>Our visa facilitation partnership with client governments frees them to assess and make decisions about visas more effectively, and at a lower cost for taxpayers. See page 48.</p>
	<p>16.05 Substantially reduce corruption and bribery in all their forms</p> <p>16.06 Develop effective, accountable and transparent institutions at all levels</p>	People	<p>Our Code of Conduct includes a widely promoted Speak Up process, and we educate and encourage our employees to report incidents in complete confidence. See page 28.</p> <p>We clarify travel documentation processes, and support people from Lesotho to get the permits needed to work abroad. See page 48.</p>

1.5 | Strategy

Sustainable Development Goals

SDG	Target	Chapter	Examples:
	<p>4.1 By 2030, Ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes</p> <p>8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking</p> <p>8.8 Protect labour rights and promote safe and secure working environments for all workers</p>	People	<p>In India, in partnership with The Akanksha Foundation, we support close to 1,000 students from marginal communities in their access to quality education. See page 39.</p> <p>Our Code of Conduct is explicit about identifying and reporting all incidences of forced or slave labour and human trafficking. See page 29.</p> <p>Rigorous training and security measures ensure that our people and customers are safe at all times. See page 16.</p>
	<p>7.2 By 2030, Increase substantially the share of renewable energy in the global energy mix</p> <p>7.3 By 2030, Double the global rate of improvement in energy efficiency</p>	Environment	<p>Through our partnership with the NGO 'myclimate', we contribute to a biogas project in Kolar near Bangalore, India that provides renewable energy to over 40,000 people. See page 46.</p> <p>Earlier in 2021, we have taken steps to reduce our GHG emissions by switching to renewable energy, or a mix with a share of renewable energy, in locations, where such options are available.</p> <p>Our eVisa services save energy by reducing customer travel and limiting paper use. See page 20.</p>
	<p>4.4 By 2030, Substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship</p> <p>10.2 By 2030, Empower and promote the social and economic inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status</p> <p>10.7 Facilitate orderly, safe, regular and responsible mobility of people</p>	Economic Contribution	<p>Our Learning & Development experts conducted exclusive career readiness sessions for young trainees from low-economic families in India, in partnership with TATA Strive. See page 39.</p> <p>VFS Global counts 118 nationalities amongst its employees. Managers are encouraged to work all over the world – we are proud of our diversity of people and thought. See page 34.</p> <p>Enabling mobility and improving the visa application experience are at the heart of our business. We have successfully processed over 226 million applications since the company's inception in 2001 till 31 December 2020.</p>

02.

VFS Global Sustainability Report 2020

RESILIENCE

2.1 Physical Security

2.2 Information Security & Data Protection

2.3 Process Excellence

2.4 Business Continuity

2.5 Surging From The Covid-19 Crisis



2.1 | Resilience

Physical Security

Being a company that caters to governments across the globe, as well as customers who entrust their personal data to us, security becomes a key aspect for VFS Global. To maintain trust, we work to ensure that our levels of physical and information security, data protection, and data privacy are the highest possible. We also strive to ensure that our customers feel secure in all our Visa Application Centres (VACs).

CUSTOMER SECURITY & SAFETY

At VFS Global, our aim is to enhance customer experience by making the visa application process and other consular related services as safe, secure, automated, and seamless as possible. We understand that when it comes to security and safety, it is the little things that matter and we follow the highest security, health and safety standards across all our VACs, which are in line with the standards set by the World Health Organisation and local health authorities.

Our dedicated and well-trained employees ensure our premises are always deep cleaned and sanitised. Our security personnel are equipped with protective gear and our employees with face masks and gloves. Early on in 2020, we introduced contactless security screening in many VACs, along with frequent disinfection of security equipment, and maintenance of social distancing during the security screening process. As a responsible

organisation, all used protective equipment is disposed by following biohazard material management standards. To ensure fresh air circulation, air purifiers are installed and air conditioners are cleaned frequently. Hand sanitisers are available at all our VACs.

All VFS Global employees had to undergo a mandatory module on COVID-19 awareness and are formally trained on safety and hygiene measures. We also introduced an easy-reference employee handbook for a safe restart, containing all guidelines, relevant information and protocols. We also track the health and wellbeing of employees and their families daily through a mandatory online health self-declaration.

A dedicated Global Security Operations Centre keeps special watch over VACs in some of the more vulnerable locations around the world, supported by a network of Regional Security Operations Centres. They also ensure that our technical security controls are working and effective.



Western Region Security Control Centre, Mumbai, India



Global Resilience Centre, Dubai, UAE

Documentation itself is kept as safe as possible. Items are scanned and barcoded, and always transported under padlock in tamper-proof zip-seal bags. At the VACs, fire-proof industry standard safes are used to store the documents and decisions, further supported by physical and technical security measures.

One of the **key USPs** for VFS Global is the deployment of state-of-the-art security technology at our VACs. Here are few examples of how we have used security technology in the past:

- Thermal sensor cameras at our VACs to check temperature during screening for COVID-19
- Systems that can include face detection capabilities
- Solutions such as digital safe locks,

digital key boxes and retrieval systems to ease VAC operations and maintain an electronic trail

- Live streaming systems deployed for client governments to see their own operations in real time, extract footage for incident management
- Integration of our access control systems with attendance management solutions to provide accurate data to HR
- Support for mobile visa enrolment solutions and development of security solutions

We maintain high level of security outside our VACs as well. Vehicles transporting documents are electronically monitored in real time. They are equipped with duress alarms, and SMS alerts trigger automatically if vehicles speed, halt for too long, or deviate from their specified routes.

2.2 | Resilience

Information Security & Data Protection

At VFS Global, employing the highest possible standard of data protection is imperative to the company's business model and we are uncompromising about the security of our customers' personal information. Our Information Security Management System (ISMS) is a three-component structure of People, Processes, and Technology, certified to ISO/IEC 27001:2013.

PEOPLE

We have a trained and dedicated data protection team led by our Privacy & Group Data Protection Officer, who collaborates with the information security team and other key stakeholders across the organisation.

Stringent background checks are carried out on all employees (including FMC (Facility Management Company)) before they are hired to work at VFS Global. All staff, including seasonal personnel, undergo mandatory and regular retraining in policies, procedures, and guidelines.

Even as most of our employees worked remotely in 2020, internal campaigns were organised to enhance employee awareness about emerging risks of cyber threats due to the pandemic, and the actions they should take to help us detect such attacks. Detailed advisories for employees were

released regularly on email security and appropriate usage and sharing of VFS Global information or data. To ensure our official calls and interactions happen in a safe and secure environment, detailed tele-video conferencing guidelines were released, which restricted employees to use only enterprise-subscribed platforms/ tools like Microsoft Teams or VFS Global-subscribed Zoom accounts for virtual meetings or conference calls.

PROCESSES

Our service involves processing of significant volumes of personal data. For security, speed, and reliability, we automate this data processing. This keeps us efficient. Once customers' applications are completed, we purge their personal data. And unless a client government requests otherwise, we delete each applicant's information within 24 hours of receiving it. We make sure the system

works securely with a privacy framework across the entire organisation.

We undergo regular government audits and conduct our own audits as well. We expect our VAC managers to be ready to answer more than 60 questions in areas ranging from accountability and governance to record management, data retention, training and awareness, security of personal data, and data sharing. The internal audit capability is being enhanced in 2021 with the deployment of the ISMS audit module in the global compliance system.

In 2020, we conducted over 100 internal, external, and government audits. As a result, there were no significant issues registered.

During the pandemic, regular IT health checks were carried out at the VACs which were open, to ensure compliance

with security policies, and ensure patch compliance. Prior to resuming operations after lockdown, all machines were physically verified to ensure compliance as part of the restart activities of each VAC. All access policies, both at our data centres and our VACs, were reviewed comprehensively to ensure that the appropriate protections were in force as VACs restarted.

This was supported by ensuring that only enterprise subscribed and required tools were permitted to connect to VFS Global systems.



2.2 | Resilience

Information Security & Data Protection

Data Security journey at VFS Global

Considering the data-intensive business we are in, VFS Global recognises that data protection is of paramount importance and employs the highest possible standards for the same. We are committed towards securely managing the data under our safekeeping throughout its lifecycle and in accordance with the security frameworks of our client governments.



Step 1:

Online application form is stored in a secure data centre, fully encrypted and under controlled access. The centre is constantly upgraded for defence against physical intrusion.



Step 2:

Applicant visits the centre, with supporting data. Physical documentation is sealed, and any electronic data, including biometrics, is captured and encrypted.



Step 3:

Data is safely transferred to the embassy or consulate. The exact manner is agreed on with client governments.



Step 4:

All data is purged, typically within 24 hours of the completed application cycle, unless client governments direct otherwise. After 30 days, no record of the data is available anywhere in the VFS Global system.

TECHNOLOGY

To ensure security remains an integral element of all our systems and services, we have employed cutting-edge security solutions to bolster our cybersecurity defences and combat cyber threats. Every centre is protected with perimeter firewalls. Centre personnel only have access to the applications for which they are responsible and have restricted access within the application as well. Every server and computer have their own additional firewall as well as antivirus and Advanced Threat Protection, which is continuously monitored. All traffic entering and leaving the VFS Global network is monitored at all times and swift action is taken when unusual behaviour is detected.

DATA PROTECTION & DATA PRIVACY

Recent external and internal surveys performed by VFS Global have identified Data Protection as an area that is 'most important' to our external and internal customers. These results are confirmed by other publicly available surveys as we want customers to know that we are committed to the safety of their data. This is ensured by our robust Data Protection framework.

We also want our customers to understand the care we take and the steps we follow to respect their data privacy. There are important data-use concerns that we address, such as consent and choice, clarity

of purpose, collection only of information that is needed, and commitment to data accuracy.

