

AUSTRALIA REPORTING CONCERNS POLICY NOTICE

SCOPE AND PURPOSE

This Australia Reporting Concerns Policy Notice ("Notice") is applicable to RELX entities in Australia (collectively and individually, "RELX Australia") and is to be read alongside the [RELX Reporting Concerns Policy](#) and forms part of it. Where there is any difference between applicable requirements under the terms of this Notice and the Policy, the terms of this Notice apply.

The purpose of this Notice is to facilitate an environment in which the reporting of relevant instances of suspected misconduct, or of an improper state of affairs or circumstances, in relation to RELX Australia or its operations, is encouraged and reported without fear of detriment.

This Notice describes protections applicable to individuals making reports ("reporting persons") within the scope of the *Corporations Act 2001* (Cth) and *Taxation Administration Act 1953* (Cth) ("protected disclosures").

This Notice also sets out to whom reporting persons may make protected disclosures (i.e., "eligible recipients"), how protected disclosures may be made, how RELX Australia will support reporting persons and protect them from detriment, how protected disclosures will be investigated, and how RELX Australia will ensure fair treatment of its employees who are mentioned in or related to protected disclosures.

For matters that fall within the scope of this Notice, the RELX Reporting Concerns Policy and this Notice are applicable. Reports that are not within the scope of this Notice (e.g., those that relate to alleged violations of the RELX Code of Ethics and Business Conduct that do not constitute protected disclosures) are subject to the RELX Reporting Concerns Policy.

The Reporting Concerns Policy and this Notice are available to all employees and officers of RELX Australia and RELX via the [RELX HOME intranet](#) and are publicly available to all persons on the [RELX.com](#) website.

"REPORTING PERSONS", "PROTECTED DISCLOSURES", AND "ELIGIBLE RECIPIENTS"

Who is a "reporting person" that is eligible to make a "protected disclosure" under this Notice?

The following are reporting person/s who are eligible to make protected disclosures:

- officers and employees of RELX Australia (this includes directors, and full-time, part-time, fixed-term, and casual employees);
- interns and secondees at RELX Australia;
- suppliers of goods or services to RELX Australia;
- RELX Australia contractors or their employees;
- individuals who are an associate of RELX Australia (such as directors and company secretaries of related companies within RELX); or
- relatives, dependents, or spouses of any of the above.

The reporting person/s referred to above can relate to a **current or former relationship** with RELX Australia.

Which types of reports are "protected disclosures" under this Notice?

Reports relating to the following types of concerns involving RELX Australia are examples of protected disclosures:

- illegal conduct;
- theft, the use or trade of illegal drugs, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- financial irregularities, including improper or misleading accounting and reporting practices;
- offering or accepting a bribe;
- a significant risk to public safety or the financial system, even where there is no alleged contravention of law;
- failure to comply with, or breach of, legal or regulatory requirements;
- engaging in or threatening to engage in detrimental conduct against a person who has made a protected disclosure or is believed or →→suspected to have made, or is planning to make, a protected disclosure; or
- misconduct or an improper state of affairs or circumstances in relation to the tax affairs of RELX Australia.

The reporting person must have **reasonable grounds** to suspect that the information they are disclosing concerns misconduct or an improper state of affairs within RELX Australia, and/or indicates that the specific alleged conduct has occurred. Disciplinary action may be taken against persons found to have made disclosures containing knowingly or recklessly false allegations.

Disclosures that relate solely to personal work-related grievances such as interpersonal conflicts among employees or decisions about an employee's terms or conditions of employment (e.g., engagement, hiring, promotion, transfer, and/or termination, suspension, or disciplinary action) and do not otherwise involve matters described above are not considered protected disclosures and are not covered by this Notice.

Who is an "eligible recipient" of a "protected disclosure" under this Notice?

In order to qualify for the protections identified in this Notice, reporting persons must make a report directly, either openly or anonymously, to one of the following reporting channels.

RELX Australia Reporting Channels

All reporting channels set out in this section ("RELX Australia Reporting Channels") are individually and collectively "eligible recipients".

Reporting persons may make a protected disclosure to an officer, senior manager, actuary, or auditor of RELX Australia.

