Code of Business Ethics



Wolters Kluwer



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A Message from our CEO Stacey Caywood



“Our Code is how we turn our values into action, by working with integrity and upholding the trust placed in us”

Dear Colleagues,

For almost 190 years, our values and commitment to integrity have always been at the heart of Wolters Kluwer. Our promise – when you have to be right – captures that commitment and the trust that our customers and other stakeholders place in us. It reflects how we show up for our customers, our partners, and – most importantly – how we work as one team across the world, every single day.

Our Code of Business Ethics guides us in how to live up to our promise. It’s our shared commitment to doing what’s right. Simply put, it guides how we work, how we innovate, and how we build long lasting relationships inside and outside our organization, and it applies to all of us.

A culture of trust starts with a simple habit: Speaking up. When you have a question or concern, notice something that doesn’t feel right, or need clarity, use your voice. We treat every concern with care and confidentiality, and have zero-tolerance for retaliation against anyone for speaking up. By asking questions, challenging ideas, and sharing your perspective, you help us stay true to our values and strengthen the way we work as a team.

Thank you for the integrity, commitment, and professionalism you bring to your work. By living our values and following our Code, we ensure that Wolters Kluwer remains a trusted partner in the moments that matter most.

Let’s hold ourselves – and each other – to the highest standards.



Stacey Caywood
CEO & Chair of the Executive Board

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Our Code of Business Ethics



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- What is the Code of Business Ethics?
- Who Must Follow Our Code?
- Our Responsibilities
- Guide to Ethical Decision-Making

- 1. Our Code of Business Ethics
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At Wolters Kluwer, we are committed to conducting business with integrity. Our Code of Business Ethics provides us guidance for how to conduct our day-to-day work in an ethical manner. It helps us make the right decisions for customers, suppliers and other business partners.

Our Values



Drive customer value



Aim high and deliver fast



Prioritize what matters



Win as a team

- 1. Our Code of Business Ethics
- 2. Raising Concerns and Questions
- 3. Respecting and Protecting Our People
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What is the Code of Business Ethics?

The Code of Business Ethics (Code) sets forth the ethical standards that are the basis for our decisions and actions, and for achieving our business goals. While our company values serve as guidelines for our workforce members and are at the heart of the company's future success, our Code provides more specific guidance on how we live those values.

Our Code contains overarching principles of business conduct that are supplemented by detailed policies and procedures, many of which are referenced in this document and listed in Annex I.

Who Must Follow Our Code?

All workforce members, which include board members, officers, employees, and contractors, who work for a Wolters Kluwer company must comply with our Code, regardless of location. Our Code does not alter the terms and conditions of your employment. A "Wolters Kluwer company" refers to Wolters Kluwer N.V. and its subsidiaries and group companies in which Wolters Kluwer N.V. holds a majority interest or the right to appointment management. Wolters Kluwer also expects its suppliers to adhere to the key principles from our Code through the Supplier Code of Conduct.

Our Responsibilities

We are all responsible for acting ethically and following the principles and rules in our Code and other policies that apply to us. We are committed to conducting our business in accordance with the laws and regulations of the countries in which we operate. If there is any difference between an applicable legal requirement and our Code, the more stringent requirement must be followed. By following our Code, we are improving our chances of success and enhancing the trust that we have with our key stakeholders, including our workforce members, customers, shareholders, business partners, and suppliers. Also, following the Code helps you protect yourself and the company's interests. Violations of our Code may lead to disciplinary action, up to and including termination of employment. If you have any questions or doubts related to anything described in this Code, Annex II to this Code provides contact information to help you direct your questions to the right person, department, or organization.

→ Additional Responsibilities of Managers and Leaders

If you are a manager, you have an important role to model ethical behavior. Here are some guidelines you should follow:

- Help your team understand the Code by reviewing with them the topics that are most relevant to their daily jobs.
- Foster an environment where everyone feels comfortable raising questions and concerns.
- Take seriously any questions or concerns raised, engage in active listening and provide the individual with your undivided attention. Remind them of the company's stance on non-retaliation.
- Evaluate whether a concern raised by a team member should be escalated. If so, escalate the matter as soon as possible. This may mean contacting a more senior leader, Human Resources, the Global Law and Compliance Department, or the Ethics & Compliance Committee. The need to report actual or potential misconduct surpasses any desire a team member may have to tell you something "off the record."

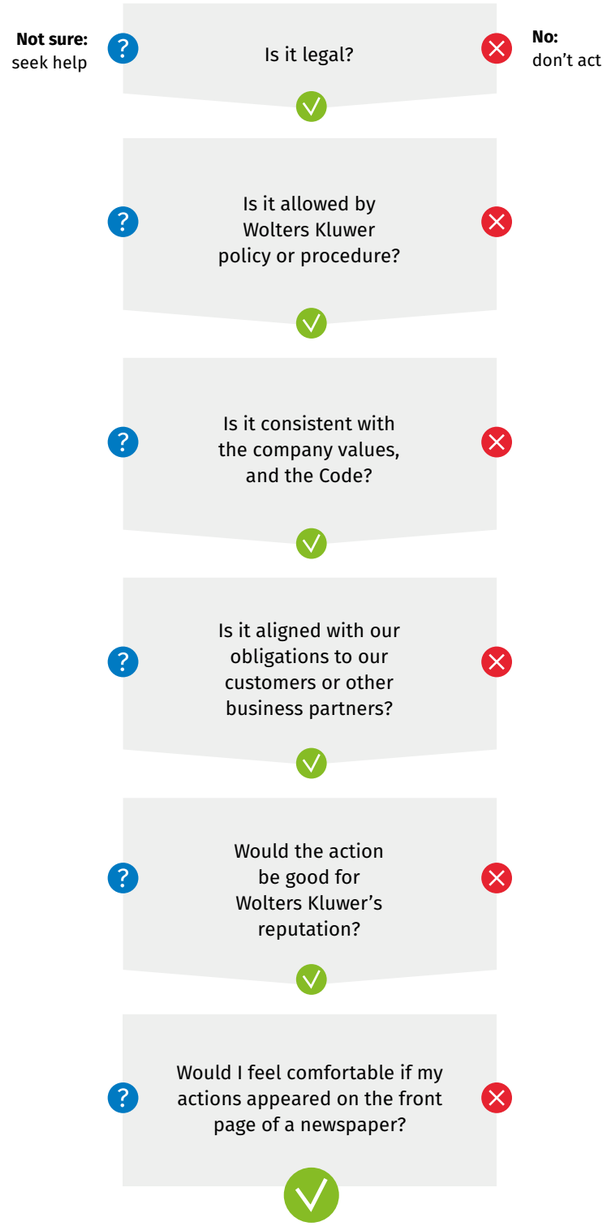
Guide to Ethical Decision-Making

It's important to realize that our Code is more than a rulebook – it is a guide on how to behave ethically even when there is not a clear rule to follow. When faced with an ethical dilemma, you have a responsibility to take the action that is in line with our Code and Values.

At times you might be uncertain as to the right course of action, or something just doesn't feel right. In those cases, the questions in the ethical decision-making model can help you determine the most appropriate way to proceed.

If the answer is no, the action may have serious consequences and you should not proceed with the action.

If you are not sure, we encourage you to seek help before acting. For example, talk to your manager or a member of the Global Law and Compliance Department, or use the SpeakUp system.



The decision to move forward appears appropriate.

Raising Concerns and Questions



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- Speaking Up
- Confidentiality and Anonymity
- Retaliation is Prohibited
- Investigations

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Understanding the Code also means that you know when and how to speak up if you have questions or concerns. The Code provides guidance on how you can raise a concern if you become aware of unethical or unlawful behavior or circumstances.

