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# SpeakUp Policy

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# Policy details

Policy details	
Name of policy	SpeakUp Policy
Short description	This policy describes when, where and how to report concerns about suspected misconduct or a violation of the Code of Business Ethics, other company policies or the law.
Owner	Global Law and Compliance Department
Contact details	<a href="mailto:corporatecompliance@wolterskluwer.com">corporatecompliance@wolterskluwer.com</a>
To whom is this policy binding	Wolters Kluwer workforce and third parties who act within a work-related context with Wolters Kluwer.
Approval level	Executive Board (EB)
Effective date	June 1, 2025

# Version history

Version number	Last check (year)	Last amendments	Changes at last amendment	Approved by
2.0	2025	2025	This version replaces previous versions of the SpeakUp Policy	EB, May 27, 2025

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# 1. Policy summary

At Wolters Kluwer, we are committed to conducting our business with integrity and in compliance with applicable laws and regulations, our Code of Business Ethics (“Code”), and other company policies.

We promote a culture of trust with open communication lines and a safe environment where everyone should feel confident to ask a question or raise a concern, without fear of negative consequences, and where violations of our Code are promptly addressed. Following the Code also means reporting any concerns and reporting violations, even if you only suspect them. Speaking up is essential for us to maintain our positive reputation and business success.

This SpeakUp Policy (“Policy”) describes who can speak up, what you can speak up about, and how to speak up. It also describes the safeguards Wolters Kluwer has in place for anyone involved in speaking up.

This Policy applies to all Wolters Kluwer companies. “Wolters Kluwer” or a “Wolters Kluwer company” refers 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 some Wolters Kluwer companies, additional, more detailed, provisions or deviations may apply based on applicable (local) laws and regulations; these additions and/or deviations are documented in a legal entity-specific addendum to this Policy.

## More information

Visit the SpeakUp page on Wolters Kluwer’s intranet:

<https://wolterskluwer.sharepoint.com/sites/ConnectPortal/Corporate/EthicsCompliance/SitePages/SpeakUp.aspx>

## 2. Who can speak up?

The following individuals (collectively “reporting persons”) can speak up in accordance with this Policy:

- individuals who are a member of Wolters Kluwer’s workforce, for the purpose of this SpeakUp Policy including employees, contractors, such as self-employed persons and persons employed through a staffing agency, volunteers, and trainees;
- candidates to become members of Wolters Kluwer’s workforce and former members of Wolters Kluwer’s workforce; and
- third parties that have a work-related relationship with Wolters Kluwer, such as shareholders and persons belonging to the Supervisory Board of Wolters Kluwer, and any individual working under the direction of contractors, sub-contractors, and suppliers who are providing services to Wolters Kluwer.

All individuals listed above can raise a concern in accordance with this Policy. However, for reporting persons who are not employees of Wolters Kluwer, Wolters Kluwer will provide the support and protections outlined in this SpeakUp Policy to the extent reasonably possible. Due to the nature of the relationship with non-employees, some protections may not apply and/or be relevant.

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## 3. What to report?

Reporting persons are encouraged to raise any concerns about suspected or actual misconduct. Misconduct is defined as a violation of our Code, any other Wolters Kluwer policies, or any applicable laws. Any concerns must be reported in good faith.

Although not an exhaustive list, examples of suspected or actual misconduct include:

- fraudulent, corrupt, or illegal conduct such as bribery or collusion with competitors;
- financial or accounting irregularities such as falsification of Wolters Kluwer’s records, reporting inaccurate sales information or misusing a corporate credit card;
- misuse or misappropriation of Wolters Kluwer’s property (including intellectual property) such as unauthorized disclosure of confidential or proprietary information;
- disruptive or inappropriate workplace conduct, such as bullying, discrimination or harassment; and
- retaliation against anyone who has raised a concern in good faith.

### What information should you provide in your report?



When reporting a concern, you are encouraged to share as much information as possible about your concern. This will help us better assess your concern and determine appropriate next steps.

*Examples of information that will be useful:*

- Background and nature of the suspected misconduct
- Names of persons involved in the suspected misconduct and any witnesses
- Where and when the suspected misconduct took place
- Any evidence or documents that may support your report, such as e-mails

### What if you don't have all the information?



When you have a concern, report it with the information that you have. We don't expect you to have all the facts and details. We will then look into your concern and determine next steps.

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This Policy should not be used to report:

- complaints or grievances regarding employee relations matters, such as those related to your terms of employment, performance issues, compensation, personal conflicts, or similar topics. Employee relations matters should be communicated to your manager or an HR representative.
- In 'bad faith'  
This means making accusations which you know or reasonably believe to be false, or that are done with malicious intent or for personal gain. Misuse of this SpeakUp Policy will be taken seriously. A report that is deliberately made in bad faith may lead to disciplinary measures.