An important component of Data Protection is Information Security, and this underpins our Data Protection framework. At VFS Global, we have established a comprehensive Privacy Information Management System (PIMS) as well as a complementary Information Security Information Management System (ISMS). Our ISMS ensures all our locations are certified against the international gold standard of ISO/IEC 27001:2013; which certifies a high level of assurance throughout our information security processes. Even during the pandemic, the effectiveness of our controls and measures were confirmed by our external certification auditors who verified the controls and recommended continuation of our ISO 27001:2013 certification. In view of the travel restrictions during the pandemic, all audits were conducted remotely using Microsoft Teams while complying to corporate guidelines on tele/video calls. Our privacy controls are also compliant with the requirements of the BS10012 standard. We will be applying for accreditation of our PIMS by seeking certification to the ISO/IEC 27701:2019 (Privacy Information Management Systems) once pandemic controls have been reduced.

2.2 | Resilience

Information Security & Data Protection

The VFS Global PIMS was designed to meet the high standards of the European Union General Data Protection Regulation (GDPR). We already complied to the regulations' requirements even before it came into force in May 2018.

The ISO Standard and GDPR Regulation are the most rigorous in the world, and we apply them globally – in 144 countries – even if individual countries don't require it. This includes multi-level safeguards, not just in physical infrastructure but also in our virtual systems. We apply a Defence in Depth (DID) model – layered defensive mechanisms, using people, processes, and technology, to protect valuable data – which is managed by our highly trained and experienced employees.

In adhering to the foundational Data Protection principle of Data Minimisation, VFS Global doesn't retain any applicant data for any longer than required to deliver the service requested. Personal data is collected at VACs and directly transmitted to the receiving client government. On successful acknowledgement of receipt, that data is purged from the sending system. Paper documents are sent to the client mission by secured transportation. No copies of applicants' data are made or retained either digitally or physically. We comply with the data protection laws in our countries of operation, and if no data protection laws exist in the country of operation, we adhere to the VFS Global data protection framework.

DATA PROTECTION GOVERNANCE

Responsibility for data protection lies with everyone within our organisation. Data protection is overseen by our Group Data Protection Officer, who ensures compliance with the requirements laid down by data privacy and data protection laws and regulations and the requirements for our client government. In addition, the Group Data Protection Officer makes sure our privacy programme aligns with our business strategy ensuring that it is a business enabler and has a positive impact on revenue.

The governance of data protection is driven from our thirteen (13) element Privacy Management Actives Framework (PMAF). The PMAF enables the Data Protection team to record actionable metrics that determine

the effectiveness of data protection controls that are in place to ensure the individuals' data privacy rights are upheld.

Our 'Defence in Depth' model uses measurable metrics to assess the effectiveness of Privacy and Data Protection controls. This means our third line of defense, Internal Audit, can independently determine if the controls are performing as they should in protecting the privacy of the individual.

Through the Speak Up initiative, employees are encouraged to report incidents related to data privacy breach directly to the Privacy and Group Data Protection Officer, who then investigates the incidents in complete confidence.

Did you know?



More than 80% of countries now have their own data protection or information security laws and many more are considering new laws!



New 'Third Generation', data protection laws are emerging that build on 'lessons learnt' from the implementation of the EU GDPR in 2018!

2.3 | Resilience

Process Excellence

At VFS Global, we constantly endeavour to provide our client governments and customers easy access to our services, straightforward answers to all their questions, and above all, rapid turnaround of their applications.

CUSTOMER-CENTRIC SERVICE

With a renewed focus on enhancing customer experience, our aim is to provide reliable, timely, accurate and quality Customer Care, with empathy engrained into all our communications. We approach the customer experience through a combination of accessible technology, staff training and optional value-added services.

To further enhance the customer journey while providing seamless experience in the post-COVID era, we leveraged technology and built solutions that allowed customers to maintain physical distancing norms as much as possible and at the same time, get a high level of service and personalised customer experience. Our eVisa solution also helped in reducing customer frictions through an end-to-end online process and helps in allaying contact related risks.

In order to provide a safe and seamless experience to our customers, VFS Global introduced the innovative, technologically enabled services like:



Form-filling assistance on phone:

A customer can simply call the helpline and have highly trained staff assist them with completing the online visa application form, scanning and uploading documents and even completing payments online.



Digital Application Submission:

New service for customers to get guidance on the application submission process remotely, over a video call, thereby making the at-VAC process faster for them, which was live across 15 locations in three corridors globally with great reviews from customers.



Online payment:

Migrating interactions to an online platform including service fee payment, and payment for optional services.



Digital Document Check:

New platforms that allow customers to get their documents reviewed online, before visiting the VAC, thus minimising the number of in-person activities.

The service was live for seven corridors globally and received positive customer feedback from the initial pilot phase.



Cloud-based contact centre technology:

This technology enabled contact centre staff to respond to customers from a BCP (Business Continuity Plan) location or enabled work from home to respond to customers' anxiety during the pandemic.



COVID-19 test booking service:

To address the need of the hour for customers globally, VFS Global tied up with local leading laboratories in 40 countries (and counting) of operations for pre-departure COVID-19 tests. VFS Global leveraged its technological know-how to offer a seamless and secure appointment booking system.

As customers increasingly prefer digital means for communication and engagement, VFS Global introduced several initiatives to improve turnaround times, reduce errors, and increase value-add for customers



Chatbot:

Our chatbot VIVA, currently available in select routes, can help customers with their

application process, post application queries and other Frequently Asked Questions. ViVA also helps customers if they want to chat with a customer care agent to resolve their queries.



Click to Call:

With this enhancement, customer can use internet on their mobile devices / computers to make calls via VFS Global's website, making the process effortless, quicker and less expensive.



Enhanced IVR:

Enhanced interactive voice response (IVR) helped in guiding our customers 24x7 during the pandemic on the process to be followed for new applications as well as in situation where their documents were in process.



Web forms to schedule appointments:

Web forms helped our customers in submitting their request in a concise and structured manner and helped us in categorising and prioritising their requests and cater to customer demand, which had pent up during the pandemic.

2.3 | Resilience

Process Excellence

We know that people are busy, and at VFS Global, we take pride in our service innovations that make visa applications easy and efficient, no matter which part of the world our customers are applying from. Our optional value-added services can be booked online from home or at a VAC and at a customer's own discretion, to enhance convenience at every step of the application process. In 2020, we witnessed an increased demand for these optional value-added services – a testimony to the rising popularity of these services over the last few years.

Visa At Your Doorstep is one such popular end-to-end visa service allowing customers to submit applications and enrol biometrics from the comfort of their home or office. It is convenient and efficient and is especially

beneficial for people living in cities away from our centres.

Another optional service is the **Premium Lounge available at a VAC**. This is a personal service that offers local language professionals to assist with expedited submission and personalised service during the visa application process. Some customers require privacy, others require speed, and some want a combination of the two. Therefore, in addition to optional services like Visa At Your Doorstep and Premium Lounge, we also facilitate Priority and Super Priority Visa services offered by UKVI (United Kingdom Visas & Immigration), for people applying to the UK. Under these services, UKVI endeavours to achieve turnaround times of five working days or



24 hours, respectively. Due to the ongoing pandemic, Priority and Super Priority Visa services may not be offered at all locations, presently.

For working people who find it difficult to visit a centre during business hours, we offer Prime Time appointment slots too for some missions in some cities depending on the traffic. And for those who simply cannot come to a centre until after work, we also do offer after-hours walk-in appointments, at an additional charge.

We make it clear to customers that opting for value-added services have no impact on visa decisions by client governments, i.e. to grant a visa or not. Visa decisions are the sole prerogative of the client government.

2.3 | Resilience

Process Excellence

By leveraging technology, we are improving operational efficiency, allowing VAC staff to focus on customer assistance, especially during peak holiday times. In collaboration with the Ministry for Foreign Affairs of Finland, we have developed a platform called LIDPro™ (Location Independent Document Processing). This tool enabled our client to reduce the number of visa officers in St. Petersburg from over 100, during peak season, to 20, making the process more efficient by optimising human resources. It also allows digitised documents to be sent to embassies and consulates directly for decision making, which is more convenient for our client governments. It is in use for governments of Finland as well as Austria, Cyprus, the UK, and Lesotho.

PEOPLE PROCESSES

To stay agile in a changing business world, we use a management framework developed at Carnegie Mellon University, called the People Capability Maturity Model (PCMM). PCMM has helped VFS Global in aligning various HR processes towards building people capabilities for achieving business objectives through Competency-Based HR Management Framework. The focal point of the framework is Strategic Workforce Planning.

Workforce Plans are commissioned to continuously improve the organisation's readiness through various people practices and activities such as learning and development, internal and external sourcing, engagement, and retention programmes for key talent; or even through other partnerships, alliances and/or independent contracting.

In March 2020, VFS Global completed the PCMM-5 sustenance audit across all the regions. The recommendations were then

shared with the Regional HR Heads for taking necessary actions. Further, Process Performance Baselines were established for key HR metrics – Attrition, Early Attrition, Hiring Turnaround Time, and Employee Capability. During the COVID-19 crisis, the entire workforce planning and rightsizing activities were executed on the foundation of PCMM best practices, with a strong focus on maintaining and building the critical workforce capabilities required for the sustainable business growth.

Customer Service Process

At VFS Global, our aim is to enhance customer experience by making the visa application process and other consular related services as safe, automated, and seamless as possible.



1

Promoting 'Customer First', our customer-centric care promise



2

Driving synergies across teams to resolve customer issues



3

Capturing the customers' 'Single Voice'



4

Continuous improvement, and ever-faster resolution of any service issues



5

Intuitive, customer-friendly interface design at all our centres

2.4 | Resilience

Business Continuity

At VFS Global, we know that client governments rely on us for uninterrupted service. To respond to potential disruptors of any kind, we have implemented tiered incident response plans designed to function at the operational, tactical, or strategic level, as appropriate. These plans are rehearsed regularly through a series of live tests and table-top exercises.