Q

I raised an ethical concern about what I thought was a violation of the Code. As it turns out, I was wrong – there was no violation. I've always been a top performer, but now my manager is no longer inviting me to certain team meetings and is making negative comments toward me in front of my colleagues. Could this be considered retaliation and am I protected?

A

Yes. When you raise a question or concern in good faith regarding a violation of our Code, the law or any Wolters Kluwer policy or procedure, you are protected against retaliation – even if the concern later proves not to be a violation. Retaliation constitutes many kinds of negative consequences that you might experience as a result of you raising a concern. Retaliation is not limited only to termination. If you suspect you have experienced or are experiencing retaliation, please contact the Corporate Ethics & Compliance team.

Speaking Up

At Wolters Kluwer, we promote a culture of trust with open communication lines and a safe environment where everyone should feel confident and comfortable to ask questions or raise concerns.

If you have questions or concerns, or witness something that you believe is not in line with our Code, other policies, or the law, you are strongly encouraged to speak up. Wolters Kluwer has several resources available to you to report any concerns. You can choose whichever method is most comfortable to you. You may raise your concerns to:

- Your direct manager or supervisor, or higher manager, or if you are not an employee, your usual point of contact at Wolters Kluwer
- An HR representative, either directly or through Workday Help *(available to Wolters Kluwer employees only)*
- A member of the Global Law and Compliance Department
- The SpeakUp system – see below for more information.

→ How to use the SpeakUp system

The SpeakUp system provides a confidential, secure, and trusted communication channel between the reporting person and Wolters Kluwer.

- Go to: https://wolterskluwer.speakup.report/wkglobal
- Select 'New Report'
- Select your preferred language
- Create a password and write down the unique code – this allows you to return to read or listen to the response when you log back in or call back later
- Respond to the intake questions

Make sure to regularly check back in as we may have questions or updates for you.

There may be situations where the Code or other policies require you to seek review or approval from a particular role or function (for example, the Global Law and Compliance Department) before taking any action. When in doubt, you can always ask your manager as to who needs to review a particular situation or potential course of action.

Confidentiality and Anonymity

When you speak up, we encourage you to identify yourself as it allows a more effective follow-up and investigation. Confidentiality will be maintained to the extent possible. The SpeakUp system also provides an option to report your concerns anonymously, except for certain countries where anonymous reporting is not legally permitted. It is important to understand, however, that reporting concerns anonymously may complicate or hinder investigations.

Additional information and instructions for reporting a concern are available on the SpeakUp page on Connect.

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See the SpeakUp Policy for more information

Retaliation is Prohibited

We are all protected by Wolters Kluwer's SpeakUp Policy against retaliation for the good faith reporting of a potential violation of our Code, the law, or other policies. This protection also applies if you participate in an investigation in good faith. If you feel that you or someone else is experiencing retaliation, please report that concern immediately to the Wolters Kluwer Corporate Ethics & Compliance team via e-mail, or through the SpeakUp system.

Investigations

The company will review and consider all reported concerns and investigate and respond as appropriate. If you become involved in an investigation, you have a responsibility to cooperate fully with the investigation so that we are able to accurately investigate and address concerns that are raised.

What does this mean for you?

- Speak up when you have any questions or concerns
- Refer to Annex II with helpful contact information to raise your questions or concerns to the right person, department, or organization
- If you feel that you or someone else is experiencing retaliation, please report that concern immediately to the Corporate Ethics & Compliance team via e-mail or the SpeakUp system
- If you become involved in an investigation, you have a responsibility to cooperate fully with the investigation

Respecting and Protecting Our People



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- Equal Opportunity
- Harassment, Violence, and Bullying
- Health and Safety

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Our success depends on the dedication and commitment of all of us. This begins with treating each other with mutual respect, regardless of position or role in the company. Wolters Kluwer supports and upholds human rights and does not tolerate disrespectful behavior, harassment, bullying, or discrimination of any kind.

Q

I've noticed that a co-worker keeps making references and jokes about another co-worker's sexual orientation. The individual who is the target of these comments does not seem bothered by these references or jokes, but it seems inappropriate. As I'm not directly involved, should I say anything?

A

Even if the target of the behavior does not make a complaint, they may still be uncomfortable, and that behavior is contributing to an environment that is not consistent with our Code. That behavior may also be making other colleagues uncomfortable at work. You should speak up.

Q

A colleague posted something on their personal social media that didn't mention me by name, but included a sarcastic comment and an inside joke that clearly refers to me and my background. It feels discriminatory. Is this acceptable?

A

No. Harassment or bullying, whether direct or indirect, including coded language, sarcasm, or veiled references is not acceptable, online or offline. All workforce members are expected to treat one another with respect and uphold our standards of conduct, including on personal platforms.

See the Diversity, Equity, Inclusion & Belonging Policy for more information

Equal Opportunity

We are a diverse and global company aimed at creating value for our workforce members, 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.

Harassment, Violence, and Bullying

Wolters Kluwer is committed to maintaining an environment where individuals are treated with dignity and respect. 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. Harassment is unwelcome and offensive conduct that may interfere with a person's ability to perform their work. Harassment does not require an intent to offend to be deemed harassment.

We do not tolerate workplace violence or bullying, whether in person or online. Harassment, violence, or bullying can take many forms and occur in many contexts.

Examples of harassment and bullying include:

- Verbal acts such as name-calling or taunting
- Physical acts such as shoving or using rude gestures
- Psychological acts such as causing public embarrassment or spreading false rumors

For more information and guidance, please refer to local Human Resources policies or consult an HR representative or a member of the Global Law and Compliance Department.

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See the Human Rights Policy for more information. Several of our businesses have additional HR policies in place at a country or business unit level, with more detailed guidance. Refer to Workday Help for information about these local policies.

Health and Safety

Wolters Kluwer is committed to providing a safe, hygienic, and healthy work environment for the safety and health of our workforce members. Wolters Kluwer implements health and safety measures in accordance with applicable law and regulations.

What does this mean for you?

- Treat your co-workers with respect and refrain from harassment, violence, and bullying.
- Speak up to report any concerns, whether it concerns yourself or a colleague.
- Follow any health and safety procedures or instructions at your offices.
- Should you happen to observe a safety or physical security issue, please report that immediately to the individual(s) responsible for facilities management or to your manager. These issues should not be reported through the SpeakUp system, as they typically require immediate attention by someone at or near the facility.

Safeguarding our Information and Assets



4

- Intellectual Property
- Responsible Artificial Intelligence
- Confidential Information
- Use of Information Technology
- Data Privacy

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We have a responsibility to handle and use the company's information and assets with care, protecting them from misuse, waste, and theft. We must not use company information or assets for illegal, fraudulent, or unethical purposes. Assets include both physical property (for example laptops) and intangible property (for example software code).

Q

I want to cut and paste an article about our company that was on a third-party website, so that I can email it to key customers. Are there any concerns with doing this?

A

Yes, even when content is available on a publicly accessible website, you may only reproduce or distribute a copyright protected work if you have permission, or if an exemption applies. Instead of copy-pasting the article, it would be permitted to use a link to the original website where the article appears. Please contact the IP team in the Global Law and Compliance Department with any questions.

Contact the Global Law and Compliance Department IP Team with any questions or for more information on intellectual property.

See the Artificial Intelligence (AI) Policy for more information

Intellectual Property

As a provider of expert solutions incorporating proprietary content, advanced technology, artificial intelligence and professional services, the intellectual property rights held by Wolters Kluwer are among our most valuable assets. These rights include, for example, trademarks protecting our brands, copyrights safeguarding our editorial content, and patents securing competitive advantages for our cutting edge technology. The innovations generated by our workforce members are integral to our business and, in accordance with applicable laws, are owned by Wolters Kluwer to ensure that our collective efforts continue to strengthen and protect the company's position in a competitive landscape.