#### **What is "good faith"?**

Raising a concern in good faith means that you genuinely believe that you have a concern regarding potential misconduct or violation of our Code, other policies, or the law, even if after investigation it appeared not to be the case.

## **4. How to raise a concern?**

### **4.1 Internal Wolters Kluwer resources**

Wolters Kluwer has several resources available to you to report concerns about suspected misconduct. You can choose whichever method is most comfortable to you.

You may report your concerns to:

- your direct manager or supervisor, or a 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's employees only);
- a member of the Global Law and Compliance Department; or
- the SpeakUp system – see next section for more information.

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## 4.2 Wolters Kluwer SpeakUp system

The Wolters Kluwer global SpeakUp system is a communication system where you can report any concern in accordance with this Policy. This system provides a confidential and secure communication channel for reporting misconduct.

The SpeakUp system is available 24 hours a day, 7 days a week, 365 days a year and is provided by a third party. Through the SpeakUp system, you can report a concern in your own language, with the option to report anonymously.

You can communicate a concern through the SpeakUp system via the online intake form or by calling the voice messaging service. In certain countries, you may have the right to request an in-person meeting at a Wolters Kluwer office. If you are interested in that option, please include that preference in your message in the SpeakUp system.

Intake of concerns raised through the global SpeakUp system is done by the Wolters Kluwer Corporate Ethics & Compliance team within the Global Law and Compliance Department, on behalf of the Ethics & Compliance Committee.

### How to report via the SpeakUp web system?

To report a concern via the global SpeakUp web system, follow these steps:

- Navigate to <https://wolterskluwer.speakup.report/wkglobal>
- Click on 'New Report'
- Select your preferred language
- Create a password and write down the unique code – this allows you to return to read the response when you log back in later

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

## 4.3 External reporting

Wolters Kluwer strives to provide trusted internal resources to report concerns, so any concerns can be properly reviewed and addressed. Reporting persons are encouraged to use one of the above-described internal Wolters Kluwer resources to report a concern. Depending on your location and the nature of your concern, you may also have the right to report concerns about suspected misconduct to an appropriate external authority in your country of residence.

The reporting person has the option to consult an advisor in confidence about a suspected misconduct.

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## 5. What happens after raising a concern?

Wolters Kluwer will review and consider and, if appropriate, investigate all reported concerns. After submitting your concern via the SpeakUp system, we will confirm receipt of the concern generally within 2 business days, and in any case no later than 7 calendar days.

### Steps that follow after reporting a concern

After the confirmation of receipt of your concern, the following steps will be taken:

1. Initial review to assess if the concern is in scope of this Policy and if an investigation is appropriate.
2. If an investigation is appropriate, your concern will be assigned to an impartial and competent internal person to investigate.
3. The investigation will be done in accordance with our internal investigation protocol and applicable laws and regulations.
4. The investigator may contact you for additional information and questions and will keep you informed on the process.
5. We will strive to provide you with prompt feedback about our follow-up and in any case no later than 3 months after the confirmation of receipt of your concern. This feedback may include, for instance, whether or not an investigation was launched. Depending on local applicable laws, this period may be reduced to 30 days.

## 6. Ethics & Compliance Committee

The Ethics & Compliance Committee has oversight responsibility with respect to concerns of suspected misconduct reported under this Policy. The Ethics & Compliance Committee is chaired by the EVP and General Counsel of the Global Law and Compliance Department and consists of the SVP, General Counsel and Company Secretary; Chief Human Resources Officer; VP Internal Control & Chief Compliance Officer; and VP Internal Audit.

The Ethics & Compliance Committee can be contacted via [e-mail](#) or via one of its members directly.



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## 7. Non-retaliation policy

Wolters Kluwer has a zero-tolerance policy towards any type of retaliation against a reporting person who has raised a concern in good faith or individuals who have participated in an investigation. We do not tolerate any actions or omissions intended to harm the reporting person as a result of reporting their concern. Retaliation is a violation of this Policy and may result in disciplinary action, as described in section 11 below. 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.

### Examples of retaliation include:

- suspension or termination;
- demotion or withholding of promotion;
- change of conditions, such as duties, location of work, wages, working hours;
- a negative performance assessment or employment reference;
- unlawful discrimination or unfair treatment; and
- deliberate exclusion from social work events.

## 8. Confidentiality

All concerns raised will be dealt with in a confidential manner, which includes the identity of the reporting person and other persons mentioned in the report. Confidentiality will be maintained to the extent possible, consistent with the need to conduct an adequate investigation of the report and implementation of any disciplinary or corrective actions, and the privacy laws of the country concerned.

