

WOLTERS KLUWER STANDARDS OF ENGAGEMENT FOR SUPPLIERS

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Contents

1. Introduction
2. Supplier Standards
3. High-Risk Countries
4. Acceptance

Appendix I	United Nations Universal Declaration on Human Rights
Appendix II	ILO Core Labor Standards
Appendix III	United Nations Global Compact
Appendix IV	High-Risk Countries

1. Introduction

Wolters Kluwer nv and its subsidiaries (hereinafter jointly referred to as “Wolters Kluwer”) are committed to using high standards of professional conduct and ethics and to being a responsible partner in society.

The Company Values are at the heart of Wolters Kluwer’s success and represent the common bond across all Wolters Kluwer businesses and employees. The Business Principles reflect the high ethical standards that are the basis for achieving the Company’s goals. Together, they are an important means to enable Wolters Kluwer and its employees to live up to high professional and ethical standards. Its Business Principles state that 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 can help to achieve this aim.

“Supplier” means a company, including its affiliates (defined as: a subsidiary, subsidiary undertaking or holding company of Supplier, or a company which is a subsidiary or subsidiary undertaking of that holding company, whereby the related ownership is at least 50% (fifty percent) of the shares or voting rights in a company and/or the right to appoint the management of a company), partnership or person delivering products or services to Wolters Kluwer.

“Employee” or “worker” means any individual that Supplier employs, hires, engages or otherwise uses to operate its business.

2. Supplier Standards

Wolters Kluwer expects all its Suppliers to adhere to local laws and regulations, to the articles of the United Nations Universal Declaration of Human Rights, the core standards of the International Labor Organization and the principles of United Nations Global Compact. Standards which Wolters Kluwer Suppliers have to meet at a minimum are:

- **Labor Conditions**

Supplier shall operate in accordance with the United Nations Universal Declaration of Human Rights (UN UDHR), and the fundamental human rights and labor rights as articulated by the International Labor Organization (ILO).

- **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 (supra-)national laws and regulations regarding child labor.

- Abuse of Labor

Supplier will treat each employee with dignity and respect, and will not use, and procure that their directors and employees 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 employees 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, 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, industrial standards and the standards of the ILO conventions.

- Health and Safety

Supplier will provide their employees 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 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.

- 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.

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 will comply with local and national laws related to bribery, extortion and other forms of corruption, and with other applicable laws including the U.S. Foreign Corruption Practices Act and the UK Bribery Act.

Supplier shall refrain from any practices relating to corruption or bribery, including payment or acceptance of payment to influence decision-making and obtaining or maintaining benefits.

Supplier are expected to show ethical behavior in business relations and to adhere to all applicable laws and regulations regarding protection, use, publication and transparency of company, personal, or confidential information.

3. High-Risk Countries

In the event that Supplier is located in a so-called high-risk country, i.e. as listed in Appendix IV hereto, in addition to signing these Standards of Engagement, Supplier will be required to provide Wolters Kluwer with the certifications for the sustainability factors for which the Supplier is certified.

4. Acceptance

The undersigned Supplier hereby acknowledges that it has received the Wolters Kluwer Standards of Engagement for Suppliers, that it agrees with the content of these Standards of Engagement, and that it will adhere thereto.

Name of supplier	
Name of authorized representative	
Title of authorized representative	
Date	
Signature	

This document should be signed by an authorized representative of supplier and returned to Wolters Kluwer.

Appendix I United Nations Universal Declaration on Human Rights

Preamble

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world,

Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people,

Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law,

Whereas it is essential to promote the development of friendly relations between nations,

Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom,

Whereas Member States have pledged themselves to achieve, in cooperation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms,

Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge,

Now, therefore THE GENERAL ASSEMBLY, proclaims THIS UNIVERSAL DECLARATION OF HUMAN RIGHTS as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

Article 1

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3

Everyone has the right to life, liberty and security of person.

Article 4

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6

Everyone has the right to recognition everywhere as a person before the law.

Article 7

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9

No one shall be subjected to arbitrary arrest, detention or exile.

Article 10

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11

Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.

No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.

Article 12

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13

Everyone has the right to freedom of movement and residence within the borders of each State.

Everyone has the right to leave any country, including his own, and to return to his country.

Article 14

Everyone has the right to seek and to enjoy in other countries asylum from persecution.

This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

Article 15

Everyone has the right to a nationality. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Article 16

Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.

Appendix II ILO Core Labor Standards

Core labor standards are inalienable rights, which all workers should enjoy by virtue of being human beings. The International Labor Organization (ILO) defines these standards as including such basic tenets such as freedom of association, the elimination of all forms of forced or compulsory labor, the abolition of the most hazardous forms of child labor, and the elimination of discrimination in respect of employment and occupation. Unfortunately, many of these rights are not respected in many parts of the world, resulting in gross injustices against vulnerable people.