At the operational level, a Premises Emergency Management Plan (PEMP) focuses our incident management efforts on the safety of personnel on site, and, secondarily, on our physical assets. At the tactical level, our Business Continuity Plan (BCP) is designed to maintain our critical business processes to safeguard people, premises, utilities, equipment, and records. At the strategic level, our Crisis Management Plan (CMP) helps us support client governments when major incidents occur. These have included earthquakes, where premises have been damaged and we have had to move operations to other locations, or the latest being the COVID-19 pandemic which forced most of our VACs and offices to close temporarily. It is at this level that we also engage with client governments over the possibility of civil or political unrest, or incidents of terrorism.

CRISIS MANAGEMENT

It is important to understand that not every incident is a crisis. However, an incident, if not handled well, can lead to a disruption

in operations, and eventually a crisis, which may pose a threat to the organisation's very existence. If the situation is not resolved, the results could be catastrophic or cause irreparable damage. It is therefore imperative to understand and assess the incident correctly and escalate it in a timely manner.

To stay agile, we have set up a Global Resilience Centre (GRC) to monitor risks 24x7 and track major geopolitical disruptions across the globe and proactively share information with operations team regarding potential impact so that they can take necessary precautionary measures and contain the impact. GRC also helps us in our evolving incidents that may turn into a potential business continuity situation. This is what keeps our trust with the governments that we serve and also confidence in us by our customers, as we respond proactively and not react to events.

Four levels of our Crisis Management framework:



1

Level 1 - Routine Emergency:

An isolated event/service disruption with low risk of expansion. Critical services remain intact or may be disrupted for up to few minutes and does not have any impact to business as usual (BAU) operations.



2

Level 2 - Minor Incident:

An event or a disruption with minor risk of expansion outside of the primary facility/city spreading up to a country. Critical services are partially affected or disrupted for up to two hours. Operations may run at a lower level of efficiency than planned for. BAU may be achieved soon after operations returning to normalcy.



3

Level 3 - Major Incident:

An event or a disruption with medium risk of expansion. Critical services have been disrupted for a more than a full day of operations (~8 hours). Customer or Client Mission escalations have been reported and financial penalties are expected if critical business is not re-initiated within a stipulated period.



4

Level 4 - Crisis:

A major event that brings all operations to a standstill. This type of incident attracts major media coverage and requires immediate intervention from the Corporate Communications team. Multiple regions or global scale impact.

2.4 | Resilience

Business Continuity

MANAGING COVID-19 CRISIS

Even during the pandemic, the GRC and BCM team did not miss even a single report as our analysts were prepared with alternative work arrangements, and laptops and VPN connections to provide services from anywhere and anytime.

As various governments announced lockdowns, Crisis Management Team (CMT) calls were organised with the regional CMTs to ensure graceful temporary closures and proper recovery and restarts post the lockdowns. To bring in further clarity, standard operating procedures (SOPs) were created for handling various scenarios which may occur at the VAC as a result of COVID-19. This included the SOP for COVID-19, precautionary measures for employees, COVID-19 restart guidelines, employee handbook, amongst others.

As part of our crisis preparedness, all employees were mandated to complete two e-learning training modules on COVID-19 for training and awareness. We also conducted over 600 table-top exercises globally to ensure our VAC managers and operational teams are aware of the various scenarios which may occur at the VAC as a result of COVID-19 and can handle them properly.

During the pandemic, the Corporate Security team continued to safeguard our premises and information - Over 95,000 passports, which temporarily could not be further processed, and 144 premises in high-risk locations were safeguarded even during lockdowns.

In addition, client missions were being updated on a real time basis and our client AMTs (Account Management Teams) were updated on a weekly basis with a digest of all COVID-19 updates.



On 4 August 2020, a large amount of ammonium nitrate stored at the port of the city of Beirut, the capital of Lebanon, exploded, causing at least 207 deaths, 7,500 injuries, and US\$15 billion in property damage, and leaving an estimated 300,000 people homeless.

The blast damaged VFS Global's infrastructure as well, triggering our crisis management measures. Here is a case study on how VFS Global efficiently handled the situation, leading to a quick restart of our Visa Application Centres (VACs) in the city:

Damage to VAC infrastructure due to a blast was reported at Beirut port. The blast led to damage of windowpanes and other infrastructure in the joint VAC (JVAC). Shattering of glass panes led to health and safety concerns for both customers and employees. As a result, the JVAC had to suspend operations in line with the city wide closure effected by government authorities.

Two Crisis Management Team (CMT) calls were conducted to discuss the impact to operations, health and safety concerns and restart plans - first one within two hours of the incident and the next one within 24 hours. Security was deployed immediately to man the VAC 24/7.

Client communications were sent out with the help of the Corporate Communications team. Customers were contacted by the VAC staff and their appointments were rescheduled. Websites were updated promptly to inform customers of the situation and the VAC schedule was updated to ensure safety of customers and staff. The VACs resumed operations post repair of the facility and two weeks of government-imposed lockdown.

2.5 | Resilience

Surging From The COVID-19 Crisis

While handling the ongoing Coronavirus pandemic, VFS Global acknowledged its responsibility to ensure that the need for health and safety and innovative solutions are continuously fulfilled for its client governments, employees, customers, and the environment.

PROJECT RESTART

VFS Global formed a 'Project Restart' team very early during the pandemic to ensure organisational preparedness towards the recovery phase and streamlining processes to ensure that we emerge as a stronger organisation.

This team focused on two specific areas towards 'restart' – re-start actions by mission and by countries – and put together a clear plan of actions that were supported by all stakeholders. These actions were combined with a tactical and strategic approach, cutting through end-to-end processes and policies across all workstreams, to ensure efficiency gains, cost control and revenue preservation, employee satisfaction and a good customer experience.

To ensure that the required standard is maintained globally during the restart of the VACs, VFS Global designed a 'VAC Restart Manual' under COVID-19. This was also supported by action specific guidelines that ensure a standardised approach with communications for websites, appointment letters, email, SMS, FAQs for customer management, and artwork and collateral on physical distancing. All employees were also

provided a comprehensive handbook with guidelines for a safe restart.

Keeping the safety of our customers as well as our employees as the utmost priority, VFS Global assembled its own comprehensive 'VAC Restart Checklist' which covered 59 critical checkpoints to ensure a standardised approach towards restart of our VACs globally related to people, infrastructure, technology, and operational readiness. This also included a detailed COVID safety checklist, in line with standards set by the World Health Organization (WHO). The probable 'Risk and Issues' pertaining to the concerned operations were analysed and resolutions planned to mitigate these.

Before a VAC reopening, we reviewed their financial viability, obtained permission from local authorities to classify VACs as "essential services" where required, and worked with client governments to intervene on such approvals. Progress was tracked by having daily calls with the extended Project Restart team including weekly calls with support teams and weekly reporting to senior management.



2.5 | Resilience

Surging From The COVID-19 Crisis

As part of our health and safety commitment towards our customers, we joined hands with the World Travel & Tourism Council (WTTC) and incorporated their #SafeTravel guidelines. Additionally, to ensure operational continuity and customer satisfaction, we adopted a quick response strategy to re-open our VACs within 24 to 72 hours after a COVID-19 incident.

EMPLOYEE-RELATED MEASURES

The wellbeing of our employees is of utmost importance to VFS Global, and we took every possible measure to create a safe and secure environment at our offices and VACs.

All employees had to undergo a mandatory module on COVID-19 awareness. Employees were being kept abreast and communicated to on a timely basis on any update or advisory pertaining to the spread, prevention, guidelines on COVID-19, any change in organisational structure and staffing needs. We also introduced an easy-reference employee handbook for a safe restart, with all the guidelines, information, and protocols to help employees in transitioning back into their workplace in a safe, smooth, and efficient manner.

Amidst the ongoing COVID-19 pandemic as our employees work from home, VFS Global was committed to take care of its employees and control the business impact of the situation while ensuring business continuity. In light of this, VFS Global implemented a 'Work From Home' policy as a precautionary measure to tackle the pandemic, keeping flexibility and empathy at the core.

To keep our employees aware about organisational updates, we launched 'Champions Bulletin', our internal employee newsletter, which shares updates about restart, key appointments and messages from top management, and highlights employee engagement, learning and development, and CSR initiatives taken across regions. We also made sure that all our internal HR policies are easily accessible to employees through cloud on our Human Resource Information System (HRIS) system. We also monitored the health of our employees daily in some regions through a self-declaration form to get an update on the general wellbeing of employees and, if required, pitch in to support the affected ones.

All the employee-related measures are being taken keeping these four objectives in mind:

1. To develop effective engagement measures for employees including communication, training, and best practices
2. To guarantee and safeguard the need for health, safety and sanitation for the employees and the customers
3. To provide a safe environment for the employees and to gain customer's confidence by adopting strict health and safety processes in VACs and offices
4. To ensure a smooth and successful restart of business operations across the globe while adhering to all local health and safety regulations

Health & Safety measures at VACs



**Your Safety
Our Priority**

03.

