

Code of Ethics and Business Conduct



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A message from our Chief Executive Officer

Dear Colleagues,

At RELX, we take great pride in our products and services, our commitment to our customers, and our contributions to the communities in which we live and work. We also take great pride in our culture of integrity and high ethical standards which are central to how we do business.



Our Code of Ethics and Business Conduct explains the core standards and policies under which we operate. It is the foundation of our culture of integrity and commitment to Do the Right Thing, inspiring trust within our businesses and among our customers, business partners, employees and shareholders.

The Code describes how we should conduct ourselves in the workplace and the marketplace and recognizes our commitment to the environment and the communities in which we operate. This is why it's so important for you to take the time to read the Code and consider how it applies to you and your work.

Our leaders and managers have a special responsibility to be role models with respect to the Code's principles and to help the employees in their organisations understand and uphold the Code's ethical standards. Managers should have periodic conversations with their teams about the Code and how it guides day-to-day operations and interactions; managers should also use the Code to exercise oversight of business activities.

If you have questions about the Code or its application, you should speak with your manager, human resources, a company lawyer, a member of the compliance committee for your business, or use the Ask A Question feature on the **RELX Integrity Line**.

I also urge you to report any situations where you believe there may be a Code violation. There are multiple avenues through which you can raise concerns about potential violations of the Code or other related policies. We prohibit retaliation against anyone for reporting concerns.

Our adherence to the highest ethical standards is at the heart of our reputation as a respected member of the global business community. I am confident that together, with the Code as a guide, we will continue to build upon our culture of integrity and meet the high standards that we have set for ourselves and our businesses.

Thank you.

Erik Engstrom
Chief Executive Officer

Our commitment to Do the Right Thing

We are committed to achieving our business goals in an open, honest, ethical, and principled way. Doing business with integrity is imbedded in our culture and we strive to “Do the Right Thing.”

Do the Right Thing means:

As colleagues we will:

- be honest in our dealings with others;
- respect our colleagues;
- pause, reflect, and, if needed, ask for guidance before taking action;
- act in conformity with the law and our policies; and
- courageously speak out for what is right.

As an organization we will:

- provide policies, training, and resources to guide us;
- enable a culture where we feel comfortable to ask questions, speak up and report concerns;
- listen to concerns when they are raised and act on them in a fair and timely manner;
- ensure that when we raise concerns, we do not suffer retaliation for doing so; and
- hold everyone to the same standards of behaviour, regardless of position within the company.

As part of our commitment to having a culture of integrity, we:

- adhere to the **RELX Operating and Governance Principles**;
- support the United Nations Global Compact, a voluntary corporate responsibility initiative intended to protect human rights, encourage fair and non-discriminatory labour practices, promote the care of the environment, and eliminate corruption; and
- strive to do business with customers, suppliers, and stakeholders who operate ethically and align with our values of inclusion and diversity.



Our Code of Ethics and Business Conduct

By understanding and adhering to the Code, raising questions, and reporting any illegal or unethical conduct, you are helping us to conduct our businesses with integrity in accordance with our high ethical standards and our commitment to legal compliance.

The RELX Code of Ethics and Business Conduct will help you understand the compliance and ethics rules that apply to our businesses and assist you in applying those rules to your job. The Code applies to all employees, executives, and members of the boards of directors of the RELX businesses.

While the Code reflects our commitment to act ethically and legally, it does not describe every law and policy that might apply to every situation. There are other RELX and business-specific policies and local laws which may apply to you and which you must follow. If any of those policies or laws are stricter than the relevant Code provision, you must follow the stricter policy or law.

There are also situations in which local laws might conflict with a Code provision. In those situations, we will comply with local law.

You are responsible for reading and complying with the Code and acting ethically in the workplace and while conducting Company business. If you violate the Code or other policies, you may be subject to remedial or disciplinary action, or even lose your job. We also may refer serious matters to public authorities for possible prosecution.



What are my responsibilities regarding the Code?

- reading it and understanding how it applies to your job;
- following the compliance and ethics rules described in the Code;
- knowing and following additional policies and laws that apply to your specific business, location or role; when an issue is covered both by the Code and another applicable policy or law, following the stricter guidance;
- asking questions if you are not sure how the Code applies to a particular situation or decision that you are facing; and
- reporting any violations or suspected violations that you believe may have occurred.

If you are a people leader, you have additional responsibilities, including:

- modelling ethical behaviour and decision-making;
- having periodic conversations with staff about the Code and our policies;
- exercising proper oversight of business activities;
- supporting the timely completion of ethics and compliance training;
- being approachable and open to colleagues reporting concerns;
- listening to and promptly acting on reports brought to you; and
- never retaliating against someone for reporting a concern.

Use the **RELX Ethical Leader Toolkit** to assist you in meeting these responsibilities.

RELX and each of its business areas have **compliance committees** to provide direction and oversight for compliance-related matters. You are encouraged to raise questions and seek advice before taking action. You may raise questions about the Code with your manager, human resources, a company lawyer, a compliance committee member, or by utilising the Ask A Question functionality available on the **RELX Integrity Line**.

If you witness or learn about any potential illegal or unethical conduct, you have a responsibility to report it. See "Reporting and investigating concerns" for more information on how and where to report concerns.

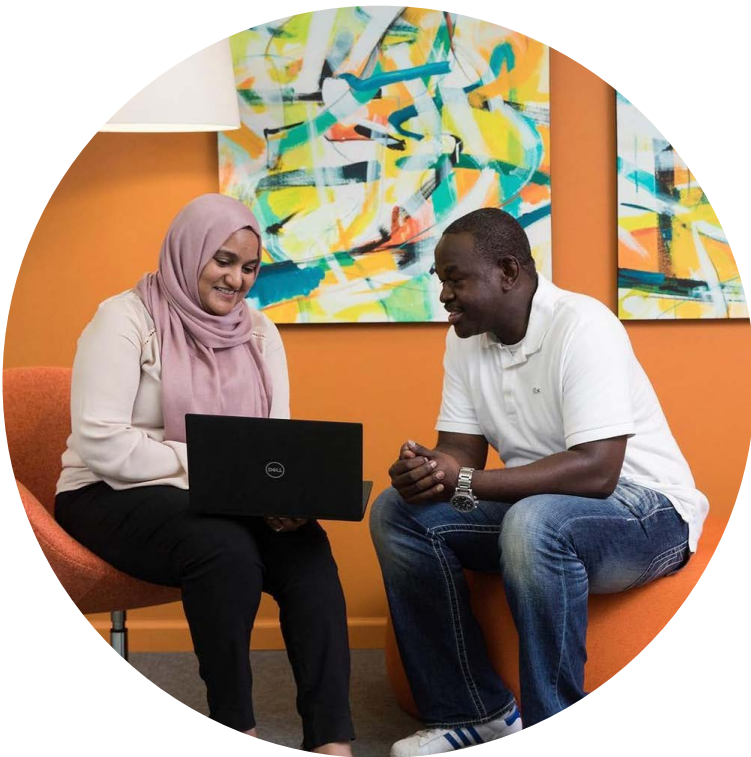
Retaliation against an employee for reporting a suspected violation of the Code is prohibited.

The Code is not an employment contract and it does not change the terms of any existing employment contract or collective bargaining agreement that applies to you. The RELX PLC Board of Directors is responsible for the final interpretation of the Code, and may revise the Code at any time, subject to the terms of any applicable collective bargaining agreements or local law.



A Guide to Ethical Decision-making

We expect that when faced with a dilemma or question about a decision or conduct, every employee will act within the spirit of the Code and exercise the highest ethical standards.



When you are faced with such a dilemma or question, consider these questions:

- Will the decision or conduct at issue detract from my ethical reputation or that of the company?
- Could the decision or conduct bring harm, embarrassment, or humiliation to a colleague or customer, or unfairly disadvantage a competitor?
- Could the decision or conduct give even the appearance of being unethical or unlawful?
- Would a report of my actions or decision appear unfavourable to others if presented on the evening news or in social media?
- Does the decision or conduct feel morally and ethically improper?
- Will I have to lie or bend the truth to justify my decision or action?

If the answer to any of the above questions is “yes”, then you must reconsider your approach and, if needed, ask for guidance before acting.