Respect for core labor standards does not imply uniform labor conditions across developed and developing states. This position would be fiercely opposed by developing states seeking to operate in an increasingly competitive market. Rather, it is a minimal level below which no one should sink. It represents a belief that globalization must work for the whole society, and that governments should not compete away the basic rights of their workers, in their search to attract inward investment. More than 140 countries meeting at the ILO in 1998 re-affirmed their commitment to core labor standards. The eight ILO conventions which make up the core conventions are:

1 Convention 87 - Freedom of Association and Protection of the Right to Organize (1948)

C87 protects the right of workers to join and form independent trade unions. This right is absolute and trade unionists are entitled to be free from any interference from the state. C87 expressly forbids the state to impose sanctions upon workers for organizing unions.

The ILO's Committee of Independent Experts has repeatedly ruled that C87 also protects the right of workers to defend their economic and social interests by measures up to and including strike action. The ILO considers that freedom of association is so important that it has a special committee on Freedom of Association which considers complaints made by any trade union or trade union federation and publishes reports of the cases it investigates. These reports can be purchased (but it is necessary to know the complaint number) or consulted at the ILO office in London. The leading decisions of this Committee and the Committee of Experts on Freedom of Association matters are neatly summarized by subject in a very useful ILO book 'Freedom of Association' which sets out the guiding principles of how the relevant Conventions (numbers 87 and 98 - see below) must operate in practice.

2 Convention 98 - Right to Organize and Collective Bargaining (1949)

C98 provides that workers are allowed to organize their union activities without threat of dismissal or action short of dismissal by their employers or by the state. C98 also protects workers' right to promote their interests by means of collective bargaining.

The convention places a duty on states to promote collective bargaining.

3 Convention 100 - Equal Remuneration

C100 requires states to put in place machinery to ensure the application of the principle of 'equal remuneration for men and women for work of equal value'.

4 Convention 111 - Discrimination in Employment

C111 requires states to declare and pursue a policy to promote equality of opportunity and 'eliminate discrimination on the grounds of: race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment'.

5 Convention 29 - Forced Labor

C29 requires states to take such measures to suppress all forms of forced or compulsory labor within the shortest possible timescale. The convention defines forced labor as 'all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'.

However, specifically excluded from the terms of C29 are: compulsory military service, ‘normal civic obligations’, work or service extracted as a result of a conviction in a court of law (but only in so far as the work is supervised by a public authority and not at the disposal of a private company), work required by the state in cases of emergency (several examples are listed). The Convention further states that no private company or individual should be permitted to profit or benefit from the imposition of forced labor or the product of that labor.

6 Convention 105 - Abolition of Forced Labor

C105 requires signatory states to ‘not to make use of any form of forced or compulsory labor’ as a means of:

- Political coercion, education or punishment for holding political or ideological views opposed to the established political or social system
- Ensuring economic development
- Labor discipline
- Punishment for strikes
- Racial, social, national or religious discrimination

7 Convention 138 - Minimum Age

C138 requires that states seek to end child labor and requires that the minimum age for entry into employment must be no lower than the age of compulsory schooling, and in no case may this be lower than 15 years.

States are entitled to lower this age to 14 years, but those choosing to do so must explain their reasons to the ILO conference every year that the lower age is maintained. C138 also specifies a minimum age of 18 years for occupations which may jeopardize the health, safety or morals of a young person.

8 Convention 182 - Worst Forms of Child Labor

The General Conference of the International Labor Organization considers that the effective elimination of the worst forms of child labor requires immediate and comprehensive action, taking into account the importance of free basic education and the need to remove the children concerned from all such work and to provide for their rehabilitation and social integration while addressing the needs of their families.

The ILO recognizes that child labor is to a great extent caused by poverty and that the long-term solution lies in sustained economic growth leading to social progress, in particular poverty alleviation and universal education.

For the purposes of this Convention, the term “child” applies to all persons under the age of 18 and the term the “worst forms of child labor” comprises:

1. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
2. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
3. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
4. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Articles 5 to 10 of the Convention outline the implementation and monitoring mechanisms. For example, each Member should take into account the importance of education in eliminating child labor, and take effective and time-bound measures to:

- prevent the engagement of children in the worst forms of child labor;
- provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labor and for their rehabilitation and social integration;
- ensure access to free basic education, and, wherever possible and appropriate, vocational training, for all children removed from the worst forms of child labor;
- identify and reach out to children at special risk; and
- take account of the special situation of girls.

So C182 commits states to put into place a wide range of measures to ‘combat child labor now!’ (ILO slogan). However, it is also true that the Convention shall be binding only upon those Members of the International Labor Organization whose ratifications have been registered with the Director-General of the International Labor Office.

