

RELX REPORTING CONCERNS POLICY

RELX and its businesses (“RELX” or the “company”) are committed to upholding high ethical standards. The [RELX Code of Ethics and Business Conduct](#) (“Code”) sets the framework to guide us in making sound, ethical business decisions. Violations of the Code, policy or law that go undetected or unreported can have serious consequences for our businesses. In order to ensure that we maintain an ethical and legally compliant company culture, RELX expects individuals to report suspected violations of the Code, policy, or law.

Scope and Purpose

This policy applies on a global basis to all RELX employees who want to report a concern and explains the process for reporting suspected violations of the Code, Code-related policies, or the law (“concerns”). The purpose of this policy is to encourage the reporting of suspected misconduct, provide examples of the types of concerns that should be reported, and explains the avenues available to report concerns. This policy also describes how RELX investigates concerns reported by employees and non-employees.

RELX recognizes the difficulty that individuals may face in disclosing to RELX instances of misconduct (illegal or unethical) while engaging in the company's business. RELX is committed to ensuring that any such misconduct is immediately addressed and future recurrence is prevented.

What to Report

We rely on you to report your concerns about suspected violations of the Code, this policy, or law. Our Code provides detailed information about the types of conduct that should be reported. Some examples include the following types of suspected misconduct:

- accounting, accounting controls, auditing and corrupt practices;
- criminal or illegal conduct (e.g., bribery, collusion with competitors);
- financial and business integrity concerns (e.g., fraud or falsification of company records, inaccurate or exaggerated sales, improper revenue recognition, improper payments, falsifying expense reports, misusing a corporate credit card);
- misuse of company property, information, or assets (e.g., theft, disclosing confidential information, misusing company property or company products);
- inappropriate workplace conduct (e.g., bullying, discriminatory or harassing conduct or comments, dishonesty);
- conflicts of interest (e.g., freelancing for or ownership interest in a competitor, using company property to run a separate business, hiring a relative);
- risk to the health and safety of individuals that are not emergencies (note that immediate, emergency threats to health and safety of individuals should be reported to law enforcement and then the company); or
- damage to the environment.

How to Report

There are several avenues available for reporting concerns and employees may use any reporting channel available to you that you feel is appropriate in a particular situation:

- A manager;
- A Human Resources representative;



- A member of a [Compliance Committee](#);
- A company lawyer; or
- The [RELX Integrity Line](#) (“Integrity Line”).

Reports may be made via the Integrity Line openly or, where legally permissible, 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.

Processing of Personal Information

If your report is made via the Integrity Line, your personal information is processed as described in the [RELX Integrity Line Privacy Notice](#). If your report is made through other avenues, your personal information is collected, shared and retained for the purposes and on the grounds described in the [RELX Integrity Line Privacy Notice](#) and the [RELX Employee Privacy Notice](#), as applicable.

Confidentiality

We do not disclose the identity of anyone who reports a suspected violation or who participates in a related investigation unless:

- the individual authorises disclosure;
- disclosure is required by law, regulation, or legal process; or
- disclosure is deemed necessary to properly investigate the matter.

Where appropriate, we will follow the requirements of the law in those countries with greater confidentiality protections.

Investigating Reports of Misconduct

RELX promptly investigates reports and takes appropriate remedial action when violations are discovered. One of the following is ordinarily assigned to oversee the investigation of a report:

- Human Resources;
- Data Protection Group, Data Privacy Officer, or Information Security Officer;
- Business Compliance Committee Designee;
- Head of Audit & Risk Management;
- Ethics or Compliance Officer; or
- Chief Legal Officer.

Factors weighed when determining who will investigate a particular matter include (but are not limited to) independence, subject matter expertise, lack of conflict of interest, applicable laws, and level of materiality. For more information about the investigations that each of the above typically oversees, refer to the Code’s [Report Notification Workflow](#).

After receiving the report, the individual(s) assigned to investigate the concerns will do so in accordance with RELX policies and procedures and local law. This ordinarily will involve speaking directly to the reporting person to obtain information about the concerns, gathering and reviewing relevant information, documenting the reporting person’s input, and speaking to other individuals who may have relevant knowledge. We might need additional information and clarifications as the investigation progresses, in which



case we may contact individuals again. The individual assigned to investigate should provide the reporting person with an estimated timeframe to complete the investigation and advise the reporting person if circumstances will prolong the investigation.

At the conclusion of an investigation, the reporting person should, when possible, be notified that the investigation is complete. The amount of information shared with the reporting person about the results of the investigation will depend upon, for example, local law, whether the concerns directly relate to the reporting person's employment or whether there are confidentiality obligations or concerns.

Retaliation or Victimization is Prohibited

Retaliating against or victimising an individual for reporting a suspected violation he or she sincerely believes violates the Code, a policy, or the law, even if the report is mistaken, or retaliating against an individual because he or she has assisted in an investigation of a reported violation, is itself a serious violation of the Code and may also be a violation of law. Any employees responsible for retaliation will be subject to disciplinary action, up to and including termination.

Grievance and Disciplinary Procedures

Certain local law or company policies require that specific types of reports be investigated under a separate grievance, discipline, or investigation procedure. The applicable grievance or disciplinary procedure will apply to reports that are within the scope of those procedures.

Location-Specific Requirements

In some locations, there are additional requirements related to certain types of reports, the avenues available to report, and the manner in which reports can be raised by non-employees. Those specific requirements are described in the [Country Specific Reporting Concerns Notices](#).