→ Examples of respecting intellectual property rights:

- Do not use, disclose, or bring to Wolters Kluwer any confidential information or protected intellectual property from a prior employer and do not use or take with you Wolters Kluwer intellectual property when you leave.
- Do not download, forward, or use copyrighted materials, such as pictures, software programs, or source code, without a proper license. Recognize that the availability of material on the internet is not an indication that the material can be freely used without a license.
- Respect the rights and restrictions in any license granted by a third party to Wolters Kluwer.

It is equally important that we respect and protect the intellectual property rights of others, including our customers, vendors, former employers, competitors, and third parties. Inappropriate use of another party's intellectual property may expose Wolters Kluwer and you to criminal and civil fines and penalties.

What does this mean for you?

We all play an important role in generating and protecting intellectual property.

- If you have been involved with the development of a new innovation or competitive advantage, contact the IP team in the Global Law and Compliance Department to assess whether your idea can be protected
- If you become aware of any suspected misuse or unauthorized use of any Wolters Kluwer intellectual property by a third party, promptly report the suspected use to the Global Law and Compliance Department IP Team.

Responsible Artificial Intelligence

At Wolters Kluwer, we recognize the transformative potential of Artificial Intelligence (AI) in enhancing our business operations and delivering value to our customers. However, with this potential comes the responsibility to develop and deploy AI ethically and responsibly and in accordance with applicable laws and regulations. Consistent with our core values and our Code, we demonstrate our commitment to responsible AI in our products and services through our AI Principles, which form the basis for our standards for the design, development, and deployment of advanced technology. We also require any AI tools that we acquire or use internally to be developed and used responsibly and in a secure manner. Please refer to the Acceptable Use Policy regarding use of AI tools.

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Steps to follow when handling confidential information:

Only share confidential information if you are authorized to do so.

↓

Make sure to follow company policies and procedures to share confidential information in a safe and secure manner. For example, a non-disclosure agreement should be executed before sharing confidential information outside of the organization.

↓

Only share confidential information with other Wolters Kluwer colleagues who have a need to know; if in doubt, confirm with management or a member of the Global Law and Compliance Department before disclosing information.

↓

Do not accept the confidential information of a competitor.

Confidential Information

Information on the company's activities, strategies, business data, intellectual property, and financial results often is confidential. Unauthorized disclosure could damage Wolters Kluwer or give unfair advantage to others. We respect and actively protect the confidentiality of our information and the confidential information of others. Although sharing confidential information with our vendors and our customers to the benefit of our mutual business interests is often necessary and appropriate, we need to make sure that we are careful in doing so.

→ Examples of Confidential Information

- Business and financial information, such as non-public financial results or forecasts, pricing policies, and strategic plans
- Business plans, including plans about mergers, acquisitions or divestitures
- Workforce records
- Existing or prospective customer lists or data
- Contract terms and conditions
- Product details and ongoing research and development
- Intellectual property, such as trade secrets
- Information about IT systems and infrastructure



See the Acceptable Use Policy for more information

Use of Information Technology

Wolters Kluwer permits its workforce members and other authorized personnel to access and use company technology and systems for business purposes. Limited and incidental personal use is permitted in accordance with our Acceptable Use Policy. We use company technology and systems in a responsible and secure manner. To protect information technology and systems from security incidents, such as unauthorized access or theft, we take the necessary security measures. You must report any potential security incidents and suspicious emails.

What does this mean for you?

- Follow any necessary security measures, such as:
  - Carry your laptop, phone, and other portable devices to airplanes as hand luggage
  - Use a password-protected screensaver and automatic screen locking feature
  - Log off from your devices when they are unattended
- Report any suspicious emails or attachments via the "Report Phishing" on the top toolbar of Outlook
- Report any security incidents to cyberincident@wolterskluwer.com
- Use the approved instant messaging and cloud storage – Microsoft Teams and OneDrive
- Read the Acceptable Use Policy and follow any required security training

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"We are committed to safeguarding the personal data of our workforce members, customers, and other stakeholders."

Q

You receive a call from someone within the organization that asks for a list of customers and their contact details. What should you do?

A

Such a list contains likely personal data. You should verify whether the requester is authorized to receive the information before sharing the information. Once you have verified, ensure the information is sent in a secure manner, for example using a password-protected file. Also ensure that the file is sent to the correct recipient. According to local privacy laws and policies, additional requirements may apply. Contact a member of the Corporate Privacy team in the Global Law and Compliance Department for advice.

See the Global Data Privacy Policy for more information

Data Privacy

In the course of our business, we may collect and store personal data of our workforce members, customers, business partners, and other stakeholders. We respect the data privacy of individuals whose personal data is entrusted with us. Many countries have data privacy laws that govern how to handle personal data of individuals. We are committed to comply with applicable data privacy laws and with our Global Data Privacy Policy. This policy guides our company-wide approach and explains the data privacy principles we adhere to when processing the personal data of our of our workforce members, customers, and other stakeholders.

What is personal data?

Personal data is information that can be used to identify an individual. Examples include a person's name, email address, telephone number, credit card number, information about religion, health or political affiliations.

What is a data privacy incident?

A data privacy incident is an incident related to the personal data of our customers or workforce members. A data privacy incident leads potentially to unauthorized access to, loss, destruction, or disclosure of personal data that is held by Wolters Kluwer. Privacy laws require that we report a data privacy incident without delay. Failing to do so may lead to customer complaints or fines from regulators.

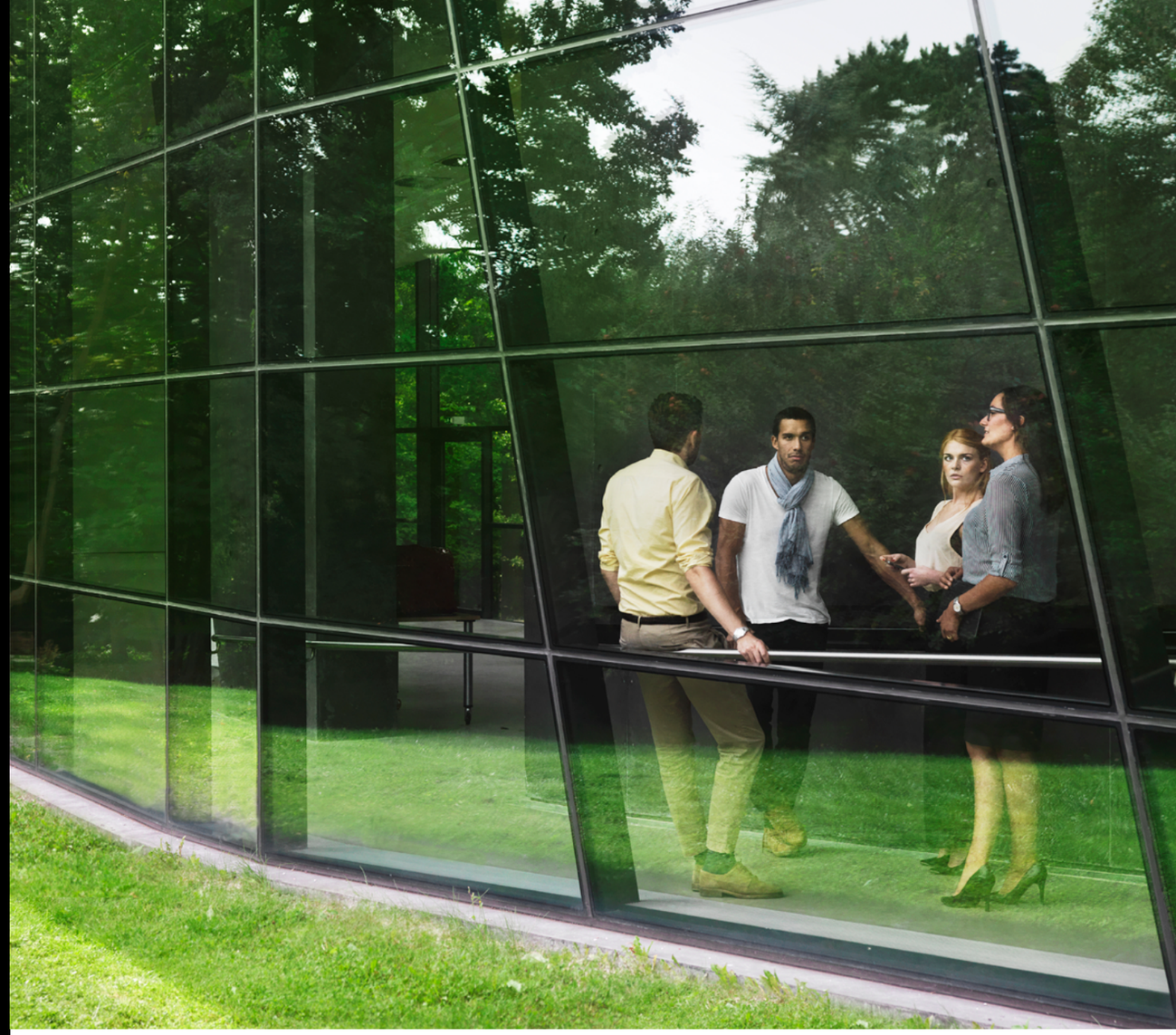
→ Examples of data privacy incidents:

