## **RELX**

### PROTECTING HUMAN RIGHTS

MODERN SLAVERY ACT STATEMENT

This statement, approved by the RELX Board during the February 2020 Board meeting, has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by RELX PLC and its subsidiaries to prevent modern slavery and human trafficking in its business and supply chain during the year ending 31 December 2019. [1] This is our fourth Modern Slavery Act statement. Past statements can be found here.

### **OUR COMPANY**

**RELX** is a global provider of information-based analytics and decision tools for professional and business customers.

We help scientists make new discoveries, doctors and nurses improve the lives of patients and lawyers win cases. We prevent online fraud and money laundering, and help insurance companies evaluate and predict risk. Our events enable customers to learn about markets, source products and complete transactions. In short, we enable our customers to make better decisions, get better results and be more productive.

### **RELX** has:

33,000+ 0ver 33,000 employees worldwide



**40**+



Countries with offices

6

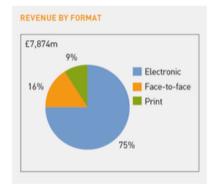


Based across six continents

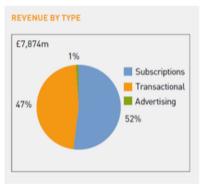
180+

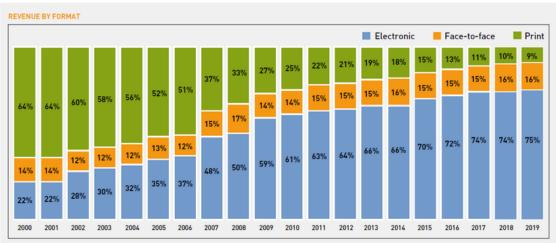


Serving customers in 180+ countries worldwide









We operate in **four major market segments.** In 2019, electronic products and services accounted for 75% of revenue, up from 36% in 2006.

### Scientific, Technical & Medical

provides information and analytics that help institutions and professionals progress science, advance healthcare and improve performance. Elsevier services fall into four market categories: Primary Research, Databases & Tools, Reference and Pharma Promotion. Significant products include: ScienceDirect, the world's largest platform dedicated to peerreviewed primary scientific and medical research; Scopus, a source -neutral abstract and citation database curated by independent subject matter experts with over 76m records across 25,000 journals; SciVal, a decision tool that helps institutions to establish, execute and evaluate research strategies by leveraging bibliometric data from Scopus and other data types such as patent citations and usage data; and ClinicalKey, the flagship clinical reference platform.

### **Risk & Business Analytics**

provides customers with information-based analytics and decision tools that combine public and industry-specific content with advanced technology and algorithms to assist them in evaluating and predicting risk and enhancing operational efficiency. Significant products include: C.L.U.E., the most comprehensive US personal loss history database, which helps insurers assess risk and provide important inputs to pricing and underwriting insurance policies; LexisNexis Digital Identity Network, which provides insight into true digital identity, by analysing global shared intelligence across more than 38bn annual transactions to distinguish legitimate consumers versus fraudsters; and Cirium, an aviation and air travel data and analytics company for the wider travel industry.

Legal provides legal, regulatory and business information and analytics that helps customers increase their productivity, improve decision-making and achieve better outcomes. Significant products include Lexis Advance, the flagship product in North America for legal research and analytics; Lexis PSL,providing UK practical guidance; Lexis 360in France, a leading integrated solution combining legal information, in-depth analysis with JurisClasseur content, and practical guidance; and Lex Machina, providing legal analytics to companies and law firms, enabling them to craft successful strategies, win cases and close business.

Exhibitions is a leading global events business. It combines face-to-face with data and digital tools to help customers learn about markets, source products and complete transactions at over 500 events in almost 30 countries, attracting more than 7m participants. Significant events include World Travel Market, a premier global event for the travel industry; MIPIM, for the world's property market; ComicCon, a premier comic book and pop culture convention; and Batimat, an international trade fair for the building industry.

We focus on our **unique contributions** as a business where we make a positive impact through our knowledge, resources and skills, including:

- Universal, sustainable access to information
- Advance of science and health
- Protection of society
- Promotion of the rule of law & access to justice
- Fostering communities

Detailed information about the segments, each of their business models and our unique contributions can be found in the RELX Annual Report on relx.com.



#### **OUR PEOPLE**

As a global provider of information-based analytics and decision tools for professional and business customers, RELX attracts and develops highly skilled professionals who can realise their career aspirations. Given the nature of our work and our workforce, the risk is low for human trafficking and modern slavery in our direct operations.

