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# Supplier Code of Conduct



Wolters Kluwer

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# Policy details

Name of Policy	Supplier Code of Conduct
Short description	This policy describes the minimum standards that all Suppliers of Wolters Kluwer must adhere to.
Owner	Global Law and Compliance Department
Contact details	corporatecompliance@wolterskluwer.com
To whom is this policy binding	Wolters Kluwer suppliers and business partners, including agents, resellers and third parties that deliver products or services to a Wolters Kluwer company.
Approval level	Executive Board (EB)
Effective date	January 1, 2024

## 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 Supplier Code of Conduct	Executive Board
2.0	2024	2023	n/a	ECC, November 15, 2024
2.1	2025	2025	Updated links and references, and further alignment with other company policies.	ECC, October 24, 2025

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# Content

<b>1. Working with Wolters Kluwer</b>	<b>5</b>
1.1 Scope	5
1.2 Compliance and Monitoring	5
<b>2. Raising Concerns and Questions</b>	<b>5</b>
2.1 Speaking Up	5
2.2 Zero retaliation	6
<b>3. Respecting Individuals</b>	<b>6</b>
3.1 Human Rights	6
3.2 Modern Slavery and Forced or Compulsory Labor	6
3.3 Child Labor	6
3.4 Non-discrimination	6
3.5 Wages and Working Hours	6
3.6 Harassment, Violence, and Bullying	7
3.7 Freedom of Association	7
3.8 Health and Safety	7
<b>4. Safeguarding Information and Assets</b>	<b>7</b>
4.1 Confidentiality and Intellectual Property	7
4.2 Data Privacy and Security	7
4.3 Responsible Artificial Intelligence	7
<b>5. Acting Responsibly and with Integrity</b>	<b>8</b>
5.1 Conflicts of Interest	8
5.2 Gifts and hospitality	8
5.3 Accurate Books and Records	8
5.4 Environment	8
<b>6. Following the Law</b>	<b>9</b>
6.1 Anti-Bribery and Anti-Corruption	9
6.2 Fair Competition and Business Practices	9
6.3 Trade Compliance	9
<b>7. Policy Updates</b>	<b>9</b>

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Wolters Kluwer is committed to conducting business in an ethical and sustainable manner and we avoid any business practices that do not adhere to our stringent standards, as set out in our [Code of Business Ethics](#).

The relationship with our suppliers is an important component to achieving our objectives as a sustainable and inclusive business. We want to work with suppliers who share the same values and are committed to improve sustainable practices.

This Supplier Code of Conduct supplements our Code of Business Ethics and sets forth the standard and practices that Wolters Kluwer suppliers are required to uphold.

Thank you for your continued efforts and collaboration.

Nancy McKinstry  
CEO and Chair of the Executive Board  
Wolters Kluwer

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# 1. Working with Wolters Kluwer

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.

## 1.1 Scope

This Supplier Code of Conduct ('Supplier Code') applies to Wolters Kluwer suppliers and business partners, including agents, resellers and third parties, that deliver products or services to a Wolters Kluwer company ('Suppliers'). A Wolters Kluwer company refers to Wolters Kluwer N.V. and its subsidiaries and group companies in which Wolters Kluwer N.V., either directly or indirectly, holds a majority interest or the right to appointment the management. Suppliers are expected to follow the principles set out in this Supplier Code and to communicate them to any individual or team engaged in work for Wolters Kluwer on their behalf. This includes any employee or officer, consultant, or sub-contractor and any agents engaged by the Supplier.

## 1.2 Compliance and Monitoring

Wolters Kluwer expects Suppliers to implement management systems, including policies, procedures, objectives, training, and self-monitoring, to ensure compliance with the standards described in this Supplier Code. Wolters Kluwer may from time to time request certain information from Supplier in relation to compliance with this Supplier Code so that Wolters Kluwer may fulfil its obligations with regard to monitoring, reporting and verification of its supply chain. Supplier will comply with such requests in a full and timely manner. If Supplier suspects any non-conformance with this Supplier Code, it shall promptly inform Wolters Kluwer thereof in writing. Supplier shall implement procedures to ensure that anyone acting on its behalf fully complies with applicable laws and the standards in this Supplier Code.