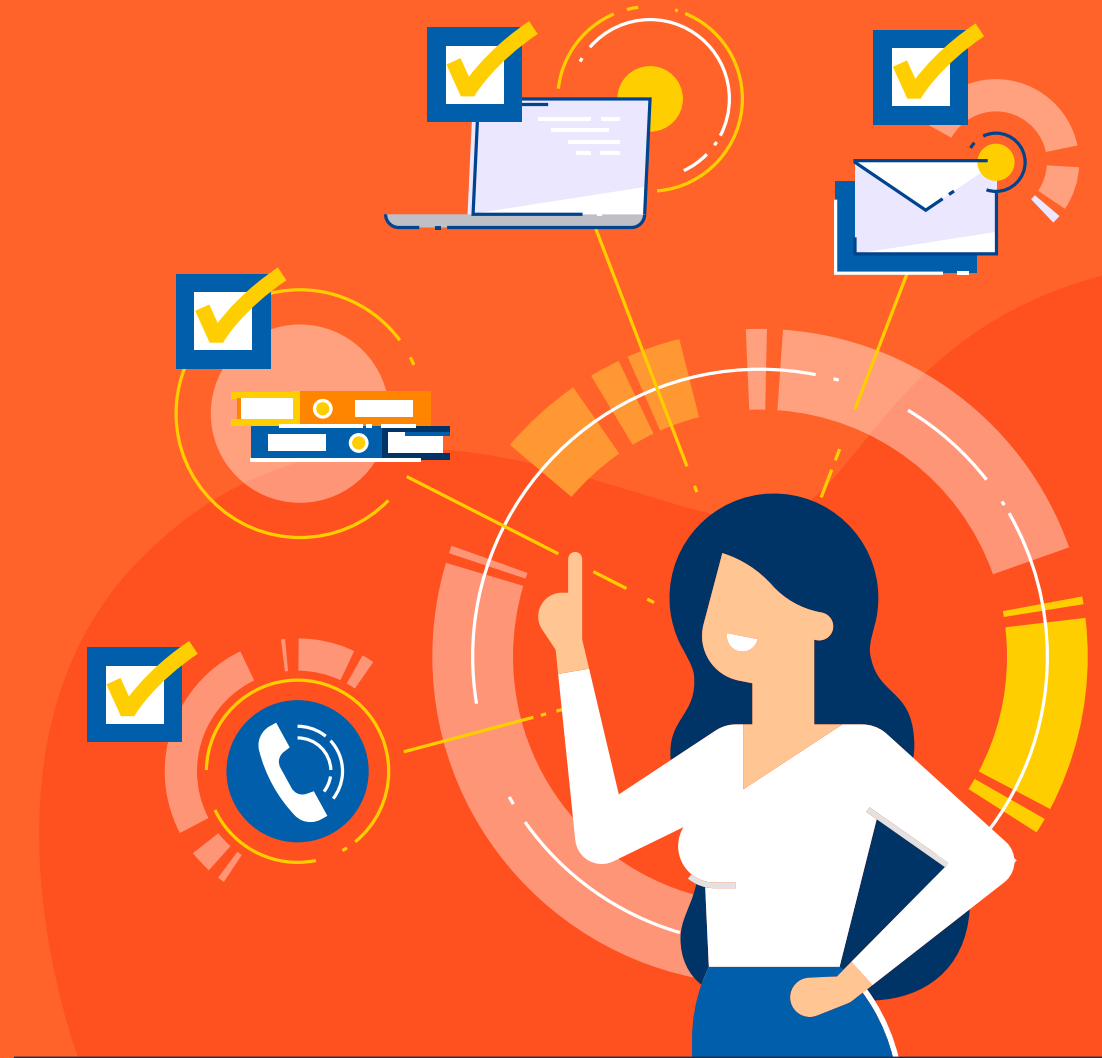
VFS Global Sustainability Report 2020

BEYOND COMPLIANCE

3.1 Code Of Conduct

3.2 International Standards

3.3 Local Laws



3.1 | Beyond Compliance

Code Of Conduct

Being the pioneer and market leader of outsourced visa and consular services for governments worldwide, we are committed to conduct ourselves professionally and carry out business in a responsible and ethically sound manner.

VFS Global has met the challenges of growth consistently and successfully. The respect and market leadership we enjoy is due to the commitment, professionalism, and integrity of our employees.

We recognise that our commitment to compliance with the 'spirit' and the 'letter' of the law is a value proposition and differentiator for generating new business.

The VFS Global Code of Conduct defines the values, principles, and behaviours expected of every employee. The Code is designed to help our staff make ethical decisions in a culture of openness and trust.

Every employee is required to complete the mandatory online Code of Conduct training module as part of the on-boarding process. Training provides employees an understanding of all elements of the Code and its applications. Knowledge of procedures, reporting mechanisms for any violations, and implications of non-compliance are the building blocks of an ethical business culture.

CORE VALUES AND PRINCIPLES

Integrity, Commitment, and Entrepreneurship are at the core of everything we do. These values are a part of our Code of Conduct, and the 12 practical principles that place ethics at the centre of all our daily decisions. Our principles include zero tolerance to bribery and corruption, speaking up to breaches of the Code, being fair and courteous with each other, and respecting the cultures and orientations we encounter globally.

SPEAK UP

We know that speaking up about an incident of concern takes courage. That is why we ask our managers to create a culture of trust, where employees feel that they are being genuinely encouraged to be open and speak up without fear for retaliation. The processes to follow under our 'Speak Up' initiative are listed in the Code of Conduct and we also sensitise all our employees about this through posters in our offices. Concerns can be taken to any manager, or any supervisor, or to anyone in the Compliance Committee – comprised of the Chief Executive Officer, Chief Financial Officer, Chief of Human Resources, and the General Counsel-Head Corporate Risk-Compliance-Legal.

Our Values



Zero Tolerance
to Bribery & Corruption



We also maintain a dedicated Speak Up e-mail address, ensuring that employees can speak up anonymously.

All Speak Up cases are assessed by the Compliance team and investigated, if required. Confirmed violations of our Code of Conduct are subject to review by

Speak Up!



a Disciplinary Committee and subject to appropriate disciplinary and remedial action (including dismissal). Our General Counsel oversees the process and reports issues raised to the VFS Global Audit Committee, ensuring good governance.

3.1 | Beyond Compliance

Code Of Conduct

LAWS AND REGULATIONS

VFS Global is committed to compliance with the 'spirit' and 'letter' of all applicable local and international laws where we operate. The VFS Global Code of Conduct includes the nine areas of law (as indicated in the visual on the right side), and explains our commitment and employee responsibilities. Following our materiality assessment (page 12), key areas for our compliance focus include anti-bribery and corruption, data protection, and anti-human trafficking and slavery.

ANTI-BRIBERY AND CORRUPTION

We have a zero-tolerance approach to bribery and corruption, are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and abide by all laws and regulations relevant to bribery and corruption in all jurisdictions we operate.

We conduct due diligence on our business partners, regularly conduct bribery and corruption risk assessments and through a recently implemented Anti-bribery Management System based on ISO 37001 we continuously monitor, evaluate and improve our controls to mitigate the risk of bribery and corruption.

We strictly mandate our employees to comply with our anti-bribery and anti-corruption procedures and encourage them to raise concerns to supervisors or through the Speak Up channels.

DATA PROTECTION

As the world's largest visa service provider that handles sensitive information of millions of applicants in 144 countries, for 64 client governments, we are committed to have a robust data protection framework. It is crucial for us to be compliant with the data protection regulations of all countries we operate in. We proactively monitor data protection laws of each of these countries to drive effective and compliant processes.

VFS Global has been committed to robust data protection controls even before the GDPR (EU General Data Protection Regulation) came into effect in May 2018. This corporate culture of working with strict controls was strengthened by having attained ISO 27001 certification for Information Security Management Systems. To support our data protection framework, we also utilise appropriate cyber security and threat detection tools.

ANTI-HUMAN TRAFFICKING AND SLAVERY

VFS Global is committed to ensuring that there is no human trafficking, slavery, or use of child labour in our business or supply chain or in any other third parties working with us. Our Anti-Slavery and human trafficking policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure that slavery and human trafficking is not taking place in our business or supply chain or with any third parties that work with us.

We require our employees to report any concerns they may have. They are prohibited from supporting or dealing with any suppliers or businesses where there is any appearance of impropriety or involvement in slavery or human trafficking. For information about how we approach compliance with the UK Modern Slavery Act, please see page 32.

THE PRIDE AFFINITY: LGBTQ+

VFS Global supports the principles and practice of equal opportunity and employment at workplace. The Code of Conduct mandates that all employees interact with their co-workers in a courteous, fair, open and respectful manner. Further, the Code also protects the dignity and respect of all employees irrespective of their gender, religion, race/ caste, colour, age, nationality, language, ethnic origin, socio-economic status, physical appearance, special abilities and sexual orientation.

ENTERPRISE RISK MANAGEMENT

In 2020, as part of a key initiative, the compliance team developed and introduced an Enterprise Risk Management System (ERMS) - a holistic, corporate approach to managing risk in all parts of the business. The ERMS enables a better identification and assessment of risk, development and assessment of related controls and mitigation plans which support a sound risk-based approach to decision making, and overall corporate strategy.

Areas of law covered under VFS Global Code of Conduct



1 Data protection and confidentiality laws



2 Anti-Bribery and Corruption laws



3 Human rights and employment equity laws



4 Anti-human trafficking and slavery laws



5 Anti-discrimination & sexual harassment laws



6 Anti-money laundering and counter terrorist financing laws



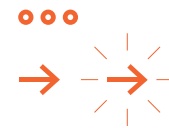
7 Copyright laws and software licensing



8 Taxation and finance regulations



9 Insider trading and securities laws



3.2 | Beyond Compliance

International Standards

Being a global company, we are committed to complying with several internationally recognised business standards. As a responsible corporate citizen, we ensure that all our products and services are legally verified, helping us improve our business credibility and authority as well as the overall efficiency of the business. Even during the pandemic, we maintained our commitment of ensuring quality and consistency in services and auditing our processes.



ISO 9001: 2015 Quality Management System

VFS Global has been certified on ISO 9001 since 2011 to ensure that standardisation and monitoring processes are put in place to improve the quality and performance of our products and services continuously, thereby improving customer satisfaction.



ISO 27001: 2013 Information Security Management

To ensure our customer information is safe at all times and to reinforce security within our environment, we have established a comprehensive Information Security Management System (ISMS) and ensured all our locations are certified against the international gold standard of ISO/IEC 27001:2013; which certifies a high level of assurance throughout our information security processes.



