

## **WOLTERS KLUWER HUMAN RIGHTS POLICY**

**POLICY DETAILS**

<i>Name of policy</i>	<b>Human Rights Policy</b>
<i>Short description</i>	This policy supports the ambitions of Wolters Kluwer and its subsidiaries to the protection of human rights.
<i>Owner</i>	Corporate Legal Affairs
<i>Contact details</i>	<a href="mailto:sustainability@wolterskluwer.com">sustainability@wolterskluwer.com</a>
<i>To whom is this policy binding</i>	All Wolters Kluwer entities
<i>Approval level</i>	Executive Board (EB)

**POLICY VERSION CONTROL**

<i>Version number</i>	<i>Last check (year)</i>	<i>Last amendments</i>	<i>Changes at last amendment</i>	<i>Approved by</i>
1.0	2013	n/a	n/a	EB
1.1	2019	2019	Updated to bring in line with international sustainability guidelines and to include reference to the SDGs.	EB, Feb 11, 2019
1.2	2020	2020	Updated the name Business Principles to Code of Business Ethics	SVP General Counsel/Company Secretary
1.2	2021	2020	n/a	Ethics & Compliance Committee, Oct 25, 2021

## 1 Introduction

This Human Rights Policy (“Policy”) supports the ambitions of Wolters Kluwer N.V. and its subsidiaries (hereinafter jointly referred to as “Wolters Kluwer” or the “company”) with respect to the protection of human rights. This Policy applies to all Wolters Kluwer divisions, business units, and operating companies that are controlled by Wolters Kluwer via majority ownership or the right to appoint management (jointly referred to as “Wolters Kluwer Entities”).

As a global provider of professional information, software solutions, and services, Wolters Kluwer helps to protect people’s health, prosperity, safety, and legal rights while helping its customers to become better professionals. Wolters Kluwer focuses on the world’s most critical areas, touching the lives of millions of people. Recognizing its responsibility to promote and protect human rights, Wolters Kluwer is committed to complying with the applicable local and international laws. Wolters Kluwer seeks ways to prevent or mitigate adverse human rights impacts that are directly linked to their business operations, products or services by a business relationship, even if they do not contribute to those impacts. Wolters Kluwer Entities are responsible and accountable for upholding the principles of this Human Rights Policy.

Wolters Kluwer encourages improvements of the human rights performance of its suppliers through its Supplier Code of Conduct. However, Wolters Kluwer is not responsible, nor accountable for the actions and practices of its suppliers and of companies or joint ventures in which Wolters Kluwer has a minority share or in which it cannot exert management control.

This Human Rights Policy serves as an extension to the Wolters Kluwer [Code of Business Ethics](#). The Executive Board fully endorses this Policy and may resolve to amend this Policy periodically. Wolters Kluwer Entities may give additional and more detailed regulations or guidance on the various subjects described in this Policy. Such additional regulations may not be in conflict with this Policy, unless the deviations are based on local laws, collective labor agreements or agreements with employee representative bodies.

## 2 Commitments and Principles

Wolters Kluwer is committed to the United Nations Sustainable Development Goals and contributes to the following goals:

- Goal 3: Good health and well-being
- Goal 9: Industry, innovation, and infrastructure
- Goal 16: Peace, justice, and strong institutions

Wolters Kluwer is guided by the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles, the OECD guidelines for Multinational Enterprises, the Core Labor Standards of the International Labor Organization, and the principles of United Nations Global Compact.

#### *Equal opportunity*

We are a diverse, multinational company and it is this diversity that sets Wolters Kluwer apart from many of its peers and creates value for its customers, employees, and shareholders. Wolters Kluwer aims to create equal opportunities for all employees regardless of personal background, race, caste, gender, national, social or ethnic background, marital status, age, physical or health condition, sexual orientation, physical or mental disability, membership of unions, political opinion, religion or any other personal characteristic or status. Wolters Kluwer will treat all individuals equal considering the responsibilities of their position, during recruitment and selection, compensation and benefits and training, promotion, transfer or termination.

#### *Labor and benefits*

Wolters Kluwer will not tolerate any form of forced, bonded, prison, military, or compulsory labor or any form of child labor, as defined by the International Labor Organization and the United Nations Global Compact. Labor contracts are fair, clear and transparent. Wolters Kluwer complies with all applicable local and national wages and benefits laws and compensation for work shall fulfill at a minimum the strictest national legal standards, industrial standards and the standards of the ILO conventions. Wages are paid regularly, directly and on time. At all times, freedom to change employment and the right of movement is respected.

#### *Health and safety*

Wolters Kluwer provides its employees with a safe and healthy workplace in compliance with all applicable local and (supra-)national laws and regulations. While taking into account the specific dangers of the working environment, Wolters Kluwer provides for safe, hygienic, and healthy working space for its employees. Adequate measures shall be taken to prevent accidents and damage to workers' health which may arise from, are related to, or occur during working hours.

#### *Freedom of association*

Wolters Kluwer respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference. In addition, all relevant collective bargaining agreements shall be respected.

#### *Freedom of publishing*

As a provider of information we support freedom of speech and the freedom to exchange information. Wolters Kluwer is aware of the fact that complete freedom of publishing is not self-evident in some parts of the world. Even if freedom of publishing is not fully secured, this is not a sufficient reason to stop providing information. While Wolters Kluwer cannot change such a situation, the company carefully monitors legislative developments and can stimulate the distribution of information. Steps in the right direction are made by working together with local partners.

#### *Discrimination and harassment*

Wolters Kluwer will not tolerate any form of physical, verbal or cyber harassment, intimidation or discrimination.

### **3 Responsibilities and management**

The Wolters Kluwer Executive Board attaches great importance to the implementation of this Policy. Each Wolters Kluwer division rolls out its Human Rights initiatives based on specific local

opportunities. This offers better granularity than an overlapping global target. These initiatives are required to adhere to Wolters Kluwer's globally-established policies and applicable laws and regulations.

#### **4 SpeakUp Policy**

Wolters Kluwer encourages its employees to report any actual or suspected irregularities including breach of this Human Rights Policy. The SpeakUp Policy and misconduct reporting system allow all employees to report any actual or suspected irregularities in confidence and without fear of retaliation. For more information, please read the [SpeakUp Policy](#).

#### **5 External reporting**

Wolters Kluwer publishes its human rights performance annually, accessible on the company website. Stakeholders are welcomed to give feedback on this Human Rights Policy and the annual performance by contacting [sustainability@wolterskluwer.com](mailto:sustainability@wolterskluwer.com).