- Wrongfully sent emails (e.g. a wrongful "reply to all" or accidental forward) with job applicant CVs or employee performance evaluation records
- Personal data published accidently on an internal or external site
- Leaving a document with personal information on a printer
- Talking in public about matters concerning personal data
- Sharing of login credentials that allowed unauthorized access to personal data
- A lost or stolen USB-stick, mobile device, or laptop with company files on it containing personal data
- A ransomware attack where personal data is blocked and no longer available

What does this mean for you?

- When handling personal data, handle such information with care and respect.
- Taking security measures as described in the previous section are a good practice to protect personal data.
- Do not use personal data for any other purpose than originally collected for.
- Become familiar and follow Wolters Kluwer's policies and procedures on data privacy and security, including the Global Data Privacy Policy.
- Know which steps to take to report a data privacy incident. If you suspect a data privacy incident, alert it to dataprivacyevent@wolterskluwer.com and inform your manager.
- In case of any questions, please contact a member of the Corporate Privacy team

Acting Responsibly



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- Environment
- Social Media
- Editorial Standards
- Responsible Sourcing
- Media or Investor Inquiries

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We are committed to protecting our brand and reputation to ensure Wolters Kluwer is associated with the highest level of integrity. Our actions have an impact on our workforce members, customers, and other stakeholders, as well as on society and the environment, and therefore we must act responsibly.

See the Environmental Policy for more information

See the Supplier Code of Conduct for more information

See the Global Media Policy and Handbook for more information

Q

A co-worker is contributing to group discussions on LinkedIn in their own time and uses publicly available information on Wolters Kluwer products. Is this subject to the Social Media Policy?

A

Yes, when you post to your personal LinkedIn account about Wolters Kluwer products, you should follow the Wolters Kluwer Social Media Policy.

See the Social Media Policy for more information

Environment

We are committed to minimizing the environmental impact of our operations and complying with all applicable local and international environmental regulations. Through our climate policies, targets, and actions, we promote environmental responsibility and support a precautionary approach to climate change and other environmental challenges. As part of this commitment, when planning and undertaking travel for Wolters Kluwer, we carefully consider the business need and strive to minimize our environmental footprint.

We extend these commitments to our suppliers via our Supplier Code of Conduct which outlines our expectations to operate in a manner that protects the environment and supports continuous improvement in environmental performance.

Social Media

Social media enables individuals and businesses to provide insights, express opinions, and share information within the context of a globally distributed conversation. It is a useful medium but can have a negative impact if not used carefully. Social media often blurs the lines between our professional and personal lives.

What does this mean for you?

Some principles for how you can use social media appropriately include:

- You are responsible for the content that you publish online – do not post anything disrespectful, harassing, bullying, or discriminatory that relates to Wolters Kluwer, our business, our workforce members, our customers, or our business partners.
- Seek approval before you post something on behalf of Wolters Kluwer, unless you are an authorized spokesperson.
- Do not share non-public information and intellectual property that relates to Wolters Kluwer, our business, our workforce members, our customers, and our business partners.
- Show consideration for your own privacy and the privacy of others.

Editorial Standards

We are committed to producing high quality content grounded in sound interpretation, best practices, and analysis across legal, financial, health, and other professional domains. We strive for impartiality and reflect the professional landscape fairly, including significant differences in expert opinion. We also uphold the responsible use of technology in our content development processes.

To maintain integrity, we avoid bias, defamation, and conflicts of interest in both our editorial approach and product development. We rely on qualified subject matter experts to provide up to date, authoritative information. Our authors and editors make decisions independently and without external pressure, thereby upholding a free and open exchange of ideas.

Across our businesses, we provide multiple channels for reader and customer feedback, reinforcing our commitment to transparency and continuous improvement.

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Responsible Sourcing

Conducting our business in an ethical and sustainable manner means that we engage with suppliers who share these same values. We therefore work together with our suppliers to ensure that high standards of professional conduct and ethics are used throughout our supply chain. To that end, we conduct due diligence on suppliers to achieve an environmentally and socially sustainable supply chain. Our Supplier Code of Conduct includes the standard and practices that Wolters Kluwer suppliers are required to uphold, based on key elements from this Code of Business Ethics.

Media or Investor Inquiries

We are committed to open communication in an effective and consistent manner, in accordance with legal requirements, and protecting the company's interests. Inquiries from media or investment communities (such as shareholders and analysts) must be handled carefully and only by authorized individuals.

What does this mean for you?

- Refer all media inquiries to Global Branding & Communications: press@wolterskluwer.com.
- Refer all investment community inquiries to Investor Relations: ir@wolterskluwer.com.

Acting with Integrity



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- → Conflicts of Interest
- → Gifts and Hospitality
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Our values and ethical standards are fundamental for how we interact with our workforce members , customers, and business partners. Sometimes, the lines between business and personal interest can be blurry and extra caution is recommended to safeguard the boundaries of what is acceptable and what isn't.

"We avoid activities and interests that could interfere with our job responsibilities."

Conflicts of Interest

As ambassadors of Wolters Kluwer, we all have an obligation to act objectively and in the best interests of the company. To do this, we must avoid any actual or potential conflicts of interest and disclose them should they arise.

What is a conflict of interest?

A conflict of interest arises when our personal interests or relationships (or the personal interests of a family member or close friend) interfere or are inconsistent with the interests of Wolters Kluwer. This includes situations where you use or could use your contacts or position in the company to advance your or your family member's personal, private business or financial interests. Even a situation that merely creates the appearance of bias can be detrimental to the company.

How do I identify a conflict of interest?

A conflict of interest may arise in many ways. Common types of potential conflicts include:

1. External professional activities
Having additional employment or paid engagement outside of Wolters Kluwer can create a conflict or the appearance of a conflict if it interferes with your responsibilities to Wolters Kluwer. These types of activities must be pre-approved in writing by your manager and an HR representative. It is prohibited to start up a competing activity or be employed by any entity that competes or does business with Wolters Kluwer.

