

## WOLTERS KLUWER COMPANY VALUES AND BUSINESS PRINCIPLES

### Mission statement and introduction

Wolters Kluwer strives to provide information, tools, and solutions to help professionals make their most critical decisions effectively and to improve their productivity. Within this in mind, Wolters Kluwer builds on its powerful brands and market positions to provide value to its customers through current, accurate, and expert information, leading edge technology and software solutions, and superior customer service.

In achieving its goals, Wolters Kluwer is committed to using high standards of professional conduct and ethics. We are also dedicated to being a responsible partner in society.

Our company values and business principles are an important means to enable us to live up to high professional and ethical standards.

### Company Values

The Company values are guidelines for all employees of Wolters Kluwer designed to facilitate the achievement of our company goals. These values are the heart of our company's future success and represent the common bond across all Wolters Kluwer businesses and employees. Our company values are:

- **Customer focus:** "Customers are the centre of everything we do"
  - Provide our customers with high quality, innovative products, which improve their expertise, productivity, and education
  - Listen to our customers and develop flexible and creative ways to meet their needs
  - Treat our customers with professionalism, honesty, and respect
- **Innovation:** "We create solutions that are bold and forward-looking"
  - Aim for continuous improvement within our products and services
  - Achieve a competitive advantage through new ideas and creative approaches
  - Approach challenges with a problem-solving and optimistic attitude
- **Accountability:** "We are fully responsible for our actions and performance"
  - Strive for results with a strong sense of urgency
  - Take individual responsibility for meeting customers' needs and shareholders' expectations
  - Be determined to succeed
- **Integrity:** "We are direct, honest, transparent, and fair in our business dealings"
  - Communicate openly and honestly
  - Respect diversity and others' ideas and points of view
  - Behave in a fair and transparent manner
- **Value creation:** "We create value for our customers, employees, and shareholders"
  - Work hard and smart
  - Set high expectations for product quality and building customer relationships
  - Ensure our daily actions contribute to meeting goals of the Company and of satisfying our customers.

### Business Principles

Our business principles reflect the high ethical standards that are the basis for achieving our goals. Our employees understand that their activities must conform to these principles and that in combination with our company values, the business principles will act as a framework for achieving our goals and for conducting business in an ethical manner.

## 1. Responsibilities in society

### *Human rights*

We conduct our business with fairness, honesty, integrity, and respect for differences in the wide variety of social, political, and economic environments we operate in. Wolters Kluwer supports and respects human rights and we strive to ensure that our activities will not infringe upon them. As a provider of information we support freedom of speech and the exchange of information.

### *Business and the environment*

We are committed to minimizing the impact of our activities on the environment. We strive to implement environmentally sound business practices throughout our operations.

### *Community-Minded*

Wolters Kluwer is committed to playing an active role within the communities it operates in. Our activities include cultural, educational, and social initiatives which provide an opportunity to support our employees, customers, and other stakeholders and their communities.

## 2. Employees

### *Professional competence level*

We strive to ensure that all employees maintain their professional competence and skills at a level that is consistent with the responsibilities of their job, with due observance of the requirements from professional bodies regarding ongoing education.

### *Communication and dedication*

Wolters Kluwer values its employees as a key resource. The success of Wolters Kluwer depends to a large extent on the dedication and commitment of all employees. Good communications with our employees are an important element of involving our employees in the various aspects of our company. We actively promote our business principles and company values among our employees. We ask each employee to carry out his or her responsibilities in an honest and ethical way by ensuring that business policies and practices are aligned with ethical principles and by communicating ethical expectations to those with whom they work. Thus we strive to create an innovative environment where our employees can create value for all our stakeholders.

### *Equal opportunities*

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 our customers, employees, and shareholders. As such, we aim to create equal opportunities for all employees, regardless of personal background t race, gender, nationality, age, sexual preference, physical disability, or religion. No form of harassment or discrimination will be tolerated.

### *Health and safety*

Wolters Kluwer will do all that is reasonable and practical to protect the health and safety of its employees.

## 3. Business integrity

### *Compliance with applicable law*

We are committed to conducting our business in accordance with all applicable laws, rules, regulations, and administrative practices of the countries and communities we operate in. No one has the authority to direct or authorize anyone to violate any applicable law, rule, regulation, or administrative practice

### *Preventing corruption*

Bribing and corrupting public officials are serious crimes and punishable in many countries. Wolters Kluwer employees, either directly or indirectly, may not offer, promise, give, demand or accept bribes or other undue advantage to obtain or retain business or other improper advantage to or from anyone for any reason.

### *Business partners*

Wolters Kluwer will assess its business partners with respect to their commitment to act fairly and with integrity towards their stakeholders and with respect to their compliance with the applicable laws, regulations and administrative practices of the countries in which they operate.

Business gifts and entertainment Service to Wolters Kluwer should never be subordinated to personal gain or advantage. No employee, his or her partner, or a member of his or her family, may receive improper personal benefits as a result of the employee's position at Wolters Kluwer. Wolters Kluwer employees should decline any gifts whose acceptance could raise suspicion of improper influence or conduct. Wolters Kluwer employees may not give or receive gifts or offer or accept entertainment if customary courtesies common under accepted ethical business practice are exceeded. Gifts or entertainment in exchange for favours or undue consideration must always be rejected.