Our commitment
to integrity

Reporting and
investigating concerns **2**

Protecting our
interests and assets

Our business partner,
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Respecting our
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Resources

Reporting and investigating concerns

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Importance of reporting

Report your concerns about suspected violations of the Code, law, or policy using any of several reporting channels without fear of retaliation.



Lukas sees his manager accept a £500 gift card from a supplier. Lukas knows this violates company policy but doesn't want to get in trouble with his manager. What should Lukas do?

Answer: Lukas must report the matter. Regardless who is involved, your responsibility is to report possible violations of our Code. RELX has numerous channels for reporting and enforces strict anti-retaliation policies. Reports should be made to human resources, a compliance committee member, your manager (if they are not involved in the conduct), or via the RELX Integrity Line. If using the Integrity Line, in most cases you have the option to report anonymously.

We promptly investigate suspected violations of the Code and, if a violation has occurred, we will take appropriate remedial action. This is an important component of our Code compliance programme which helps us to protect employees, preserve the company's reputation, and adhere to our legal obligations.

You play a critical role in the fair and effective implementation of our compliance programme. It is important that employees report concerns or suspected violations regardless of the identity or position of the suspected offender. With respect to potential criminal conduct, in many countries failure to report such conduct can itself be considered a crime.

If you learn or suspect that someone has violated the Code or otherwise acted unethically or illegally, it is important that you promptly report your concerns to your manager, human resources, a company lawyer, or a compliance committee member.

You also may report violations through the RELX Integrity Line at www.RELXIntegrityLine.com or by **telephone**. In most cases, reports can be made via the Integrity Line anonymously. While we prefer that you identify yourself when making a report, we recognize that in certain situations you may want to remain anonymous. Local laws may only allow reports related to certain subjects or may prohibit anonymous reports to the Integrity Line. Those limitations are identified in the **RELX Integrity Line Privacy Notice**. Reports regarding questionable accounting or auditing matters may be submitted directly to the Audit Committee of the RELX Board of Directors.



RELX INTEGRITY LINE

REPORT CONCERNS. ASK A QUESTION. DO THE **RIGHT** THING.

Investigations

We investigate reports of suspected violations of law or the Code, including anonymous reports. To do so properly and thoroughly, it is imperative that you cooperate in the investigation of suspected violations and that you be truthful.

Reports subject to a separate business area or country grievance or disciplinary procedure will be investigated in accordance with the applicable procedure.

Confidentiality

In most cases, we do not disclose the identity of anyone who reports a suspected violation or who participates in a related investigation unless the employee submitting the report: authorises disclosure; disclosure is required by law, regulation, or legal process; or disclosure is deemed necessary to properly investigate the matter. We follow the requirements of the law in those countries with greater confidentiality protections.

Protection from retaliation

Retaliating against an individual (also known as victimising) for reporting conduct they believe violates the Code, a policy, or the law, or retaliating against an individual because they have assisted in an investigation, is itself a violation of the Code and may also be a violation of law. Reporters are protected from retaliation regardless of whether the concerns raised are ultimately substantiated. Any employees found to be responsible for retaliation will be subject to disciplinary action, up to and including termination.

For more information about reporting concerns please consult the **RELX Reporting Concerns Policy**.



What is retaliation?

Retaliation is an action taken against someone who reports a violation, misconduct, or concern, or is involved in an investigation because that person made such a report or was assisting in an investigation. Retaliation might take the form of a manager or supervisor taking action against an employee, or it could involve actions between employees.

Examples of retaliation include:

- terminating or demoting an employee;
- changing the employee's job duties or work schedule;
- transferring the employee to another job or location; or
- denial of a promotion or pay raise.

Retaliation may also take more subtle forms, for example:

- isolating or excluding the employee from work or social activities;
- ignoring the employee; or
- disparaging or belittling the employee to others.

Retaliation is prohibited at RELX and is itself a violation of our Code. Allegations of retaliation will be investigated, and a finding of retaliation will result in disciplinary action up to and including termination.

Protecting our interests and assets

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- Managing company records
- Systems, networks, electronic communications
- Theft or misuse of property
- Intellectual property and confidential information
- Protecting data privacy
- Information security
- Contacts with the media and the financial community
- Government inquiries and requests for information

Fraud, financial impropriety, and false or misleading statements

- Securities fraud

Advertising and promotional activities

Using social media



Conflicts of interest

Avoid activities or financial interests that interfere with your job performance, your loyalty to RELX, or the decisions you make on our behalf.

A conflict of interest may arise when you engage in an activity or have a financial interest that detracts from or interferes with your full, loyal, and timely employment performance or might improperly influence the decisions you make in your job. It is important to avoid such conflicts. If you think that you might have a conflict, or if you think it could appear to others that you have a conflict, you should discuss the situation with your manager or a human resources representative, who may then consult with the compliance committee designee for your business. Some apparent conflicts may be resolved simply by disclosing them; others will need to be eliminated.

Conflicts of interest can arise in many ways. Common examples include:

Outside jobs, engagements, or affiliations

When you work for, serve as a director of, provide consulting services to, or contract with another company or individual, a conflict of interest or the appearance of one may arise. Unless permitted to do so by local law, you may not engage in any freelance or “moonlighting” activity or employment that:

- adversely affects the quality or quantity of your work for us;
- competes with one of our businesses;
- advances the interests of a supplier or customer with whom you deal over that of RELX;
- implies that we sponsor or support your outside employment or work with another organisation;
- harms our reputation; or
- makes use of or interferes with our time, facilities, resources, or supplies.



Interests in other businesses

We do not allow ownership interests in competitor, supplier, or customer businesses, except for minor investments in publicly traded companies.

Investing in or lending money to a competitor is a prohibited conflict of interest. So, too, is having a financial or managerial interest in one of our customers or suppliers with whom you or anyone who reports to you works.

The only exception to this prohibition is that we allow minor investments in the publicly traded stock of competitors, suppliers, and customers. An investment is “minor” if it is in an amount that will not:

- influence or appear to influence your decisions on our behalf, considering your discretionary authority concerning our dealings with that company, your annual compensation, and other relevant factors; or
- influence the decisions of the company in which you have invested.

In any event, you may not own more than 1% of the outstanding shares of any such publicly traded company. If you have holdings that are (or grow to be) greater than these limits, notify your manager promptly and take action to reduce your shareholding to less than or equal to the maximum permitted.

These limits do not apply to investments through mutual funds, which are allowed without regard to investment value.

When your spouse, domestic partner, or other immediate family member works for, consults with, or otherwise has a financial interest in one of our competitors or a customer or supplier with whom you deal, a potential conflict exists. You must disclose any such interest to your manager or a human resources representative, who will then consult with the business compliance committee to make sure that there is no appearance of improper communication or conflicted loyalty.

Corporate opportunities

You have a duty to advance our legitimate interests when the opportunity to do so arises. It would be inappropriate to take personal advantage of opportunities that are discovered through your position or with the use of company property, information, or time.

Nepotism and close personal relationships

It is a conflict to supervise or make employment or contracting decisions involving a relative or someone with whom you have a close personal relationship.

RELX does not prohibit the employment or retention of relatives and does not prohibit consensual relationships between co-workers as long as it does not impact business operations. However, it is important to ensure that individuals are not and do not appear to be improperly influenced by

the existence of close personal relationships. You may not directly supervise, negotiate regarding, approve, or otherwise participate in decisions regarding the hiring, retention, promotion, contractual engagement, compensation or any other employment terms and conditions of your spouse, domestic partner, immediate family members, or any person with whom you have a close personal relationship. Close personal relationship also includes other relationships (relatives, friends, romantic relationships, or significant others) that could influence your objectivity, or even appear to do so.



Jackie is a member of a committee that is responsible for evaluating and selecting vendors for a variety of supplies and services. Jackie is aware that another member of the committee is a close personal friend of one of the vendors under consideration. Does this present a conflict of interest?

Answer: Yes. The close personal relationship is likely to influence or give the appearance of influencing the other committee member in evaluating the potential vendors. Jackie's colleague should make the conflict of interest known and recuse themselves from the evaluation.