ISO 14001: 2015 Environmental Management System

VFS Global has been sensitive and committed towards safeguarding the business impact on environment and had implemented the ISO 14001 standard in 2014. Since then, VFS Global has continuously improved its deployment and effectiveness of various measures to ensure that the environment is safeguarded, and the organisation is legally compliant through regular surveillance audits.



ISO 45001:2018 Health and Safety Management System

At VFS Global, the health and safety of our employees, our client governments, and our customers, is a top priority. From assessing VAC design to monitoring and mitigating safety and security incidents, ISO 45001:2018 helps us build a robust process and comply with laws in all countries where we operate and encourages a healthy work-life balance.



CMMI SVC 1.3 Capability improvement approach

To maintain a leadership position in our industry, we adopted a business excellence model, CMMI framework, to benchmark our processes against industry best practice. Having implemented the model across all our processes up to the micro level, we see improvements in all areas of the business.



ISO 23026:2015 Systems and Software Engineering

VFS Global maintains more than 1,000 websites for different customers in different languages and having a standardised approach for providing transparent and timely information is a mandatory requirement. This standard helps us improve the usability of informational websites and ease of maintenance of managed web operations in terms of locating relevant and timely information.



ISO 37001:2016 Anti-Bribery Management System

ISO 37001 was developed to provide a global standard to combat bribery and and promote an ethical business culture. Through the implementation of ISO 37001, VFS Global has further enhanced its controls to mitigate the risk of bribery throughout the global organisation. The Anti-bribery Management System ensures that these controls to prevent, detect and respond to bribery are continually monitored, evaluated and improved.



ISO 10002:2018 Complaint Handling System

Due to our customer-first approach, customer care becomes one of the most important focus areas for VFS Global and an integral part of our business strategy. This international standard provides guidance in defining and implementing processes to monitor and measure complaint handling in an organisation and adopts quality management system to enhance customer satisfaction. This standard not only helps in handling customer complaints, but also helps in converting the customer complaints into an opportunity to improve the quality of the service.



People Capability Maturity Model

As a people-driven business, VFS Global chose PCMM as a road-map for implementing workforce practices to continuously improve employee capability. Each level of PCMM enables cultural transformation through powerful practices for attracting, developing, organizing, motivating, and retaining employees, which results in achieving our business objectives.



GDPR EU General Data Protection Regulation

We are committed to safeguarding customer and employee privacy, ensuring data protection and maintaining information security in all our processes. We comply with the European GDPR and data protection laws in all our countries of operation. We are proud to be one of the few companies globally that was already compliant with the GDPR when it came into effect in May 2018.



ISAE 3402 Assurance Engagements

To ensure our processes are tightly controlled and in line with the business requirements, VFS Global had implemented ISAE 3402 back in 2013 and gone through Type-I and Type-II audits. Since then, we are in compliance with the standard requirements and have observed no major deviation in the past seven years.

3.3 | Beyond Compliance

Local Laws

GLOBAL: ANTI-HARASSMENT AND BULLYING POLICY

VFS Global is committed to creating a conducive work environment free of harassment and bullying, where everyone is treated with dignity and respect. We follow a zero tolerance approach to bullying and harassment, which is captured in the Global Anti-Harassment and Bullying Policy.

This policy covers bullying and harassment of and by managers, employees, contractors, agency staff and anyone else engaged to work at VFS Global, whether by direct contract with VFS Global or otherwise. VFS Global also does not tolerate victimisation of a person who has made allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence at VFS Global.

INDIA: SEXUAL HARASSMENT OF WOMEN IN THE WORKPLACE ACT

Sexual harassment, predominantly of women, is a worldwide concern. VFS Global has a zero-tolerance approach to sexual harassment. Our Code of Conduct includes a dedicated section on 'Sexual Harassment' in the workplace, which is applicable to all employees worldwide.

In India, to provide security for women employees, the government introduced the Sexual Harassment of Women in the

Workplace (Prevention, Prohibition and Redressal) Act in 2013, under which every employer is mandated to formulate and implement an anti-sexual harassment policy at the workplace.

Non-compliance may result in severe consequences including restrictions for doing business. The Act enables organisations to provide a safe workplace to its women employees by ensuring regular awareness programmes are conducted to sensitise employees about the act, familiarise them with the Internal Complaints Committee, and orient them on penal consequences of sexual harassment.

In India, we have developed our own Prevention, Prohibition and Redressal of Sexual Harassment at Workplace Policy. It exceeds the requirement of the Act, mitigating the risk of employees of any gender being subject to sexual harassment. The policy applies to any employment arrangement, be it permanent, temporary, direct or through an agent, or voluntary.

VFS Global India reports annually on progress and any relevant incidents, in compliance with the Act.

INDIA: CORPORATE SOCIAL RESPONSIBILITY

India is the first country in the world to make corporate social responsibility (CSR) mandatory by an amendment to the Companies Act, 2013.

Under this Act, all companies above a specific net worth, turnover, or profit are required to spend 2% of their average net profits over three years on social development initiatives. CSR funds may be spent on promoting education, protecting the environment, eradicating hunger, poverty, and gender inequality, among others.

VFS Global Services India Private Limited has been 100% compliant with the Act since its introduction in 2014, and invests in protecting the environment and promoting education, in alignment with its global CSR strategy. See page 39 and 46 for more information.



UK: MODERN SLAVERY ACT

VFS Global has a zero tolerance approach to Modern Slavery within its operations and supply chains and encourages its staff to report related concerns and incidents using the escalation matrix available across the organisation.

The VFS Global Policy under the UK Modern Slavery Act 2015 reflects the company's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the countries we operate in.

04.

VFS Global Sustainability Report 2020

PEOPLE

4.1 Employees

4.2 Customers

4.3 Community

4.4 Client Governments



4.1 | People

Employees

VFS Global wants to be an employer of choice. In times like these when organisations across the world are experiencing workforce disruption at an unprecedented scale and speed, we understand that more than just offering employees a good salary, it is vital to offer them a safe and friendly work environment, along with enhancing their skillsets through good training.

Currently, VFS Global employs more than 7,500 people, and respect for each other is central to our working culture as is personal development. These values are important to our personnel, and our annual employee engagement survey, EMPOWER, shows consistently high scores in diversity of thought. The survey is conducted every year to provide our employees with an opportunity to provide the management with feedback on various aspects that impact their satisfaction levels at the workplace. In 2019, the overall engagement score was 65%, which is near the top quartile of IT/ITES and higher than the median. In 2020, the management decided not to conduct the survey due to the pandemic and focus of restarting / resuming operations amidst health and safety being paramount.

DIVERSITY & INCLUSION

Diversity of thought is the essence of a healthy, entrepreneurial organisation, and our diverse culture is an important driver of our success. Globally, 118 nationalities work with VFS Global, bringing the benefit of a

wide variety of world views. For us, ensuring gender diversity at the workplace has proven to have positive effects across the entire organisation. We have maintained our gender balance with an overall female:male ratio of 57:43 as on 31 December 2020. In 2021, we have taken strong targets to improve our female:male ratio at the management level, which is currently at 20:80.

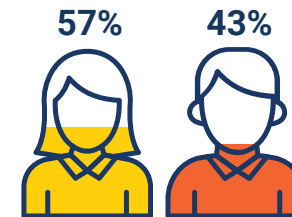
Our newly appointed General Counsel, who heads Corporate Risk, Compliance & Legal, brings with her a rich experience in gender equality and diversity from across multiple industries and countries. She will be driving several initiatives within the company, including the recently launched VFS Global Women's Network, that are aimed at further strengthening our Diversity & Inclusion strategy.

VFS Global understands that in today's environment, it has never been more critical for a company to demonstrate its commitment to addressing gender inequality. In light of the same, VFS Global

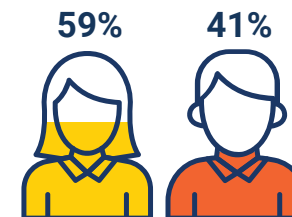
DIVERSITY & INCLUSION

Gender Diversity at VFS Global

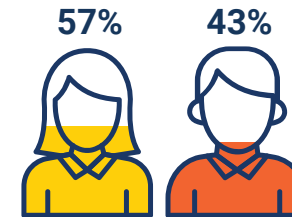
Female:Male Ratio



2020



2019



2018

signed the British High Commission 'UK in India' Network Gender Equality Charter, which focuses on promoting gender equality within our workplaces and beyond and empowering people of all genders to break down gender norms and together build a gender-equal society.

Adapting and staying updated with the times, we also released our revised Diversity and Inclusion Policy for employees in 2020.

EMPATHY

We keep empathy at the core of everything we do, be it communicating with our employees, customers, trade partners, or client governments. During the pandemic, we made sure our employee communications were empathetic and took into consideration the unique circumstances and needs of employees.

We have put structures and guidelines in place for employees to voice concerns and request support. We encourage them regularly to not shy away from seeking help.

REMOTE WORKING

Amidst the COVID-19 pandemic, VFS Global was committed to take care of its employees and control the business impact of the situation while ensuring business continuity. In light of this, VFS Global implemented a 'Work From Home' policy as a precautionary measure to tackle the pandemic, keeping flexibility at the core.

4.1 | People

Employees

We have made sure that employees have sufficient infrastructure, flexibility, and support to do their job to the best of their ability under the current circumstances. No matter which digital tools our employees use, we have ensured that they know how these systems work, why they're being used, and who can support if troubles are encountered. This was done through regular trainings and updates about these digital tools to our employees.

HEALTH AND SAFETY

The safety and wellbeing of our employees are of utmost importance to us, and we take every possible measure to create a safe and secure environment at our offices and Visa Application Centres (VACs). We ensure everyone's ergonomic comfort with suitable chairs and work surfaces, correct illumination, and proper climate control. We also make sure our facilities are clean, and that the water is safe for drinking.