We employ more than 33,000 people in more than 40 countries worldwide. 70% of our employees are based in North America and Europe. The Philippines is our third largest geography where 12% of our employees are located.

We offer employee assistance programmes, including a work-life program in the US that helps employees and their family members with issues such as stress, alcohol, and substance abuse. We also have a dependent care support programme in the US which includes paid time off for Family Medical Leave Act (FMLA) and dependent care events and additional support programmes for mental wellbeing and overall wellness through medical and wellbeing vendor partners. Our UK employees can utilize a free confidential helpline and counselling agency encompassing personal, legal, financial, tax and relationship advice, available 24 hours a day throughout the year for employees and their immediate family members.

We have approximately 8,000 contingent workers providing short-term temporary support. Most of these skilled workers are in the US, UK and the Netherlands and are providing technical or specialist support. These workers are managed through a global employment agency as part of our Reflex programme, where we provide detailed guidance and standards for managers wishing to recruit contingent workers.

We understand skill-level can be an indication of risk and that some countries are at higher risk for human rights issues which is why, when prioritising focus areas for avoiding human trafficking and modern slavery, we consider location, type of work and employment status.

#### **OUR COMMITMENT TO PROTECT HUMAN RIGHTS**

We stand against all forms of slavery and human trafficking. We do not tolerate it in any part of our business, including our supply chain. We are a signatory to the United Nations Global Compact (UNGC) Ten Principles related to human rights, fair and non-discriminatory labour practices (which derive directly from the ILO Declaration on fundamental principles and rights at work), the environment, and anti-corruption. Our policies are also informed by the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the Women's Empowerment Principles.

We are aware of the risk of modern slavery given our global presence and diverse supply chain. We have robust human rights due diligence processes in place which include:

- Assessing risks in our own operations and our supply chain through consultations with key stakeholders and through the use of due diligence tools
- Providing training to teams such as Global Procurement, who are more likely to face potential modern slavery issues
- Conducting awareness raising campaigns for all employees, including materials for all employees on detecting modern slavery
- Enhancing our policies when necessary to address modern slavery risks
- Prioritising key risk areas so that steps can be taken to monitor those areas more closely and provide remediation if necessary

At RELX, all employees have an obligation to conduct business with integrity including respecting human rights. We have a governance structure in place to support this very important objective, including personnel devoted to corporate responsibility, procurement, compliance, audit, corporate affairs, and legal. The CEO is responsible to the Board for the ethical operation of our business, including respecting human rights, supported by the CEOs of our businesses, the head of corporate affairs, the chief legal officer, the head of corporate responsibility, the chief procurement officer, and colleagues throughout our business.

### ACCOUNTING FOR OUR ACTIONS TO AVOID MODERN SLAVERY

We have an internal Modern Slavery Act working group including representation from our four business areas and key corporate functions, chaired by corporate responsibility, including global procurement, legal, compliance, human resources, government affairs, risk and audit, and company secretariat. The working group monitors progress on our commitments and provides critical input on our initiatives to prevent Modern Slavery in our business.

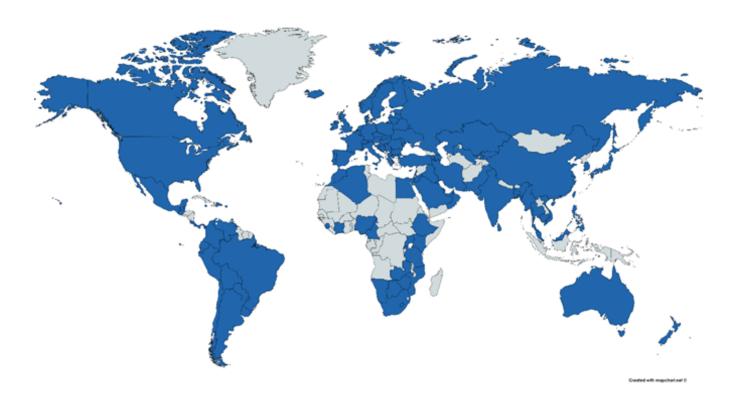
#### **OUR SUPPLY CHAIN**

RELX has a diverse supply chain: there were 145 countries in which we we spent more than \$1,000. These suppliers are spread across multiple categories including technology (hardware, software, cloud, telecom, etc.), indirect (consulting, marketing, contingent labour, travel, etc.), and direct (content, production services, print / paper /bind, distribution, etc.).