2. Personal Relationships
Personal relationships can include family relationships, romantic relationships, and friendships involving a personal or financial interest with a colleague, such as two colleagues who are roommates. For those who are supervisors, managers, executives, or otherwise in sensitive or influential positions or involved in hiring, firing, promotion, performance management or compensation management decisions, these relationships must be disclosed to your manager and an HR representative.

3. Financial or Investment Interests
Conflicts of interest can also occur when you or an immediate family member has a financial or investment interest in a competitor, supplier, or customer of Wolters Kluwer. These interests must be disclosed to your manager and an HR representative. As an exception, minor investments (less than 1% of the total equity) in publicly-traded companies do not need to be disclosed.

What is an immediate family member?
Immediate family members include children, dependents, parents, siblings, spouses, partners, or other members of a household.

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4. External Board Memberships
Serving on a board for another organization (commercial or non-profit) can lead to a conflict, especially if you serve on a board of a company that competes with Wolters Kluwer. Proposed paid board memberships, and any board memberships in a competitor, supplier, or customer must be pre-approved by your manager and an HR representative.

5. Corporate Opportunities
We do not take opportunities for ourselves that we discover or create through our position at Wolters Kluwer or through company information or resources. If you learn of a business or investment opportunity that is within our company's scope of business, you may not participate in the business or make the investment without disclosing the opportunity and obtain written pre-approval from your manager and an HR representative.



Q

You are considering investing in a start-up company operating in the healthcare market. The company currently does not compete with any Wolters Kluwer offerings but is aimed at some of our customer segments. Do you need to disclose this?

A

Discuss and disclose this to your manager and an HR representative because this is potentially a competitor. A financial or investment interest in a competitor, supplier, or customer of Wolters Kluwer must be disclosed to your manager and an HR representative, except for minor investments (less than 1% of the total equity) in publicly-traded companies.

→ Examples of conflicts of interests that must be disclosed:

- A colleague's daughter works in sales at a vendor and receives a commission for all sales made to Wolters Kluwer
- A manager is dating a team member
- A colleague's spouse is a board member at a competitor
- The partner of a colleague has a major financial interest in a customer

→ Examples of conflicts of interests that must be pre-approved:

- A colleague wishes to take up a second job
- A colleague is offered a board membership at a non-profit organization that is also a customer

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What should I do in case of a (potential) conflict of interest?

Discuss and disclose it to your manager and an HR representative using the Create Case button on Workday Help. Under "Case Type", select the option "Conflict of Interest – Requests and Reports".

The company will conduct a careful review of the situation to determine whether the situation creates a conflict or the appearance of a conflict.

Based on this review, the company will determine the appropriate course of action.

Some types of (potential) conflicts of interest must be pre-approved.

What does this mean for you?

- Always act objectively and in the best interest of the company
- When you think you may have a potential conflict of interest, discuss and disclose this to your manager and an HR representative
- Obtain pre-approval from your manager and an HR representative for (potential) conflicts of interest that require approval
- Use company property or information, or your position, only to advance the company's interests and not for personal gain
- Your division or business unit may have additional policies in place on conflicts of interest, that may be stricter or provide more detailed guidance. Refer to Workday Help or your (local) intranet for information about local policies.

“We do not accept or offer gifts or hospitality that impact our or anyone else’s ability to make impartial business decisions.”

Q

I would like to give a potential customer, while we are bidding for a new contract with that customer, tickets for a sporting event that I will attend with the customer. Is that allowed?

A

No, that is not allowed. It is inappropriate to host a customer at a sporting event while there is a business decision pending, such as a tender or request for proposal process. This may appear to influence the customer.

Gifts and Hospitality

We do business in many different parts of the world. While we appreciate and respect cultural differences and norms, we must be careful that our giving and receiving of gifts and hospitality do not impact (or appear to impact) our objectivity. We must never use our position at Wolters Kluwer to solicit gifts and hospitality. Similarly, we must never accept or offer gifts and hospitality that are intended to influence a business decision.

→ Examples of appropriate gifts and hospitality

What is an appropriate gift depends on the circumstances. In general, appropriate gifts and hospitality include:
- Promotional material with the company logo
- Meals of modest value during business meetings
- Taking a customer to a local sporting, social or cultural event, while no business decision is pending

What kind of gifts and hospitality are allowed?

Gifts and hospitality that meet the following criteria are allowed to be given or received without pre-approval when dealing with individuals who are not public officials:
- the gift is modest in value, and in any case does not exceed $/€ 150 or local currency equivalent, or such lower value that is considered appropriate and nominal under the local circumstances; such lower monetary limits may be set forth in local policies
- the hospitality (routine meals or tickets to sporting events or theater) is provided with the host present to allow for discussion of business matters or foster better business relations and does not exceed $/€ 300. Note that if the host of the hospitality is not present, the hospitality will be considered a gift and the gift maximum of $/€ 150 will apply
- the gift or hospitality is reasonable and appropriate given the circumstances
- the gift or hospitality is in compliance with law, this Code, and local policies

Any gifts or hospitality that do not meet these criteria must be approved by the Global Law and Compliance Department prior to giving or accepting the gift or hospitality.

When offering gifts and hospitality, the associated expenses must be accurately recorded and accounted for in our books and records.

→ Submit your pre-approval requests

Go to the Gifts & Hospitality page on Wolters Kluwer Connect to request pre-approval via the appropriate forms for:
- Gifts and hospitality to and from third parties that does not meet the criteria and thresholds described in this section
- Honorarium or incentive programs that involve cash or cash equivalents to third parties

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What kind of gifts and hospitality are not allowed?

We do not give or receive gifts and hospitality that are:
- cash or cash equivalents (e.g. gift certificates or gift cards) or securities, except where given as part of a company-sponsored incentive program approved by the Global Law and Compliance Department
- given or received routinely such that it appears to be a pattern
- given or received in exchange for favors or preferential treatment
- given or received during a contract negotiation, tender process, or vendor selection process
- offensive, sexually oriented, or violating our commitment to respect others
- given while there are any indications that the recipient will conceal it from his/her employer
- given while there are any indications that the recipient is or would be acting in bad faith by receiving the gift or hospitality
- given while there are any indications that it is not permissible for the recipient to accept the gift or hospitality on the basis of their own code of conduct or other policies

Q

I received a gift card from a supplier for a small amount. May I accept it?

A

Offering or receiving cash or cash equivalents, such as a gift card, is prohibited by this Code no matter the amount. Even modest gifts of cash or cash equivalents are not allowed.

Q

I received an invitation to a sporting event from a key vendor and I suspect the ticket price exceeds $300. What should I do?

A

Before accepting the invitation, submit the pre-approval request form available on the Gifts & Hospitality page on Wolters Kluwer Connect. After review, you will be instructed whether the invitation can be accepted or must be declined. Accepting the invitation without obtaining approval from a member of the Global Law and Compliance Department is a violation of the Code.

When you are offered a gift that exceeds the monetary limits, you should politely decline and explain that accepting the gift would be violating Wolters Kluwer policies. In any situation where you have already received a gift that is prohibited by the Code, you should do the following:

- Inform a member of the Global Law and Compliance Department who will assist you in determining how to resolve the situation
- Sometimes it might be possible to return the gift, explaining that while thoughtful, the gift does not comply with our policies
- In other cases, the gift may be donated to charity or shared amongst many colleagues so that it does not appear to create a conflict. For example, a large gift basket that seems excessive can be shared in an office breakroom.

Are we allowed to offer gifts or hospitality to a public official?

We must exercise extreme caution before offering any gifts and hospitality to public officials as there are special rules and requirements that apply. In some countries, offering any gifts or hospitality to a public official is not allowed at all. Any gifts, entertainment, meals, travel, or other hospitality proposed to be given to a public official must therefore be pre-approved by the Global Law and Compliance Department. A pre-approval request must always be submitted via the form available on the Gifts & Hospitality page on Wolters Kluwer Connect.