During the pandemic, all employees had to undergo a mandatory module on COVID-19 awareness. Employees were being kept abreast and communicated to on a timely basis on any update or advisory pertaining to the spread, prevention, guidelines on COVID-19, any change in organisational structure and staffing needs. We also introduced an easy-reference employee handbook for a safe restart, with all the guidelines, information, and protocols to help employees in transitioning back into

their workplace in a safe, smooth, and efficient manner. Employee health and safety was monitored throughout the crisis. Daily employee status was monitored by the corporate security team and a report was consolidated at the end of each day since early February which was then shared with our executive management team.

For the physical safety of our staff and customers, we also security-check our premises constantly, at all locations, and we make sure that all staff receive security training as part of their HR on-boarding. Our premises are always deep cleaned and sanitised and our security personnel are equipped with protective gear and our employees with face masks and gloves. For more details on our physical security measures, please refer to 'Resilience' on page 15.

MENTAL HEALTH AND WELLBEING

Mental health implications such as stress, fear, and uncertainty, especially during the current times, can be very devastating, and we took several measures, many of which are still ongoing, to improve the wellbeing of our employees.

We partnered with Isha Foundation to conduct exclusive sessions on yoga and guided meditations by trained instructors globally to help employees develop inner balance and stability. Fitness sessions including virtual yoga, zumba, aerobic

and dance classes were conducted for employees across regions like South Asia, Middle East, Africa, Europe and China. In the Middle East region, we launched a wellbeing hotline to manage any challenges or stress of employees, while in Europe, we partnered with organisations such as 'Outreach' to develop holistic employee assistance programmes to provide support and employee counselling services. We also connected with local counsellors in some locations to offer online support/ counselling services to our employees.

Internally, other than promoting a sustainable working from home culture, we issued guidelines for Head of Department and People Managers to ensure employee wellbeing and keep a regular check on them through regular communication. We also encouraged employees to stay connected with each other through virtual video meetings.

By skilling our employees and improving their mental wellbeing, we aim to not only create a more motivated, engaged and high-performing workforce, but ensure customer loyalty and brand goodwill as well.

LEARNING AND DEVELOPMENT

Learning and development is not just an activity at VFS Global, but a deliberate business strategy, closely aligned with our objectives. We give each new hire six mandatory training modules that must be

completed within a month of joining. Topics within these modules include the VFS Global Code of Conduct, data privacy, corporate security, IT security, and anti-bribery and corruption.

We don't stop there. Because our business is fast-moving, we constantly train, and retrain, our people in core competencies that best match our evolving business goals. Even when the Coronavirus pandemic forced the entire globe into a lockdown, halting our business for over four months, we understood the role learning and development will play in rebuilding a rebooted world, and did not put capability building of our people on hold.



1,578
new employees were trained and certified in 2020, clocking 31,560 man-days of training.



37% employees participated in Instructor-led Courses delivered online, whereas
63% employees preferred Self-learning Programmes

4.1 | People Employees

Be it reskilling the workforce or rolling out company-wide training modules, VFS Global made sure the learning process for its employees was only enhanced further through the online channel.

In recognition of the exemplary learning and development practices within the organisation, VFS Global has also been awarded the Golden Peacock National Training Award for 2020, through a special virtual presentation ceremony that was hosted on a digital platform in July 2020. We had earlier won this award, which is given to only one company every year from a specific industry, in 2017 as well.



As our employees work from home, VFS Global put additional emphasis on digital learning and enabled and delivered value-creating efforts by adapting programmes and delivery. From conducting a slew of online trainings on various subjects by

external speakers, to virtual knowledge sharing sessions by our in-house experts and senior management, this lockdown period saw a series of activities at VFS Global that brought employees together to learn, inspire, and enjoy, while working from home.

LEARN FROM HOME:

This programme was introduced in April 2020 to engage and up-skill or re-skill employees as they worked from home. It comprised Instructor-Led Webinars on various subjects around personal and professional development with special attention to health and wellness. It also consisted of self-paced eLearning Modules from top Institutes like the Boston University, Harvard Institute and Indian Institute of Management (IIM) and training platforms like eDX, Coursera, Udemy and Skillsoft. In addition, over 250 inter-organisational webinars were identified and offered, hosted by top business schools and communities such as the London Business School, Association of Talent Development, TedX, etc., to bring in fresh perspectives and ideas. VFS Global also introduced its mobile training platform called Percipio in Q4, which offered our employees access to over 550 courses, in multiple languages. Around 111,690 employee registrations were recorded in 2020, out of which 32,524 employee logins attended webinars and 79,167 employee hits were recorded on

Learn From Home' Programme



Webinars Conducted

105

Participant logins for the Webinars

32,520



e-Learning Modules Released

112

Hits on eLearning Modules

75,292

eLearning courses. Around 80% of all VFS Global employees have enrolled for one or more course.

HEALTH AND WELLNESS:

We conducted programmes for employees targeting their overall wellbeing. Sessions on yoga for health, yoga for success, yoga for peace and yoga for respiratory health were conducted in addition to focused sessions on meditation and mindfulness. The ongoing 'Learn From Home' series offered programmes on de-cluttering life, pranic healing, work from home essentials. Employees were also trained on COVID-19 prevention to take care of themselves, their colleagues, customers, and environment at large.

PROCESS TRAINING/ PREPARATIONS FOR AN EFFECTIVE RESTART:

To ensure our VACs restart seamlessly, VAC-specific refresher trainings were conducted across our Centres. Over 1,100 Videos were created on VAC-specific process training and rolled out to employees. These videos, which were watched around 37,200 times in 2020, now run on VFS Global's very own self-paced learning platform called VideoTube. In addition to that, a fully online training programme has been created for employees who will join us in 2021, enabling them to learn at their own pace. It also allows business teams to recruit in small numbers and still complete the induction in time.

4.2 | People

Customers

Customer safety and convenience are at the core of everything we do, and we constantly aim to enhance customer experience by making the visa application process and other consular related services as convenient, automated, seamless, and safe as possible. Through our global presence and dedicated employees, we create value for all our stakeholders, including society at large. Being an ISO 10002:2018 certified organisation for quality management – Customer Satisfaction, VFS Global has implemented defined processes to monitor and measure complaint handling to enhance customer satisfaction.

CUSTOMER CARE

Customers rightly expect service from us that is efficient, smooth, and friendly. We review this constantly, focusing especially on the challenge of keeping the quality high during peak times. No one likes to be kept waiting and our ethos is to respond quickly to requests and take ownership of any problems, should they arise.

Built into our Service Level Agreements with client governments are clear targets for responding to customer queries or complaints. We require that all e-mail correspondence within our control is to be acknowledged within 48 hours and closed within seven calendar days. Social media queries or complaints are to be acknowledged within eight hours and closed within 48 hours. For managing complaints, we use a clear five-step Resolution Matrix, developed for just this purpose.

Despite our teams being forced to work remotely for most of the months in 2020, we continued to resolve our customers' queries around the clock. From the lockdown to the restart period, we saw an unprecedented rise in volume against the pre-COVID 19 period, with our social media handles registering a staggering 354% rise in customer interaction volume. We primarily received queries from customers, which saw a 73% increase on our social media platforms and 80% on email compared to the same period in 2019. Our teams were completely motivated in assisting customers who reached us and their queries on visa applications and appointments, passport status, visa centres closure and restart dates, and visa process and requirements.

As part of our Customer Care proposition, VFS Global implemented a 24x7 real-time Social Media Command Centre (SMCC) in 2019, lending a structured approach to our

customer interaction. Despite the pandemic forcing our SMCC to go remote, we still were able to offer seamless service to our customers around the clock, without any major challenges.

Increased customer queries



4.2 | People

Customers

CUSTOMER FIRST

'Customer First' is a successful initiative for enhancing our customer care culture across the organisation and to address peak season challenges with large numbers of application volumes, using digital and non-digital platforms.

Under this initiative, we measure not just the speed of our responses to customers, but also assess their quality and process efficiency, through insights that come to us from our 'Voice of Customer' initiative. Our Customer Care team analyses e-mail and social media communications closely, and shares what they find with client governments, wherever applicable.

In 2020, the overall positive sentiments for VFS Global as a brand increased by a massive 794% to 19,248 positive comments, from 2,153 positive comments in 2019. We also saw a steady rise in our Trustpilot score, from 3.4 in January 2020 to 4.6 in December 2020, primarily due to the feedback we received from our customers on the safety standards incorporated at our centres and service extended by staff.

While 'Customer First' is working behind the scenes, we also have Customer Experience Managers, across some limited VACs who work directly with the people who come to our centres. They help customers personally with concerns, and proactively support a smooth application process.

CUSTOMER AWARENESS

Customer awareness is equally important for us, and we ensure that our customers are informed about any change in Visa norms and health and safety practices at VFS Global. To ensure that, we launched a 'COVID-19: Customer Advisories' page on www.vfsglobal.com for information on country-specific visa advisories. We updated these advisories regularly on our social media handles as well. We also launched the #TravelAgain inspiration page on our website for positive and inspiring content and helpful information from credible sources, to let readers make their travel plans.

The safety of our customers is of top priority for us. Thus, to showcase the key health, safety and hygiene measures VFS Global has taken across all its VACs, we introduced the Health & Safety Video for our customers.



Caring for our customers is part of our ongoing priorities, and we continuously take measures to offer them a safe and convenient experience.