Reporting persons may alternatively use the [RELX Integrity Line](#) ("Integrity Line") to report their concerns. The Integrity Line is available around the clock, every day of the year, with calls and web reports relayed to RELX Australia by a third-party administrator. While RELX Australia prefers reporters to identify themselves when making reports, it is recognised that in some cases reporters may wish to remain anonymous (and they are entitled to do so). The third-party administrator is not able to answer any questions about ethics or policy and cannot advise a reporter on any course of action. When a report is made through the Integrity Line via phone, a representative from the third-party administrator will answer the telephone call. The third-party administrator does not capture the telephone number of any incoming calls so that the reporting person's call-in information can remain anonymous. The third-party administrator also does not record the calls.



External Reporting Channels

RELX Australia strives to provide trusted reporting channels so that it can have an opportunity to review the concerns and, where necessary, implement appropriate remedial actions.

While reporting persons are encouraged to first use RELX Australia's reporting channels, they may also make protected disclosures to an external regulator such as [Australian Securities & Investments Commission](#) ("ASIC"), or the [Australian Prudential Regulation Authority](#) ("APRA").

Other Reporting Considerations

Public Interest and Emergency Disclosures

Reporting persons who disclose information to a journalist or parliamentarian may qualify for the protections identified in this Notice if the requirements for a "public interest disclosure" or an "emergency disclosure" described below are met. Reporting persons are encouraged to contact their own independent legal advisor before making a public interest disclosure or an emergency disclosure.

Public Interest Disclosure Requirements:

- at least 90 days have passed since the reporting person made their disclosure to ASIC, APRA, or another Commonwealth body identified by the regulations to the Corporations Act;
- the reporting person does not have reasonable grounds to believe that action is being, or has been taken in relation to their disclosure;
- the reporting person has reasonable grounds to believe that disclosing the information to a journalist or parliamentarian is in the public interest;
- before disclosing the information, the reporting person has provided written notice to the body to which their previous disclosure was directed that identifies the previous disclosure and the reporting person's intent to report the matter to a journalist or parliamentarian; and
- the extent of the information disclosed to the journalist or parliamentarian is no greater than is necessary to inform them of the misconduct, improper state of affairs and/or alleged conduct.

Emergency Disclosure Requirements:

- the reporting person has previously made their disclosure to ASIC, APRA or another Commonwealth body identified by the regulations to the Corporations Act;
- the reporting person has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- before disclosing the information to a journalist or parliamentarian, the reporting person has provided written notice to the body to which their previous disclosure was directed that identifies the previous disclosure and the reporting person's intent to report the matter to a journalist or parliamentarian; and
- the extent of the information disclosed to the journalist or parliamentarian is no greater than is necessary to inform them of the substantial and imminent danger.

Legal Practitioner Disclosures

Reporting persons who make disclosures to a lawyer for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions of the Corporations Act are entitled to the protections identified in this Notice, even if the lawyer concludes that a matter does not constitute a protected disclosure.

PROTECTIONS FOR REPORTING PERSONS UNDER THIS NOTICE

Can protected disclosures be made anonymously?

Reporting persons are entitled to remain anonymous when making a protected disclosure, during the investigation of that matter, and after that investigation is finalised.

RELX Australia encourages reporting persons to maintain ongoing two-way communication so that it can obtain additional information as needed in the investigation and provide status updates on the investigation. This can be accomplished through use of the Integrity Line, which has mechanisms available for reporting persons to communicate anonymously with investigators, or by using an anonymous email address.

Will the identity of reporting persons be kept confidential?

It is illegal to disclose the identity of reporting persons, or information likely to lead to their identification without their consent, or unless required or permitted under applicable laws.

RELX Australia will only disclose the identity of reporting persons making protected disclosures, or information that is likely to lead to their identification, if any of the following exceptions apply:

- the disclosure is to ASIC, APRA, a member of the Australian Federal Police, or any other prescribed body;
- the disclosure is to a lawyer for RELX Australia to obtain legal advice;
- the "investigation exception" applies (see below);
- the disclosure is to a court or tribunal that finds it necessary in the interest of justice; or
- the disclosure is otherwise permitted by law.

The "Investigation Exception"

Information that is likely to disclose the identification of a reporting person making a protected disclosure may be disclosed by RELX Australia where:

- it does not include the reporting person's identity;
- it is reasonably necessary for investigating the issues raised in the disclosure; and
- RELX Australia has acted reasonably in reducing the risk of the reporting person being identified from the information disclosed.

