

UK Tax Strategy

Introduction

Wolters Kluwer Holdings (UK) plc is an unlisted public limited company incorporated in England and Wales, and is the head of the UK sub-group within the Wolters Kluwer group.

This tax strategy applies to Wolters Kluwer Holdings (UK) plc, its UK subsidiaries, and other UK-registered companies in the Wolters Kluwer group. A full list of entities (excluding dormant companies) to which this tax strategy applies, is included at the end of this document.

This document is published so as to comply with the requirements in paragraph 19(2) of Schedule 19 of the Finance Act 2016 and is applicable from the date it is published until it is superseded. Any references to 'tax', 'taxes' or 'taxation' refer to those taxes and duties as defined under 'UK taxation' within paragraph 15(1) of the Schedule.

Risk management and governance

The UK entities have open channels of communication with the group's Corporate Tax department, and we frequently work together to assess and manage potential and actual tax risks. The UK adopts and promotes the Wolters Kluwer culture and practices of tax risk management and governance, as well as the group's Tax Principles below.

The systems and controls specific to the different areas of UK taxation, as well as the associated tax risks and potential exposures, are managed by competent qualified individuals. Ultimate responsibility for managing and mitigating UK tax risks lies with the board of directors of each UK entity within the UK sub-group. The UK tax teams ensure that their tax knowledge is kept up-to-date and is shared among the UK sub-group. Professional advice and guidance is sought from external third-party tax advisors where deemed necessary or appropriate.

Attitudes towards tax planning

The attitude towards tax planning in the UK very much mirrors the group's attitude, as described in the Wolters Kluwer Tax Principles below. Like the rest of the group, the UK sub-group sees paying taxes as an integral part of the business.

Where appropriate, Wolters Kluwer make use of government tax incentives, reliefs and exemptions, in accordance with tax legislation. The UK sub-group, and in fact the wider Wolters Kluwer group, do not seek to avoid taxes through the use of artificial or complex tax planning strategies and structures. This is a key part of the overall Wolters Kluwer Tax Strategy.

Levels of acceptable risk

The level of risk that the UK sub-group is willing to accept in relation to UK taxation is very much in line with the group's tax principles. Whilst some level of tax risk is both inevitable and acceptable, the primary objective is to maintain regulatory compliance with local tax legislation, so as not to cause any damage to the Wolters Kluwer brand or reputation.

Relationship with HMRC

The UK entities have an open and honest relationship with HMRC, and key tax personnel within the UK sub-group have open channels of communication with the CRM and the designated HMRC tax advisors.

The UK sub-group has maintained a low risk rating with HMRC for a number of years, which is testament to our attitude towards tax compliance and our desire to uphold and strengthen this relationship.

Where tax risks, exposures or errors are identified, we promptly discuss and disclose these to HMRC, once the scope and any potential change or correction has been reasonably estimated. Where areas of UK tax legislation requires subjective judgement, or if there is doubt over how the law should be interpreted, we approach both third party professional tax advisors and HMRC for clarity and advice.

List of entities covered by this tax strategy

Enablon (UK Permanent Establishment)

Finarch Limited

Wolters Kluwer Financial Services (United Kingdom) Limited

Wolters Kluwer Health (Europe) Limited

Wolters Kluwer Health (Medical Research) Limited

Wolters Kluwer Health (Professional & Education) Limited

Wolters Kluwer Holdings (UK) plc

Wolters Kluwer TAA Limited

Wolters Kluwer Tax and Accounting Limited

Wolters Kluwer (UK) Limited



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.

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 Business Principles and Values.

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. 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. Tax disclosures are made in accordance with relevant domestic regulations and any relevant reporting guidelines and standards, including IFRS.