Handling our property and information

You must handle our property and information responsibly, without misuse or waste. Our assets are intended to help you achieve your individual job objectives, as well as our overall corporate goals. Illegal, careless, or other inappropriate use of company property or information will not be tolerated.



RELX email is stored in Office365 with nearly unlimited storage and therefore Frederic assumes that he is not required to delete any emails. Is he correct?

Answer: No. Many types of records should not be kept indefinitely; and most records that need to be retained for long periods should not be kept as email files. Having unlimited storage does not diminish the need to actively manage email. Email should be deleted after 30 days unless it is a business record with a different retention period according to the Record Management Policy and Record Retention Schedule, or you have been instructed by a company lawyer or someone acting at their direction to preserve emails.

Managing company records

Records must be accurate, complete, and timely, and retained in line with the RELX Record Management Policy and Record Retention Schedule, and any applicable record destruction suspension requirements.

Preparing records

The integrity of our books and records is important to our credibility. We rely on you to maintain books and records that correctly and fairly reflect all transactions. This helps ensure that we provide shareholders and the public with complete, accurate, timely, and understandable financial information. In addition to records that are transaction-related, this same responsibility extends to, for example, records of costs, sales, time sheets, expense reports, payroll and benefits records, regulatory filings, contracts, and acquisitions.

Retaining records

Legally, we must keep certain business records for specified time periods. To comply with these requirements you are to retain and/or discard records as required by the **RELX Record Management Policy** and **Record Retention Schedule**. This includes email messages; electronic data stored in any manner; hard copies of documents; and records in any other medium.

At times, you must keep certain records beyond the normal retention period. For example, if you have records relevant to an actual, threatened, or reasonably anticipated lawsuit, government investigation, or subpoena for documents or information, you must keep all relevant records in any form, and suspend any ordinary disposal or modification of documents. A company lawyer or someone acting at their direction will contact you if we become aware of actual or anticipated legal or government actions requiring continued retention of records and can answer your questions about what records you are required to retain.

In addition to retaining records for the appropriate amount of time, you must store, transfer, and delete records in a manner that is consistent with the value of the information contained in those records. For more information about how to classify, store, transmit and delete records appropriately, consult the **RELX Information Value Classification Policy**.

Systems, networks, electronic communications

Use RELX systems for business purposes, know the rules limiting the use of personal systems for business purposes and do not assume that your personal usage is private.

Acceptable use

Our systems are intended for business purposes. Although you may use those systems for limited personal reasons, including uses protected by law, your use must not interfere with your work or disturb your colleagues or our general business affairs. You may never use company systems or equipment to:

- harass, intimidate, or make discriminatory or defamatory remarks about others;
- create, send, intentionally receive, access, download, or store sexually explicit, abusive, offensive, or profane material;
- gamble;
- conduct business activities in competition with or unrelated to the company;
- introduce malicious programs (malware) onto any RELX network or servers;
- violate the copyright, trade secret, patent, or other intellectual property rights of the company or any other party; or
- engage in any other activities in violation of applicable law, the Code, or other company policies, or which may lead to liability or cause harm to the company.

Privacy

Do not assume that your use of company systems is private. Where legally permitted, the company may monitor, record, and review your use of company systems or make copies of the records you process on company systems, either remotely or by accessing the equipment, for any legitimate business purpose such as: an investigation; a legal proceeding (during which we may legally be compelled to release company records to relevant authorities); to detect or prevent unauthorised access, use, or disclosure; or to obtain needed company records in your absence. Unless legally required, you will not receive prior notice of such activities. If you work in the United States, you should have no expectation of privacy in anything you create, store, or receive on our systems. Each business will follow established approval processes before monitoring, recording, or reviewing use of company systems.

Personal systems

There are limits on your ability to use personal systems to conduct company business. You may use personal systems to conduct company business only if you are given permission to do so by your business and your use complies with company policies, including the RELX **Bring Your Own Device Policy**.

Refer to the RELX **Electronic Workplace Policy** for definitions of personal and company systems and for more information about appropriate use of systems, networks, and electronic information.

Theft or misuse of property

Actual or attempted theft or misuse of company property or personal property of other employees, including excessive or unauthorized use of company property is prohibited.

Theft or misuse of company property can take many forms, including:

- stealing supplies, equipment, documents, cash, or other tangible property;
- improper use of a company credit card or purchasing card;
- submitting falsified time sheets or expense reports;
- excessive use of telephones, computers, photocopy machines, company systems, company networks, or other equipment for non-business purposes;
- using without authority our logos, brand names, or other trademarks, or our proprietary information, trade secrets, inventions, copyrights, or other company property; and
- retaining any personal benefit from a customer, supplier, or others with whom we do business that properly belongs to us.



Intellectual property and confidential Information

Like all company property, intellectual property, confidential, and restricted information must be protected.

Intellectual property, confidential information, and restricted information

You must safeguard our intellectual property (including copyrights, trademarks, and patents), confidential information, and restricted information just as you would all other important company property. There are also specific rules regarding the protection of certain commercially valuable confidential information, often called trade secrets or know-how, in the RELX **Trade Secret Guidelines** and under applicable law.

Examples of information that is considered confidential and/or may be a trade secret are information regarding:

- customer relationships and pricing plans;
- financial projections and reports;
- computer source code and data models; or
- prospective acquisitions or divestitures.

All documents, files, records, and reports that you acquire or create in the course of your employment belong to RELX. Employees may not access or remove from our offices such material unless authorised to do so.

If you are involved in an acquisition or other commercially sensitive transaction, you may be required to sign a non-disclosure agreement.

Periodically, we have authority to receive and use intellectual property or confidential or restricted information belonging to someone else. This might include licenced copyrighted materials or information learned in the course of a proposed acquisition. RELX requires that employees respect the ownership rights others have in their intellectual property. Employees may not copy, use, or distribute others' intellectual property without the owner's permission. For instance, while someone may post content on a website or on social media, the owner may not have permitted companies to use the content for commercial purposes. Only copy and use this information if your use complies with applicable laws and agreements with its owner.



Olivia and her RELX colleagues were assigned to develop a software program to replace one supplied by a vendor. They viewed the programs side by side and reviewed the vendor's user manual. Can they do this?

Answer: No. The vendor's software and documentation are protected by intellectual property rights and its licence agreement also likely prohibits such activities. Before replacing third party content or software with an in-house substitute, Olivia should seek legal counsel for advice.

Protecting data privacy

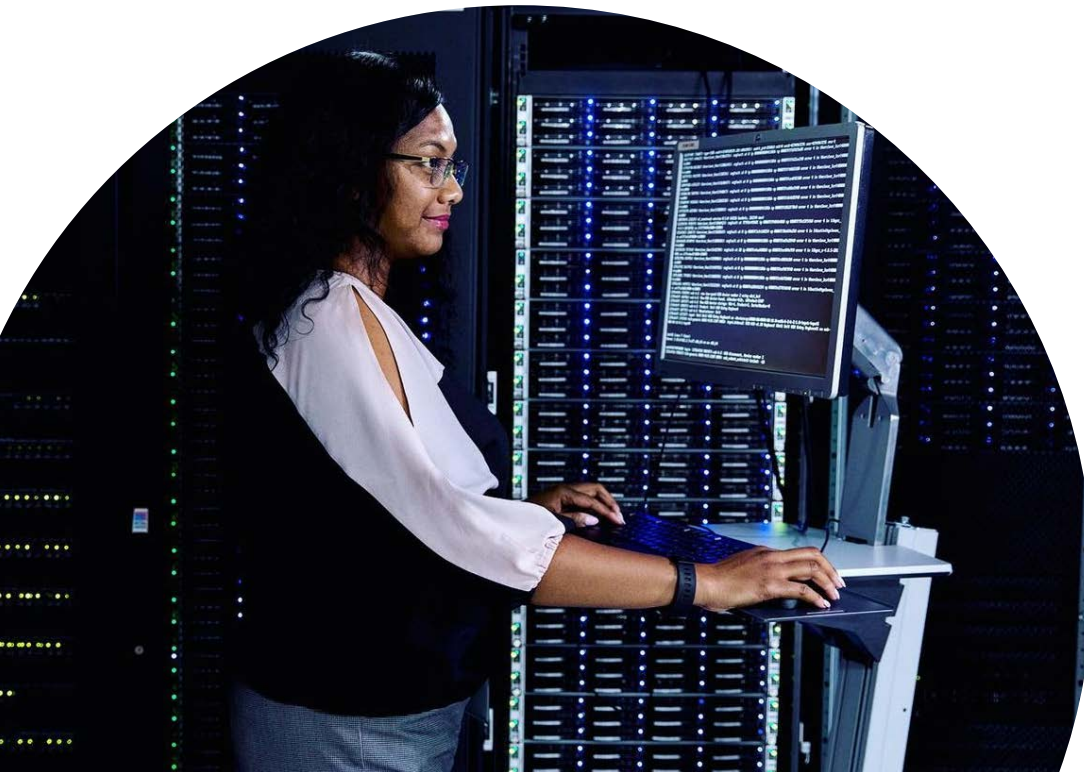
We are committed to protecting the privacy of the personal information of our customers, employees, and others; and complying with laws that regulate how we handle this information.

