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# Stakeholder Engagement Policy

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# Policy details

Name of policy	Stakeholder Engagement Policy
Short description	This policy reflects the commitment of Wolters Kluwer to engage in dialogue with relevant stakeholders on sustainability aspects of its strategy.
Owner	Corporate Sustainability
Contact details	<a href="mailto:sustainability@wolterskluwer.com">sustainability@wolterskluwer.com</a>
To whom is this policy binding	All Wolters Kluwer companies
Approval level	Executive Board (EB)
Effective date	December 19, 2023

# Version history

Version number	Last check (year)	Last amendments	Changes at last amendment	Approved by
1.0	2023	2023	New Policy	EB, December 19, 2023

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# Content

<b>1. Introduction</b>	<b>4</b>
<b>2. Scope of this Policy</b>	<b>4</b>
<b>3. Key stakeholders, topics &amp; methods of engagement</b>	<b>4</b>
3.1 Customers	4
3.2 Employees	5
3.3 Suppliers and partners	5
3.4 Investors	5
3.5 Society	5
<b>4. Policy updates</b>	<b>6</b>

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# 1. Introduction

This Stakeholder Engagement Policy (“Policy”) outlines the approach of how Wolters Kluwer engages in dialogue with relevant stakeholders on sustainability aspects of the company’s strategy, in accordance with section 1.1.5 of the Dutch Corporate Governance Code.

Wolters Kluwer continually seeks ways to create long-term value for all stakeholders including society, by using resources thoughtfully and efficiently, respecting our company values and focusing our efforts on actions that support our purpose and our strategy. Stakeholders are groups and individuals who, directly or indirectly, influence or are or may be influenced by the attainment of the company’s objectives, as well as certain sustainability matters.

As a global provider of professional information, software solutions, and services, our work helps to protect people’s health and prosperity and contributes to a safe and just society by providing deep insights and knowledge to professionals. Moreover, sustainability is fundamental to how we do business and respect and create value for our stakeholders, something which has been ingrained in our processes, policies, values, and company culture for many years. To honor these various commitments, we carefully consider the interests of our stakeholders. These include our customers, employees, suppliers and partners, investors and society.

## 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.

## 3. Key stakeholders, topics & methods of engagement

Wolters Kluwer stimulates stakeholder dialogue in all its business activities and via the various channels and activities for stakeholder engagement. The form that is chosen for any specific dialogue depends on the topic and on the stakeholder(s) involved, since not every stakeholder of the company can be regarded as equally relevant to every aspect of our strategy, including sustainability. As such, the group of stakeholders we engage with is subject to change depending on the topics of the dialogue as well as their developments over time. Moreover, Wolters Kluwer reserves the right to decline requests or invitations to engage in dialogue with stakeholders, or to accept such requests or invitations at its sole discretion. The topics and methods of engagement with each stakeholder group are described below.

### 3.1 Customers

For customers, we sustain a continuous year-round dialogue involving our sales, marketing, and customer service teams, fostering collaboration on product development to meet evolving needs. Moreover, we provide clear

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information on our Environmental, Social and Governance (ESG) matters, where the information is already available or publicly disclosed, to all customers who request such information. We do not provide any confidential information and are free to decline requests under certain conditions.

### **3.2 Employees**

Our employees are instrumental to the success of our company, meaning that cultivating an environment in which employees are engaged and experience a strong sense of belonging is critical to driving business results. Our comprehensive engagement with employees spans various formats, from one-on-one interactions to group meetings, townhalls, check-ins, performance assessments, our annual engagement and belonging survey and works councils. We aim to provide a welcoming environment and equitable opportunities for all employees, fostering our culture of ethics and compliance by raising awareness of our values and the standards in our Code of Business Ethics and other policies. Through our various communication and training activities, we support employees to understand how our company standards apply to their day-to-day work and interactions with colleagues, customers, and business partners. We monitor our culture of ethics and compliance via the annual global employee survey, our SpeakUp program, and through internal audits, which simultaneously help us measure the effectiveness of the programs.

### **3.3 Suppliers and partners**

Our supplier engagement focuses on regular quality screening, audits, and due diligence, emphasizing collaboration for mutual success. We expect our business partners to support the same social and environmental standards by committing to our Supplier Code of Conduct or an equivalent standard. Additionally, suppliers who are managed through our central supplier database are required to complete a due diligence questionnaire providing information on their policies for data security and data privacy, human rights and labor conditions, environmental footprint, and more. We intend to further engage with suppliers on various sustainability matters to help achieve our own sustainability goals.

### **3.4 Investors**

We maintain an active dialogue with investors throughout the year through investor roadshows, conferences, and ad-hoc meetings or calls during open periods. Members of the Supervisory Board and Executive Board participate in many of these meetings, providing them with direct stakeholder input on a wide range of strategic, financial and sustainability topics. We also conduct regular engagement with other market participants, including financial analysts, ESG and governance ratings firms and analysts, and credit ratings agencies. We are in strict compliance with applicable rules and regulations on fair disclosure to the financial markets in accordance with our [Investor Relations Policy](#).

### **3.5 Society**

Our societal stakeholders include government bodies, media, civil society organizations, regulators, industry organizations, end-users/clients of our customers, local communities, and society in general.

Our societal engagement is manifested through active support for communities worldwide, aligning efforts with UN Sustainable Development Goals, ensuring the availability of our products and services where needed as well as being a fair taxpayer. What is more, our products and services can help (indirectly) protecting people's health and prosperity, and contributing to a safe and just society.

Dialogue on sustainability aspects of the strategy also takes place through dedicated meetings involving the Executive Board, Management Board, and Supervisory Board, ensuring a holistic approach to sustainability aspects. The Executive

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Board and Supervisory Board receive regular formal updates on ESG topics, including climate-related matters. In addition to presentations on selected ESG-related topics such as the governance structure of ESG activities and the engagement of employees, the Supervisory Board receives regular updates regarding ESG priorities. The Supervisory Board continues to support the ESG activities of the company and believes that these efforts will contribute to an inclusive culture of integrity, accountability, and transparency, creating long-term value for all stakeholders.

## 4. Policy updates

This Policy will undergo annual review unless regulatory or business needs dictate otherwise. The Corporate Sustainability Department is responsible for reviewing and updating this Policy. Any substantive changes to this Policy will be reviewed and approved by the Executive Board.

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



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