Factual information about an investigation may be disclosed at the conclusion of an investigation to senior leadership in order to take appropriate remedial action, including disciplinary action against those who have been found to have engaged in misconduct. Where such disclosure occurs, it will be consistent with all requirements under this Notice and applicable laws.

RELX Australia will take steps to protect the confidentiality of reporting persons making protected disclosures under this Notice, including, for example:

- limiting the people who are directly involved in managing, advising, or investigating the protected disclosure, and making those people aware of confidentiality requirements;
- securely storing documents associated with the protected disclosure;
- where appropriate, asking for the reporting person to consent to the disclosure of their identity (or information likely to disclose their identity), where it will assist RELX Australia in investigating the protected disclosure (which the reporting person is not obliged to provide).

Concerns about improper disclosure of a reporting person's identity can be made to any of the reporting channels listed in this Notice.

What protection is provided against retaliation when making a protected disclosure?

Threatening or taking detrimental action against a reporting person because they have made a protected disclosure is prohibited. Any persons responsible for such retaliation will be subject to disciplinary action, up to and including termination of employment or engagement.

Examples of prohibited retaliation against a reporting person may include:

- dismissal / termination of their employment or engagement;
- disadvantageous alteration of their position or duties (e.g. a demotion);
- discriminatory treatment;
- harassment or intimidation;
- inflicting harm or injury (including psychological harm);
- damage to their property or reputation; or
- damage to their business or financial position.

Prohibited retaliation does not include reasonably managing a reporting person's unsatisfactory work performance or taking action in response to misconduct they have engaged in under RELX Australia's policies and procedures.

Examples of measures RELX Australia may take to protect reporting persons from prohibited retaliation include:

- where possible, keeping the reporting person informed of the progress and outcome of the investigation (subject to any privacy and confidentiality obligations);
- reminding the reporting person of employee assistance resources available; or
- where reasonably practicable, approving temporary proactive measures that the reporting person may request (e.g. a temporary change in work location or supervisor, assigning a support person, or a leave of absence).

Reports alleging prohibited retaliation against a reporting person who has made a protected disclosure can be made to any of the reporting channels listed in this Notice.

Other protections

Reporting persons are protected from civil, criminal or administrative liability for making a protected disclosure under this Notice (e.g., they cannot be found to have breached their employment contract or a duty of confidentiality, in making that disclosure).

However, if a reporting person makes a protected disclosure under this Notice but is later found as a result of an investigation to have been involved in the relevant wrongdoing, they may also be subject to disciplinary action.

INVESTIGATING PROTECTED DISCLOSURES UNDER THIS NOTICE

How are protected disclosures investigated?

RELX Australia will assess a report that is made to determine whether it is a protected disclosure under this Notice and whether an investigation is required.

Protected disclosures will be investigated in a manner consistent with the steps set out in the RELX Reporting Concerns Policy (see "Investigating Reports of Misconduct"). RELX Australia strives to acknowledge



reports within seven days and to complete its investigation within 90 days; however, the process and timeframes may vary depending on the circumstances.

During the investigation process, RELX Australia will take all reasonable steps to ensure that individuals mentioned in the disclosure, or to whom the disclosure relates, are treated fairly throughout the investigation process. This may include:

- to the extent practicable and required by law, maintaining the confidentiality of the identity of these persons;
- ensuring that any investigator who is appointed acts impartially and without bias during the investigation;
- ensuring that any investigation accords with the principles of procedural fairness (e.g. an opportunity to respond to allegations made); and
- providing reasonable support services to these persons (e.g. RELX's employee assistance programme).

The information supplied by reporting persons may result in decisions that affect employees of RELX and RELX Australia, and other third parties involved in the relevant incident. Reporting persons should only provide information that they have reasonable grounds to believe is accurate. Where possible, any report should be limited to facts that are relevant to the report and the investigation.

CONSEQUENCES OF BREACHING THIS NOTICE

Disciplinary action may be taken against persons who breach the requirements under this Notice. In appropriate circumstances, this may include termination of employment or engagement, and/or reference to appropriate regulatory or law enforcement authorities.

FURTHER INFORMATION

Who can answer questions about this Notice or the RELX Reporting Concerns Policy?

Individuals seeking additional information before deciding whether to formally make a disclosure may contact the RELX Chief Compliance Officer, utilise the Ask A Question Feature on the Integrity Line, or email RELX Compliance directly at compliance@relx.com.