→ What constitutes a public official?

How a "public official" is defined depends on a variety of factors, including the relevant country. As a minimum, a public official is any person who is appointed by the public authorities to perform a function that has an undeniably public character to carry out some of the powers of the state or its official agencies. This includes any individual who holds a legislative, administrative, or judicial position of a foreign, national, local, or municipal government, whether elected or appointed. Public officials may also exercise a public function for a public agency or public enterprise.

Common examples of public officials are:

- Employees of national, federal, state, regional, and municipal bodies
- Political candidates or an officer or employee of a political party
- Officers or employees of public institutions such as the World Bank and the United Nations
- Employees (including doctors and nurses) of public hospitals
- Professors and employees of public universities
- Employees of government-owned or -controlled companies (for example oil and gas companies)
- Employees of partially nationalized banks
- Custom officials
- Members of armed services
- Arbiters or mediators

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Q

My business is hosting a user conference and some of the attendees will be public officials. Can we provide meals and goodie bags to the attendees to thank them for participating?

A

You may not provide anything of value to a public official unless you have pre-approval from the Global Law and Compliance Department, which must be obtained by submitting a pre-approval request form via our Gifts & Hospitality page on Wolters Kluwer Connect. In some jurisdictions, providing even modest meals or snacks is prohibited to public officials and, in general, gifts are never allowed.

What does this mean for you?

- You must never accept or offer gifts and hospitality that are intended to influence a business decision.
- You may not accept or offer gifts and hospitality to public officials, unless pre-approved by the Global Law and Compliance Department.
- If you receive or propose to offer a gift or hospitality that does not meet the criteria of this Code, you are required to obtain prior approval from the Global Law and Compliance Department by submitting a pre-approval request via the Gifts & Hospitality page on Wolters Kluwer Connect.
- Do not accept invitations for events when a business decision involving the inviting business partner is under consideration.
- Always observe (local) laws on giving and receiving gifts and hospitality.
- When you have any question or doubt, contact your manager or a member of the Global Law and Compliance Department.

Q

You are preparing a report that shows the client renewals your group signed this quarter. The number is lower than usual, and your manager tells you can just include the renewals that have already signed last quarter in this quarter's report. Should you do this?

A

No, you must never intentionally misrepresent any information in a business record you create for the company, regardless of whether you think it causes harm.

Q

You are submitting your travel expenses from a recent business trip. You lost one of the taxi receipts, but you remember roughly what the fare was. To avoid delays or questions, you consider entering an amount that "seems close enough." Should you do this?

A

No. You must record the actual amount. Entering estimates or guesses creates inaccurate business records and is not allowed.

Accurate Business Records

We are required by law to maintain accurate business records and follow our internal controls. Business records include travel and expense reports, as well as time sheets. Inaccurate reporting for both financial and non- financial disclosures would damage the trust and reputation that Wolters Kluwer has established with its workforce members, customers, shareholders, and other stakeholders. Our financial and sustainability statements must fairly and accurately present the overall condition of the business. Intentionally misrepresenting or omitting financial or non-financial information or any other business records is strictly prohibited.

Since accurate business records play a vital role in assuring the maintenance of high ethical standards, we have a responsibility to record transactions accurately, completely, and in a timely manner. Never make false or artificial entries in any company records, or alter the documents used to support these records. Wolters Kluwer has a zero-tolerance policy for fraud of any kind and will always investigate and seek to take disciplinary action against any individual who commits or attempts to commit fraud. Fraud can take many forms including theft or skimming of cash or cash equivalents (e.g. gift cards), falsifying expense and reimbursement claims, misappropriating assets, forging or altering checks or other forms of payment, falsifying sales information, or dishonestly altering company records.

Records Retention

Business documents and records are important company assets. They contain data and information critical to the continuity of our business, preserve information necessary to protect our legal rights, and support and document audit, tax, and other regulatory requirements. We are prohibited from tampering with company records or removing or destroying them prior to the later of the dates specified in company retention policies or legal hold restrictions.



See the Global Travel and Entertainment Policy and/or local travel and expense policy for more information

Authority to Act

Acting with honesty and integrity also means that we only execute agreements, or otherwise commit Wolters Kluwer, when we have been specifically authorized to do so. Authorization can be based on specific powers of attorney or general authorization guidelines, and based on your functional role. If you are ever uncertain about whether you have the authority to bind the company, please contact your manager and obtain written permission.

Political Donations & Activities

Everyone is free to participate in the political process as private citizens, in their own time, and at their own expense. We are not permitted to make political contributions on behalf of Wolters Kluwer, or to support a political party, candidate, or campaign, by using Wolters Kluwer funds or resources (including working time), unless the Executive Board has provided explicit pre-approval. When you make personal donations to political parties or express political views you should avoid any reference to Wolters Kluwer, and you should make it clear that you are acting on a personal basis and not on behalf of Wolters Kluwer.

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You are preparing an email to a prospect about our product offering. You know the prospect is also considering a competitor's product and you don't want to lose this sale. You think the competitor's product may have some flaws, but you aren't sure. Should you highlight those possible flaws in your email?

A

No, you should never make statements that you cannot substantiate. Instead, you should emphasize the strengths of Wolters Kluwer's offerings without naming competitors. If you feel that comparing our products to a competitor's product is necessary, you should consult with the Global Law and Compliance Department before making any comparative claims.

Honest and Fair Dealing

We are honest in our dealings with customers, suppliers, and other business partners. We work in an open and transparent manner and do not take unfair advantages. We only commit to what we can deliver, and we follow contract commitments.

We are committed to responsible advertising and marketing of our products and services, preserving our ethical standards, and acting in compliance with applicable advertising laws.

What does this mean for you?

- Apply the same ethical standards in your dealings with customers, suppliers, and other business partners, as with colleagues.
- Be aware of the potential limits on the scope of our business. Seek appropriate input and approvals before committing to expand on our product or service capabilities.
- Be mindful of and understand our commitments that are included in contracts with customers, suppliers, and other business partners.
- Be fair and truthful when we communicate about our products and services.

Following the Law



7

- Anti-Bribery and Anti-Corruption
- Trade Compliance
- Fair Competition
- Government Contracting
- Anti-Money Laundering
- Insider Dealing

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We do business in various countries around the globe. It is our responsibility to understand and follow all laws that apply to our business. In some cases, laws from one country apply to and govern our activities elsewhere in the world. For these reasons, it is important to follow this Code and other policies that help establish how we remain in compliance with laws.

"We do not offer, solicit, give or receive bribes, either directly or through a third party."

See the Anti-Bribery and Anti-Corruption Policy for more information

Anti-Bribery and Anti-Corruption

Most countries have strict laws prohibiting corruption and bribery – and those laws extend to the activities of our company, wherever in the world we operate. Wolters Kluwer strictly prohibits offering, soliciting, giving, or receiving any bribes – even if they are custom in a given country or culture. Our zero-tolerance policy on bribes applies to:

- **Both public and private sectors.** However, dealing with public officials creates a heightened level of risk. Therefore, any gifts, entertainment, meals, travel, or other hospitality proposed to be given to or received from a public official must be pre-approved by the Global Law and Compliance Department. See the Gifts and Hospitality section for more information.
- **Our workforce members and all third parties that act on behalf of Wolters Kluwer.** This means that we must take adequate measures to prevent bribery from happening, either directly by members of our workforce or by third parties acting on our behalf, as these actions can be seen as bribery by Wolters Kluwer even if we did not specifically know or approve of the third party's actions.
- **Both directly and indirectly.** This means that bribes cannot be offered indirectly to the recipient by offering them to a family member, or a company or charity owned or run by the intended recipient.

