
Human Rights and Modern Slavery Policy

Policy details

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Title	Human Rights and Modern Slavery Policy
Short description	This policy reflects the commitment of Wolters Kluwer to protect human rights and prevent modern slavery in the conduct of our business.
Owner	Global Law and Compliance Department
Contact details	corporatecompliance@wolterskluwer.com
To whom is this policy binding	All Wolters Kluwer companies
Approval level	Executive Board (EB)
Effective date	June 1, 2023

Version history

Version number	Last check (year)	Last amendments	Changes at last amendment	Approved by
2.0	2023	2023	This version replaces previous versions of the Human Rights Policy	EB
2.0	2023	2023	N/A	ECC, October 27, 2023
2.1	2024	2024	Update link to new SpeakUp system	ECC, November 15, 2024

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1. Introduction

This Human Rights and Modern Slavery Policy (“Policy”) reflects the commitment of Wolters Kluwer to protect human rights and prevent modern slavery in the conduct of our business.

This Policy serves as an extension to and should be read in conjunction with the Wolters Kluwer [Code of Business Ethics](#) (Code). Our Code sets forth the ethical standards that are the basis for our decisions and actions, and for achieving our business goals. Our workforce is required to undertake annual training on our Code, including certification that they have read and understood the Code.

Wolters Kluwer continually seeks ways to identify, assess, prevent or mitigate adverse human rights impacts and encourages the same behavior from its partners, vendors and suppliers through its Supplier Code of Conduct (“Supplier Code”). Through our comprehensive third-party risk management system, we engage with our suppliers to ensure they meet the same environmental and social standards to which we are committed.

2. Scope of this Policy

This Policy applies to all Wolters Kluwer companies and its workforce. “Wolters Kluwer”, a “Wolters Kluwer company”, “our”, or “we” refer to Wolters Kluwer N.V., and its subsidiaries and group companies in which Wolters Kluwer holds a majority interest or the right to appoint management. “Workforce” or “workforce member(s)” refer to everyone who works for a Wolters Kluwer company, including board members, officers, employees, and contractors. Although third parties are not directly bound by the requirements of this Policy, Wolters Kluwer is committed to engaging only those third parties who embrace standards of ethical behavior that are consistent with our own and will require additional assurances from third parties when adherence to this Policy is required.

3. Commitments and principles

Wolters Kluwer supports the principles of the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD guidelines for Multinational Enterprises, the Core Labor Standards of the International Labor Organization. Wolters Kluwer is a signatory of United Nations Global Compact and the United Nations Women Empowerment Principles and is committed to aligning with these respective principles.

3.1 Equal opportunity

We are a diverse and global company aimed at creating value for our employees, customers, and shareholders. We foster an inclusive company culture. We do not make employment decisions based on factors such as race, creed, color, religion, sex, age, national origin, marital status, citizenship, sexual orientation, gender identity, ethnicity, genetics, disability, handicap, veteran status, or any other status protected by law or regulation. This includes equal treatment in recruitment, hiring, training, compensation, promotion, performance assessment, and disciplinary action.

3.2 Labor and benefits

Wolters Kluwer will not tolerate any form of forced, bonded, prison, military, or compulsory labor or any form of child labor, as defined by the International Labor Organization (ILO) and the United Nations Global Compact. Labor contracts are fair, clear and transparent. Wolters Kluwer is committed to comply with all applicable local and national wages and benefits laws and to compensate, at a minimum, its employees in accordance with national legal standards, industrial standards and the standards of the ILO conventions. Wolters Kluwer also aims to ensure that its workforce earns a living wage at or above the Global Living Wage Coalition benchmarks. Wages are paid regularly, directly and on time.

3.3 Health and safety

Wolters Kluwer is committed to providing its employees a safe, hygienic, and healthy work environment. Wolters Kluwer will implement health and safety measures in accordance with applicable laws and regulations. This includes making sure that adequate facilities, training, and access to safety information are provided. Adequate measures shall be taken in our facilities to prevent accidents and damage to workers' health which may arise from, are related to, or occur during working hours.

3.4 Freedom of association

Wolters Kluwer respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference. In addition, all relevant collective bargaining agreements to which Wolters Kluwer is a party shall be respected.

3.5 Freedom of publishing

As a provider of information, we support freedom of speech and the freedom to exchange information. Wolters Kluwer is aware of the fact that complete freedom of publishing is not self-evident in some parts of the world. Even if freedom of publishing is not fully secured, this is not a sufficient reason to stop providing information. While Wolters Kluwer cannot change such a situation, the company carefully monitors legislative developments and can stimulate the distribution of information. Steps in the right direction are made by working together with local partners.

3.6 Discrimination and harassment

Wolters Kluwer is committed to maintaining an environment where individuals are treated with dignity. We do not engage in – and the company will not tolerate and condemns the promotion of – any form of harassment or discrimination, including sexual harassment. We further do not tolerate workplace violence or bullying, whether in person or online.

3.7 Modern slavery and human trafficking

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Wolters Kluwer is committed to taking steps to prevent modern slavery or human trafficking in our supply chains or in any part of our business. This Policy and our Supplier Code of Conduct reflect our commitment to acting ethically

and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our supply chains.

3.8 Privacy and data protection

Wolters Kluwer fosters a culture that respects the data privacy rights of individuals. Our [Global Data Privacy Policy](#) is based upon generally accepted data privacy principles and regulations. We collect personal data only for specified purposes, which are documented. As part of our contracting with third parties, such as vendors, we include standards and requirements for processing of data. Our workforce receives annual data privacy training on the safeguarding and processing of personal data.

4. Monitoring, reporting, and remediation

In line with the expectations articulated in the UN Guiding Principles on Business and Human Rights and as included in our [Code of Business Ethics](#) and [SpeakUp Policy](#), we provide our workforce and other stakeholders with various channels to raise concerns about human rights or this Policy in confidence and without fear of retaliation. Our [SpeakUp system](#) is available to our workforce 24/7 with the option to report anonymously where permitted by law. Other stakeholders can report a question or concerns via email at speakup@wolterskluwer.com.

We take seriously any concerns reported, and we promptly review, respond, and/or investigate any concerns. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to taking appropriate corrective action.

As part of our commitment to uphold our ethical standards and protect human rights, Wolters Kluwer reports on its human rights performance in its annual report, available on the company [website](#). Stakeholders are welcomed to give feedback on this Policy and the annual performance by contacting sustainability@wolterskluwer.com.

5. Compliance with this Policy

As with all Wolters Kluwer policies, compliance is expected by and from all persons subject to this Policy. Compliance is the individual responsibility of those subject to this Policy. Non-compliance or violations (including repeated inattention to carelessness in following this Policy, and any intentional or willful violations of this Policy) may be grounds for disciplinary actions, up to and including termination of employment or engagement. The disciplinary measures to be taken will be evaluated on a case-by-case basis, depending on the particular facts and circumstances of the violation, consistent with applicable law.

6. Policy updates

This Policy will undergo annual review unless regulatory or business needs dictate otherwise. The Global Law and Compliance Department is responsible for reviewing and updating this Policy. Any substantive changes to this Policy will be reviewed and approved by the Ethics & Compliance Committee.

If you have questions regarding this Policy, please contact the [Global Law and Compliance Department](#).

Wolters Kluwer N.V.
Zuidpoolsingel 2
P.O. Box 1030
2400 BA Alphen aan den Rijn
The Netherlands

wolterskluwer.com