Personal information is information that can be used to identify an individual or can be associated with an identifiable individual. This can include a person's name, address, telephone number, government identification number, or other identifier. In the course of our business, we may collect, hold, and use personal information of our customers, suppliers, employees, job applicants, shareholders, or others. Our business will thrive if our customers, employees, suppliers, and regulators trust us to be a responsible steward of personal information.

This means that you must:

- comply with applicable laws and all company policies relating to protection and use of personal information;
- collect, process, use, disclose, or store personal information only if you have a legitimate business purpose for doing so, and any necessary notices have been provided to the relevant individuals; and
- carefully follow the RELX **Information Value Classification Policy** and all company policies related to properly classifying, collecting, processing, using, disclosing, storing, transferring, and deleting personal information.

The **RELX Privacy Principles** guide our approach to data protection and privacy across the organization.



Someone who says she's from a government agency requests another employee's contact address and phone number. Should you provide the information?

Answer: No. You must not provide information concerning another employee or other personal or company information unless you have authority to do so. This also includes information about, customers, suppliers, or anyone about whom you have access to personal information.

If you are asked for an employee reference, check with human resources or a company lawyer to know and comply with any applicable policies before you provide any information.

Information security

You must protect the information entrusted to us. Be diligent in preventing unauthorised access to our systems and data. Moreover, if your job involves access to personal information, public records, or other restricted information as defined in the RELX **Information Value Classification Policy**, you must know and comply with all applicable policies and laws for that information.



Audrey's job in the company gives her access to a wide range of academic information. Her daughter is doing a school research project about prominent scientific advances made in the past 12 months. To help her daughter in her project, Audrey offers to allow her to use her company login-ID and password to do her research. May she do this?

Answer: No. Login credentials are never to be shared.

Follow the RELX **Information Security Policy** and all policies and practices designed to safeguard our information. This includes, for example:

- maintaining physical security and password protection of all portable devices (laptops, tablets, smartphones) and storage devices;
- keeping desk and work areas clear of sensitive information;
- reading and following company issued communications and guidance for safeguarding information;
- keeping confidential and not sharing user IDs or passwords;
- only accessing, using, or sending confidential or restricted information if you are authorised to do so and with appropriate safeguards to protect the information;
- following company guidelines to securely destroy information when appropriate and permitted;
- not loading unauthorised software on company-issued devices; and
- immediately reporting attempts to gain access to or corrupt our systems through ploys like phishing, pretexting, and social engineering.

If you have any questions or concerns about information security, contact your business area's information security team. If you become aware of a security incident, report it immediately to your information security team or to **security@relx.com**.



What types of information security incidents should be reported and where do I report them?

You should immediately report any actual or suspected incident, including for example:

- Loss of device;
- Application flaw or vulnerability;
- Accidental exposure of information;
- Exposure of information due to an attack; or
- A near miss or suspicious event related to phishing, voice calls or social media solicitation.

Report the incident to your business area's security team:

- RELX: **security@relx.com**
- Elsevier/STM: **security@elsevier.com**
- LexisNexis L&P: **security@lexisnexis.com**
- Risk Solutions Group: **security@lexisnexisrisk.com**
- Exhibitions: **security@reedexpo.com**

Contacts with the media and the financial community

Only authorised employees may communicate with the media or financial community.

Only authorised persons may speak with the media as a spokesperson on behalf of any RELX company. If you are contacted for comment on behalf of a RELX company, please forward such requests as follows:

- refer media inquiries regarding our parent company to the RELX Corporate Communications Department;
- refer media inquiries about your individual business area as required under your business area policies and procedures; and
- refer requests for information or site visits from financial institutions, brokers, analysts, commentators, shareholders, or other members of the financial or investment communities to RELX Investor Relations.

Disclosure policy

Where individuals may have access to inside information or contact with the media and financial community in the course of their employment, they should ensure that they are familiar with and understand the terms of the RELX **Disclosure Policy** (Disclosure Policy). The Disclosure Policy sets out the key internal procedures, systems and controls to ensure that RELX complies with its obligations relating to its regulatory disclosures in the UK, Netherlands and the US. A copy of the RELX Disclosure Policy is available on request from the RELX Company Secretariat Department.

Government inquiries and requests for information

If you receive a request for company information, personal data or documents concerning an investigation, audit, or legal proceeding, immediately notify a company lawyer. A company lawyer will help assess how to proceed.

In some countries, government representatives have the authority to come to the company's premises to conduct surprise inspections (known as "dawn raids") to gather evidence for an investigation of suspected violations of laws. These authorities may enter our offices, or in some regions even your home to examine and take copies of business records; seal our offices and records; interview employees; and take notes about facts or documents relating to the subject matter and purpose of the inspection. You should familiarise yourself with the RELX **Dawn Raid Policy** and any dawn raid policy and procedures for your business or location for guidance on what to do if your office is subject to a dawn raid. If you have any questions about dawn raids, you may direct them to a company lawyer.



Fraud, financial impropriety, and false or misleading statements

We prohibit any attempt to defraud a customer, supplier, shareholder, employee, contractor, intermediary, auditor, regulator, or other person with whom we communicate or do business.

Our credibility and reputation depend on the accuracy of our books, records, and representations. All reports and written or oral statements about our business must be accurate and not misleading. Any effort to engage in financial impropriety including making intentionally or recklessly false or misleading oral or written statements or omissions about our products, services, sales, financial condition or otherwise make false or misleading oral or written statements about our policies, security, privacy, or compliance practices is prohibited.

Regarding the prevention, detection, and remediation of financial fraud or financial impropriety, including roles and responsibilities in relation to mitigating financial fraud risk, consult the **RELX Framework for Mitigating Financial Fraud Risk**.



In the fourth quarter, Simon, a sales representative, realised he won't meet his year-end revenue target and therefore won't receive his full sales bonus. To meet his revenue target, he considered whether he could record a sale this year for a customer he knows will be placing an order at the start of the new year. Should Simon do this?

Answer: No. Falsifying a legitimate order so he could recognise the revenue this year rather than next year would be considered financial impropriety and a violation of the Code.





Securities fraud

All employees must comply with the RELX **Securities Dealing Code** (Dealing Code).

It is illegal and/or a breach of the Dealing Code to take certain actions if you have inside information (material, non-public information) in connection with RELX securities and the securities of any other company that you come across in the course of your work with RELX.

In particular, it is illegal and/or a breach of the Dealing Code to:

- deal in RELX securities or instruments linked to them if you have inside information;
- disclose such information to others except where the disclosure is made strictly as part of your regular duties or function and the recipient is under an obligation of confidentiality; or
- recommend, encourage, or induce another person to deal in RELX securities or instruments linked to them if you have inside information.

Inside information is information about RELX which is not publicly available and would be likely to have a significant effect on the price of RELX securities if announced. Information is “not publicly available” if it has not been disclosed in an annual or periodic report to shareholders, a press or regulatory release, or in public filings with regulatory authorities. When in doubt, you should presume that information that you learn as an employee of RELX is not publicly available.

