

# RELX Code of Conduct for Business Partners

## Chapter I Purpose and Application Scope

- 1 It is one of the necessary guarantees for the long-term development of RELX to comply with laws, regulations, and ethics in its business activities. As a proponent and advocate of business ethics and fair competition, RELX has incorporated integrity and sustainable business practices into the Company's core values. It not only requires RELX to strictly abide by higher standards of business conduct but also requires its business partners to comply with higher standards of business ethics jointly.
- 2 All business partners of RELX shall read, familiarize themselves with, and agree to abide by this Code of Conduct for Business Partners ("Code of Conduct"), and sign this Code of Conduct to confirm their recognition and commitment of the values and standards of the Company.
- 3 This Code of Conduct applies to all business partners of RLX Technology Inc. and its subsidiaries and affiliates (hereinafter collectively referred to as the "Company") and their employees, casual workers, agents, and contractors. The business partners of the Company refer to sellers or buyers of products or services to the Company. The Company expects its business partners to:
  - 1) Be familiar with and abide by the law.
  - 2) Maintain high-standard business ethics.
  - 3) Develop together with the Company.

## Chapter II Compliance with Laws and Prohibition on Business Misconduct

### 4 General legal compliance

Business partners shall operate in compliance with the laws and regulations of the place of registration and the country or region where they operate, international business practices, and internationally recognized standards, and ensure that legal compliance issues will not affect their cooperation with the Company. These laws, practices, and standards may concern investment, trade, import and export business, foreign exchange, labor, environment, contracts, consumer protection, intellectual property, accounting, taxation, etc.

### 5 Integrity and honest business conduct

---

### 5.1 Anti-corruption and anti-bribery

Business partners shall comply with anti-corruption and anti-bribery laws. Business partners shall not directly or indirectly offer or promise to provide bribes to or solicit or accept bribes from government officials, political parties and groups, employees of the Company and their family members, and other business entities for illegitimate benefits or to influence the decisions of decision-makers illegitimately. Bribes herein include but are not limited to cash, securities, payment vouchers, and other valuables, as well as improper gifts, business hospitality, travel, and employment opportunities.

### 5.2 Prohibition on insider trading

Business partners shall not use the inside information of the Company or other companies acquired from work to seek financial benefits. This is unethical behavior and may violate the laws. Business partners shall not use material non-public information to buy or sell securities (e.g., RELX stocks or bonds) or pass material non-public information to others to prevent them from buying and selling securities. "Material information" refers to the information deemed crucial by anyone engaged in securities trading when deciding to buy, sell, or hold securities.

### 5.3 Complying with competition and antitrust laws

Competition and antitrust laws protect consumers and competitors from infringement of unfair business practices. Such laws protect fair competition. Business partners shall not commit market monopoly, or inequitable competition behaviors alone or cooperate with other partners. The prohibited behaviors include but are not limited to dividing the market through agreement or collusion, fixing resale prices, collusive bidding, bundling, abuse of market dominance, and other behaviors that cause an infringement of the rights and interests of end-users.

### 5.4 Anti-fraud

Business partners shall not commit fraudulent activities such as forging false identities, financial fraud, concealing accurate information, fabricating data, and "phishing emails" against the Company and other business entities. Business partners are prohibited from forging company seals and official documents in any form. Business partners shall also require all their employees to be honest and trustworthy and forbid any form of deception.

### 5.5 Avoiding conflicts of interest

For the common interests of business partners and the Company and to maintain a transparent,

---

fair, and just business environment and market order, business partners shall be proactive in disclosing to avoid conflict of interest relationships. In case employees with conflicts of interest, their family members, or people with close relationships with them are working for a business partner or have interests in dealings with a business partner, the business partner shall promptly report to the Company.

#### 5.6 Ensuring financial integrity

Business partners shall abide by the legal, accounting, taxation, and other regulatory requirements of the countries or regions where they operate, present accurate and complete operational and financial information, and ensure that all the information they record is complete, accurate, and easy to understand. Business partners shall not conceal any information that may affect the Company's interests. To ensure that business partners strictly abide by this Code of Conduct, partners shall cooperate with audits of the Company in case of any reasonable doubts. Qualified third-party agencies will conduct the audits.