# 2. Raising Concerns and Questions

At Wolters Kluwer, we promote a culture of trust with open communication lines and a safe environment where everyone should feel confident to speak up, including our Suppliers and their workers.

## 2.1 Speaking Up

Supplier or any of its workers are encouraged to raise any questions or concerns about behavior that violates the law or this Supplier Code to their usual Wolters Kluwer contact, in accordance with the available channels in the Wolters Kluwer SpeakUp Policy, available on our [website](#).

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## 2.2 Zero retaliation

Wolters Kluwer takes a zero-tolerance stance to retaliation against those who raise a concern or participate in an investigation in good faith. Supplier must not tolerate any retaliation against any employee who makes a good faith report of a violation of the law or this Supplier Code or who assists in the investigation of any such report.

# 3. Respecting Individuals

Wolters Kluwer expects its Suppliers to support and uphold human rights and not tolerate disrespectful behavior, harassment, or discrimination of any kind.

## 3.1 Human Rights

Supplier will support and respect internationally recognized human rights in dealing with their stakeholders at large, namely their employees, clients, suppliers, shareholders, and communities.

## 3.2 Modern Slavery and Forced or Compulsory Labor

Supplier will not directly or indirectly use, participate in, or benefit from any form of human trafficking, slavery, servitude or any forced, bonded, prison, military or compulsory labor or similar coercion or exploitation. Where required by law, Suppliers will have employment contracts signed with all employees in the applicable local language clearly outlining the employment relationship. Supplier will engage non-employee contract workers on terms which do not contravene this Supplier Code.

We expect Suppliers to have remediation procedures to assist any worker found to be subjected to any form of involuntary labor, including human trafficking.

## 3.3 Child Labor

Supplier will not directly or indirectly use child labor, as defined by the International Labor Organization and the United Nations Global Compact and shall adhere to all national and international laws and regulations regarding child labor. The minimum age for workers will be the age of 15 or the minimum age by applicable law, whichever is greater.

## 3.4 Non-discrimination

Supplier shall treat and reward workers equally. Workers shall receive equal pay for equal work. Supplier will not discriminate in hiring and employment practices based on factors such as race, creed, color, religion, sex, age, national origin, marital status, citizenship, sexual orientation, gender identity, ethnicity, genetics, disability, handicap, caste, veteran status, or any other status protected by law or regulation.

## 3.5 Wages and Working Hours

We expect Suppliers to recognize that wages are essential to meeting workers' basic needs. At a minimum, Supplier will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages,

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overtime, maximum hours, piece rates, and other elements of compensation, and provide legally mandated benefits. Wages should be paid regularly, directly and on time. Wolters Kluwer expects its Suppliers to pay fair and adequate wages and benefits in line with industry standards. We encourage Suppliers to ensure that its workforce earns a living wage at or above the Global Living Wage Coalition benchmarks.

### **3.6 Harassment, Violence, and Bullying**

Supplier shall treat their workers with respect and dignity. As a minimum, workers shall not be threatened with or subjected to any form of harassment or inhumane treatment, including threats of violence, corporal punishment, or any other form of physical, sexual, psychological, or verbal coercion, harassment, bullying or abuse.

### **3.7 Freedom of Association**

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

### **3.8 Health and Safety**

Supplier will provide its workers with a safe, hygienic, and healthy workplace in compliance with all applicable local and national laws and regulations. This includes making sure that adequate facilities, training, and access to safety information are provided. Adequate measures shall be taken in Supplier's facilities to prevent accidents and damage to workers' health which may arise from, are related to, or occur during working hours.

## **4. Safeguarding Information and Assets**

Wolters Kluwer expects its Suppliers to be committed to handling information, data, and assets with care and protecting them from misuse, waste, and theft.

### **4.1 Confidentiality and Intellectual Property**

Supplier shall adhere to all applicable laws and contractual obligations regarding protection, use, publication and transparency of confidential information and intellectual property rights. Supplier shall respect and actively protect the confidentiality of Wolters Kluwer business information and take the necessary steps to protect Wolters Kluwer's intellectual property rights.