What constitutes a bribe?

The definition of bribe is very broad and can depend on the relevant country, but includes anything of value intended to secure an improper advantage, favorable treatment, or influence the recipient's decision-making. Examples include money, gifts, entertainment, travel, hospitality donations, discounts, personal favors (such as hiring a relative), promises, and benefits.

Facilitation payments

Wolters Kluwer also prohibits facilitation or "grease" payments. These are generally small payments made to public officials (such as government employees) who secure what should be a routine action, for example processing a visa or issuing a required permit. Facilitation payments do not include official payments for a service available to everyone (for example, an expedited passport processing fee). If you believe that your personal safety requires you to make a facilitation payment, you may make the payment, but must contact the Global Law and Compliance Department and disclose the payment as soon as you are safely out of the situation.

Evaluating third party representatives

Our high standards of integrity and legal compliance also apply to third parties who help us conduct business. These third-party representatives are sometimes referred to as "intermediaries." Third party representatives are individuals or companies like resellers, sales agents, distributors, referral partners, joint venture partners, consortium partners, and certain types of consulting partners who are authorized to conduct business on our behalf. We strive to work with third parties who share our values and our commitment to integrity and compliance with laws and we take a risk-based approach when evaluating them. The actions of these parties can impart corruption and bribery risk on Wolters Kluwer, so we must be careful in how we select our business partners. The services and fee arrangements made with third party representatives must be clearly documented and appropriate due diligence conducted.

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A local sales agent acting for Wolters Kluwer has requested a $ 10,000 payment to be made to him to cover the cost of "meeting expenses" in order for a meeting to be arranged with a new prospect. Should we agree to pay this additional amount?

A

No, not without more information that would reasonably explain the expenses this fee will cover. Unusual expenses or expenses that are not clearly explained are a red flag for bribery and corruption because the additional funds received could be used by the agent to bribe the prospect. Resellers, distributors, sales agents, and other third parties who act on behalf of Wolters Kluwer may not engage in activities that would be prohibited if they were performed by a member of our workforce directly. In this situation, you must contact the Global Law and Compliance Department to ask for advice.

See the Trade Compliance Policy for more information

What does this mean for you?

- Do not offer, solicit, or receive bribes.
- Report to your manager and a member of the Global Law and Compliance Department or use the SpeakUp system if you are offered a bribe or requested to make one.
- Do not provide "facilitation payments" even if they are small or legal in the country where requested. If you are unsure whether something qualifies as a facilitation payment or believe the payment is required, please contact a member of the Global Law and Compliance Department.
- In extraordinary circumstances, if you believe that your personal safety requires you to make a facilitation payment, you may make the payment, but must contact the Global Law and Compliance Department and disclose the payment as soon as you are safely out of the situation.
- Record all payments and receipts honestly and accurately.
- Clearly document arrangements made with third party representatives. If you notice that such documentation is lacking or if there is any uncertainty about the role of a certain third-party representative, you must contact your manager and a member of the Global Law and Compliance Department.
- Verify that an appropriate and risk-based due diligence check has been done to evaluate third party representatives and document this verification. Due diligence can be initiated via the Third Party Due Diligence Request Form.
- Look for red flags when doing business with third parties, such as requests for unusual or excessive commissions or discounts.

Trade Compliance

We comply with applicable international trade laws, including economic sanctions, export controls, and anti-boycott laws. These laws impact where and to whom we are allowed to provide products and services. Trade compliance laws can be complex and change frequently based on national security, political, and economic factors. Failure to comply with these laws could jeopardize the company's reputation and could result in a loss of revenue and severe criminal and civil penalties being imposed on the company and our workforce members.

Current Embargoed Countries/Regions

Wolters Kluwer is not allowed to sell products or services (either directly or indirectly through an agent or distributor) to a party in a country or region that is subject to comprehensive economic trade sanctions without approval from the Global Law and Compliance Department.
Currently sanctioned countries and regions are:

- Cuba
- Iran
- North Korea
- The Crimea, Donetsk, Kherson, Luhansk, and Zaporizhzhia regions of Ukraine that are under Russian control

Although Russia and Belarus are not subject to comprehensive sanctions, there are numerous sanctions and export restrictions that apply to those countries. In addition, Wolters Kluwer has policies that restrict the ability to conduct business in Russia and Belarus unless an exception applies. You should contact the Trade Compliance team in the Global Law and Compliance Department if you have any questions about doing business in these areas.

In addition, sanctioned individuals and entities can be from any country. The Trade Compliance Policy provides more detailed information about required screening and compliance procedures.

Q

I was asked to participate in a trade association meeting. I know competitors will be present. Should I be concerned about fair competition issues?

A

Yes, participating in trade and professional associations requires special consideration to comply with fair competition laws. Exchanging pricing or other confidential or sensitive business data among competitors including contract terms and negotiating positions, whether within a trade or professional association or not, is always a concern. You should contact the Global Law and Compliance Department for advice before agreeing to participate.

Fair Competition

We work hard to win the business and trust of our customers and are committed to doing so fairly. This means that we comply with all competition and antitrust laws that apply to us. Certain types of agreements or activities with customers, competitors, or suppliers may have an anti-competitive impact and can damage our company. These are complex areas of law and you should reach out to the Global Law and Compliance Department with questions.

What does this mean for you?

- Do not discuss or enter into any type of agreement or understanding with any competitor relating to:
  - pricing, or any matter that affects pricing including costs, discounts, or credit terms
  - bids, including whether or how to bid
  - allocation of markets, geographies, customers, or lines of business
  - hiring practices, salaries, and benefits, including hiring or recruiting members of each other's workforce
  - exchanging of other competitively sensitive information
- Avoid contacts of any kind with competitors that could create the appearance of improper agreements or understandings.
- Do not share Wolters Kluwer's confidential information with a competitor and do not accept a competitor's confidential information. This includes information like pricing, terms and conditions of sales, costs, distribution methods, hiring plans, and salaries.
- Do not restrict competition against other market participants wholly or in some limited fashion.
- If approached by a competitor about anything prohibited, make it clear that we are not agreeing to anything and do not want their confidential information. End contact with that person immediately and contact the Global Law and Compliance Department as soon as possible.

Government Contracting

Whenever we are pursuing business or entering contracts with government entities, we need to be mindful that special rules apply that may be different and stricter than how we interact or contract with commercial entities. Failure to follow these strict rules may not only lead to fines and penalties but could result in Wolters Kluwer being barred from doing business with the government.