### *Free competition*

It is our conviction that free and fair competition is essential to the welfare of the company, its customers, and suppliers. All Wolters Kluwer companies and employees have to comply strictly with the legal requirements of antitrust laws.

## **4. Internal controls and transparency**

### *Internal guidelines*

Conducting our business in a transparent and honest way is an important part of our ethical standards. Our internal policies and guidelines are a tool for our employees to act in such manner. All employees have to act in conformity with the applicable internal policies, procedures and guidelines. Immediate action should be taken to resolve any control weaknesses that could materially affect the reliability of financial reporting and disclosures, or that could expose the Company to the risk of fraud.

### *Whistleblowing*

Wolters Kluwer encourages its employees to report fraud, breach of laws or breach of Wolters Kluwer policies. Towards this end a Whistleblower Policy has been introduced. This policy allows all employees to report fraud or violation of laws or internal policies without fear of retaliation. [Click here for the full Whistleblower Policy.](#)

## **5. Use of assets and information**

### *Confidentiality*

Information on the Company's activities, strategies, business data, and financial results often is proprietary and confidential. Unauthorized disclosure could damage the Company or give unfair advantage to others. Wolters Kluwer expects its employees to respect and actively protect the confidentiality of business information. This also includes information of a confidential nature obtained from third parties.

### *Insider trading*

Wolters Kluwer employees will act in compliance with the applicable conditions of the Wolters Kluwer Code of Conduct on Insider Trading, and applicable local legislation regarding insider trading. This means amongst others that non-public information that might influence the price of Wolters Kluwer shares on the stock exchange shall be kept strictly confidential until publicly released by authorized management. Furthermore all employees who have sensitive inside information must refrain from directly or indirectly executing transactions in Wolters Kluwer securities. [Click here for the full Code of Conduct on Insider Trading.](#)

### *Conflicts of interest*

Wolters Kluwer employees must avoid any situation that could create a conflict, or appearance of conflict, between their private interests and the interests of Wolters Kluwer. A conflict of interest arises in any situation in which Wolters Kluwer employees use their contacts or position in the Company to advance their personal, private business, or financial interests, whether or not at the expense of the Company.

This code requires every employee, whatever their job, to observe the values set out below. It provides a clear guide to appropriate workplace behaviour. Failure to comply with the code may result in disciplinary action, including termination of employment.

### Customers First

When dealing with internal and external customers we:

- ❖ Are honest, respectful, professional, courteous and helpful.
- ❖ Actively consult with and listen to the customer.
- ❖ Base decisions and actions on their needs.
- ❖ Provide prompt attention, accurate information and meet commitments.
- ❖ Ensure our appearance is neat, clean, and appropriate to the job.
- ❖ Refraining from language and behaviour that may offend, harass, victimise, bully and unfairly discriminate.

### Ownership

To ensure our future, we:

- ❖ Recognise we are the company.
- ❖ Ensure our actions do not bring the company into disrepute.
- ❖ Take responsibility for resolving problems, irrespective of the cause.
- ❖ Use materials, equipment, software and other resources wisely, and prevent their misuse.
- ❖ Only approve expenditure for which we are authorised.
- ❖ Do not disclose confidential information other than when required during the performance of our job.

### Expertise & Knowledge

To ensure the quality of our work and a learning organisation, we:

- ❖ Hire based on talent and diversity.
- ❖ Promote and reward based on attitude, performance and skill.
- ❖ Create opportunities to acquire and apply knowledge and skills.
- ❖ Actively learn from one another, and seek assistance when required.
- ❖ Provide guidance and constructive feedback to one another.

### Collaboration

We work together towards our goals by:

- ❖ Adopting a positive and enthusiastic attitude in working with others.
- ❖ Celebrating and rewarding effective teamwork.
- ❖ Observing safe working practices and reporting hazards, accidents, injuries, and unsafe practices.
- ❖ Refraining from language and behaviour that may offend, harass, victimise, bully and unfairly discriminate.
- ❖ Supporting our smoke free workplace policy.
- ❖ Refraining from work when affected by alcohol or recreational drugs.
- ❖ Communicating with, and relating to each other in a respectful, professional, considerate, courteous and appropriate fashion.

### Contribution

To ensure our contribution and demonstrate our commitment we:

- ❖ Work to the best of our ability, giving proper attention and care to the job.
- ❖ Follow lawful and reasonable instructions.
- ❖ Are punctual, and report and account for any absences.
- ❖ Encourage our colleagues to achieve their full potential.
- ❖ Disclose and resolve any conflicts of interest.
- ❖ Refrain from canvassing for private business during work hours.
- ❖ Refuse inappropriate gifts and benefits from customers or suppliers.
- ❖ Observe the spirit and letter of the law, and company policies governing our work.

### Innovation & Entrepreneurship

To improve the quality of our products and services, we:

- ❖ Embrace new ideas, methods, and change.
- ❖ Use initiative to suggest more effective ways of doing our jobs.
- ❖ Take controlled risks, where necessary, to effect innovation.
- ❖ Encourage our colleagues to challenge the status quo.