

RELX Anti-Corruption and Anti-Bribery Rules

Chapter I General Provisions

Article 1. The RELX Anti-Corruption and Anti-Bribery Rules (“Rules”) is a part of the RELX’s integrity and compliance system and a further explanation and interpretation of the Company’s business code of conduct. Violation of the Rules will be deemed a violation of the Company’s business code of conduct. Employees that violate the Rules may confront penalties, which will be as severe as the termination of their labor contract.

Article 2. The right of the interpretation of the Rules resides with the Company. The “Company” referred to herein is RLX Technology Inc. and the entities under its control.

Article 3. **The Company strictly prohibits corruption and bribing anyone for any reason.** Corruption and bribery are severe violations of company values. Bribing, solicitation of bribes, and acceptance of bribes are strictly prohibited. The Company also strictly prohibits the above behaviors by any person or entity acting on behalf of the Company. The Company requires its employees to abide by the Rules in their daily work. Therefore, employees’ understanding of the Rules is crucial. For dealing with everyday specific situations, please refer to the Compliance Q & A. If employees still have questions after reading the Rules and the Compliance Q & A, employees should promptly seek help from the Integrity and Compliance Team of the Legal Department.

Chapter II Definitions

Article 4. Bribery and corruption are not tolerated.

“Corruption” refers to the dishonest or illegal behaviors by a person in a specific position taking advantage of his or her position and/or exerting his or her influence for illegitimate benefits or advantages.

“Bribery” refers to the behavior of offering property or other benefits to or receiving them from an entity or individual for illegitimate benefits or advantages. “Bribery” includes “bribing,” “commitments to bribe”, “acceptance of bribes”, and “solicitation of bribes” as follows:

1. “Bribing” refers to the behavior of offering property or other benefits to an entity or individual for illegitimate benefits or advantages.
 2. “Commitments to bribe” refers to the behavior of promising to offer property or
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other benefits to an entity or individual in any form for illegitimate benefits or advantages.

3. "Acceptance of bribes" refers to the behavior of receiving property or other benefits as bribes.
4. "Solicitation of bribes" refers to the behavior of requesting, suggesting, or coercing others for property or other benefits. It does not take the practical acquisition of property or other benefits as the essence.

A behavior that involves offering or commitments to offer property or other benefits to the bribee to influence the bribee to illegally use his or her authority, regardless of the legitimacy of the goal of the briber, will be deemed bribing or commitments to bribe.

The payment or commitment to pay a bribe will be deemed bribing or commitments to bribe. Soliciting or accepting a bribe will be deemed solicitation or acceptance of bribes. The above behaviors do not take the briber's practical acquisition of illegitimate benefits or advantages as the essence.

Article 5. Illegitimate benefits or advantages include but are not limited to winning projects or opportunities for oneself or others; seeking personal performance, year-end bonuses, or other types of rewards; completing personal or team goals; exempting from punishment; and obtaining approval from the superior.

Article 6. Property and other benefits as "bribes" include but are not limited to cash, foreign currencies, transfers, securities, company shares, precious metals, jewelry, real estate, cars, luxury goods, luxury hotels and restaurants, upper-scale tours, cosmetic medicine, private services, sex services, and employment (internship) opportunities for relatives or offspring.

Article 7. "Government officials" refers to officials or employees of national, federal, state, provincial, county, or municipal governments and their departments or agencies; managers or employees of companies and enterprises wholly or partly owned by the government ("state-owned enterprises"); managers or employees of international public institutions (e.g., the World Bank, the United Nations, the European Union); foreign political parties or their officials; or candidates for any political organizations. Government officials include government officials at any level, regardless of their ranking. In a complex government-invested institution, please

consult the Integrity and Compliance Team of the Legal Department if the relevant personnel are government officials.

Chapter III Violations

Article 8. Bribery and corruption are committed in various forms. The following is a list of the more common forms. Employees shall understand that bribery and corruption prohibited by the Company are not limited to these examples:

1. Bribing company superiors

It is deemed bribing for employees offering bribes to their superiors or those who may influence their superiors to get a promotion, avoid punishment, and/or maintain a good relationship with their superiors. Correspondingly, it is deemed acceptance of bribes for employees accepting bribes. To prevent bribery, private lending is prohibited among employees, especially between employees and their superiors. Please refer to the Prevention of Conflicts of Interest Rules for interacting with other employees in compliance.

