



## RELX's Major Marketing Policies and Systems

### RELX Responsible Marketing Policy

The RELX Responsible Marketing Policy clearly sets the Board of Directors' oversight responsibility for responsible marketing and pledges to do the utmost to protect minors and ensure marketing content and methods be in compliance with laws and regulations. The policy also sets out the measures taken to ensure the fulfillment of the pledge and the implementation of the policy, including prohibited items, supervisory audits, and regular training for all employees, to ensure the implementation of the policy.

### RELX Copywriting Communication and Release Regulation

The RELX Copywriting Communication and Release Regulation requires copywriting communication and release to abide by laws and regulations and be truthful and accurate and makes clear bans on some words and expressions in the practice. The policy also clearly states that all marketing materials must be approved by the system before being released to the public.

### RELX Management System for Distributors' Market Conduct

The RELX Management System for Distributors' Market Conduct sets inspections for distributors, including inspections of business practices, marketing practices and other practices. The system also lists specific manifestations of non-compliance and penalties for them. For example, if a distributor sells products to minors, sells products online or fails to implement the Guardian Program, we will terminate the partnership, collect fines, and/or degrade the distributor, etc.

# Guardian Program

Since its establishment in 2018, RELX opposes the sale of e-vapor products to minors and their use in their presence, initiating the "Guardian Program" to set up a protection network for minors along the entire distribution chain. We strictly abide by the Announcement of the State Tobacco Monopoly Administration and the State Administration for Market Regulation on Prohibiting the Sale of E-cigarettes to Minors, and the Law of the People's Republic of China on the Protection of Minors, and we have made it our primary principle not to sell e-vapor products to minors. We are committed to protecting minors in all aspects, from product labels to marketing channels and technology innovation. When applying to open a store, intended partners need to sign the RELX One-page Commitment for Store Opening to ensure that they do not open any sales venues in areas with a high concentration of minors. We have launched the "Sunflower System", an intelligent protection system to prevent minors' purchasing. Using big data technology, it realizes prevention and traceability in every segment, from store location to user purchase. We also require consumers to complete identity verification before purchasing products to further prevent minors from being exposed to and purchasing e-vapor products.



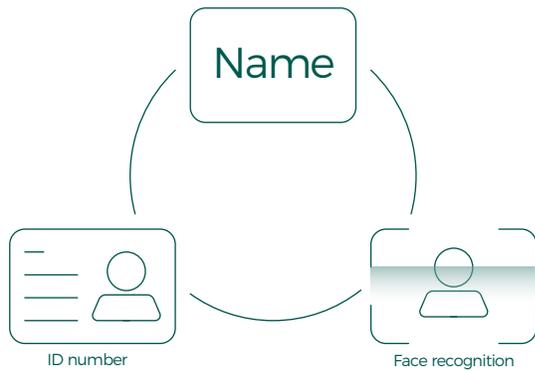


# Warning Signs for Minors

We display the prominent warning signs of “nicotine content” and “not for sales to minors” in all our marketing activities and physical stores. We do not use any advertisement, words, graphics and cultural elements that can attract minors on any of our product’s packaging and marketing materials.

# Sunflower System 3.0

Over the past two years, we have sought scientific and technological means to more effective minor protection and updated the functions of the “Sunflower System”. In 2021, the “Sunflower System” was upgraded to version 3.0. Age verification is set as mandatory action for purchase order generation; hence, when purchasing RELX products, consumers are required to first complete the verification of their “name + ID number + face recognition” when generating a purchase order. Those whose age cannot be verified or who do not meet the age requirement will not be able to complete their purchase. This upgrade means that we are the first to achieve comprehensive age verification before purchasing vaping products from a technical and institutional level. Meanwhile, the “Sunflower System” also applies big data technology to risk management. Each order will be screened to determine whether any stores are in violation of selling products to minors. Severe penalties will be imposed on the offending stores and those responsible. We also use big data and GPS to determine prohibited areas according to local policies and regulations and automatically filter out store locations that do not meet the legal requirements. Through more than 300,000 “electronic fences” we have accurately determined areas with high concentration of minors, such as primary and secondary schools and children’s palaces. In this way, the store owners cannot open any kind of sales venue near these areas when applying to open new stores.



Triple Authentication

2019, “Sunflower System” Version 1.0: Age verification was carried out in stores using a tablet.



2020, “Sunflower System” Version 2.0: “One code for each store” was realized, with full coverage of RELX specialty stores. Consumers must scan the QR code in the store to complete age verification.



2021, “Sunflower System” Version 3.0: “One code for each order” was realized and age verification became mandatory. Consumers can only complete the purchase after verifying their age.

