

RELX Internal Whistleblowing Rules

Chapter I General Provisions

Article 1. The RELX Internal Whistleblowing Rules (“Rules”) is a part of RELX’s integrity and compliance system and a further explanation and interpretation of RELX Code of Business Conduct. Violation of these rules will be deemed a violation of the RELX Code of Business Conduct. Employees that violate the Rules may confront penalties, which could 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 is committed to doing business with the highest legal and ethical standards. Under this commitment, the Company encourages employees to engage in the integrity and compliance supervision system and actively report corruption, occupational crimes, and other law violations. Whistleblowers will have enhanced protection. The Company requires its employees to abide by the Rules in their daily work. Therefore, employees must understand the Rules. 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, they should promptly seek help from the Integrity and Compliance Team of the Legal Department.

Chapter II Definitions

Article 4. “Whistleblower” refers to any entity or individual that reports violations of the Company’s internal rules or the laws and regulations, including but not limited to employees of the Company as well as its suppliers and other business partners.

“Respondent” refers to the object in the report, mainly the person whom a whistleblower accuses or reports of alleged unethical or illegal behavior. Typical respondents include the employees and business partners of the Company.

Article 5. The main types of compliance whistleblowing cases reported shall include but are not limited to corruption and bribery, fraud, harassment and discrimination, insider trading, conflicts of interest, endangering information security or personal information protection, theft,

damaging company property, and other violations of the laws and disciplines.

Article 6. Whistleblowers can report through the following channels:

1. Email: coc@relxtech.com
2. The Integrity and Compliance Team of the Legal Department
3. Women's Rights and Interests Protection Team

Chapter III Handling of Reports

Article 7. The reports shall meet the following requirements:

1. The report's content shall be objective, fair, and evidence-based. Malicious fabrication, distortion of facts, and false accusations are prohibited.
2. In order to efficiently and quickly investigate and deal with reported cases, the company encourages whistleblowers to report in their real names; for those who do not want to report in their real names, they can use pseudonyms or anonymity, but still need to ensure that the case reflects the real situation and is traceable.
3. The whistleblower shall provide the respondent's name, department, and other personal information as well as the time, place, process, and additional details of the event as complete as possible. If there is any evidence, it shall be submitted together.

Article 8. Upon receiving a report, the Integrity and Compliance Team will register and respond to it as soon as possible. For statements not within the integrity and compliance scope, the Integrity and Compliance Team will transfer the case to the competent department. For reports within the integrity and compliance scope, the Integrity and Compliance Team will determine whether there is enough factual evidence or apparent objects for an investigation. If it is impossible to carry out an investigation, the Integrity and Compliance Team will notify the whistleblower that the existing evidence cannot support analysis, and the Integrity and Compliance Team will close and archive the case unless the whistleblower provides more evidence. If it is possible to carry out an investigation, the Integrity and Compliance Team will investigate according to the procedures in the Report Investigation SOP. After the investigation, the Integrity and Compliance Team will issue an investigation report to the Code of Conduct Committee and provide feedback to the whistleblower.

Article 9. The Company conducts investigations in the following ways to keep the

whistleblower's information and the content of the report confidential:

1. The Integrity and Compliance Team directly reports to the Code of Conduct Committee to ensure that the investigation is independent, objective, and honest.
2. The whistleblower's personal information, such as the name, is confidential. The whistleblower and the report's content are only accessible to relevant investigators within the Integrity and Compliance Team.

Chapter IV Protection of Whistleblowers

Article 10. The Company prohibits any retaliation against whistleblowers and will seriously handle such behaviors with severe punishments following the Employee Handbook. Retaliation against whistleblowers includes but is not limited to:

1. Endangering the safety of the whistleblower by violence, threats, or other means.
2. Framing, insulting, and slandering the whistleblower.
3. Joining colleagues or instructing subordinates to isolate the whistleblower.
4. Dismissing the whistleblower without a proper reason.
5. Unreasonably deducting or disguised deducting the salary, bonus, or other benefits of the whistleblower.
6. Making difficulties and suppressing the whistleblower in promotions, position arrangement, and performance rereviews.
7. Not approving or deliberately delaying the approval of reasonable applications made by the whistleblower that shall be approved.
8. Other behaviors infringing on the whistleblower's legitimate rights and interests.

Chapter V Obligation of Employees

Article 11. Employees of the Company are obliged to cooperate with compliance investigations. The following behaviors will be deemed severe violations of the Company's rules:

1. Refusing, delaying without a justifiable reason, or failing to cooperate with the Company's compliance interviews, including but not limited to refusing to cooperate with investigations on the pretext of business travel.
 2. Refusing to accept or cooperate with other requirements of compliance investigations of the Company.
 3. Failing to provide accurate and complete clues or facts during the investigation.
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Chapter VI Rewards for Whistleblowing

Article 12. Whether internal staff or external whistleblowers, once confirmed, the Company may provide material or other rewards to whistleblowers based on the nature of the case, the degree of impact, and the whistleblower's cooperation.

Chapter VII Supplementary Provisions

Article 13. 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.