Disclosure of the concerns raised by the reporting person will only be made to individuals with a need to know for the purpose of conducting or participating in an investigation.

## 9. Anonymity

We encourage reporting persons to identify themselves as it allows a more timely and effective follow-up and investigation. Nevertheless, the SpeakUp system provides reporting persons an option to report any concerns anonymously. It is important to understand, however, that reporting concerns anonymously may complicate or hinder investigations.

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## 10. Data privacy

Wolters Kluwer is committed to safeguarding any personal data that it is entrusted with under this Policy in accordance with applicable privacy and data protection rules and regulations.

Wolters Kluwer may process personal data provided under this SpeakUp Policy for the purposes of logging and administering the concerns by the reporting person, investigating alleged violations, taking any necessary actions following from completion of the investigation, and compiling anonymized reports for our company's management. As applicable under data privacy legislation, we rely on the grounds of legitimate interests as the lawful basis for collecting and processing personal data and to comply with our legal obligations.

Dependent on applicable data privacy legislation and the circumstances of the investigation, you may have certain rights in respect of your personal data, including transparency, rights of access, rectification, and erasure. There may be circumstances under applicable law, where such individual rights may be restricted, for example, where exercising such rights could seriously impede the specific investigation.

For more information about how we process personal data, please read the Wolters Kluwer [Global Data Privacy Policy](#), our [Privacy and Cookies Notice](#), or the workforce privacy notice applicable to your location.

## 11. Compliance with this Policy

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

## 12. Policy updates

This Policy will undergo annual review unless regulatory or business needs dictate otherwise. The Global Law and Compliance Department is responsible for reviewing and updating this SpeakUp Policy. Any substantive changes to this Policy are subject to the approval of the Executive Board.

In case of questions regarding this Policy, please contact the [Corporate Ethics & Compliance team](#) within the Global Law and Compliance Department.

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# Legal Notice

In case of any conflict between this document and any applicable local laws or regulations, such applicable local laws or regulations will prevail. This Policy does not alter the terms and conditions of your employment. The Policy has been approved and adopted by the Executive Board of Wolters Kluwer N.V. and will be implemented company-wide, subject to local applicable law and consents that must be observed. The Executive Board may resolve to amend, revise, discontinue, or terminate this Policy at any time at its sole discretion, subject to applicable law. This Policy has been translated in other relevant languages. In case of any inconsistency between this English version and another language version, this English version shall prevail. The other language versions include translations of the addenda only to the extent relevant for that language. The most up-to-date version of the Policy will be available on Wolters Kluwer's intranet portal and [www.wolterskluwer.com](http://www.wolterskluwer.com).

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# Addendum for Wolters Kluwer Belgium N.V.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Belgium N.V., a subsidiary of Wolters Kluwer N.V., with address at Motstraat 30, 2800 Mechelen, Belgium.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Belgium N.V.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Belgium N.V., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Belgian implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
  
- Concerns related to tax fraud and social fraud

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Belgium N.V. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wkbelgium>

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# Addendum for Wolters Kluwer Deutschland GmbH

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Deutschland GmbH, a subsidiary of Wolters Kluwer N.V. with address at Wolters-Kluwer-Straße 1, 50354 Hürth, Germany.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Deutschland GmbH.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Deutschland GmbH, composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the German implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of German federal or state law or European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns about violations of German criminal law
- Concerns about administrative offences that are subject to a fine under German law, insofar as the violated regulation serves to protect life, limb, or health or to protect the rights of employees or their representative bodies

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Deutschland GmbH can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wkdeutschland>

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# Addendum for Wolters Kluwer Tax & Accounting Deutschland GmbH

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Tax & Accounting Deutschland GmbH, a subsidiary of Wolters Kluwer N.V. with address at Kammerer Straße 39, 71636 Ludwigsburg, Germany.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Tax & Accounting Deutschland GmbH.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Tax & Accounting Deutschland GmbH, composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the German implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of German federal or state law or European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns about violations of German criminal law
- Concerns about administrative offences that are subject to a fine under German law, insofar as the violated regulation serves to protect life, limb, or health or to protect the rights of employees or their representative bodies

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Tax & Accounting Deutschland GmbH can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wktaxaccountinggermany>

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# Addendum for Tagetik Software S.r.l.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Tagetik Software S.r.l., a subsidiary of Wolters Kluwer N.V. with address at via Roosevelt 103, 55100 Lucca, Italy.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Tagetik Software S.r.l.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Tagetik Software S.r.l., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Italian implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns about administrative, accounting, civil or criminal offenses under applicable Italian law
- Concerns about the suspected commission of crimes included in the list provided by Legislative Decree no. 231/2001 and about the suspected violation of the Organization and Control Model and the Code of Conduct adopted by Board of Directors of Tagetik Software S.r.l.