Overall positive sentiments related to customer interaction increased to

19,248
from
2,153
in 2019

Trustpilot score increased to

4.6 out of **5.0** from
3.4 in 2019

of customer responses every minute



2020 – 9
2019 – 24
2018 – 24
2017 – 27

Customer feedback volume dropped (from 2,846,704 to 1,104,465), hence the overall response is showing as 9

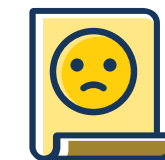
Customer Satisfaction



2020 – 95%
2019 – 95%
2018 – 96%
2017 – 97%

Overall – 95%

Complaints Resolution



2020 – 99.9%
2019 – 99%
2018 – 97%
2017 – 97%

4.3 | People

Community

At work, we focus on serving client governments and customers, but our impact on society is much wider. We take our responsibilities towards the communities around us seriously. Many of our employees, customers, and suppliers live locally, and so this is simply good business. And of course, it's also the right thing to do.

While employees are encouraged to volunteer their time during weekends, we also provide two fully paid days off per annum for employees to volunteer for community support activities. We include a few examples of our engagement activities below.

MEANINGFUL GIFTING

Instead of giving customary corporate gifts, in 2020, VFS Global focused on supporting community initiatives thereby serving the needs of the hour and giving a more meaningful gift to our clients and partners.



Supporting UAE government's efforts to strengthen the country during crises, VFS Global made a conscious decision of donating meals to the less fortunate people in the UAE during the month of Ramadan through the 10 Million Meals initiative.

During Diwali, VFS Global donated the amount through the Indian Consulate in Dubai towards repatriating stranded Indian expatriates in the UAE who were held behind without any financial aid and brought them home to their loved ones.

Just before Christmas, we donated care packages including medicines, blankets, and hygiene kits to the Consulate General of Philippines in Dubai to support the Filipino migrant workers who lost their jobs due to the pandemic.

THE AKANKSHA FOUNDATION

Children from underprivileged backgrounds need access to quality education. To this end, since 2015, we have partnered with the foundation to support public schools in Mumbai and Pune. From 2015 to 2019, our programme benefitted more than 500 students

of the Shindewadi Mumbai Public School achieving a 100% pass rate in their 10th grade exams. In 2020, we took up on us to support the Pujya Kasturba Gandhi English Medium School in Pune benefitting over 600 students.

WALK FOR EDUCATION

Employees from VFS Global's Dubai, UAE offices participated in the 'Walk for Education' event and helped raise funds to support the education of children in developing economies across the world. More than 100 Volunteers participated in the event organised by Dubai Cares Authority and helped raise over AED 5,700 towards the cause.

PROMOTING CAREER READINESS

Experts from VFS Global's Learning & Organisation Development team conducted exclusive sessions on various topics relating to career readiness for trainees of TATA Strive, which provides skill training to youth from low-income families in India. The topics included interview skills, time management and interpersonal skills among others and benefitted 150 young trainees who will soon begin their corporate career journeys.

#GOVIRTUAL

In partnership with iVolunteer, employees in India were encouraged to take up virtual projects and activities based on their skills and interests to promote virtual volunteering. This helped us support community initiatives while adhering to the social distancing norms in the country during lockdown.

DADOBRO

In Russia, our employees regularly participate and contribute to community initiatives through DaDobro - the International Volunteer Movement, that is supported by VFS Global. DaDobro (joining two Russian words 'Da' meaning Yes and 'Dobro' meaning Good), acts as a bridge between the community needs and corporates.

The organisation fosters a socially oriented corporate culture and operates in Russia, Ukraine, Belarus, Kazakhstan, Uzbekistan, and the UK. In 2020, DaDobro partnered with volunteers from more than 80 corporate organisations supporting causes and activities of 75 charitable institutions that benefitted over 5,000 individuals. More than 1,000 VFS Global employees participated in initiatives throughout the year as part of DaDobro's 'Good Deeds Calendar', which dedicates a month to a particular theme including education, environment, compassion, sports & wellness and animal-welfare among others.



4.3 | People

Community

GIVE FOR GOOD

Give a little, help a lot - that's what VFS Global's 'Give For Good' annual initiative is all about!

Through this enterprise-wide campaign to support local communities, VFS Global employees from over 80 cities across the world participated in about 10 'Give for Good' initiatives and helped children and families across Australasia, China, Europe, Middle East & North Africa, Russia & CIS, and South Asia to have happy holidays.

1. Times of Miracles - Russia, Kazakhstan, Belarus
2. Christmas Jumper Day Fundraiser – United Kingdom
3. School Supplies Donation Drive – India, Sri Lanka
4. Clothes & Blankets Donation Drive - Philippines
5. Clothes & Toys Donation Drive – Thailand
6. Toy Donation Drive & Play Area Renovation Activity – Algeria



4.3 | People

Community



CHAMPIONS OF CHANGE'

Our signature employee volunteering programme 'Champions Of Change' encourages VFS Global staff to actively participate in and provides opportunities for them to contribute to community initiatives.

The pandemic did not stop our employees from pursuing their passion and lending a helping hand to the needy. In 2020, our champions made some exemplary contributions towards social causes.

Here are our 'Champions of Change' -

1. **Hari Hadkhale** from London (UK), participated in the London Marathon and completed 26.2 miles, raising GBP 1,010 in support of Cancer Research UK.
2. In Ahmedabad (India), **Harshvardhan Nagar** volunteered with a local charity to provide meals/ food supplies to families of daily wage workers that were severely affected due to the lockdown in the city.
3. In London (UK), **Iffat Memon** regularly volunteered at a local food bank in London, which helps distribute food packets to vulnerable families.
4. **Kathryn Martin** in London (UK), has been associated with Alpha India Foundation, a charity organisation in India since 2001 and supports four children by taking care of their daily meals, tuition fees, and study materials.
5. **Maria Paula Lizcano Sepúlveda** from Bogota DC (Colombia) has been conducting online sessions for local communities during the lockdown under the initiative 'Let's have a Cup Of...!', on topics that help them improve their personal and work lives!
6. A pioneer of DaDobro Volunteering Movement, **Oksana Sarga** from Saint-Petersburg (Russia), has been actively supporting and coordinating volunteering projects and other initiatives since the past six years.

7. As part of his 'Ride For Support' programme and to promote The Akanksha Foundation's 'Education Saves Lives Too' campaign, **Ram Mohan** from our Global Support Office in Mumbai (India), travelled 4,000 km and visited 20 villages in south India to teach kids how to use digital tools and learning platforms, and distributed refurbished smartphones and tablets.
8. For several years, **Somrak Tungkhanakhorn** in Bangkok (Thailand) has been using his weekends and holidays to travel to remote areas in Thailand to help

destitute families. He recently received the Thai Monarch Long Services Award Pin from Her Royal Highness Princess Chulabhorn Krom Phra Srisavangavadhana for his volunteering efforts!

9. **Yana Agibova** from Saratov (Russia) has been passionately volunteering with DaDobro for over two years and supported its nationwide programmes in 2020.



4.4 | People

Client Governments

VFS Global always strives to maintain service continuity by collaborating closely with its client governments and keeping them regularly informed about all the organisational updates. Even during the pandemic, we made sure to keep all our stakeholders always updated.



CONNECT

VFS Global's client government magazine – Connect – specifically designed to keep client governments abreast of the organisation's activities and initiatives across the globe, took on a new role in 2020 – being the key information disseminator of the company's efforts during the pandemic. Be it the safe and seamless restart of operations across regions, employee learning and engagement as they worked from home, services and solutions offered to customers and clients alike during the pandemic, and CSR initiatives undertaken, we made sure our client governments are informed about our organisation's efforts through the three editions of Connect published in 2020.

Starting 2021, Connect will transition to a fully online magazine, thereby strengthening our efforts to lower our carbon footprint by avoiding printed copies and deliveries of the same.

CLIENT GOVERNMENT NEWSLETTER

To provide clients with regular and up-to-date information on VFS Global's efforts - be it resuming visa operations, progress across other business verticals, and even launching new services - a client government newsletter was rolled out in March 2020, detailing the company's efforts during the pandemic, which was established as a continuous new information channel with monthly updates.

05.

VFS Global Sustainability Report 2020

ENVIRONMENT

5.1 Reducing Our Footprint

5.2 Green Initiatives



5.1 | Environment

Reducing Our Footprint

At VFS Global, we continue to be committed to being a good corporate citizen through continuously improving our sustainability and environmental, social and governance (ESG) performance. While we keep up with the changing market needs, even in the current times, by staying agile and resilient, the one aspect that defines the way VFS Global conducts business is ‘sustainability’.

CARBON FOOTPRINT

As awareness spreads about how humans are contributing to the long-term degradation of the environment through man-made pollution and carbon emission, governments, businesses, and consumers alike are placing higher emphasis on reducing – or even reversing – their contributions to this global problem.

At VFS Global, we constantly strive for responsible growth by monitoring our carbon footprint and gathering data about our energy use. Last year, mainly due to several travel restrictions in place, we managed to significantly reduce our direct and indirect greenhouse gas emissions from our offices, VACs, and business travel, emitting just 14,660 tonnes of CO₂e or carbon dioxide equivalent, compared with 20,176 tonnes of CO₂e in 2019. Around 730 tonnes of this was from air travel, which was again very low compared to 4,918 tonnes of CO₂e emitted in 2019 since business travel was stalled by March-end due to travel restrictions.

In order to ensure carbon emission neutral business travel, company’s work-related flights are offset since 2012 for which we collaborate with the Swiss non-profit organisation ‘myclimate’ (www.myclimate.org). And to do so, over the past few years, VFS Global has been supporting a bio-gas project in Kolar, India (Refer to Green Initiatives on page 46). However, in 2020, we were able to partly offset our business travel considering the financial challenges due to the pandemic.

With an aim to reduce our building emissions in a systematic and measurable way, we have started exploring to purchase renewable power for our VACs and offices, wherever possible. This will complement our long-standing commitment to offsetting our business travel.

We have already taken steps to lower our greenhouse gas (GHG) emissions and initiated a project to reduce the use of non-renewable energy. For VACs in locations where renewable energy is available, or a mix with renewable energy share, we intend to use renewable energy.



