

## IRELAND REPORTING CONCERNS NOTICE

### Purpose and Scope

The RELX Reporting Concerns Notice for Ireland (the “**Notice**”) supplements the RELX Reporting Concerns Policy. In the event of a conflict between the terms of this Notice and the RELX Reporting Concerns Policy, this Notice shall prevail. This Notice is implemented by all RELX legal entities based in Ireland (together, “**RELX Ireland**”).

This Notice applies to RELX Ireland employees (whether employed on a permanent, temporary, full-time, part-time, or fixed-term basis) and persons who have acquired information about a Wrongdoing (as explained below) from or working with RELX Ireland or providing services to RELX Ireland. These persons include independent contractors, sub-contractors, service providers, suppliers, members of the board, members of management, auditing or supervisory corporate bodies, non-executives, agency staff, persons on work experience, ex-employees, volunteers, and trainees.

This Notice also applies to those who report any alleged wrongdoing of which they became aware during a recruitment process or pre-contractual negotiations.

### What concerns does this Notice apply to?

This Notice covers the reporting of concerns (the “**Reports**”) relating to the following Wrongdoing:

- criminal offences that have been, are being, or are likely to be committed;
- a failure or likely failure to comply with any legal obligation, other than one arising under a contract of employment or a contract to provide services personally;
- a miscarriage of justice that has occurred, is occurring, or is likely to occur;
- the actual or likely endangerment of the health or safety of any individual;
- damage or likely damage to the environment;
- an unlawful or otherwise improper use (or likely improper use) of funds or resources of a public body or other public money;
- an act or omission by or on behalf of a public body that is oppressive, discriminatory, or grossly negligent, or which constitutes gross mismanagement;
- an act or omission that is unlawful or that defeats the object or purpose of certain rules of the European Union in the following areas:
  - 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 affecting the financial interests of the European Union as referred to in Article 325 Treaty on the Functioning of the European Union ("TFEU") and as further specified in relevant European Union measures;
- breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of European Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law; or
- information tending to show that any of the preceding matters has been, is being or is likely to be concealed or destroyed or that an attempt has been, is being or is likely to be made to conceal or destroy such information.

The Notice does not cover reports relating to your own personal circumstances, grievances, complaints, or employment relationship. Such concerns will generally fall outside the scope of this Notice, and it may be more appropriate to raise such matters under a different RELX Ireland policy or procedure.]

### **What internal reporting channels are available?**

In Ireland, employees may use any of the reporting channels identified in the Reporting Concerns Policy which they feel is most appropriate or the local reporting representative ("**Local Reporting Representative**") for Ireland listed below. Reporting persons who are not RELX Ireland employees may use the [RELX Integrity Line](#) ("**Integrity Line**") or contact the Local Reporting Representative to report their concerns.

#### **Local Reporting Representatives:**

Local reporting mailboxes are managed by local representatives for the relevant RELX business unit, namely:

- **Elsevier:** [elsevierirereportingconcerns@elsevier.com](mailto:elsevierirereportingconcerns@elsevier.com) - VP Software Engineering and Senior Development Manager, Product Development; and
- **Risk:** [riskirereportingconcerns@lexisnexisrisk.com](mailto:riskirereportingconcerns@lexisnexisrisk.com) - AVP Technology and AVP, Data Science.

Reporting persons 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 Representative.

Reports may be made via the RELX Integrity Line. The Integrity Line is available around the clock, every day of the year, with calls and web reports relayed to RELX Compliance by a third-party administrator. We prefer that you identify yourself when making a report because anonymous reports may make it more difficult to investigate fully, and to establish whether such allegations are credible. However, where you make an anonymous report of Wrongdoing and you subsequently identify yourself, you will be afforded protections under the 2014 Act, as amended.

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?**

RELX Ireland strives to provide trusted internal 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 internal reporting channels, they also may report certain Relevant Wrongdoing externally to "*prescribed persons*" who are set out in the Protected Disclosures Act 2014 (Disclosure to



Prescribed Persons) Order 2020 (SI 367/2020), available [here](#). The reporting person may also make a Report to the Office of the Protected Disclosures Commissioner or, where relevant, to institutions, bodies offices or agencies of the European Union.

A reporting person may make a Report to a prescribed person if the person reasonably believes that the report is within the remit of the prescribed person and the person reasonably believes that the information disclosed, and any allegation contained in it, are substantially true.

### **How are Reports investigated internally?**

Reports will be investigated as described in the RELX Reporting Concerns Policy.

Once a Report has been received, RELX Compliance or the Local Reporting Representative, as applicable, will carry out an initial assessment to determine whether there is enough evidence to take appropriate action, which may include an investigation. The reporting person may be asked to provide further information in connection with any such investigation process.

The designated investigator will aim to keep reporting persons informed of the progress of any investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the designated investigator from giving specific details of the investigation or any action taken as a result. Any information about the investigation must be treated as strictly confidential.

Fair procedures require that any individual accused of wrongdoing in a report will be made aware of, and 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.

Where possible, reporting persons will be provided with feedback on the action envisaged or taken as follow-up to the Report, subject to applicable legal and regulatory obligations.

### **Will the identity of reporting persons be kept confidential?**

RELX Ireland will not, without your explicit consent, disclose your identity or any information from which your identity may be directly or indirectly deduced, to another person, other than those (including members of staff designated under legislation) whom RELX Ireland reasonably considers may be necessary for the purposes of the receipt or transmission of, or follow-up on, reports as required under legislation.

The prohibition on disclosure will not apply where:

- a) the disclosure is a necessary and proportionate legal obligation in the context of investigations or judicial proceedings;
- b) the person to whom your report was made or transmitted:
  - i. shows that they took reasonable steps to avoid disclosing your identity or any information from which it could be deduced, or

- ii. reasonably believes that disclosing your identity or any such information is necessary for the prevention of serious risk to the security of the State, public health, public safety, or the environment;
- c) the disclosure is otherwise required by law.

Where your identity or any other information from which your identity may be directly or indirectly deduced is disclosed to another person, you will be notified in writing in advance, together with the reasons for the disclosure unless this would jeopardise:

- a) the effective investigation of the wrongdoing;
- b) the prevention of serious risk to the security of the State, public health, public safety, or the environment; or
- c) the prevention of crime or the prosecution of a criminal offence.

#### **How is information handled when a Report is made?**

When a Report is made within the scope of this Notice, 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, 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 strictly prohibited, even if the Report is mistaken. Any RELX Ireland employees responsible for retaliation will be subject to disciplinary action, up to and including termination. Individuals who believe that they are being retaliated against can raise the issue with RELX Compliance at [relxcompliance@relx.com](mailto:relxcompliance@relx.com); the Integrity Line; or the Local Reporting Representative.

#### **False Reports**

If it is found that a person knowingly reported false information, the person who made the Report may be subject to disciplinary action in accordance with the applicable RELX Ireland disciplinary procedure.