#### 5.7 Providing materials truthfully

Business partners must ensure that all materials provided to the Company are accurate, legal, and valid. These materials, including but not limited to orders, sales reports, applications for special offers, cashback, payment applications, significant alterations of the Company, qualification certificates, project experience, and patents, shall be true, accurate, and complete. In case the material involves the confidential information of a third party, the business partner shall guarantee that it has obtained the third party's authorization.

#### 5.8 Prohibition on defamation

Business partners shall adhere to the principle of honest operation and shall not defame or slander the goodwill of the Company or its competitors. Business partners are prohibited from making false or misleading statements about the Company, its competitors, or its products and services.

#### 5.9 Reporting

The Company firmly maintains a good and orderly environment. It adopts a zero-tolerance approach to all fraud, corruption, bribery, extortion, embezzlement, theft, harassment, discrimination, money laundering, and other illegitimate behaviors that violate the Code of Conduct. For any suspected violations of the Code of Conduct, the Company encourages all

---

business partners to make full use of the following channels to report:

RELX Code of Conduct Committee

[coc@relxtech.com](mailto:coc@relxtech.com)

The Company strictly prohibits any retaliation and takes appropriate measures to protect the whistleblowers. In particular, the Company is committed to providing the whistleblowers with channels for submitting confidential information and anonymous reports within the scope permitted by applicable laws and regulations to eliminate their concerns.

#### 6 External communication and social media

Business partners shall not make false statements or misstatements or exaggerate the features of a product in all communications with investors, shareholders, the press, and the financial community. Without the Company's consent, they shall not leak or disclose the status of cooperation projects with the Company to the media.

#### 7 International trade compliance and anti-money laundering

Business partners shall abide by laws, regulations, and resolutions concerning trade sanctions, export control, and other trade affairs in the country where they and RELX operate. To observe international trade compliance laws, the Company prohibits any business, activities, and other transactions with any areas or parties subject to sanctions that may violate sanctions as well as export control laws and regulations applicable to RELX and its business partners. To combat money laundering and terrorist financing, business partners can only do business with customers who engage in legal business activities and obtain funds from legal sources.

#### 8 Respecting and protecting labor rights

Business partners must abide by all laws and regulations concerning employment, and respect and protect labor rights. This Code of Conduct shall apply to all types of business partners' employees, including but not limited to casual workers, temporary workers, and full-time employees.

##### 8.1 Prohibition on forced labor and human trafficking

Business partners must ensure no forced labor or human trafficking in any part of the company

---

or its supply chain. Business partners shall not withhold anyone's wages, benefits, or property to force them to continue working. Business partners shall ensure that employees can freely resign within the notice period stipulated by laws and contracts.

#### 8.2 Prohibition on child labor

Business partners shall not hire minors below the minimum employment age prescribed by laws. Business partners must abide by relevant laws and regulations when conducting apprenticeship training in their workplaces and shall not allow employees underage prescribed by laws to engage in jobs with high risks to health and safety.

#### 8.3 Prohibition on discrimination and harassment

Business partners shall create a healthy, dignified, and fair working environment free of discrimination or harassment for their employees. Discrimination refers to prejudice or unfair treatment to others based on their characteristics other than work performance, including but not limited to race, nationality, skin color, gender, sexual orientation, religion, political opinions, ethnicity, ancestry, constellation, social origin, marital status, age, height, accent, chronic illness, and appearance characteristics (e.g., tattoos, hair volume, weight, body odor, and physical defects). Harassment refers to any behavior that makes a work environment intimidating, objectionable, or hostile. These unwelcome behaviors may come physical, verbal, or visual. Examples of harassment include sexual harassment, bullying, intimidation, and offensive jokes and pictures. Among them, sexual harassment includes obscenity, blue talk, indecent touch, and asking for sexual favors.

#### 8.4 Working hours and labor remuneration

Business partners must abide by all laws and regulations concerning working hours and labor remuneration. They shall arrange working hours, pay labor remuneration, and provide other benefits to employees in accordance with relevant laws and regulations.