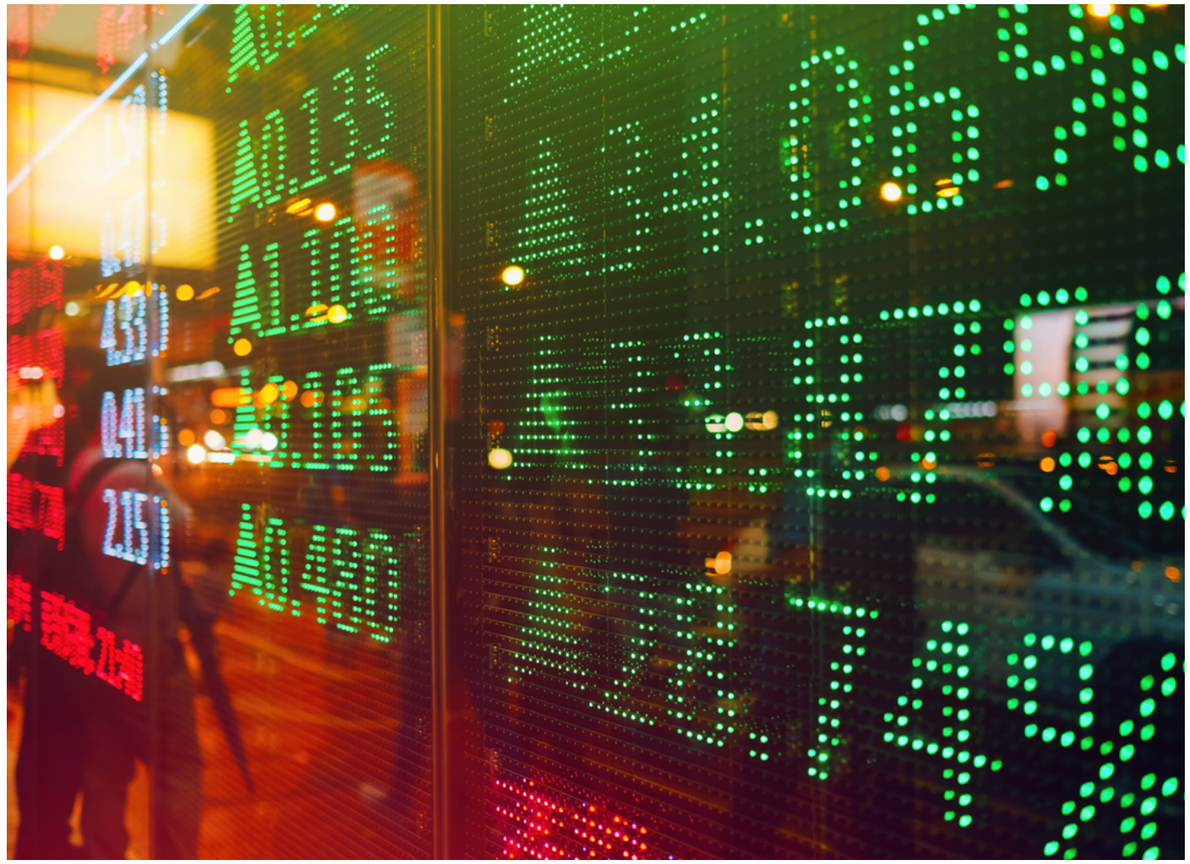
What does this mean for you?

- If you do enter a contract with a government entity, it is important to periodically review the contractual requirements to ensure that we are compliant.
- In case of any doubt or question, please contact a member of the Global Law and Compliance Department.

Anti-Money Laundering

Money laundering occurs when the money or assets from a crime (for example, terrorism or drug dealing) are hidden or "cleaned" through legitimate business transactions. Terrorism financing occurs when money is intended or knowingly to be used for acts that are associated with the support of terrorists or terrorist organizations. We follow all applicable anti-money laundering and anti-terrorism financing laws and do not knowingly deal with criminals or engage in transactions that we have reason to believe are attempts to launder money or that would otherwise violate these laws.

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Q

A friend is considering selling some Wolters Kluwer shares. I know that in the next few days, Wolters Kluwer will issue a press release that may have a negative effect on the share price. May I tell my friend to sell his shares?

A

No, you may never disclose inside information to anyone else, nor use your knowledge of inside information to "tip" others dealing (or not dealing) in Wolters Kluwer shares or other securities.

See the Insider Dealing Policy for more information

Insider Dealing

The basic principle for trading securities on a stock exchange is that everyone involved in the transaction should simultaneously have access to the same information. In the course of our work for the company, we may have access to inside information about Wolters Kluwer. We are all responsible for keeping inside information confidential.

What is inside information?

Inside information constitutes information related to Wolters Kluwer that has not been disclosed publicly and could affect the trading price of Wolters Kluwer shares or other securities if it were publicly known.

What does this mean for you?

- If you are aware of inside information, you may not use that information to deal in Wolters Kluwer shares or other securities or recommend another person to engage in dealing in Wolters Kluwer shares or other securities.
- You may also not disclose inside information to anyone else.
- Members of the Executive Board and Supervisory Board and certain workforce members designated as "insiders" are subject to further restrictions related to dealing in Wolters Kluwer shares or other securities, set out in the Insider Dealing Policy.

Annex I: List of Global Policies

Anti-Bribery and Anti-Corruption Policy
Acceptable Use Policy
Artificial Intelligence (AI) Policy
Diversity, Equity, Inclusion and Belonging Policy
Global Data Privacy Policy
Environmental Policy
Global Travel and Entertainment Policy
Human Rights Policy
Insider Dealing Policy
Social Media Policy
SpeakUp Policy
Supplier Code of Conduct
Trade Compliance Policy

To access the Global Policies, which support our Code and provide more detailed guidance about specific topics from the Code, visit the Ethics & Compliance page on Connect.

In addition to the global policies listed above, your division, business unit, or country may have additional policies in place that apply to you. Please consult Workday Help, (local) intranet or refer to an HR representative for information about any additional policies.

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Annex II: Helpful Contact Information

Useful links

Code of Business Ethics and other global policies:
Connect
Corporate website

SpeakUp system:
Connect

Reporting

Reporting security incidents:
cyberincident@wolterskluwer.com

Reporting data privacy incidents:
dataprivacyevent@wolterskluwer.com

Reporting retaliation:
speakup@wolterskluwer.com or through the SpeakUp system

Reporting suspected misconduct, including breaches of any law, this Code or other company policies:
- Your direct manager or supervisor, or higher manager, or if you are not an employee, your usual point of contact at Wolters Kluwer
- An HR representative, either directly or through Workday help *(available to Wolters Kluwer employees only)*
- A member of the Global Law and Compliance Department
- The SpeakUp system.

Resources

In most cases, your manager is the first resource for any questions or concerns you may have. Wolters Kluwer has various specialized departments and functions for matters described in this Code:

Human Resources
Workday Help

Global Law and Compliance Department
Where the Code refers to a *member of the Global Law and Compliance Department*, this includes:
- A company lawyer assigned to your business, country, or function (see Connect)
- A member of the Corporate Legal Affairs team

Ethics & Compliance Committee
ecc@wolterskluwer.com

Information Security team
Connect
GlobalITSecurity@wolterskluwer.com

Corporate Privacy team
Connect
privacyoffice@wolterskluwer.com

Trade Compliance team
tradecompliance@wolterskluwer.com

Corporate Sustainability team
sustainability@wolterskluwer.com

Global Travel team
globaltravel@wolterskluwer.com

Media Relations team
press@wolterskluwer.com

Intellectual Property team
ir@wolterskluwer.com

Contact Information and Legal Notice

Contact information
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www.linkedin.com/company/wolters-kluwer
www.facebook.com/wolterskluwer

Legal Notice
Policy contact: ecc@wolterskluwer.com
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In case of any conflict between this document and any applicable local laws or regulations, such applicable local laws or regulations will prevail. The Code of Business Ethics does not alter the terms and conditions of your employment. The Code of Business Ethics has been approved and adopted by the Executive Board of Wolters Kluwer N.V. and applies company wide, subject to local applicable laws . The Executive Board may amend, supplement or terminate this Code of Business Ethics at any time at its sole discretion, subject to compliance with applicable law. The Ethics & Compliance Committee will annually review this Code of Business Ethics and assess whether any adjustments need to be made. The Ethics & Compliance Committee is authorized to approve non-material adjustments to this Code of Business Ethics. The most up to date version of the Code of Business Ethics will be available on Wolters Kluwer's intranet portal and www.wolterskluwer.com.

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→ 1. Our Code of Business Ethics
→ 2. Raising Concerns and Questions
→ 3. Respecting and Protecting Our People
→ 4. Safeguarding our Information and Assets
→ 5. Acting Responsibly
→ 6. Acting with Integrity
→ 7. Following the Law