### **4.2 Data Privacy and Security**

Supplier shall protect personal data and comply with applicable data privacy and security laws. Supplier shall handle and process data in accordance with Wolters Kluwer's contractual agreements with Supplier and other applicable instructions and shall not process data for any other purpose than for which it was collected, received, or otherwise made available.

### **4.3 Responsible Artificial Intelligence**

If Supplier is providing products or services to Wolters Kluwer that are facilitated, augmented or influenced by artificial intelligence (AI) systems and technologies, Supplier will develop, manage, use, and monitor such products

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and services in accordance with governance framework that prioritizes human-centric approaches, fairness, privacy, security, transparency, and explainability.

## 5. Acting Responsibly and with Integrity

Wolters Kluwer expects its Suppliers to always act responsibly and with integrity toward our employees, our customers, our communities, and the environment.

### 5.1 Conflicts of Interest

It is essential we conduct all business in an honest, transparent, and neutral way, and avoid even the appearance of bias or self-interest. Suppliers should avoid situations where a conflict of interest could interfere, or give the appearance of interfering, with a Wolters Kluwer business decision and should immediately make Wolters Kluwer aware of any actual or potential conflict of interest, including any connections with Wolters Kluwer colleagues, business partners, or competitors. Supplier may contact their regular Wolters Kluwer point of contact or send an email to the Wolters Kluwer Ethics & Compliance team at [corporatecompliance@wolterskluwer.com](mailto:corporatecompliance@wolterskluwer.com).

### 5.2 Gifts and hospitality

Suppliers may not offer, give, or accept gifts or hospitality that are intended to influence a business decision. Gifts or hospitality must be modest in value, occasional, and reasonable and appropriate given the circumstance. Suppliers must avoid requesting, offering, or otherwise sharing gifts or hospitality which are in contravention of Wolters Kluwer's [Code of Business Ethics](#), either with Wolters Kluwer employees, or with others when acting on behalf of Wolters Kluwer. Supplier shall never provide gifts or hospitality to a public or government official when acting on behalf of Wolters Kluwer unless explicit, written approval is provided by the Wolters Kluwer Global Law and Compliance Department, to be contacted via [corporatecompliance@wolterskluwer.com](mailto:corporatecompliance@wolterskluwer.com).

### 5.3 Accurate Books and Records

Supplier will maintain accurate and complete financial, non-financial, and business records in accordance with all applicable laws and regulations and internationally recognized financial and non-financial accounting and reporting standards.

### 5.4 Environment

Supplier will operate in a manner that is protective of the environment and will comply with all applicable environmental laws and regulations. Wolters Kluwer expects Suppliers to commit to reducing their environmental footprint and report on their progress toward this commitment. This includes measuring and reporting on greenhouse gas (GHG) emissions in accordance with the GHG Protocol, and working towards setting science-based emission reduction targets.

We encourage Suppliers to develop and use environmentally friendly technologies and practices, increase the use of renewable or recyclable materials, and reduce water and waste consumption across their operations.

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## 6. Following the Law

Wolters Kluwer expects its Suppliers to understand and comply with the laws and regulations that apply to their business.

### 6.1 Anti-Bribery and Anti-Corruption

Supplier is expected to show ethical behavior in business relations. Supplier will comply with local, national, and other applicable laws and regulations related to bribery, extortion and other forms of corruption, including the U.S. Foreign Corruption Practices Act and the UK Bribery Act.

Supplier shall not, either directly or indirectly, offer, promise, solicit, demand, give or accept a bribe. Bribery is any act in which “anything of value” either directly or indirectly is offered or made to a person to obtain or retain business, to secure an improper business advantage, or to improperly influence a government official.

### 6.2 Fair Competition and Business Practices

Free and fair competition is essential to the welfare of the global business. Supplier will comply strictly with all applicable antitrust and non-competition laws and in particular, not fix prices, rig bids, allocate customers or markets, or exchange current, recent, or future pricing information with competitors.

### 6.3 Trade Compliance

Supplier will understand and comply with all applicable international trade controls, including export controls, economic sanctions, and anti-boycott laws.

## 7. Policy Updates

This Policy will undergo annual review unless regulatory or business needs dictate more frequent revisions. 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.

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