

WOLTERS KLUWER

SUPPLIER CODE OF CONDUCT

1. Introduction

This Code of Conduct (this “Code”) applies to Wolters Kluwer N.V. and its subsidiaries and group companies (hereinafter jointly referred to as “Wolters Kluwer” or the “Company”).

Wolters Kluwer is committed to using high standards of [professional conduct, ethics and corporate citizenship](#). Wolters Kluwer supports and respects responsible business behavior and it strives to ensure that its activities will not infringe upon them.

Wolters Kluwer also requires its suppliers to uphold these standards, wherever they are located, and cooperates with them to improve sustainable practices. Wolters Kluwer does not only take responsibility for the social and environmental impact of its own activities, but also takes a critical look at the impact of all business partners' activities. Wolters Kluwer wants to ensure it is not part of, or party to activities, wherever they take place, that do not adhere to certain standards of social and ethical conduct. Wolters Kluwer's suppliers must help to achieve this aim.

Wolters Kluwer reserves the right to modify, revise, discontinue, or terminate this Supplier Code of Conduct at any time at its sole discretion, without prior notice.

“**Supplier**” means any person, company or other entity delivering, or that that may be invited to deliver, products and/or services to Wolters Kluwer, as well as its worldwide Affiliates. For purposes of this definition, “affiliates” include any and all companies or other corporate entities that control, are controlled by or are under common control with, the Supplier, and “control” means ownership or control of at least 50% of the shares or voting rights in, and/or the right to appoint the management of, any company or other corporate entity.

“**Worker**” means any individual that Supplier employs, hires, contracts with, engages or otherwise uses to operate its business or provide products or services to Wolters Kluwer.

2. Supplier Standards

Wolters Kluwer expects all its Suppliers to adhere to the articles of the [United Nations Universal Declaration of Human Rights](#), the [core labor standards of the International Labour Organization](#), the [United Nations Guiding Principles](#) and the principles of [United Nations Global Compact](#) and all applicable laws and regulations at the national, provincial, state and local levels where the Supplier operates.

Standards which Wolters Kluwer Suppliers have to meet at a minimum are:

- **Forced Labor**

Supplier will not use, participate in or benefit from any forced, bonded, prison, military or compulsory labor.

- **Child Labor**

Supplier will not use child labor, as defined by the International Labor Organization and the United Nations Global Compact, and shall adhere to all national and international laws and regulations regarding child labor.

- **Abuse of Labor**

Supplier will treat each Worker with dignity and respect, and will not use, and procure that their directors and Workers will not use, corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.

- **Freedom of Association**

Supplier shall acknowledge and respect the rights of Workers to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or illegal interference, in order to advance their interests. In countries where national law curtails Workers' freedom of association and collective bargaining, Supplier shall support the development of similar efforts to achieve independent and free association, organization and bargaining.

- **Non-discrimination**

Supplier shall treat and reward Workers equally on the basis of the characteristics of their work and the intensity of their effort. Supplier will not discriminate in hiring and employment practices on the basis of race, caste, gender, national, social or ethnic background, marital status, age, physical or health condition, sexual orientation, genetics, physical or mental disability, membership of unions, political opinion, religion or any other personal characteristic or status.

- **Wages and Benefits**

Supplier will comply with all applicable local and national wages and benefits laws and compensation for work shall fulfill at a minimum the strictest national legal standards, industry standards and the standards of the ILO conventions.

- **Health and Safety**

Supplier will provide their Workers with a safe and healthy workplace in compliance with all applicable local and (supra-)national laws and regulations. In addition, all relevant collective bargaining agreements shall be respected.

Supplier shall provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their Workers. 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.

- **Environment**

Supplier will operate in a manner that is protective of the environment. Supplier will comply with all applicable environmental laws and regulations and observe the principles on the environment in the United Global Compact, to:

- support a precautionary approach to environmental challenges
- undertake initiatives to promote greater environmental responsibilities
- encourage the development and diffusion of environmentally friendly technologies

In addition thereto, Supplier shall take steps to ensure safe handling, transport, storage, use and disposal of waste and to reduce energy consumption and GHG emissions.

Wolters Kluwer expects Supplier to provide full transparency regarding emissions, the use of hazardous substances and the traceability of natural resources. Supplier will be able to guarantee no use of resources from illegal land use and conservation value forests.