5.1 | Environment

Reducing Our Footprint

WATER

Companies that integrate water conservation into their long-term business models can see both economic benefits and risk mitigation over time and VFS Global is conscious about this fact. While the nature of our business is such that we primarily consume water for drinking and sanitation purposes only, we feel it is important for us to conserve water starting with the way we manage water in our facilities.

While there cannot be a limit set for drinking water, we have taken adequate steps to provide guidance, training and visual reminders to our employees on how to minimise unnecessary water use and reduce wastage. Leftover water from RO filters and dispensers is used in planters within the offices and VACs.

Other initiatives like introduction of dry urinals at VACs, installation of water-efficient fixtures in restrooms, hand-wash areas, or staff rooms, and compulsory daily checks for water leakage, among others, have helped us in significantly reducing our water usage.

WASTE

We understand that by reducing, reusing, and recycling our businesses' waste, we can help in conserving natural resources, protecting the environment, and becoming an eco-friendly and environmentally conscious company. While we produce little waste, not being a manufacturer, we do produce some, and our aim is to recycle as much as possible, measuring carefully what goes to landfills. Through our continuous efforts, we have managed to gradually reduce our waste going into landfills to 295 tonnes in 2020, from 427 tonnes in 2019 and 558 tonnes in 2018.

E-WASTE MANAGEMENT

With the boom in technology and the mushrooming rate of consumption, the generation of e-waste is increasing, too. Being a technology-enabled company and having a significant proportion of our waste as end-of-life electronics and IT equipment, we are cognisant of the fact that materials used in their component parts can jeopardise both environmental and human health, and continuously take measures for proper e-waste disposal.

For example, we employ a certified waste manager to collect and dispose appropriately all our IT and e-waste. In India, this amounted to 6,065 kgs of waste items being properly recycled in 2020. Our offices in the UAE and the Kingdom of Saudi Arabia together recycled 1,701 kg of e-waste that may have potentially damaged the environment if it went into a landfill.

Waste

2020 295 Metric tons

2019 427 Metric tons

2018 558 Metric tons



5.2 | Environment

Green Initiatives

Businesses that focus on green initiatives for their workspace, employees, and products prioritise the health of the planet and environment. At VFS Global, we understand that for a company's green initiative to be a successful one, everyone in the organisation has to be in on it as well. Thus, other than the organisation-wide initiatives, we constantly encourage our employees to be champions of green initiatives.

PROVIDING ACCESS TO CLEAN ENERGY

VFS Global has been partnering with the Swiss non-profit organisation 'myclimate' to fund a biogas project in Kolar (near Bengaluru), India over the past few years to offset business-related flights. Under this project, biodigesters are installed in each household that help produce clean energy for about 8,000 families, or 40,000 people.

The project benefits the people of Kolar by cutting use of kerosene and firewood for cooking, leading to cleaner air, reducing pressure on the local forests for firewood harvesting (the project removes the need for an estimated 4.5 tonnes of wood per household every year), and helping farmers by giving them waste slurry from the biogas system as a soil improver. And of course, greenhouse gas emissions are being reduced, there being fewer wood fires in people's homes.

WORLD ENVIRONMENT DAY

Close to 250 VFS Global employees attended a special Climate Change Webinar on 4 June 2020 to celebrate the World Environment Day. The session was conducted by its non-profit partner myclimate, helped the

participants understand what Climate Change is, how it affects them, and what they can do to protect the planet.

In addition, a series of social media posts were designed and published, highlighting the three R's at the centre of VFS Global's conservation efforts - Reduce, Reuse and Recycle.

SUPPORTING CONTINUED EDUCATION

In UAE, VFS Global joined hands with Dubai Cares and the UAE Ministry of Education to support their 'Education Interrupted' initiative by making old IT devices available for students from less privileged families to continue with their distance learning programmes. Similarly, VFS Global's London office donated refurbished laptops and smartphones to our charity partner Save the Children who distributed them to children from vulnerable and hard-to-reach local families to support their virtual education and learning needs.

APPLES FOR BATTERIES

Batteries contain toxic materials that damage the environment. To address this, we conducted a used-battery collection

drive across 10 cities in Russia in October 2020. Employees and customers brought in used batteries and traded them in for green apples as part of the initiative. We collected around 800 kilos of batteries to be disposed of responsibly, avoiding dumping in local landfills.

TECH FOR TREES

Employees in Dubai (UAE) donated their old electronics and devices towards the 'Tech For Trees' initiative, organisers of which

planted one tree on behalf of VFS Global for each device that was donated to the cause. Some devices were also upcycled and distributed to low-income families in the UAE. The remaining devices were disposed in a responsible manner to ensure they don't end up in landfills and harm the environment. The initiative helped us take small steps to protect the environment, increase green cover to combat climate change by planting trees (in Ghana) and also serve local communities.



06.

VFS Global Sustainability Report 2020

ECONOMIC CONTRIBUTION

6.1 Business Benefit To The Society

6.2 Tax As A Key Economic Contributor To The Society



6.1 | Economic Contribution

Business Benefit To The Society

VFS Global, being a crucial player in the travel ecosystem, plays its part in supporting the communities and economies of the countries where we operate in by providing employment, imparting training, supporting local businesses, and tax contributions.

Travel brings a meaningful change to the lives of the people and communities it touches. It not only creates jobs but enriches communities both economically and socially. It supports diversity and inclusion, employing and offering opportunities to people from all walks of life, including minorities, youth, and women.

According to the World Travel & Tourism Council's 2020 Economic Impact Report, during 2019, travel and tourism supported one in 10 jobs (330 million total), made a 10.3% contribution to global gross domestic product (GDP), and generated one in four of all new jobs.

International trade and investment have always relied on the cross-border mobility of individuals, and VFS Global, being one of the major players in travel ecosystem, plays a significant role in facilitating cross-border mobility. Arrivals of foreign visitors trigger local expenditures on accommodation, food, transportation, and other goods and services. These expenditures, a form of international trade funded by the visitors' foreign currency, benefit local communities.

VFS Global employs 7,773 people in 144 countries, providing valuable income to staff and their families. Indirectly, we make financial contributions to a large ecosystem of service providers such as couriers, drivers, and other support staff who help us keep our business running smoothly.

We also contribute to local economies by bringing growth and innovation to the community in which our business is established. We help stimulate economic growth by providing employment opportunities to local people at the Submission Officer level at our Visa Application Centres, thereby creating economic activity through generating taxes on incomes from employment.

In a business environment that moves as quickly and unpredictably in today's world, the way things "have always been done" is no longer the best way to do them. VFS Global, through its customised learning and development programmes, makes sure to successfully equip tomorrow's leaders with the tools and talents they need to thrive amidst constant disruption. We also support

local travel agents through the opportunity we create, and through regular training programmes to upskill and reskill them to serve our customers better.

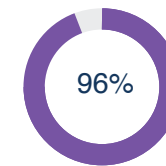
In certain countries such as Lesotho, we have a direct impact on creating opportunities for those eager to work. Here, we collaborate with governments to facilitate work permits, enabling thousands to support themselves and their families.

As a responsible organisation, VFS Global ensures that our business, providing outsourced visa application and consular services to client governments and customers, is efficient and delivers high levels of customer satisfaction. Refer to 'People' on page 33 for more. We also continue to play the role of a good corporate citizen through constantly improving our sustainability and environmental, social and governance (ESG) performance.

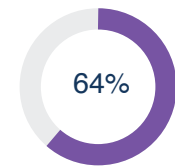
VFS Global is committed to contribute within its range of influence and beyond to support local communities.

Region-wise Locals Headcount percentage as on 31 December 2020

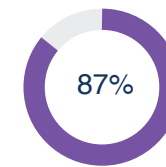
Africa



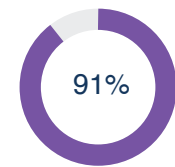
Americas



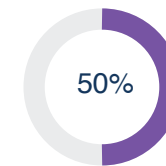
APAC



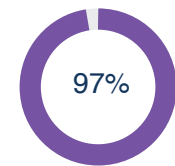
Europe/CIS



MENA



South Asia



6.2 | Economic Contribution

Tax As A Key Economic Contributor To The Society

APPROACH TOWARDS TAX MATTERS

At VFS Global, we are deeply committed to ethical business practices and to respecting local laws in the territories where we operate, and this has a direct bearing on our approach to taxation. We are committed to compliance with the tax laws and practices in the countries in which we operate and have implemented robust governance processes to enable us to do so. It is our endeavour to use automated technology to track tax-related compliances in various operating jurisdictions and also modify, alter, and create technology used in operations for easy and accurate implementation of tax reforms, wherever possible. Based on pre-determined guidelines, escalation mechanisms are in place within VFS Global with respect to key tax matters / risks including reporting to the Chief Executive Officer or Chief Financial Officer of the company or the Audit Committee or the Board, as required.

VFS Global has always maintained a cooperative and collaborative relationship with tax authorities and will continue to do so. In light of the unprecedented times due to the Covid-19 pandemic, it was imperative for VFS Global to have evolving and flexible tax policies or procedures to help address the impact of Covid-19 on our business.

ATTITUDE TOWARDS TAX PLANNING

All tax risks are identified and considered before concluding on any business decision. The tax decisions are driven out of commercial considerations and tax is just one of many factors taken into consideration when making business decisions.

TAX RISK MANAGEMENT

At VFS Global, the level of tax risk that we accept is driven by our overarching values, brand and reputation. We have a minimal tax-risk tolerance. We are committed to compliance with the tax laws and practices across all the countries we operate in, and continuously monitor changes to tax legislation, ensuring that we take advice where appropriate from professional advisers. In cases where specialist tax knowledge is required, we routinely seek professional advice.





For more information, please write to us at communications@vfsglobal.com or visit www.vfsglobal.com
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