#### 8.5 Freedom of association and collective bargaining

Business partners must respect employees' freedom of association, collective bargaining rights, and representative elections as stipulated by the laws. Business partners shall ensure free communication channels between employees and the management, free of discrimination, intimidation, and harassment.

---

## 9 Occupational health and safety

Business partners must abide by the laws and regulations concerning health and safety, be committed to providing a healthy and safe working environment, and take appropriate measures to prevent potential safety risks.

### 9.1 Safety management

Business partners shall ensure that the workplace, mechanical equipment, other equipment, and work processes are risk-free (including fire safety) and ensure the health and safety of employees that work in such workplaces or are exposed to such equipment and techniques. Business partners shall ensure that employees are protected from chemical, biological, and physical safety hazards with appropriate safety design, engineering, and administrative controls, equipment safety inspections, and work safety procedures.

### 9.2 Prevention and control of work injuries and occupational diseases

Business partners shall ensure safety and health in the workplace and reduce the risk of employees to accidents, injuries, and exposure to danger. Business partners are encouraged to develop and implement environmental, health, and safety performance monitoring plans.

### 9.3 A violence-free workplace

All forms of violence are prohibited in the workplace of business partners. Regardless of where they are, their employees shall not commit any violence or threat of violence.

### 9.4 No drugs or alcohol in the workplace

All business partners' employees shall not take, possess, or distribute illegal drugs. Except for lawful and moderate alcohol consumption at a proper business reception, please stay away from the influence of alcohol or drugs when working or conducting company business.

## 10 Information security

Business partners are obliged to maintain information security for both parties. Business partners must abide by RELX's information security and confidentiality systems and protect the confidential information of the Company like theirs. They shall not disclose the Company's proprietary information without authorization or use it outside its business. The confidential information shall be returned or deleted promptly upon the Company's request.

---

## 11 Personal data protection

The Company is committed to handling personal data responsibly in accordance with the laws concerning personal data protection. Business partners shall develop guidelines on how to handle protected personal information, including but not limited to how to collect, process, maintain, share, and dispose of personal data. The use of the personal data obtained shall be strictly limited to those who need to know about the business. All information processing is required to strictly abide by the relevant laws and regulations of the state.

## 12 Protection of intellectual property rights and creators

Business partners shall develop policies on intellectual property and information security for the protection and legal use of the intellectual property rights of both parties. The Company's intellectual property rights include but are not limited to patents, trademarks, copyrights, trade secrets, proprietary technology, and other information. Moreover, business partners shall work to protect the intellectual property rights of all creators, including RELX users, cooperative institutions, and business partners. Business partners shall not obtain or use other people's trade secrets or additional confidential information by any means that are illegal or violate business ethics, including but not limited to improperly collecting or receiving their own or their third-party's trade secrets or confidential information from customers, competitors or other parties.

## 13 Protect the company's assets

### 13.1 Confidential information

Business partners are obliged to protect the confidential information of both parties. Confidential information refers to non-public information that may be useful to competitors or cause damage to the Company, its business partners, or customers.

### 13.2 Real assets

Real assets include the facilities, goods and materials, equipment, inventory, vehicles, cash, and the Company's accounts. Business partners are obliged to ensure both parties' physical assets are used responsibly, that is, protecting assets' safety and avoiding loss, damage, theft, unauthorized use, and waste. Business partners shall not use products or materials for personal purposes. Business partners shall not use the Company's credit card for personal expenses. The transfer of assets through fraud or embezzlement shall be avoided.

### 13.3 Record retention

Business partners shall record and report information accurately and honestly. They shall ensure

---

that the work records and documents (including but not limited to expense reimbursements, transaction documents, account books, and financial reports) that they submit are true, accurate, and complete, and comply with the laws and regulations and relevant rules of the Company.

#### 14 Protection of minors

Business partners shall be familiar with and abide by the regulations related to electronic cigarettes in the Law of the People's Republic of China on the Protection of Minors, designate the primary responsibility, and prohibit the sale of electronic cigarette products to minors. RELX will strictly inspect the sales of all stores and set up a complaint mechanism for the public.

