

SPAIN REPORTING CONCERNS NOTICE

What is the EU Whistleblower Directive (“Directive”) and the Spanish 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 Spanish Whistleblower Protection Act, the Spanish implementing law of the Directive (together, the “Relevant Laws”); who can make a report and how; the reporting channels available to reporting persons; how personal information is processed when concerns are raised, as well as, how reports are managed and investigated. This Notice supplements the RELX Reporting Concerns Policy and prevails to the extent there is conflicting information contained in that Policy and this Notice.

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 competition law, state aid rules and corporate tax rules).

Reports relating to:

- Crimes / criminal offenses under Spanish law; or serious or very serious administrative infractions, including those involving financial loss to the Treasury and Social Security and occupational health and safety offences under labour law.

Who can report under the Relevant Laws?

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

- Current and former workers / employees of the Spanish RELX company;
- Temporary workers;
- Paid and unpaid volunteers and trainees;
- Self-employed individuals;
- Shareholders, owners, members of the Spanish RELX company administrative, management or supervisory body, including non-executive members;
- 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.

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, including the [RELX Integrity Line](#) (“Integrity Line”). Non-employees may use the [Integrity Line](#). Reporting persons may also communicate a concern by means of a face-to-face meeting, which will be held within seven (7) days, following a written request through the Integrity Line.

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. 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.

Persons receiving a report should maintain confidentiality over the information communicated in the Report and should immediately provide the report to the RELX Chief Compliance Officer who is the person responsible for the Reporting System in Spain, so that it can be processed in accordance with this Notice. Once the information in the Report has been forwarded to the RELX Chief Compliance Officer, the person who received the Report must destroy or delete the communication.

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 matter. We therefore ask reporting persons to provide only information that they have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, is accurate and falls within the scope of the Relevant Laws.

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 Spanish Whistleblower Protection Act can also be reported to **the Independent Authority for the Protection of the Informant** or to the **Anti-Fraud Office of Catalonia**, and, where appropriate, to the institutions, bodies and agencies of the European Union, either directly or following a communication through RELX reporting channels.

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 and the following:

- **Preliminary analysis of the report**
 - Once the concern has been raised through the corresponding reporting channels, an acknowledgement of receipt will be sent to the reporting person within seven calendar days.
 - The RELX Chief Compliance Officer or their designee, after carrying out a preliminary analysis and verification of the report, may accept or reject the report based on the criteria of sufficiency

and relevance, and for this purpose may request additional information or documentation from the reporting person that may be relevant to make that determination.

- In the event of rejection, the RELX Chief Compliance Officer or their designee shall inform the reporting person of this decision, stating the reasons for the rejection.
- If the decision is to investigate, the RELX Chief Compliance Officer or their designee shall inform the reporter, thereby initiating the investigation phase of the report.
- Once the report has been received, the RELX Chief Compliance Officer or their designee will document the relevant information contained in the communication in such a way that it is duly recorded, including the reasons for both accepting and rejecting the communication.

- **Investigation process**

- The investigation procedure shall be initiated as soon as the RELX Chief Compliance Officer accepts a report submitted and will be concluded within three months, which period may be extended for a further three months when the complexity of the facts or of the investigation is sufficiently justified.
- The designated investigator will keep the person affected by the report informed, whenever is most convenient, in order to ensure the successful completion of the investigation of the actions or omissions attributed to them. The person affected by the report will have the right to be heard.
- If deemed necessary, the reporting person may be asked for additional information about the concern submitted and, if deemed appropriate, further communication with the reporting person may be maintained.
- The reporting person will also be notified when the concern has been closed but, for confidentiality reasons, details of the outcome of the investigation will not be provided to them.
- The principles of confidentiality, presumption of innocence, and respect (i.e. the right to honour) will be followed with respect to the reporting person, the person affected and any other parties involved in the investigation.
- When the facts are indicative of a criminal offence, the RELX Chief Compliance Officer will follow laws that require the information to be forwarded to the Public Prosecutor's Office, or the European Public Prosecutor's Office where the facts affect the financial interests of the European Union.

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.

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](#) and in accordance with any applicable data protection regulations.

Is retaliation prohibited?

Retaliating against or victimising any of the following is prohibited:

- reporting persons within the scope of the Relevant Laws;



- 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 report person); or
- legal entities that reporting persons own, work for or are otherwise connected with in a work-related context.

This retaliation protection applies even if the report was based on incorrect information regarding breaches of Relevant Laws as long as the reporting person had reasonable grounds to believe that the information on breaches reported was true at the time of the 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 relxcompliance@relx.com or the RELX Integrity Line.