

GERMANY REPORTING CONCERNS NOTICE

What is the EU Whistleblower Directive (“Directive”) and the German Whistleblower Protection Act?

This Notice informs individuals who wish to raise concerns (“reporting persons”) about topics which fall within the scope of the Directive and the German Whistleblower Protection Act as the German implementing law of the Directive (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. If there are differences in the interpretation of the German and English versions of the Directive, the German version always applies in case of doubt. In case of differences in the interpretation of the Directive and the German Whistleblower Protection Act, the legal requirements of the German Whistleblower Protection Act are relevant.

This Notice supplements the RELX Reporting Concerns Policy.

Which reports are within the scope of the Relevant Laws?

Reports relating to breaches of EU and German law that concern:

- Public procurement;
- Financial services, products and markets, and prevention of money laundering and terrorist financing;
- Product safety and compliance;
- Transport safety (regarding inter alia road, railway, maritime and civil aviation safety requirements);
- Protection of the environment;
- Radiation protection and nuclear safety;
- Support for the use of energy from renewable sources and energy efficiency;
- Food and feed safety, animal health and welfare;
- Public health (regarding inter alia quality and safety standards for organs and substances of human origin, medicinal products for human and veterinary use, medical devices and cross-border patient care and manufacture, presentation and sale of tobacco and related products);
- Consumer protection;
- Protection of privacy and personal data and security of network and information systems;
- Corporate tax rules;
- Restraints of competition;
- 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:

- Crimes / criminal offenses under German law; or
- Administrative offenses that are subject to a fine under German law, insofar as the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies.

Who can report under the Relevant Laws?

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

- (Former) Workers / employees of the German RELX group companies;
- Temporary workers;
- Paid and unpaid volunteers and trainees;

- Self-employed individuals;
- Quasi-employees;
- Shareholders, owners, supervisors, and managers;
- 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 and fall under the scope of the Relevant Laws.

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 Laws 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”).

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. 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. Information which is subject to the German Whistleblower Protection Act can also be forwarded to the state reporting channels designated by law (so-called external reporting channels). However, German law provides that reporting persons should give preference to reporting to the internal reporting channel in cases where effective internal action can be taken against the violation and they do not fear retaliation. Further information on the external reporting channels can be found on the homepage of the Bundesamt für Justiz (“Federal Office of Justice”) at:

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/ZustaendigkeitderMeldestellen/ZustaendigkeitderMeldestellen_node.html.

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. 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 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 unless such disclosure is otherwise legally required. This is especially the case (i) in criminal proceedings at the request of the criminal prosecution authorities; (ii) on the basis of an order in administrative proceedings following a report and (iii) on the basis of a court decision.

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. Any employees responsible for retaliation will be subject to disciplinary action, up to and including termination. Reporting persons or other individuals against whom retaliation is prohibited who believe they are being retaliated against can raise the issue with RELX Compliance at compliance@relx.com or the Integrity Line.