#### 15 Channel policies and supply routes

As permitted by local laws, business partners shall strictly abide by the Company's channel policies, including but not limited to channel management, channel incentives, and supply routes. They shall agree with the Company's interpretation of the above-mentioned policies and regulations.

#### 16 Prohibition on unauthorized commitments

Business partners shall not promise unauthorized matters to end-users or third parties without the Company's authorization. If business partners find any employees of the Company making unauthorized commitments, they shall directly refuse them and report to the Company. Any loss caused by a business partner's unauthorized commitment or failure to reject an unauthorized commitment by the Company's employees shall be solely borne by the business partner. In case of any loss caused to the Company, the business partner or the Company's employees who make the unauthorized commitment shall compensate the Company. To effectively prevent unauthorized commitments, business partners shall know and accept that the Company will not perform any terms other than the content of agreements signed by both parties.

During bidding processes, even if the Company promises to assume joint and several liabilities to the authorized business partner in the authorization letter to the manufacturer, the Company only assumes product liability for the products provided by the business partner as agreed; the business partner shall solely bear all other liabilities.

---

#### 17 Diversity and inclusion

RELX respects uniqueness and diversity, we call for building a diverse and inclusive culture and encourage our employees to be their true and creative selves. As a reliable business participant, RELX expects its business partners to behave with dignity and respect in a work environment and remain committed to providing a work environment where everyone feels safe, comfortable, and respected. As part of this commitment, any form of discrimination and harassment will be accompanied by corresponding corrective actions.

#### 18 Corporate social responsibility

RELX takes the initiative to fulfill its social responsibilities covering products, marketing, the environment, employees, and the community. The Company invests resources in minor protection, product innovation, environmental protection, supply chain, and employees; promotes industrial innovation, technological upgrading, and environmental protection, creating values for consumers, the industry, and the society. RELX encourages all business partners to actively participate in volunteer services and other public welfare activities, continue improving their business practices and contribute to the community. Business partners shall observe applicable laws and regulations related to product safety.

#### 19 Environmental protection

RELX advocates environmental protection. Business partners are encouraged to operate sustainably and comply with all applicable environmental laws and regulations. For example, they should implement and maintain an environmental management system that meets international standards; adopt environmental management policies to decrease waste of energy, raw materials, and water resources, reduce the generation and discharge of harmful substances, and dispose of any solid waste (especially hazardous waste) following local laws and regulations. The Company expects that all business partners are committed to protecting the environment, conserving natural resources, and promoting corporate sustainable development

### **Chapter III Compliance Management**

#### 20 Setting up a compliance system

Business partners are encouraged to establish compliance management systems to ensure that they better comply with local laws, perform legitimate business practices, and comply with the Company's policies.

---

#### 21 Compliance training

Business partners are encouraged to establish compliance training systems of their own, attach importance to and continue to improve their employees' compliance awareness and abilities, making them fully understand their compliance obligations and responsibilities, and integrating compliance awareness into each employee's behavior.

#### 22 Communication of the Code of Conduct for Business Partners

Business partners shall communicate this Code of Conduct for Business Partners with sub-partners or develop similar regulatory documents whose standards are not lower than those of this Code of Conduct.

#### 23 Disciplining employees

Business partners shall strictly discipline their employees, require them to follow the internal code of conduct, and urge them to comply with this Code of Conduct for Business Partners.

### **Chapter IV Liability for Violations**

24 The Company will take measures such as investigation, monitoring, and auditing to confirm that its business partners indeed comply with this Code of Conduct for Business Partners. Any violation of this regulation will be deemed a fundamental breach of the contract signed with the Company and may result in the Company's unilateral termination of the contract as agreed. For business partners who cause financial or reputation losses to the Company, the Company reserves the right to hold them accountable before the law. Moreover, this will affect the incentive plan that they may enjoy. In severe cases, the Company may directly terminate the cooperation with the business partners or permanently remove them from the cooperation list.

### **Chapter V Revision**

25 For business partners and more potential business partners to understand this Code of Conduct for Business Partners, the company publishes this Code of Conduct on its official website ([www.relxtech.com](http://www.relxtech.com)). The Company reserves the right to make further supplements and revisions at any time. The latest edition on the website shall prevail.

---