
Diversity, Equity, Inclusion & Belonging Policy

Policy details

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Title	Diversity, Equity, Inclusion & Belonging Policy
Short description	This policy supports the ambitions of Wolters Kluwer and its subsidiaries to promote a diverse and inclusive work environment.
Owner	Vice President, Diversity, Equity, Inclusion and Belonging
Contact details	belong@wolterskluwer.com
To whom is this policy binding	All Wolters Kluwer companies
Approval level	Executive Board and Supervisory Board
Effective date	December 22, 2023

Version history

Version number	Last check (year)	Last amendments	Changes at last amendment	Approved by
1.0	2023	2023	N/A – new policy	Executive and Supervisory Board

Related documents:

Code of Business Ethics

Human Rights and Modern Slavery Policy

SpeakUp Policy

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Introduction

A diverse workforce drives innovation, better decisions and stronger performance, which creates value for all our stakeholders. An inclusive culture ensures all employees are heard and respected for their contributions and helps to maintain a rewarding work environment that encourages individual and business success.

This Diversity, Equity, Inclusion & Belonging Policy (“Policy”), which is based on the Company’s informed and deliberate exercise of business judgement, reflects the commitment of Wolters Kluwer to foster an inclusive culture of belonging to support our business goals.

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 as we work to achieve our business goals. Our workforce is required to complete annual training on the Code, including certifying that they have read, understand, and commit to compliance with the Code.

Scope of this Policy

This Policy applies to all Wolters Kluwer companies and their workforces. “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. For the purpose of this Policy, “Workforce” or “workforce member(s)” include all employees, board members and officers of each Wolters Kluwer company.

Governance

The Supervisory Board is responsible for adopting a Policy for the composition of the Executive Board and the Supervisory Board. This Policy is published on our [website](#).

The Executive Board is responsible for adopting this Policy for senior management and for the rest of the workforce with the prior approval of the Supervisory Board.

Our Diversity, Equity, Inclusion and Belonging (DEIB) activities are overseen by the Executive Board. The CEO and Chair of the Executive Board has ultimate responsibility for and oversight of the DEIB strategy. Our Chief Human Resources Officer is accountable for the development and execution of the DEIB strategy and reports on progress of the DEIB strategy to the CEO. Our VP Diversity, Equity, Inclusion, and Belonging is accountable for the recommendations and implementation of the annual DEIB actions with approval by the Senior Vice President, Talent and Chief Human Resources Officer.

The Executive Board informs the Supervisory Board periodically about execution of this Policy and about progress with respect to DEIB within the company in general. The Supervisory Board advises the Executive Board on this topic and may delegate part of its responsibilities in this respect to its Selection and Remuneration Committee.

Respecting and Protecting Our People

Aligned with the [Wolters Kluwer Code of Business Ethics](#), we strive to create an environment where all colleagues have a strong sense of belonging, inclusive of characteristics such as race, creed, color, religion, sex, age, national origin, marital status, citizenship, sexual orientation, gender identity, ethnicity, genetics, disability, handicap, veteran status, caste or any other status protected by law or regulation. We reinforce our commitment to belonging by applying a standard of equal treatment for all in our employment decisions including those related to recruitment, hiring, training, compensation, promotion, performance assessment, and disciplinary action.

In addition, we are 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 do not tolerate workplace violence or bullying, whether in person or online. Violence and bullying include verbal or physical threats, or any other acts of aggression or violence advanced toward or by an individual. And we are committed to providing a safe, hygienic, and healthy work environment for the safety and health of our workforce.

To drive progress in our journey of cultivating a diverse and inclusive workplace, we are striving to implement key actions as permitted by and in accordance with applicable laws, regulations, policies and customs. These key actions include:

- Hire, promote, and retain a highly engaged and talented workforce that represents the diversity of the communities where we live and work.
- Cultivate a culture of inclusion and belonging that values authenticity and fairness, respects diversity in all its forms, and enables everyone to contribute to our collective success while positively impacting the communities where we live and work.
- Provide DEIB learning programs to all employees, including programs on inclusive behaviors, mitigating bias, allyship, and inclusive recruiting and hiring.
- Support our company-sponsored global inclusion networks.
- Offer a global accessibility resource site with accessibility offerings and the option to request an accommodation.
- Offer flexible work arrangements, including flexible work hours and the option to work outside the office, to help our workforce balance their professional and personal commitments.
- Conduct an annual employee survey that includes a belonging score, through which we measure the extent to which employees believe they can bring their authentic selves to work and be accepted for who they are.
- Regularly review our policies and practices to support diversity, equity, inclusion and belonging, and update them as appropriate.
- Offer inclusive benefits tailored as appropriate to local markets, such as gender-inclusive parental leave policies, adoption assistance, insurance coverage for fertility services, and support for childcare services.

We track the aggregate candidate diversity slate for all U.S.-based roles, setting specific slate goals to advance gender, race, and ethnic diversity. We aspire to year-over-year improvement and are committed to executing on actions to maintain our positions of strength while improving where we have opportunity.

Raising Concerns

We encourage our workforce to report any actual or suspected irregularities including breach of this Policy. Our [Code of Business Ethics](#) and [SpeakUp Policy](#) offer various channels to raise any concerns in confidence and without fear of retaliation.

Our workforce can report any concerns about this Policy to:

- Their direct manager or higher manager within their line of reporting
- An HR representative
- A member of the Global Law and Compliance Department
- The Ethics & Compliance Committee, via [email](#) or through the [SpeakUp](#) system. Our SpeakUp line is available 24/7 with the option to report anonymously, where permitted by law.

Compliance with this Policy

As with all Wolters Kluwer policies, compliance is expected by and from all people 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.

Policy Updates

This Policy will undergo annual review unless regulatory or business needs dictate otherwise. The Diversity, Equity, Inclusion and Belonging function is responsible for reviewing and updating this Policy. Any substantive changes to this Policy will be reviewed and approved by the Executive Board and the Supervisory Board.

If you have questions regarding this Policy, please contact the [Human Resources Department](#).

As part of our commitment to foster a diverse and inclusive work environment, Wolters Kluwer reports on its DEIB performance in its annual report, available on the company website.

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

[wolterskluwer.com](https://www.wolterskluwer.com)