

## FRANCE REPORTING CONCERNS/WHISTLEBLOWERS 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 French implementing law (together, the “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 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:

- Actual and attempted violations of international law applicable in France;
- Crimes or offenses under national law; or
- Threats or harm to the public interest.

### Who can report under the 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 Laws?

RELX employees who wish to raise concerns under the 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 [relxcompliance@relx.com](mailto:relxcompliance@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. 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 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. The *Défenseur des droits* ("Defender of Rights") is the key external authority for France, although others have also been appointed for specific sectors to whom the Defender of Rights may refer the matter if applicable.

### **How are matters within the scope of the Laws investigated?**

Matters reported under the 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 personal information handled when a report is made?**

When a report is made about a concern that falls under the Laws via the Integrity Line, 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 Directive, 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 a violation of the Code, this policy and the law, even if the report is mistaken. 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 [relxcompliance@relx.com](mailto:relxcompliance@relx.com) or via the Integrity Line. They may also report their retaliation concerns externally to the [Defender of Rights](#).