

DENMARK REPORTING CONCERNS NOTICE

What is the EU Whistleblower Directive (“Directive”) and the Danish Act on Protection of Whistleblowers (“Danish Act”)?

This Notice informs individuals who wish to raise concerns (“reporting persons”) about topics which fall within the scope of the Directive and the Danish Act (together, the “Relevant Laws”), who can make a report and how, the reporting channels available to reporting persons, and how personal information is processed when concerns are raised. This Notice supplements the RELX Reporting Concerns Policy.

Which reports are within the scope of the Relevant Laws?

Reports relating to breaches of EU law that concern:

- Public procurement;
- Financial services, products and markets, and prevention of money laundering and terrorist financing;
- Product safety and compliance;
- Transport safety;
- Protection of the environment;
- Radiation protection and nuclear safety;
- Food and feed safety, animal health and welfare;
- Public health;
- Consumer protection;
- Protection of privacy and personal data and security of network and information systems;
- Breaches of the EU’s financial interests; or
- Breaches related to the EU internal market (including state aid rules and corporate tax rules).

Reports relating to serious offenses or other serious matters, hereunder but not limited to:

- Actual and attempted violations of international law applicable in Denmark;
- Crimes or offenses under national law, hereunder;
 - Bribery, corruption, and theft;
 - Breach of competition law rules; and
 - Breach of human rights and workers rights (hereunder harassment and sexual harassment);
- Threats or harm to the public interest.

Reports of minor employment related matters such as e.g. dissatisfaction with salary conditions, difficulties in cooperating with colleagues, violation of the smoking or alcohol policy, etc., should be handled via the usual internal HR channels. If such reports are received via the whistleblower reporting channel, the report will be deleted and the report dismissed.

Who can report under the Relevant Laws?

Anyone who acquires the information reported in a work-related context including:

- Workers;
- Self-employed individuals;
- Shareholders, owners, supervisors, and managers;
- Paid and unpaid volunteers and trainees;
- Persons working under the supervision of contractors, subcontractors, and suppliers; and
- Applicants or persons participating in the recruitment process or involved in pre-contract negotiations.



Reporting persons should have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true.

What internal reporting channels are available to report concerns within the scope of the Relevant Laws?

RELX employees who wish to raise concerns under the Relevant Law may use any of the reporting channels identified in the Reporting Concerns Policy that they feel is most appropriate. Non-employees may use the [RELX Integrity Line](#) (“Integrity Line”) to report their concerns.

Employees and non-employees may also request a meeting to report their concerns by contacting RELX Compliance at compliance@relx.com.

Reports may be made via the Integrity Line either openly or anonymously. The Integrity Line is available around the clock, every day of the year, with calls and web reports relayed to RELX by a third-party administrator. While we prefer you to identify yourself when making your report, we recognize that in some cases you may wish to remain anonymous. However please be aware that if the information contained within an anonymous report cannot be verified or is not sufficient to process the report, it will be necessary to close the case. Please note that the third-party administrator is not able to answer any questions about ethics or policy and cannot advise you 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.

What external reporting channels are available to report concerns within the scope of the Relevant Laws?

RELX strives to provide trusted internal reporting channels so that the company can have an opportunity to review the concerns and where necessary implement appropriate remedial actions. While reporting persons are encouraged to first use internal reporting channels, they also have the right to report concerns about violations of EU laws externally to a competent external authority. Den Nationale Whistleblowerordning (“**The National Whistleblower Scheme**”) administered by Datatilsynet (“Danish Data Protection Agency”) is the key external authority for Denmark. Albeit administered by the Danish Data Protection Agency, report can be made on all matters which falls within the scope of the Relevant Laws. Reports can be made through the website www.whistleblower.dk.

How are matters within the scope of the Relevant Laws investigated?

Matters reported under the Relevant Laws will be investigated as described in the RELX Reporting Concerns Policy. RELX aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame. Implicated individuals will have the opportunity to respond to the information reported. Please note that the information supplied by reporting persons may result in decisions that affect employees of RELX and other third parties involved in the relevant incident. We therefore ask reporting persons to provide only 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 follow-up investigation.

Will the identity of reporting persons be kept confidential?



RELX seeks not to disclose the identity of reporting persons or the other information from which the reporting person's identity could be deduced beyond those authorized to receive and follow up on reports without the consent of the reporting person.

How is information handled when a report is made?

When a report is made about a concern that falls under the Relevant Laws, details of how personal information is handled as part of this process can be found on the [RELX Integrity Line Privacy Notice](#).

Is retaliation prohibited?

Retaliating against or victimising reporting persons within the scope of the Relevant Laws, as well as facilitators (i.e., individuals who facilitate or assist reporting persons), individuals who are connected with the reporting persons and could suffer retaliation in a work-related context (such as relatives of the reporting person) or legal entities that reporting persons own, work for or are otherwise connected with in a work-related context is prohibited. This also applies if the report was based on incorrect information regarding breaches of Relevant Laws, but the reporting person had reasonable grounds to believe that the information on breaches reported was true at the time of reporting. Any employees responsible for retaliation will be subject to disciplinary action, up to and including termination. Individuals who believe they are being retaliated against can raise the issue with RELX Compliance at compliance@relx.com or the Integrity Line. They may also report their retaliation concerns externally to the National Whistleblower Scheme.