If you have any questions about buying or selling RELX securities when inside information may be (or may appear to be) involved, you should ask the Head of Secretariat of RELX before trading those RELX securities. Where applicable, you must comply with closed periods during which you are prohibited from dealing in RELX securities or instruments linked with them. You will be notified directly by the Company Secretariat if closed periods apply to you.

Advertising and promotional activities

We have both a legal and ethical obligation to engage in fair and accurate advertising and sales practices. Strictly adhering to this obligation helps preserve our goodwill and reputation.

All advertising claims and other representations in any print, electronic, or other non-print medium must be truthful and have a reasonable basis. They must be substantiated before publication or dissemination. This also applies to oral presentations or even casual conversations where you make any objective, factual, or quantifiable comments about our products or services or those of other companies.



Scott is preparing a marketing webcast in which he lists subscription totals and web visits for several of the company's products. To meet a tight schedule, he is estimating those figures based on the facts for just one of the products. Is this appropriate?

Answer: No; representations must be accurate to ensure that he is not misrepresenting the facts and misleading potential customers. Any factual, objective and/or quantifiable statements in advertising or marketing materials, in presentation materials or in informal discussions, must be substantiated in advance of communication to third parties.



Using social media

Social media platforms and services are tools that can help us grow our brands, promote our products and services, and build relationships with our customers and prospects.



When using social media you must:

- exercise personal integrity and responsibility;
- respect our intellectual property rights and those of third parties;
- only represent or speak on behalf of RELX if you have authority to do so;
- protect and do not share confidential or other protected information; and
- otherwise comply with the RELX **Social Media Policy**.

These precautions apply to company-sanctioned or sponsored social media activity. They also apply to your personal use of social media when you:

- represent yourself as an employee of a RELX business;
- post about your work, our businesses, products, services, or competitors; or
- discuss or connect with other employees or our authors, editors, customers, agents, suppliers, or other stakeholders.



Jon, a RELX employee, posts an offensive comment on his personal social media page. Jon does not identify RELX as his employer but is friends on social media with people from work. A work colleague sees the offensive post and reports it to the company. Can the company discipline Jon for posting offensive content on social media?

Answer: Yes. Jon is not prohibited from this activity, but he is subject to the Social Media Policy because he is using social media to discuss or connect with other employees. Employees are required to exercise personal integrity and responsibility knowing that there are potential consequences to his/her social media activity.

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Competition and antitrust laws

We are strong but fair competitors. We prohibit anti-competitive or unfair trade practices including illegal agreements with competitors, customers, suppliers, and other stakeholders.

We compete vigorously, but also fairly, with integrity, and in compliance with antitrust and competition laws. Those laws promote free and fair competition around the world, so that customers benefit from open competition among their suppliers; and sellers similarly benefit from competition among their purchasers.

Antitrust and competition laws prohibit illegal restraints of trade, including certain types of agreements or conduct involving competitors, customers, or suppliers, or a single company with a dominant market position.

Examples of potential illegal conduct include:

- **Competitors are strictly prohibited from reaching agreements or taking joint actions regarding:**
 - prices, terms, or bids;
 - product or territory allocations or divisions;
 - selection of customers or suppliers; or
 - limits on production, inventory, or research and development.
- **Suppliers and their customers or licencees generally are not allowed to agree on the prices at which goods or services will be resold.**
- **Individual companies with “monopoly” or “dominant” power may not take actions that appear to be efforts to control a market. Such actions generally include:**
 - tying or required bundling of separate products;
 - unfair termination of dealers, distributors, or suppliers;
 - price discrimination;
 - predatory pricing (selling below cost); or
 - overly restrictive exclusive dealing arrangements.
- **Unfair or deceptive trade practices or methods of competition, for example:**
 - misleading advertising;
 - disparaging a competitor’s product;
 - harassing a competitor; or
 - stealing trade secrets or other confidential business information.

There are legitimate reasons and occasions for interacting with competitors, provided you do not engage in illegal collusion through these activities. Such activities include trade association involvement, benchmarking, joint ventures, lawfully gathering competitive intelligence in accordance with RELX procedures, and certain joint activities such as lobbying and legal enforcements.

For more information concerning the competition and antitrust laws, consult the RELX **Competition Law Compliance Standards** and any relevant business policies, guidelines, and procedures.



Tessa was chatting with a group of competitors during a trade conference when a competitor's director of business development pulled her aside. The competitor suggested that her company would concentrate their sales efforts in New York if Tessa's company stayed away from New York and focused their sales in London. Tessa knew that she should not discuss topics like this with her competitors, so she immediately walked away. Was this the correct way to handle the situation?

Answer: Partly correct. Tessa was correct to exit the conversation because even casual conversations among competitors can lead to antitrust violations. However, Tessa should have done more than simply walk away. She should have clearly and emphatically stated that she did not wish to be a part of the conversation. She then should follow that up by contacting a company lawyer to discuss the situation and determine if any further action is warranted to avoid any appearance that she or the company was involved in the inappropriate conduct.



Bribery

Do not offer, give, or receive from another party anything of value, or any financial or other advantage, in exchange for favourable treatment or with the aim of influencing the recipient's business decisions.



Bribery occurs when anyone offers, promises, solicits, gives, or accepts anything of value, or any financial or other advantage, in exchange for favourable treatment by a company, government authority, official, or employee, or authorises another to do so. Bribes include cash payments, gifts, favours, or any item or service of value or any financial advantage.

Most countries and many local governments enforce laws prohibiting bribery and corruption. Many of these laws apply when the wrongful conduct is committed outside the country's own borders and/or by citizens of other countries. Examples of laws with extraterritorial reach include the UK Bribery Act and the US Foreign Corrupt Practices Act.

To comply with bribery laws, you must avoid making or receiving any improper payments directly to or from another commercial party, customer, customer's representative, or a government employee or official. This includes facilitation or "grease" payments to local officials, even though those may be considered customary. You also must not make any such payments indirectly through a consultant, agent, or other party performing services on our behalf and must keep accurate books and records so that any payments are honestly described and not used for unlawful purposes.

Prior to engaging a third-party who will be acting on behalf of the company and as needed during the engagement, you must conduct appropriate due diligence to assess whether engagement of the third-party is permissible. For more information about conducting due diligence including which type of third-parties act on the company's behalf, refer to the **RELX Preventing Bribery Due Diligence Guidance**.

The bribery laws also limit the offering or giving of gifts, entertainment, or gratuities, especially to government employees and officials, as the following section on Offering or accepting gifts or entertainment explains.

Offering or accepting gifts or entertainment

Do not solicit, accept, offer, or give gifts or entertainment that may influence or appear to influence the ability to make objective business decisions.

Gifts of more than nominal value, frequent gifts or entertainment, or entertainment that is more than a routine social amenity can appear to be an attempt to influence you or the other party. Our policy is intended to prevent bribery and even the appearance of bribery with current or prospective customers, vendors, consultants, suppliers, and other business stakeholders. In addition to this policy, you must follow any stricter standards required by your individual business or department.



Philip is establishing an office in a country that is new to the company. He hired a local consultant to assist with translation and getting the required permits and licences required to open the business. The consultant has said that he needs to have a £3000 cash fund available to meet unspecified expenses. Should Philip provide the fund?

Answer: No. Philip should not make the funds available without documentation about how they will be used for legitimate expenses, along with controls to ensure the same. Otherwise, this appears to be a means to make facilitation or grease payments to influence local government officials, which is prohibited by RELX and would likely violate the UK Bribery Law and US Foreign Corrupt Practices Act.





Aron received a \$25 Amazon gift card from an author as a thank you gift. Can Aron accept the gift card?

Answer: No. Gifts or gratuities from third parties in the form of cash or cash equivalent (e.g., checks, money orders, securities, gift cards of any kind, or gift certificates) may not be accepted regardless of the amount.



Marie and her team are evaluating cloud storage solutions to acquire on behalf of the company. One of the prospective vendors has offered to gift the team with new laptops and personal cloud storage accounts to better allow the team to evaluate the vendor's services. Can Marie's team accept the laptops and accounts?

Answer: Marie must decline the offer. Accepting a gift, particularly while making a potential buying decision, could improperly influence the team or appear to do so.

