

## THE NETHERLANDS REPORTING CONCERNS POLICY NOTICE

### What is the EU Whistleblower Directive (“Directive”)?

This Notice informs individuals who wish to raise concerns (“reporting persons”) about topics which fall within the scope of the Directive and the Dutch implementing law (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 of suspected misconduct related to violation of Union law, such as:

- 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 of suspected misconduct where the public interest is potentially at stake involving:

- a violation or a risk of violation of a statutory regulation or of internal rules which have been established by RELX pursuant to a statutory regulation; or
- a risk to public health, to the safety of persons, to the detriment of the environment or to the proper functioning of the public service or an undertaking as a result of improper acts or omissions.

### Who can report under the Relevant Laws?

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

- Employees;
- Agency workers;
- Independent contractors;
- 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. Reporting persons are free to consult a counsellor in confidence about suspected misconduct.

## 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 or the local reporting option (Local Reporting Option) for the Netherlands listed below. Non-employees, meaning anybody who acquires information about RELX in a work related context but is not an employee, may use the (independent) [RELX Integrity Line](#) (“Integrity Line”) or the Local Reporting Option to report their concerns.

### Local Reporting Options:

- **LexisNexis:** [lexisnexisnlreportconcerns@lexisnexis.nl](mailto:lexisnexisnlreportconcerns@lexisnexis.nl)
- **Elsevier:** [elseviernlreportingconcerns@elsevier.com](mailto:elseviernlreportingconcerns@elsevier.com)
- **RSG:** [risknlreportingconcerns@lexisnexisrisk.com](mailto:risknlreportingconcerns@lexisnexisrisk.com)

The above inboxes will be managed by the local HR team for that company and RELX shall not have access. The local HR team will forward the report to the relevant department as mentioned in the Reporting Concerns Policy under 'Investigating reports of Misconduct' which will ensure careful follow-up of the report.

The reporting person can make a report in writing, by email, by telephone or other voice messaging systems.

Employees and non-employees may also request a meeting to report their concerns by contacting RELX Compliance at [relxcompliance@relx.com](mailto:relxcompliance@relx.com) or the Local Reporting Option.

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 an independent third-party administrator. While we (meaning RELX) prefer reporting persons to identify themselves when making their report, we recognize that in some cases the reporting person may wish to remain anonymous. Please note that the third-party administrator is not able to answer any questions about ethics or policy and cannot advise reporting persons on any course of action.

When a report is made through the Integrity Line via phone, an independent 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 a suspected misconduct externally to a competent external authority.

In the Netherlands, external reports of reasonable suspicion of misconduct can be made to a competent authority. Competent authorities are in any case:

- the House of Whistleblowers ([www.huisvoorklokkenluiders.nl](http://www.huisvoorklokkenluiders.nl));
- the Consumer and Market Authority (ACM) ([www.acm.nl](http://www.acm.nl));
- the Financial Markets Authority (AFM) ([www.afm.nl](http://www.afm.nl));
- the Personal Data Authority (AP) ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl));
- De Nederlandsche Bank N.V. (DNB) ([www.dnb.nl](http://www.dnb.nl));
- the Healthcare and Youth Inspectorate (IGJ) ([www.igi.nl](http://www.igi.nl));
- the Dutch Healthcare Authority (NZa) ([www.nza.nl](http://www.nza.nl));

- the Nuclear Safety and Radiation Protection Authority (ANVS) ([www.autoriteitnvs.nl](http://www.autoriteitnvs.nl)).

The competent authorities' websites contain the procedure for making an external report. They also state how the competent authority handles the report and investigates.

Although reporting persons can report externally right away, they are encouraged to seek advice before reporting any concern externally by contacting one of the local reporting options or the advisory department (*afdeling advies*) of the Institute for Whistleblowers.

### **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*. Reporting persons receive a confirmation of receipt within seven days after receiving the report. No later than three months of sending the confirmation of receipt, information will be provided to the reporting persons on the assessment of the report and (if applicable) follow-up of the report. RELX aims to inform each person implicated in a report about the allegations against them 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 unless the reporting person consents. Anyone who is involved in a report or an investigation into a suspected misconduct should not disclose the identity of reporting persons or the other information from which the reporting person's identity could be deduced, except insofar as any statutory provision requires disclosure of the identity of the reporting person. In the case of the latter, the reporting person will be notified in writing in advance, unless such information could jeopardise the related investigation or judicial proceedings.

### **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 the following individuals is prohibited:

- reporting persons within the scope of the Directive;
- 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

Retaliation or threats of retaliation are prohibited even if the report is mistaken.

Employees responsible for retaliation will be subject to disciplinary action, up to and including termination. If non-employees retaliate appropriate action will be taken. Individuals who believe they are being retaliated



against can raise the concern with RELX Compliance at [relxcompliance@relx.com](mailto:relxcompliance@relx.com); the Integrity Line.; or the Local Reporting Option. They may also report their retaliation concerns externally to the Institute for Whistleblowers.