- **Paper**

Supplier is encouraged to make use of responsibly sourced paper, according to the generally acknowledged certification schemes of FSC, SFI and PEFC.

- **Anti-Corruption**

Supplier is expected to show ethical behavior in business relations. Supplier will comply with local, national and other applicable laws and regulations related to bribery, extortion and other forms of corruption, including the U.S. Foreign Corruption Practices Act and the UK Bribery Act.

Supplier shall refrain from any practices relating to corruption or bribery, and may not, either directly or indirectly, offer, promise, demand or accept bribes to influence decision-making or obtaining or maintaining benefits. Supplier is asked to provide any available anti-bribery certifications, including ISO 37001.

- **Fair competition**

Free and fair competition is essential to the welfare of the global business. Supplier will comply strictly with all applicable antitrust and non-competition laws.

- **Intellectual Property and Confidentiality**

Supplier shall adhere to all applicable laws and regulations regarding protection, use, publication and transparency of company, personal, and confidential information, and intellectual property rights. Supplier shall respect and actively protect the confidentiality of Wolters Kluwer business information and take the necessary steps to protect Wolters Kluwer's intellectual property rights.

- **Data Privacy**

Supplier shall comply with all applicable data protection and data privacy laws when processing personal data for or on behalf of Wolters Kluwer. Supplier shall handle and process data in accordance with Wolters Kluwer's contractual agreements with Supplier and other applicable instructions and shall not process data for any other purpose than for which it was collected, received or otherwise made available. Supplier shall at all times have implemented adequate operational, technical and organizational measures to protect data against accidental or unlawful destruction, loss or alteration and unauthorized disclosure or access. Supplier is requested to provide the information security certification: ISO 27001.

- **Conflicts of Interest**

Supplier must avoid any situation that could create a conflict of interest, or appearance of conflict of interest in its dealings with Wolters Kluwer, including entering into transactions with Wolters Kluwer Workers. Also, Supplier will observe Wolters Kluwer's policies regarding gifts and entertainment when dealing with Wolters Kluwer Workers.

- **Financial records**

Supplier will maintain accurate and complete financial and business records in accordance with all applicable laws and regulations and internationally recognized accounting standards.

- **Management Systems and Audits**

Wolters Kluwer encourages Supplier to implement management systems, including policies, procedures, objectives, training and self-monitoring, to ensure compliance with the standards described in this Code. Wolters Kluwer may verify Supplier's compliance by carrying out an audit at Supplier's facilities. Supplier shall cooperate with and provide full assistance to such audit, including provision of relevant information and data on request. If Supplier suspects any non-conformance with this Code, it shall promptly inform Wolters Kluwer thereof in writing.

3. Countries and industries from which Supplier delivers to Wolters Kluwer

Wolters Kluwer wishes to review the countries and industries from where Supplier provides products and/or services to Wolters Kluwer in order to evaluate social and environmental responsibility risks.

The countries and industries under evaluation are published on Wolters Kluwer's [website](#). In the event that (i) the product is manufactured in or service is directly delivered from one of the countries listed and (ii) the Supplier is active in one of the industries listed, Supplier will be required to provide Wolters Kluwer with the relevant sustainability certifications for which the Supplier is certified. Relevant certifications may include at least one of the following social certifications (or equivalent):

- OHSAS 18001, ICTI, Smeta (Sedex), UL (PGA), SA8000, BSCI, ETI, ISO 37001

In addition, Wolters Kluwer recommends that Supplier is also certified for at least one of the following environmental certifications (or equivalent):

- ISO 9001, ISO 14001, ISO 50001, EMAS, China Environmental Label, QC 080000, UL Environment, LEED, BREEAM

Suppliers for printed media and office paper products are required to be certified by at least one of the following certifications:

- FSC, PEFC, SFI, EU Ecolabel, Nordic Swan, Blauer Engel



4. Certification

The undersigned Supplier hereby acknowledges that it has received the Wolters Kluwer Supplier Code of Conduct, that it agrees with the content of this Code, and that it will adhere thereto.

Name of Supplier: <i>(please include full legal name)</i>	
Name and title of authorized representative:	
Date:	
Signature:	

This document is to be signed by an authorized representative of Supplier and returned to Wolters Kluwer with a copy sent to sustainability@wolterskluwer.com.