Gifts

When dealing with non-governmental employees, limit your offer or acceptance of gifts, including products, personal services, or favours, to those valued at less than £100 per person or your local currency equivalent. For government employees and officials, RELX imposes stricter gift-giving limits, as set out in the RELX

Preventing Bribery and Corruption Policy.

These monetary limits are intended as a maximum, as any gift of more than nominal value might be suspect depending upon the circumstances. Do not solicit gifts of any amount. Also, do not offer or accept any gift that is:

- not in compliance with the RELX **Preventing Bribery and Corruption Policy**;
- cash, cash equivalent (e.g., checks, money orders, gift cards of any kind), or securities;
- offered in exchange for something in return (“quid pro quo”);
- given at a time when you and the other parties are negotiating a contract or are in a related vendor selection process;
- part of what might appear to be a pattern of giving frequent gifts, even if of nominal value;
- indecent or sexually oriented;
- illegal or in violation of the Code or any of our policies;
- capable of adversely impacting our reputation; or

- intended to or may appear to be intended to influence the recipients’ business decisions or be reasonably likely to improperly influence the recipients in the performance of their functions, or to cause the recipients to act improperly, or to be reasonably capable of causing improper actions.

Gifts or gratuities that fit any of these descriptions may be viewed suspiciously and possibly considered to be illegal bribes.

If you receive or wish to give a gift valued at more than £100 or the equivalent, or that otherwise may appear to conflict with these requirements, consult with your business area compliance committee before accepting or offering the gift. Regarding gifts that you receive, you may be asked to return higher-valued gifts, or to have the company keep the gift for company use, or donate it to charity, rather than allow you to keep it and risk appearing biased.

Remember that even lower value gifts are inappropriate if they are intended to (or may appear to) improperly influence the recipient. Lower value gifts may also be inappropriate if they are repeated.



Entertainment

Accepting or offering normal business entertainment such as a routine lunch, dinner, theatre, or a sporting event is allowed if it is reasonable, infrequent, and in the course of a bona fide business meeting or event intended to discuss business matters or foster better business relations.

As a guide, “normal” and “reasonable” business entertainment generally includes that which is valued at the same amounts, per person, identified for gifts. Normal business entertainment is subject to the same limitations as those listed above for gifts, regardless of cost or value. Extraordinary events or entertainment that includes overnight travel generally are not appropriate. Lavish entertainment (for example, World Cup, Masters Golf Tournament) only is allowed if it meets strict company guidelines and with express approval of your business area compliance committee. In addition, when considering entertaining government employees or officials, always comply with the stringent monetary limits set out in the **RELX Policy Limits on Permissible Gifts and Gratuities Given to Government Officials**.

Before offering or accepting any entertainment that could appear to be excessive, consult with your business area compliance committee. Do not solicit entertainment of any value. Even lower value entertainment is inappropriate if it is intended to (or may appear to) improperly influence the recipient.

Gifts and hospitality register

All gifts and hospitalities (for example, meals, entertainment, or other gratuities) given or received that meet the thresholds established by your business must be logged in the appropriate gifts and hospitality register tool.

Trade sanctions

International trade sanctions laws impose restrictions on our ability to do business with certain individuals, entities, and potentially entire countries.

We are committed to complying with all applicable trade sanctions laws. Failure to do so may impact our reputation and could result in severe criminal and civil penalties being imposed on the company and our employees.

Our sanctions compliance efforts primarily involve designees of each business assessing transactions with guidance from legal and compliance representatives. However, all employees should be aware of the RELX **Trade Sanctions Policy** and related procedures, and raise any questions or concerns that arise.

Money laundering

Global criminal laws prohibit schemes that make monetary proceeds arising from criminal activity appear legitimate. RELX prohibits any activities which could facilitate money laundering by suppliers, customers, or any other third party with whom we may have a business relationship.

Contracting with other parties

We require formalising agreements in writing. You may only enter into agreements consistent with the level of authorisation that your manager has communicated to you. If you have not been given any level of authorisation do not sign any agreement on our behalf without your manager's approval.

You must also obtain approval from your manager and a company lawyer to terminate an agreement before its expiration date. This is because, for example, even an agreement involving relatively minor amounts of money may contain important contractual obligations or other terms and early termination may also raise competition law issues.



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Hiring government employees

Company political involvement



Doing business with governments

Strict rules apply to our negotiations, contract terms, and business relations with government agencies and their officials and employees.



We often work with government agencies, officials, and employees as customers, authors, editors, or in other capacities. There are strict rules governing our business relationships, contract negotiations, and contract terms with government agencies and their officials. This includes employees of government owned and operated enterprises. These rules may differ from those that apply when dealing with commercial or private customers.

If you are doing business with a governmental body, agency, official, or employee, you must know and follow these rules as set out in the RELX **Preventing Bribery and Corruption Policy – Related Documentation**. Violations of these rules may result in harsh penalties, suspension, disqualification from competing for government contracts, or even criminal prosecution. To ensure that we comply with these rules, report any suspected violations of law related to any government contract.

Our RELX **Policy on Doing Business with Government Agencies and Officials in the United States** further details the requirements that you must meet when working with a government agency or official in the United States.



Peng is negotiating a contract with a government agency. The official he is working with is involved with a recognized charitable organization. Peng thinks the company can improve our chances of winning the contract if he makes a personal donation to the charity on behalf of the official. Is this appropriate?

Answer: No. Although it may be legitimate for our company to make charitable donations in countries where we'd like to do business, we may never make a donation for the purpose of influencing a government official in order to obtain or retain business or under circumstances when that might appear to be our purpose. Even personal donations may be prohibited if they are made for improper purposes.

Hiring government employees

Before talking with a current or recent government employee about working for RELX, verify that engaging with that individual (for purposes of recruitment or performing other work in any capacity) will not be in violation of the law.

Many laws restrict companies that do business with the government from hiring as an employee or retaining as a consultant, advisor, editor, or other contractor a present or former government employee other than in a secretarial, clerical, or other similar grade position. These restrictions also cover informal arrangements for prospective employment under certain circumstances. Therefore, consult with a company lawyer before discussing proposed employment or retention with any current government employee or any former government employee who left the government within two years of the proposed employment or retention.

Company political involvement

Political contributions by, in the name of, or on behalf of the company are prohibited, except for certain pre-approved contributions in the United States.

Most countries prohibit the use of corporate funds, assets, services, or facilities on behalf of a political party or candidate. However, some US states permit such contributions and activities if they comply with strict reporting and disclosure regulations. Accordingly, we do not allow the use of corporate funds for any political contributions except in the US, and then only in compliance with strict guidelines for making such contributions, as set out in the RELX **Policy on Making Political Contributions**.

If you personally participate in the political process, express your views on legislative or political matters, engage in political activities, and/or make personal political contributions, you must conduct such activities on your own time and at your own expense. Unless you have obtained advance approval from RELX Government Affairs and a company lawyer, you must avoid any reference to your affiliation with RELX or any of our operating units or subsidiaries other than legally required disclosure to applicable governmental agencies, and make clear that you are acting personally and not for the company.

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Fair employment practices

We support inclusion and diversity, prohibit harassment and discrimination, and are committed to safe and fair treatment of employees.

We are committed to fostering work environments that promote teamwork, diversity, inclusion, and trust as embodied in our **Inclusion and Diversity Policy**. Our employment policies and practices are consistent with and are intended to ensure compliance with the principles of the United Nations Global Compact regarding fair and non-discriminatory employment practices.



One of Geraldo's work colleagues has been sending him suggestive chat messages and invitations to meet outside of work several times a week, and even sends private chats during team Zoom meetings. Geraldo informed the colleague that the messages were not welcome and should be stopped. They were stopped for a few days, but now have started up again. What should Geraldo do?

Answer: Geraldo's colleague is engaging in inappropriate conduct that violates our Code and company policies. Geraldo should report this conduct to his manager, human resources, or the RELX Integrity Line.



Discrimination

We are an equal opportunity employer. We are committed to treating all employees and applicants for employment with respect and dignity, and we prohibit discrimination. We recruit, hire, develop, promote, discipline, and provide conditions of employment without regard to protected characteristics such as race, colour, creed, religion, national origin, gender, gender identity or expression, sexual orientation, marital status, age, disability, or any other category protected by law.