Appendix III United Nations Global Compact

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Appendix IV High Risk Countries



International Human Development Indicators

Country	Human Development Index (HDI) value 2012
Norway	0,955
Australia	0,938
United States	0,937
Netherlands	0,921
Germany	0,920
New Zealand	0,919
Ireland	0,916
Sweden	0,916
Switzerland	0,913
Japan	0,912
Canada	0,911
Korea (Republic of)	0,909
Hong Kong, China (SAR)	0,906
Iceland	0,906
Denmark	0,901
Israel	0,900
Belgium	0,897
Austria	0,895
Singapore	0,895
France	0,893
Finland	0,892
Slovenia	0,892
Spain	0,885
Liechtenstein	0,883
Italy	0,881
Luxembourg	0,875
United Kingdom	0,875
Czech Republic	0,873
Greece	0,860
Oceania	0,857
Brunei Darussalam	0,855
Cyprus	0,848
Malta	0,847
Andorra	0,846

Estonia	0,846
Slovakia	0,840
Qatar	0,834
Hungary	0,831
Barbados	0,825
Poland	0,821
Chile	0,819
Lithuania	0,818
United Arab Emirates	0,818
Portugal	0,816
Latvia	0,814
Argentina	0,811
Seychelles	0,806
Croatia	0,805
Bahrain	0,796
Bahamas	0,794
Belarus	0,793
Uruguay	0,792
Montenegro	0,791
Palau	0,791
Kuwait	0,790
Russian Federation	0,788
Romania	0,786
Bulgaria	0,782
Saudi Arabia	0,782
Cuba	0,780
Panama	0,780
Mexico	0,775
Costa Rica	0,773
Grenada	0,770
Libya	0,769
Malaysia	0,769
Serbia	0,769
Antigua and Barbuda	0,760
Trinidad and Tobago	0,760
Kazakhstan	0,754
Albania	0,749
Venezuela (Bolivarian Republic of)	0,748
Dominica	0,745
Georgia	0,745
Lebanon	0,745
Saint Kitts and Nevis	0,745
Iran (Islamic Republic of)	0,742
Peru	0,741
The former Yugoslav Republic of Macedonia	0,740
Ukraine	0,740
Mauritius	0,737

Bosnia and Herzegovina	0,735
Azerbaijan	0,734
Saint Vincent and the Grenadines	0,733
Oman	0,731
Brazil	0,730
Jamaica	0,730
Armenia	0,729
Saint Lucia	0,725
Ecuador	0,724
Turkey	0,722
Colombia	0,719
Sri Lanka	0,715
Algeria	0,713
Tunisia	0,712
Tonga	0,710
Belize	0,702
Dominican Republic	0,702
Fiji	0,702
Samoa	0,702
Jordan	0,700
China	0,699
Turkmenistan	0,698
Thailand	0,690
Maldives	0,688
Suriname	0,684
Gabon	0,683
El Salvador	0,680
Bolivia (Plurinational State of)	0,675
Mongolia	0,675
Palestine, State of	0,670
Paraguay	0,669
Egypt	0,662
Moldova (Republic of)	0,660
Philippines	0,654
Uzbekistan	0,654
Syrian Arab Republic	0,648
Micronesia (Federated States of)	0,645
Guyana	0,636
Botswana	0,634
Honduras	0,632
Indonesia	0,629
Kiribati	0,629
South Africa	0,629
Vanuatu	0,626
Kyrgyzstan	0,622
Tajikistan	0,622
Viet Nam	0,617
Namibia	0,608

Nicaragua	0,599
Morocco	0,591
Iraq	0,590
Cape Verde	0,586
Guatemala	0,581
Timor-Leste	0,576
Ghana	0,558
Equatorial Guinea	0,554
India	0,554
Cambodia	0,543
Lao People's Democratic Republic	0,543
Bhutan	0,538
Swaziland	0,536
Congo	0,534
Solomon Islands	0,530
Sao Tome and Principe	0,525
Kenya	0,519
Bangladesh	0,515
Pakistan	0,515
Angola	0,508
Myanmar	0,498
Cameroon	0,495
Madagascar	0,483
Tanzania (United Republic of)	0,476
Nigeria	0,471
Senegal	0,470
Mauritania	0,467
Papua New Guinea	0,466
Nepal	0,463
Lesotho	0,461
Togo	0,459
Yemen	0,458
Haiti	0,456
Uganda	0,456
Zambia	0,448
Djibouti	0,445
Gambia	0,439
Benin	0,436
Rwanda	0,434
Côte d'Ivoire	0,432
Comoros	0,429
Malawi	0,418
Sudan	0,414
Zimbabwe	0,397
Ethiopia	0,396
Liberia	0,388
Afghanistan	0,374
Guinea-Bissau	0,364

Sierra Leone	0,359
Burundi	0,355
Guinea	0,355
Central African Republic	0,352
Eritrea	0,351
Mali	0,344
Burkina Faso	0,343
Chad	0,340
Mozambique	0,327
Congo (Democratic Republic of the)	0,304
Niger	0,304
Korea (Democratic People's Rep. of)	..
Marshall Islands	..
Monaco	..
Nauru	..
San Marino	..
Somalia	..
Tuvalu	..

Source:

Human Development Index (HDI) value: HDRO calculations based on data from UNDESA (2011), Barro and Lee (2011), UNESCO Institute for Statistics (2012), World Bank (2012) and IMF (2012).

Note:

The cut-off for High-Risk Countries in the Human Development Index is set on < 0.75.