

## **RELX CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS**

RELX PLC and all of its direct and indirect subsidiaries (collectively, "RELX") are committed to conducting business in accordance with applicable laws, rules and regulations, including those related to full and accurate financial disclosure and the highest standards of business ethics. In accordance with the RELX Operating and Governance Principles, this Code of Ethics for Senior Financial Officers ("SFO Code") supplements RELX's Code of Ethics and Business Conduct (the "Code of Ethics"), which sets forth the fundamental principles and key policies and procedures that govern the conduct of all RELX officers and employees. This SFO Code applies to the Chief Executive Officer and Chief Financial Officer of RELX PLC and the RELX Financial Controller (together, "SFOs").

### **1. Compliance with Laws, Rules, Regulations and the SFO Code; Accountability**

SFOs are required to comply with all laws, rules and regulations that govern RELX in the conduct of RELX's business, including this SFO Code as well as the Code of Ethics.

SFOs have particular leadership responsibilities that require them to create a culture of high ethical standards and commitment to compliance; maintain a work environment that encourages employees to raise concerns; and promptly address employee compliance concerns. Violations of this SFO Code may result in disciplinary action, up to and including discharge. The Chairperson of the Board of Directors of RELX PLC, ("Board Chair") shall determine, or shall designate appropriate persons to determine appropriate action in response to violations of this SFO Code. Any questions about this SFO Code should be raised with the RELX Chief Legal Officer ("CLO").

SFOs are required to promptly report any suspected violations of any applicable laws, rules, regulations, the Code of Ethics, or this SFO Code to the CLO, Board Chair or otherwise in accordance with RELX's reporting policies and procedures, including the reporting channels described in the Code of Ethics (as applicable). SFOs are required to cooperate fully and in good faith with any investigations of allegations of suspected violations and will not be subject to retaliation for making a report when they honestly believe a violation may have occurred or for cooperating in an investigation.

### **2. Conflicts of Interest**

A conflict of interest may arise in any situation in which an employee, including a SFO, engages (or has a family member that engages) in any activity that detracts from or interferes with his or her full, loyal and timely performance of services to RELX, or has a personal interest (including those of their family members) that might influence the employee's judgment on behalf of RELX in a manner adverse to RELX. SFOs must make full disclosure of all facts and circumstances to, and obtain the written approval of, the CLO or Board Chair before making any investment, accepting any position or benefits, participating in any transaction or business arrangement or otherwise acting in a manner that creates or appears to create a conflict of interest. If a SFO has any doubt as to whether or not any particular activity or interest would be considered a conflict of interest, they may consult with the CLO.

### **3. Disclosures**

RELX's policy is to make full, fair, accurate, timely and understandable disclosures in compliance with all applicable laws and regulations in all of its public communications, particularly including the reports and documents that RELX submits to, or files with, shareholders, stock exchanges on which the securities of RELX are traded, the Securities and Exchange Commission and other regulatory authorities. SFOs are required to promote compliance with this policy by all employees and to abide by RELX standards, policies and procedures designed to promote compliance with this policy.

### **4. Financial Reporting and Audits**

SFOs are to provide reliable financial reporting and disclosures, and in particular to:

- Provide full, fair, accurate, timely and understandable financial information and disclosures in reports and documents that RELX files in public filings or communications and any internal reporting that leads or may lead to public filings or communications, including to stock exchanges and other regulatory authorities;
- Give RELX's external and internal auditors access to information necessary to properly conduct any audit or interim review of RELX; and
- Refrain from directly or indirectly taking any action to fraudulently influence, coerce, manipulate, or mislead persons preparing or reviewing the financial statements and related public disclosures or to otherwise take any action directly or indirectly that would cause such financial statements or disclosures to be materially incorrect or misleading.

### **5. Waivers of the SFO Code**

RELX will waive application of the policies set forth in this SFO Code only when circumstances warrant granting a waiver in the judgment of the Board of Directors. If any SFO would like to seek a waiver of this SFO Code, they must make full disclosure of the particular circumstances to the CLO and Board Chair before engaging in any activity that may violate this SFO Code. Changes in and waivers of this SFO Code may be made only by the Board of Directors and will be disclosed promptly as required under applicable law and regulations.

### **6. No Rights Created**

This SFO Code is a statement of certain fundamental principles and key policies and procedures that govern RELX's SFOs in the conduct of RELX's business. It is not intended to and does not constitute an employment contract or assurance of continued employment, and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.