2. Accepting bribes from suppliers or distributors

Suppliers and distributors are the Company's business partners. In the interaction with the Company's business partners, employees will be deemed committing acceptance of bribes once accepting bribes from the Company's business partners or their employees or agents, regardless of whether they take advantage of their position and/or exert their influence. To prevent bribery, private lending between employees and suppliers or distributors is prohibited. Please refer to the Code of Conduct for Business Partners and the Prevention of Conflicts of Interest Rules for the interaction with the Company's business partners in compliance.

3. Offering unusual gifts and hospitality

Gifts or hospitality that are likely to arouse public suspicion or misunderstanding may be deemed bribery, such as expensive concert tickets, the latest iPhones, first-class flight tickets and luxury hotel accommodations for government officials, and expenses of Sanya vacations reimbursed for government officials. Please refer to the Gifts and Hospitality Rules for details.

4. Unusual donations and unusual political funding

It will be deemed bribery to donate supplies and/or funds to an organization or individual for illegitimate benefits or advantages. Legal donations shall reflect the Company's independent will. It shall not aim to directly obtain economic benefits from the donation or be returned by the donation-receiving organization or individual. It will be deemed bribery to offer supplies and/or funds to a political group or party or its designated organization or individual to intervene in policy decisions. The offering of supplies and/or funds to local political organizations or parties must comply with local laws and have legitimate reasons and shall not be for direct economic benefits of the Company. It shall obtain approval from the Legal Department of the group and the top local management of the Company.

5. Facilitating payments to government officials

It is a kind of "tip" to government officials to accelerate the result of a reasonable request. When being threatened, employees may make facilitating payments to ensure their safety. After the incident, they shall report to their manager in charge and the Legal Department.

Article 9. The following situations are usually not deemed bribery or corruption:

1. Small gifts or hospitality at a small expense are business etiquette in many places of the world. Concerning local business etiquette, small gifts or hospitality at a small expense will not be deemed bribery or corruption if they are not for illegitimate benefits or advantages and are not easily misunderstood by others. Please refer to the Gifts and Hospitality Rules for details.
2. Discounts or reward programs for distributors, as long as they are truthfully recorded in the account book, will not be deemed bribery or corruption.
3. Discounts or cashback offered to consumers will not be deemed bribery or corruption.

Chapter IV Penalties on Employees

Article 10. All employees must understand and abide by the Rules. Any violation of the Rules will be punished according to the facts, which will be as severe as the immediate termination of the

labor contract and recovery of economic losses. If an employee's behavior violates local laws and regulations, the Company has the right to report the employee's behaviors and cooperate with local law enforcement agencies to hold the employee legally accountable. For those who actively cooperate with the Company's probes and take the initiative to confess, report other offenders, and/or provide valuable clues, the Company will take a lighter punishment or mitigate it according to the situation. For those with major meritorious services, the Company may cancel the penalty.

Chapter V Liability of the Managers

Article 11. In case the manager in charge who know that their subordinates violate the Rules and does not report to the Company shall be jointly and severally liable for bribery. In case the manager in charge does not assist the Company in the process of subordinates being investigated for bribery, or tipped off subordinates, or pleaded for subordinates, will be punished with demerits, warnings, training and education according to the severity of the situation.

Chapter VI Liability of Business Partners

Article 12. The Company prohibits bribery or corruption by business partners in the business cooperation with the Company or its office. It also prohibits bribery or corruption by employees in their interactions with its business partners. Employees that violate the Rules will be punished by the penalties mentioned above. In case the Company's business partners violate the Rules, they will be severely punished, which will be as severe as the termination of the partnership. They will not be qualified to cooperate with the Company again until they are entirely rectified. Please refer to the Code of Conduct for Business Partners for details.

Chapter VII Audition and Supervision

Article 13. The Company has the right to audit and supervise all departments and employees whether they comply with the Rules from time to time. The Integrity and Compliance Team of the Legal Department is the primary department responsible for implementing the Rules and performing audits and supervision. Departments or employees subject to audit or supervision are obliged to cooperate with the Integrity and Compliance Team of the Legal Department to complete the audit or investigation. The results of the audit or probe will be included in the year-

end performance review of the employees.

Chapter VIII Reporting Channels

Article 14. To ensure that corruption and bribery can be reported and revealed promptly, the Company provides unblocked reporting channels to everyone. Anyone can write to the email address of the Code of Conduct Committee of the Company, coc@relxtech.com. The Company will take every report seriously, protect the whistleblower's identity, and provide feedback to the whistleblower after the probe. Please refer to the Internal Whistleblowing Rules for details.

Chapter IX Supplementary Provisions

Article 15. The Integrity Compliance Group of the Legal Department is responsible for drafting, revising, interpreting, and organizing training on the Rules. This document is released upon approval by the head of the Legal Department.