Given the importance of maintaining an ethical supply chain, we have a Socially Responsible Supplier (SRS) programme encompassing all of our businesses, supported by corporate responsibility and colleagues with expertise in operations, distribution and procurement and a dedicated SRS Director from our global procurement function. We use a country risk ranking tool to determine risk in our supply chain. The tool, developed by Carnstone, incorporates eight indicators, including human trafficking information from the US State Department and Environmental Performance Index results produced by Yale University and partners, to determine the risk level of each country. Based on this tool we focus on suppliers primarily located in high and medium risk countries, as designated by the tool

We also monitor our supply chain by using our own commercial tools such as LexisNexis Entity Insight, which provides access to comprehensive global news content and company and market intelligence, alerting colleagues to potential supply chain disruptions and supplier risks.

### **RELX** supplier country locations



# ACTIONS TO AVOID SLAVERY AND HUMAN TRAFFICKING IN OUR DIRECT OPERATIONS

Our Code of Ethics and Business Conduct (Code) disseminated to every employee and publicly available at www.relx.com, sets the standard for our corporate and individual behaviour. The UNGC ten principles are reflected in our Code which stresses our commitment to respecting human rights and supporting fair and non-discriminatory labour practices, among other provisions. It clearly states that we "support and respect international human rights" and work to "ensure that we are not complicit in human rights abuses."

The Code is available in 14 languages to ensure all our employees understand it. It is supplemented by other policies to further assist employees in complying with laws related to anti-bribery, competition, data privacy and security, trade sanctions and workplace harassment.

Employees receive mandatory training on The Code – both as new hires and at regular intervals during their tenure – in order to maintain a respectful workplace, prevent bribery and protect personal and company data. Mandatory periodic training covers key Code topics in depth and is supplemented by advanced in-person training for higher-risk roles. We ensure training effectiveness through validation and feedback during and after the training.

We are committed to an inclusive workplace, with diversity that reflects our customers and communities, and a culture that welcomes individuals and their contributions, regardless of gender, race or other personal characteristics protected by law, as stated in our Inclusion Vision.

We are an equal opportunity employer. We are committed to treating all employees and applicants for employment with respect and dignity, and we prohibit discrimination. We recruit, hire, develop, promote, and provide conditions of employment without regard to protected characteristics.

We are a Living Wage accredited employer in the UK which means our employees and contractors are paid a Living Wage. We monitor this each year

to ensure that this still applies as Living Wage rates of pay increase.

In 2018, we made a pledge to the Equal Pay International Commission. In 2019, as part of our commitments, we undertook a comprehensive review of our job architecture to improve consistencies in pay. We launched a new HR Information System in the year, building in automated pay equity checks. Pay equity audits in key functions and geographies were completed in 2018 with adjustments made as necessary in 2019.

To advance our 2019 commitments, we ran an internal Modern Slavery awareness campaign with special offerings for Anti-Slavery Day in October. The awareness campaign included a guide to assist employees in detecting modern slavery, a quiz and a panel discussion with experts from Intertek, our third party auditors; Carnstone, developers of our country risk ranking tool; the head of corporate responsibility and the head of our socially responsible supply chain programme which was streamed to employees globally and made available on HOME, the RELX intranet.

### CONFIDENTIAL REPORTING & EMPLOYEE SUPPORT

We maintain compliance committees for all parts of RELX. Employees are expected to report suspected violations of the Code or law to their manager, a human resources representative, a company lawyer or the appropriate compliance committee.

We also offer employees a confidential reporting line, the Integrity Line, managed by an independent third party, which is accessible by telephone or online 24 hours a day, 365 days a year. As allowed under applicable law, employees may submit reports to the Integrity Line anonymously.

Reports of violations of the Code or related policies are promptly investigated, with careful tracking and monitoring of violations and related mitigation and remediation efforts by the compliance team and compliance committees. The Code stipulates protection against retaliation if a suspected violation of the Code or law is reported. Substantiated Code breaches are subject to disciplinary action, up to and including termination of employment.

The Integrity Line now also includes "Ask a Question" functionality which provides another avenue for employees to get ethics and compliance advice before taking action.

RELX tracks all enquiries and reports received through the Integrity Line plus any reports received, regardless of reporting mechanism. We analyse violations and reports by subject matter, business line, and geography, among other categories; and report trends and mitigation efforts to senior management and the Audit Committee. To date, we have not received any reports or questions from employees that directly relate to modern slavery.

During the year, we carried out human rights and modern slavery impact mapping on our operations through consultations with internal stakeholders to better understand potential risks and impacts. This project will be completed in 2020.

### **FOCUS AREAS**

To ensure we meet the same standards in our contingent workforce we will review our processes for these workers.

As a Living Wage Accredited employer in the UK we want to ensure living wages are paid to all our employees. We commit to undertake Living Wage reviews in four countries where we have the largest employee populations over the next 3 years.

