

RELX Anti-harassment & Anti-discrimination Rules

Chapter I General Provisions

Article 1 These Rules constitute part of the Company's policies for integrity and compliance, and further interpret and construe the Company's Code of Business Conduct. Any violation of these Rules shall be deemed a violation of the Company's Code of Business Conduct. Any employee who violates these Rules may be disciplined, and even to the extent of termination of his/her labor contract.

Article 2 The Company reserves the right to interpret these Rules. The "Company" mentioned herein refers to RLX Technology Inc. and the entities controlled by it.

Article 3 **The Company strictly prohibits any harassment or discrimination, as it is a serious violation of the Company's values.** The Company stresses the value of integrity at all times and in all internal documents. Both the Management and employees at all levels of the Company shall uphold integrity in daily work and completely eradicate harassment or discrimination. The Company requires employees to apply the requirements of these Rules to their daily working practices, so it is essential for employees to have a good understanding of these Rules. To deal with specific situations in daily work, please refer to "Q&A on Compliance". If you still have doubts after reading these Rules and Q&A about Compliance, please seek help from the Integrity & Compliance Division of the Legal Department of the Company in a timely manner.

Chapter II Definitions and Violations

Article 4 "Harassment" refers to the act of causing a person to feel offended, insulted, hostile or uncomfortable by actions, expressions, words or displays against the person's will. Harassment mainly includes sexual harassment, auditory harassment, visual harassment, mental harassment, and physical harassment.

1. Sexual harassment refers to the act of harassing a person with sexually suggestive words or actions, attempting to gain sexual advantage, or forcing the victim to cooperate and thus causing discomfort to the victim. People of any gender may be victims or perpetrators of sexual harassment. Sexual harassment specifically includes:

- Making sexual jokes with others or using sexually suggestive language toward others;
 - Making physical contact against others' will and thus causing others uncomfortable;
 - Pursuing others frequently after clear rejections and thus causing distress to others;
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- Asking for sex in exchange for gains;
- Sending obscene messages or emails to others;
- Giving intimate or sexually suggestive gifts to others;
- Other acts that cause discomfort, annoyance or other negative emotions or even mental damage to others through any means to perform unwelcome sexual flirtation or sexual stimulation for the purpose of venting sexual desires or mischief or harassing or insulting others.

2. Auditory harassment refers to the act that causes discomfort to others by stimulating others' auditory senses through speech, sound, audio, music or noises. It specifically includes harassers' verbal abuse, threats, intimidation against victims, or playing of music or making of noises that cause discomfort to victims.

3. Visual harassment refers to the act that causes discomfort to others by stimulating others' visual senses with pictures, videos, performances, lighting or words. It specifically includes harassers' continuous change of the light and shade to cause discomfort to victims, or display of abusive words, pictures or videos to victims.

4. Mental harassment refers to the act that impairs the mental health of victims in any possible form. It specifically includes causing the mental stress of victims to such a serious degree that it affects the normal state of life or physical health of the victims through cold violence or in the form of imposing mental burdens or mental stress on the victims.

5. Physical harassment refers to the act of touching, attacking or threatening others' bodies with any part of the body (including excrement) or with instruments, or destroying others' properties and thus causing pain, fear, anger or discomfort to victims. It specifically includes pushing others' heads, slapping others in the face, spitting on others, and smashing cups or computers.

6. An act that constitutes harassment hereof shall be to a certain extent. Offering to shake hands or using curse words occasionally shall not be considered harassment. The feeling of the harassed is the basic factor to determine whether an act constitutes harassment, and the subjective willfulness of the harasser will also be taken into account. An act is recognized as harassment possibly because it is conducted frequently and severely, causes great harm, or causes strong feelings to the victim.

Article 5 "Discrimination" refers to the act of derogatorily or negatively differential treatment of others' characteristics other than job performance.

1. Such characteristics other than job performance include but are not limited to race, nationality, skin color, gender, sexual orientation, religion, political view, ethnicity, ancestry, zodiac sign, social origin, reproductive status, marital status, age, height, accent, disease, and physical characteristics (e.g., tattoos, hair volume, weight, body odor and physical defects).
2. Derogatorily or negatively differential treatment includes but is not limited to affecting others' promotion opportunities and award eligibility, reducing others' bonuses, imposing heavier punishments, reducing others' employment opportunities, denying others' due benefits or treating others unfairly by other means due to others' characteristics other than job performance.

An act constitutes discrimination hereof only when it causes unfair results, and an act that merely expresses one's preference without making differential appointments of personnel shall not constitute discrimination.

Chapter III Discipline for Violations

Article 6 All employees must understand and abide by these Rules. Any violation hereof will be disciplined based on facts and circumstances, and even to the extent of immediate termination of his/her labor contract. The Company shall have the right to report employee violations of local laws and regulations, and may cooperate with local law enforcement authorities to hold such an employee accountable for legal liabilities. If the employee positively cooperates with the Company's investigation and voluntarily confesses, reports others' violations or provides useful clues, the Company will impose a lighter discipline action as the case may be. If the employee performs major meritorious service, the Company may withdraw the discipline actions.

Chapter IV Managers' Duties

Article 7 If a direct supervisor of the Company knowingly fails to report subordinates' violations of these Rules to the Company, or even covers up such subordinates, he/she shall be jointly liable for harassment and discrimination. If a direct supervisor of the Company does not assist the Company's investigation, or tip off or ask for favor for a subordinate who is being investigated for harassment or discrimination, he/she will be recorded a demerit, warned, educated or punished in other forms based on the severity of the circumstance.

Chapter V Business Partners' Duties

Article 8 The Company prohibits business partners' harassment or discrimination during their business cooperation with the Company or in the Company's office premises, and also prohibits employees from engaging in harassment or discrimination in their dealings with the Company's business partners. Any employee who violates these Rules will be disciplined as per the foregoing rules for discipline. Any business partner of the Company in violation of these Rules will be disciplined, and even to the extent of termination of the cooperative relationship. Such a business partner will no longer be a business partner of the Company until it makes thorough remediation. See the *Code of Conduct for Business Partners* for details.

Chapter VI Audit & Supervision

Article 9 The Company shall have the right to audit and supervise, from time to time, all departments and employees for compliance with these Rules. The Integrity & Compliance Division of the Legal Department shall be the primary department responsible for implementing these Rules and performing the audit and supervision duties. Departments or employees under audit or supervision are obliged to cooperate with the Integrity & Compliance Division of the Legal Department to complete the audit or investigation. Results of the audit or investigation will be included in the year-end appraisal of employees.

Chapter VII Whistleblowing

Article 10 The Company provides everyone with smooth whistleblowing channels to ensure timely whistleblowing and exposure of harassment and discrimination. Everyone can whistle blow harassment and discrimination to the Company's Code of Conduct Committee at coc@relxtech.com. The Code of Conduct Committee of the Company has set up a special action team for protection of women's rights and interests, which directly reports to the Code of Conduct Committee. The Special Action Team for Protection of Women's Rights and Interests and the Integrity & Compliance Division of the Legal Department supervise and cooperate with each other to promote timely follow-up, investigation and handling of the corresponding issues, and are also responsible for routine education and consultation. To whistle blow harassment or discrimination, you may also meet with the contact persons of the action team stationed in different offices (you may get a list of them conveniently on the Company's Intranet), in addition to sending an email to the Code of Conduct Committee. The Company will take every whistle blow letter seriously, protect the information of the whistleblower, and feed back to the

whistleblower once the investigation is completed. See the *Relx Internal Whistleblowing Rules* for details.
