

WOLTERS KLUWER TAX PRINCIPLES

POLICY DETAILS

<i>Name of policy</i>	Wolters Kluwer Tax Principles
<i>Short description</i>	The tax principles display the consistency of Wolters Kluwer with its sustainability strategy and the various tax laws, regulation and other jurisdiction of the countries where it operates and reports and pays its taxes.
<i>Owner</i>	Corporate Tax
<i>To whom is this policy binding</i>	All Wolters Kluwer entities
<i>Approval level</i>	Executive Board (EB) for material changes; Chief Financial Officer (CFO) for non-material changes

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	2016	2016		EB
1.0	2018	2016	n/a	n/a
1.0	2019	2016	n/a	n/a
2.0	2020	2020	Non-material updates: Reference to new Code of Business Ethics Added tax strategy responsibilities Added types of taxes the company pays	CFO
2.1	2023	2023	Update for VNO-NCW tax governance code	CFO

Introduction

At Wolters Kluwer, we are dedicated to continuously improving on the sustainability of our global operations. That approach is also reflected in our tax principles. As a global leader in providing information, software and services to the Tax & Accounting profession, we take our responsibility as a corporate citizen seriously. Wolters Kluwer's tax principles are fully consistent with our sustainability strategy and take into account a balanced approach regarding the interests of our various stakeholders, including customers, shareholders, employees, governments, and the global community in which Wolters Kluwer operates.

Wolters Kluwer also subscribes to the principles of the VNO-NCW Tax Governance Code that was issued in 2022. Wolters Kluwer's own tax policy and principles is largely in line with this code and already complies with most elements therein. The main step to full compliance we are planning to take next relates to information as listed in paragraph F (Tax Transparency & Reporting) of the code. To further increase our transparency in line with the code, we will be preparing disclosure of such information.

Compliance and monitoring

Wolters Kluwer is subject to taxation in the many countries where it operates and reports and pays its taxes in accordance with all relevant tax laws, rules and any other regulations in these various jurisdictions. We have procedures and controls in place to monitor compliance on a regular basis. In managing tax matters, our employees must adhere to the Wolters Kluwer Code of Business Ethics and Values.

The tax strategy is approved by the Chief Financial Officer (CFO). Any material changes to the tax strategy will be approved by the Executive Board. The responsibility for the tax strategy, supporting procedures and controls, and management of tax risk ultimately sits with the CFO. The day-to-day responsibility for each of these areas sits with the Senior Vice President of Corporate Tax, who reports to the CFO. The Audit Committee receives quarterly updates on the overall tax position of the Wolters Kluwer Group including changes to tax strategies, material tax issues, and effective tax rates.

Integral part of our business

Tax strategies and planning follow the commercial operations of Wolters Kluwer's businesses.

We consider paying taxes as an integral part of doing business. We pay corporate income taxes, employment taxes, and other business taxes in the jurisdictions where we operate. In addition, we collect and pay employee taxes, dividend withholding taxes, and indirect taxes such as Value Added Tax (VAT) and sales taxes. The taxes we pay and collect represent a significant contribution to the countries and societies in which we operate.

Wolters Kluwer reports income in the countries where the value is created applying domestic and international rules and standards. We respect the rights of governments to determine their own tax regime. As tax is a business expense that needs to be managed, like any other expense, we may legitimately respond to tax incentives and exemptions offered by governments. We do not seek to avoid taxes through "artificial" structures in tax haven jurisdictions.

Communication and transparency

In its relationships with tax authorities, Wolters Kluwer seeks transparent and constructive communication disclosing all relevant facts and circumstances. We cooperate proactively in addressing and resolving tax issues in a manner that demonstrates we take our responsibility as a corporate citizen seriously. As we aim for assurance on our tax positions and where a tax law is unclear or subject to interpretation, we seek confirmation by requesting a tax ruling on the application of the relevant tax law and regulations.

Tax disclosures are made in accordance with relevant domestic regulations and any relevant reporting guidelines and standards, including IFRS. On an annual basis, Wolters Kluwer provides the non-public country-by-country report to the tax authorities in the Netherlands, in line with the Base Erosion and Profit Shifting (BEPS) Plan as initiated by OECD and as enacted into Dutch legislation. At this point, Wolters Kluwer is awaiting the new EU rules on public country-by-country reporting. As preparation for this, Wolters Kluwer is building a set of reliable and structured data that can be retrieved from the systems at consolidated group level. Public country-by-country reporting is expected to be introduced mid-2024, based on the EU Directive on public country-by-country reporting.

We annually report on (corporate) income taxes paid globally and per region (see our Annual Report 2022 Financial Statements notes 16 and 23). The Wolters Kluwer group paid income taxes of €289 million in total in 2022. See table below for the income taxes paid per key countries and regions.

	Profit before tax (€m)	Income Tax accrued (€m)	Income Tax paid (€m)	FTE (Ultimo 2022)
Australia	8	3	2	257
Belgium	35	2	3	643
Canada	26	7	6	320
Germany	33	19	14	1.058
India	7	4	3	2.623
Ireland	250	31	31	37
Italy	21	7	20	1.589
Netherlands	150	35	36	1.344
Poland	14	3	4	361
Spain	18	1	4	599
United Kingdom	19	3	3	455
United States	636	162	155	8.771
Other EMEA	49	5	5	1.363
Other APAC	8	2	3	618
Other Americas	1	0	0	19
Total	1.276	285	289	20.056

Taxes paid include corporate income taxes and withholding taxes paid in 2022. This may include tax payments or refunds relating to previous years. Withholding tax is reported by the recipient country of the source income. The corporate income tax paid in a given year can be lower or higher than the statutory tax rate in a country due to, among others, deferred tax differences relating to timing differences between tax law and accounting standards, carry forward of tax losses, tax exemptions and credits, prior year true-ups, and can be lower or higher than the corporate income tax accrued due to timing differences in payments and/or refunds.