# ACTIONS TO AVOID SLAVERY AND HUMAN TRAFFICKING IN OUR SUPPLY CHAIN

We have a comprehensive Supplier Code of Conduct (Supplier Code), available in 16 languages, which we ask suppliers to agree and display prominently in the workplace. It commits them to following applicable laws, promoting best practices in their business operations, legal and ethical conduct and treating all individuals and the environment with respect, based on the ten principles of the UNGC referenced in our Supplier Code.

We ask suppliers to require the same standards in their supply chains, including requesting that suppliers require subcontractors to enter into a written commitment to uphold the Supplier Code. The Supplier Code states that where local industry standards are higher than applicable legal requirements, we expect suppliers to meet the higher standards.

The Supplier Code contains provisions on child labour, involuntary labour, wages, coercion and harassment, non-discrimination, association, health and safety, environment and anticorruption. In accordance with the UK's Modern Slavery Act 2015 and based on the American Bar Association's Model Business Conduct Standards to Eradicate Labor Human Rights Impacts in Hiring and Supply Chain Practices, our Supplier Code specifically prohibits participation in any activity related to human trafficking.

Our Supplier Code states unequivocally that suppliers cannot directly or indirectly use, participate in, or benefit from involuntary workers, including human trafficking-related activities.

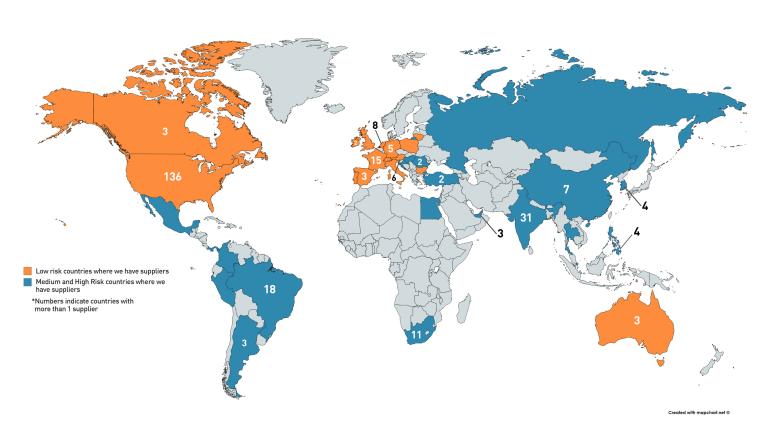
To strengthen adherence to our Supplier Code, we embed it into standard terms and conditions (such as contracts and purchase orders). We require the employment agencies with which we work to adhere to the Supplier Code.

#### TRACKING SUPPLIERS

Through our Socially Responsible Supplier (SRS) database, we track suppliers with whom we spend >\$1m and those located in medium and high-risk countries as designated by our supplier risk tool, that incorporates eight indicators, including human trafficking information from the US State Department and Environmental Performance Index results produced by Yale University and partners with a spend of >\$200K for a consecutive two-year period. We are proactive in that we assess suppliers based on the aforementioned criteria and not after a non-compliance is reported. The tracking list changes year-on-year based on the suppliers we engage to meet the needs of our business.

In 2019, there were 354 suppliers on the SRS tracking list, of which 102 are in high and medium risk countries. At year end, 91% of suppliers on the tracking list were signatories to our Supplier Code. Of the 33 non-signatories, 9 suppliers are in high or medium risk countries. We continue to work with non-signatories to gain agreement to our Code, and/or assess whether they have equivalent standards in place, in order to ultimately decide whether to continue doing business with them. We have embedded the Supplier Code into our sourcing process, and have a total of 3,202 suppliers who have agreed to the Supplier Code in 2019, up from 3 082 in 2018

### Map of suppliers on the tracking list



### MONITORING SUPPLIERS

Where required by law, suppliers must have employment contracts signed with all employees in the applicable local language clearly outlining the employment relationship. They must comply with local labour laws and upon hiring, inform their employees of the terms of their employment.

We use our tracking list to identify suppliers for audit. We engage a specialist external supply chain auditor which undertook 93 external audits on our behalf in 2019. Audit locations in 2019 included Argentina, Brazil, China, Egypt, Hong Kong, India, Lithuania, Malaysia, Pakistan, Philippines, Romania, Russia, Singapore, South Africa, United Kingdom, United States and Vietnam. All of Intertek's auditors undergo Compliance Practitioner Initiative (CPI) CSR Lead auditor training. The training covers various Human Rights standards including the United Nations Universal Declaration of Human Rights, the International Labor Organization's (ILO) Eight Fundamental Conventions, the United Nations Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code. In addition to the CPI training, Intertek conducts periodic updated / refresher training to cover various topics such as human trafficking and modern slavery, land rights and other new or emerging issues.