Last year, Xia reported a concern that one of her colleagues was sexually harassing her. Since that time, her manager has gone to extreme measures to avoid interacting with her and even insists that they handle personnel matters such as performance reviews remotely. Is this allowed?

Answer: Our policies against harassment should not, and may not, be used as a basis for excluding or separating individuals from participating in business or work-related social activities or discussions in order to avoid allegations of misconduct. The prohibitions against harassment, discrimination, and retaliation are intended to complement and further the company's commitment to an inclusive workplace, not to form the basis of an exception to it.

Harassment

We do not tolerate any form of harassment, including sexual harassment or harassment of any kind based upon any of the protected characteristics listed above. Harassment can be verbal, physical, visual, or other behaviour that creates an offensive, hostile, or intimidating environment. We also prohibit bullying; intimidation; jokes or insults relating to any protected characteristic; distributing or displaying offensive pictures, videos, or cartoons; and using voice mail, instant messaging, email, or other electronic devices to communicate derogatory or discriminatory information.

Employment conditions

We comply with all applicable laws relating to employment and employment conditions. We respect employees' legal rights to seek representation through trade unions, works councils, or other mechanisms.

Labour standards

We operate in many different countries with varying labour standards and conditions. Wherever we do business, we comply with all applicable labour laws and provide employees throughout the world with appropriate working conditions and wages and select suppliers who commit to do so as well.

The workplace

RELX has approximately 235 properties globally. The **Physical Security Policy** defines physical security requirements for these properties and provides guidance to RELX business leaders for the protection of personnel, assets, property, and visitors. All staff, contractors, and visitors must comply with it.

We are committed to providing a safe workplace and to complying with legal requirements to avoid safety and health hazards. We expect our employees to conduct themselves in a manner that contributes to a healthy, safe, and productive work environment. We do not permit weapons in our workplaces or at work-related events, and we do not tolerate workplace violence in any form.



Health and safety

We manage our facilities in compliance with all applicable health and safety regulations. To maintain compliance, everyone at our facilities must follow all of our safety instructions and procedures, including those outlined in the RELX **Global Health and Safety Policy**. Alert your manager and human resources immediately if you have any questions or concerns about possible health and safety hazards at any of our facilities.

Drug and alcohol free workplace

Drug and alcohol use can pose a threat to safety and does not belong in our work environment.

Alcoholic beverages may only be served on the premises or at a company-sponsored event under certain circumstances with the advance approval of site leadership. Employees attending functions where alcohol is served are expected to conduct themselves in an appropriate and professional manner.

We otherwise prohibit the use, possession, sale, manufacturing, dispensing, distribution, or purchase of alcohol (unless legally held in transit) or drugs (unless pursuant to a current, valid prescription issued by a medical professional) while on the job or on our property. We also prohibit employees from engaging in work on behalf of RELX while impaired.

In addition to compliance with the Code, you must also comply with any applicable drug and alcohol policy issued by your business.

Human rights

As a signatory of the United Nations Global Compact, we are committed to the protection of human rights. We support and respect international human rights. We also seek to ensure that we are not complicit in human rights abuses.

The environment

We strive to support environmental improvement initiatives and reduce our negative impact on the environment.

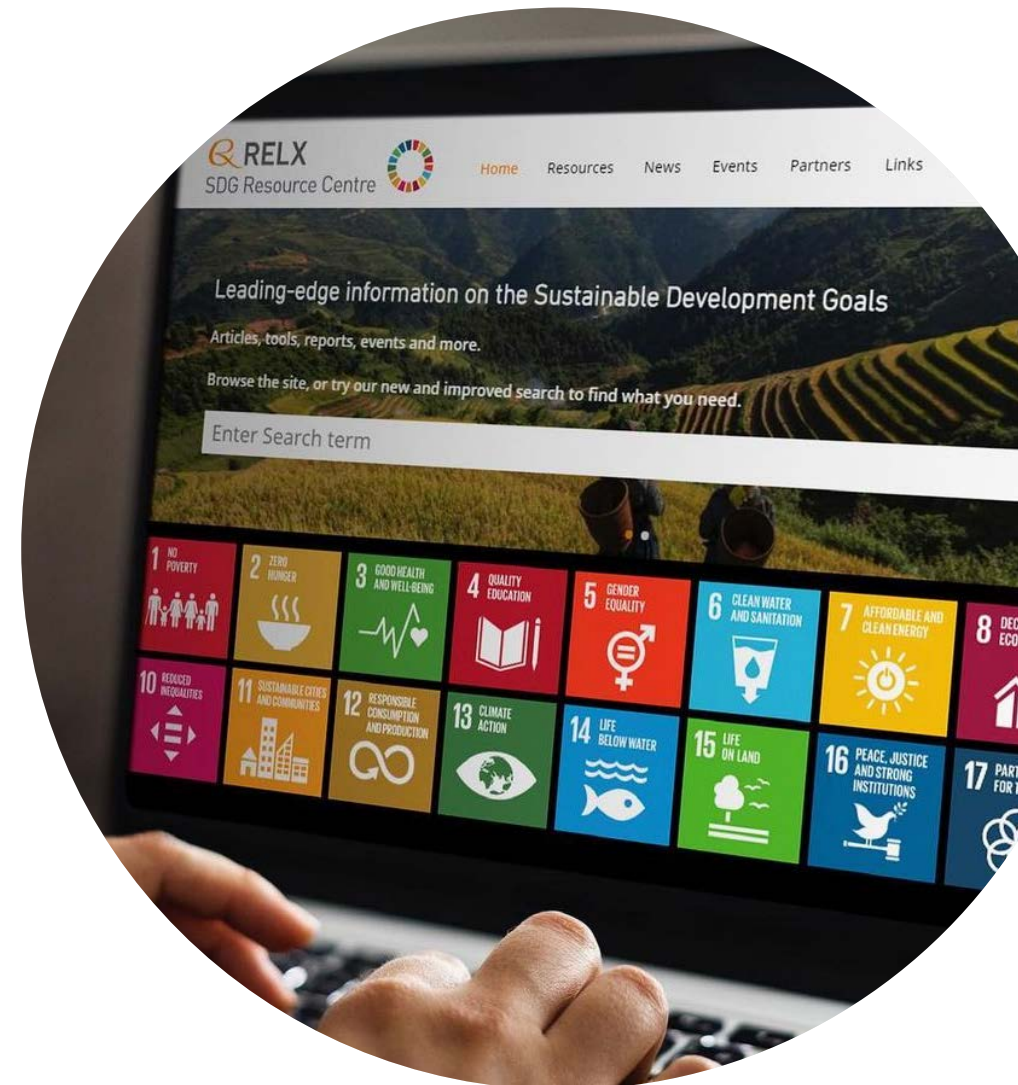
Our businesses have an impact on the environment, principally through the use of energy and paper, the use of print and production technologies, and the recycling of waste. We are committed to reducing this impact where we can, and to abiding by the three principles on the environment that are set out in the United Nations Global Compact, which are to:

- support a precautionary approach to environmental changes;
- undertake initiatives to promote greater environmental responsibility; and
- encourage the development and diffusion of environmentally friendly technologies.

To satisfy this commitment, we aim to use:

- sustainable and recyclable resources and materials with a minimum of waste;
- technologies, materials, and processes that have minimal impact on the environment, where possible; and
- suppliers and contractors that have the same objectives.

We set measures and targets for our environmental performance, as outlined in the RELX **Global Environment Policy**.