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Tagetik Software S.r.l. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/tagetik>

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# Addendum for Wolters Kluwer Italia S.r.l.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Italia S.r.l., a subsidiary of Wolters Kluwer N.V. with address at via Bisceglie 66 - 20152 Milano, Italy.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Italia S.r.l.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Italia S.r.l., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Italian implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns about administrative, accounting, civil or criminal offenses under applicable Italian law
- Concerns about the suspected commission of crimes included in the list provided by Legislative Decree no. 231/2001 and about the suspected violation of the Organization and Control Model and the Code of Conduct adopted by Board of Directors of Wolters Kluwer Italia S.r.l.

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Italia S.r.l. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wkitalia>



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# Addendum for Wolters Kluwer Nederland B.V.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Nederland B.V., a subsidiary of Wolters Kluwer N.V. with address at Staverenstraat 15, 7418 CJ, Deventer, the Netherlands.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons as listed above can also report concerns to the local SpeakUp channel of Wolters Kluwer Nederland B.V.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Nederland B.V., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Dutch implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
  
- Concerns of suspected misconduct where the public interest is at stake in connection with
  - o a suspected violation of a Dutch statutory provision or of internal rules set by Wolters Kluwer Nederland B.V. or
  - o a threat to the public health, the safety of persons, the detriment of the environment, or the proper functioning of the public service or a company resulting from improper acts or omissions

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Nederland B.V. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wknetherlands>

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# Addendum for Wolters Kluwer Polska Sp. z o.o.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Polska Sp. z o.o., a subsidiary of Wolters Kluwer N.V. with address at Przyokopowa 33, Warsaw, Poland, 01-208, Poland.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Polska Sp. z o.o.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Polska Sp. z o.o., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Polish implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the financial interests of the State Treasury of the Republic of Poland, local government unit and the European Union
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns relating to corruption
- Concerns relating to Polish constitutional freedoms and rights of man and citizen occurring in the relations of a person with public authorities of Poland

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Polska Sp. z o.o. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wkpoland>

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# Addendum for Wolters Kluwer Financial Services Romania SRL

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Financial Services Romania SRL, a subsidiary of Wolters Kluwer N.V. with address at dul 21 Decembrie 1989, Nr. 77, The Office Business Center, 400604 Cluj-Napoca, Romania.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Financial Services Romania SRL.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Financial Services Romania SRL, composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Romanian implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Financial Services Romania SRL can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wkfsromania>

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# Addendum for Wolters Kluwer Tax and Accounting España, S.L.

This addendum supplements the SpeakUp Policy and applies to reporting persons employed by or having a work-related relationship with Wolters Kluwer Tax and Accounting España, S.L., a subsidiary of Wolters Kluwer N.V. with address at Paseo de la Castellana, 93, 28046, Madrid, Spain.

## Local SpeakUp channel

In addition to the resources listed in section 4.1 of the SpeakUp Policy, reporting persons in scope of this Addendum can also report concerns to the local SpeakUp system of Wolters Kluwer Tax and Accounting España, S.L.

Intake of concerns raised through this local SpeakUp channel is handled by the local SpeakUp Committee of Wolters Kluwer Tax and Accounting España, S.L., composed of representatives from HR, the Global Law and Compliance Department, and Internal Control.

## Concerns that can be reported

Concerns that can be reported to the local SpeakUp channel in accordance with the Spanish implementation law of the EU Whistleblowing Directive are:

- Concerns about a suspected violation of European Union law, such as:
  - o Public procurement
  - o Financial services, products and markets, and prevention of money laundering and terrorist financing
  - o Product safety and compliance
  - o Transport safety
  - o Protection of the environment
  - o Radiation protection and nuclear safety
  - o Food and feed safety, animal health and welfare
  - o Public health
  - o Consumer protection
  - o Protection of privacy and personal data, and security of network and information systems
  - o Breaches of the EU's financial interests
  - o Breaches related to the EU internal market, including competition and corporate tax rules
- Concerns about acts or omissions that may constitute a serious or very serious criminal or administrative offence under Spanish law, including those serious or very serious criminal or administrative offences that involve financial loss to the Public Treasury or Social Security
- Concerns about occupational health and safety violations under Spanish labor law

Concerns reported through the local SpeakUp channel that are not in the scope described above, may be passed on to the Corporate Ethics & Compliance team of Wolters Kluwer for further handling.

The local SpeakUp channel for Wolters Kluwer Tax and Accounting España, S.L. can be accessed via the following URL:

<https://wolterskluwer.speakup.report/wktaxaccountingspain>



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