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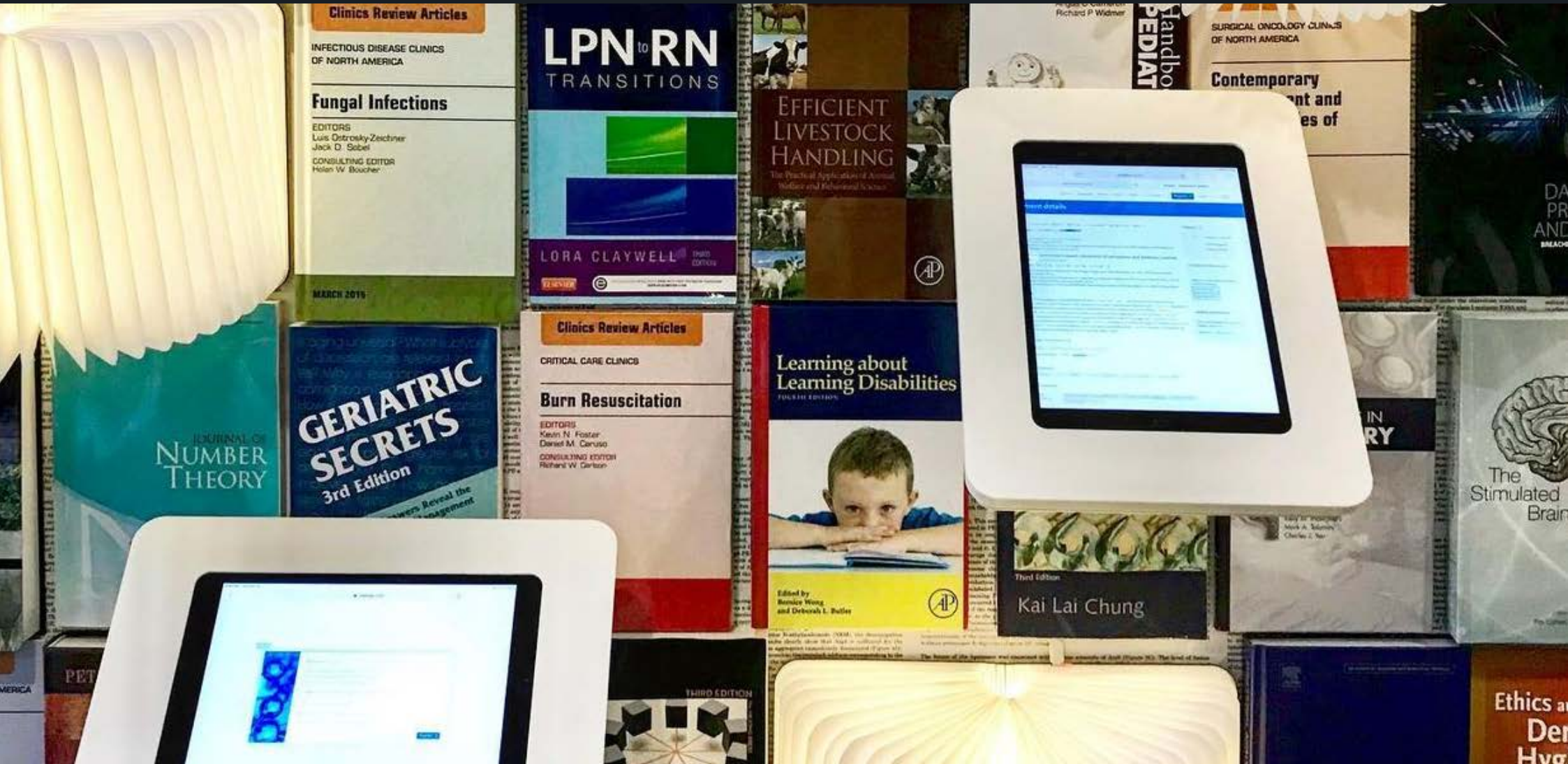
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Resources

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Frequently asked questions

What is the Code for?

The Code compiles the key general principles that apply to RELX businesses, our employees, and members of our boards of directors of our businesses.

The Code aims to help us maintain a lawful, honest, and ethical environment throughout our companies.

To whom does the Code apply?

It applies to all employees of the worldwide group of RELX companies. When the Code refers to “the company” or RELX, it means all of the RELX entities, subsidiaries, divisions, affiliates, and businesses.

What is the basis for all of the policies in the Code?

Generally, the policies set forth in the Code are intended to promote a culture of integrity including ethical and appropriate business and workplace conduct. Many of the policies in the Code are based on laws and government rules and regulations that apply to RELX and our employees wherever in the world we do business. Other policies in this Code, whether or not rooted in any particular law or regulations, reflect our determination to maintain a respectful and ethical workplace that is conducive to our business and free from discrimination, harassment, or other inappropriate conduct.

Because RELX is a global company, there are also local laws in each country where we operate that apply to our operations in those countries. You are expected to comply with all applicable laws, rules, and regulations, even if they are not specifically discussed in the Code.

In addition to the Code, there are separate policies maintained by RELX as well as by each business, country, or group of which you are associated. You also are expected to be familiar with and comply with those policies.

Are there other policies that apply to me? Which policies take precedence?

In addition to the policies in the Code, RELX and its businesses enforce policies that relate to all or parts of our business. In some cases, RELX or its businesses also have more detailed policies about subjects included in the Code. If so, the more detailed policies also apply to the extent they are consistent with the Code.

In the event of a conflict between the Code and any supplemental policies, please consult your manager, a human resources representative, compliance committee member, or a company lawyer.

If it is not covered in the Code or a related policy, could it still be a violation?

We expect that when faced with a dilemma or question about a decision or conduct, every employee will act within the spirit of the Code and exercise the highest ethical standards at all times. When you are faced with such a dilemma or question, consider these questions:

- Will the decision or conduct at issue detract from my ethical reputation or that of the company?
- Could the decision or conduct bring harm, embarrassment, or humiliation to a colleague or customer, or unfairly disadvantage a competitor?
- Could the decision or conduct give even the appearance of being unethical or unlawful?
- Would a report of my actions or decision appear unfavourable to others if presented on the evening news or in social media?
- Does the decision or conduct feel morally and ethically improper?
- Will I have to lie or bend the truth to justify my decision or action?

If the answer to any of the above questions is “yes”, then you must reconsider your approach and, if needed, ask for guidance before acting.

What if I have questions about the Code?

After reading the Code and receiving training on the Code and/or individual Code policies, you may still have some questions. After all, many of the policies are based on complex laws and regulations. Complying with each policy is important because even an unintentional breach could have serious consequences for the individuals involved and for RELX. Therefore, please raise any questions with your manager, a human resources representative, a company lawyer, or a member of a compliance committee. You may also use the Ask a Question feature of the **RELX Integrity Line** at any time.

What should I do if I become aware of a violation of the Code?

It is your responsibility to report any violation of policy or law of which you become aware. You may report violations to your manager, a human resources representative, a company lawyer, a member of a compliance committee, or via the **RELX Integrity Line**.

Could reporting a breach of any rule or policy jeopardize my job?

RELX policies prohibit retaliation against anyone who reports a suspected violation of the Code. Any person who attempts to retaliate against individuals who raise good faith concerns under the Code or company policy would not only violate RELX policy, but may also violate the law, and will be addressed accordingly.

How do I make a report to the RELX Integrity Line?

The RELX Integrity Line is a channel for making reports if you do not feel comfortable reporting a known or suspected violation to your manager, a human resources representative, a company lawyer, or a member of a compliance committee. It is a service provided by an independent third party that is available 24 hours per day, 7 days per week, 365 days per year. You may make reports online at **www.RELXIntegrityLine.com** or by telephone. Telephone access information for each country and language is available on the website and on our intranets.

May I make a report without identifying myself?

While we prefer that you identify yourself when making a report, we recognize that in certain situations you may want to remain anonymous. Local laws may only allow reports related to certain subjects or may prohibit anonymous reports to the Integrity Line. Those limitations are identified in the **RELX Integrity Line Privacy Notice**. If you do report anonymously, be sure to provide as much detail as possible to better enable us to investigate the matter. Anonymous reporters are assigned a report number and are asked to check the report record after making a report as this will enable us to ask follow-up questions if we need more information to complete a thorough investigation.

What are the Compliance Committees?

The compliance committees are groups of senior leaders designated to help assure compliance by the business they represent and its employees. There is a committee for all of RELX, comprised of senior leaders which is representative of all of our businesses. There also are committees for at least each of the major business areas. The contact information for the compliance committee members is available on our intranets.

What should I do if I'm asked to do something that I think violates the Code?

You should discuss your concerns with your manager. If you are not comfortable doing so, you should contact a human resources representative, a company lawyer, a member of a compliance committee, or report your concerns using the RELX Integrity Line.