When an audit is scheduled, the auditor asks the facility to inform them what languages their employees speak, and if necessary, obtains its own outside interpreter.

The auditor selects the employees and, to avoid improper influence, facility management is not allowed to select or suggest which employees are interviewed or documents that are selected for review. The auditor will select employees from a full roster (and may select employees to interview on the work floor during the facility walkthrough). Employee interviews are private and confidential and facility management is not allowed to be present. All information gathered from employee interviews is anonymised. When the auditor communicates noncompliance to facility management, they are not allowed to disclose information which could identify the employee or employees to avoid retaliation against employee(s), which is also forbidden in the Supplier Code.

An incidence of non-compliance triggers a continuous improvement report summarising audit results, with remediation plans and submission dates agreed and signed by both the auditor and the supplier. The auditors review evidence of corrections which they accept or reject, working with suppliers until full remediation is reached.

RELX has a tiered approach to remediation, as detailed in the table below:

Finding Rating	%	Time to remediate (Months)	Re-audit
Zero tolerance	100	1	Re-audit within 12 months
Major	100	3	Re-audit within 12 months
Moderate	100	6	A score of 90 or above with moderate issues, re-audit within 24 months
Minor	100	9	A score of 90 or above re-audit within 24 months



Ensuring suppliers remediate any findings from audits is critical to confirm compliance with the Supplier Code. We have a defined process in place with increased communication both internally and externally in an effort to help suppliers remediate Zero and Major findings within the defined timelines. If a supplier does not remediate Zero and Major findings within the deadline, we will work with internal stakeholders to define next steps (e.g., alternative suppliers, exit strategy, etc.).

Areas covered in the audit include:

- Labour (child / forced labour, discrimination, discipline, harassment / abuse, association, and labour contracts)
- Wages and hours (wages benefits; and working hours)
- Health and safety (general work facility, emergency preparedness, occupational injury, machine safety, safety hazards, chemical and hazardous material, dormitory and canteen)
- Management systems (documentation and records, worker feedback and participation, audits and corrective action process) Environment (legal compliance, environmental management systems, waste and air emissions)
- Anti-corruption and data security questions

The Supplier Code states, "Failure to comply with any RELX term, condition, requirement, policy or procedure...may result in the cancellation of all existing orders and termination of the business relationship between RELX and supplier."

We understand that audits are a helpful diagnostic tool and work effectively to identify risks alongside other measures. We aim to build meaningful relationships with our suppliers to foster dialogue on labour and other issues. In the past year, we provided training on avoiding human trafficking and modern slavery for procurement colleagues and solicited feedback to better understand their challenges. In 2020, we will update our interactive anti-human trafficking and modern slavery training for procurement colleagues, managers across the business, as well as suppliers.

### EXCERPT FROM SUPPLIER CODE ON INVOLUNTARY LABOUR

"Suppliers will not directly or indirectly use, participate in, or benefit from involuntary workers, including human trafficking-related activities, for example: (i) using misleading or fraudulent recruitment or engagement practices for employees or contract workers (ii) charging employees and/or contract workers recruitment or engagement fees; (iii) destroying, concealing, confiscating, or otherwise denying access by an employee or any contract worker to his or her identity documents, such as passports or drivers' licenses); or (iv) using workers who are imprisoned, indentured, bonded, military or slaves."



### As a result of 2019 audits, we required:

- suppliers to ensure regular working hours do not exceed allowable limits under applicable law or agreement
- suppliers to ensure total overtime hours not exceed allowable limits under applicable law or agreement
  - suppliers to provide complete proof of age records
- suppliers to allow employees at least one day off following six consecutive days worked
  - suppliers to require agencies who provide employees to have signed employment contracts with all employees dispatched to the facility

Our suppliers and their employees can report any grievances to a dedicated RELX email address. We did not receive any complaints in 2019 related to human trafficking or modern slavery.

### PROGRESS ON PRIOR COMMITMENTS & NEXT STEPS

In 2019, we held training workshops on avoiding human trafficking and modern slavery with Global Procurement colleagues.

We also refined our human rights risk mapping to progress human rights impact assessments. This has involved stakeholder engagement with internal stakeholders, including Global Procurement.

As a result of this work, we have identified two primary supply chain focus areas for 2020: we will conduct a human rights risk assessment of our building management services, including cleaners who are often low-skilled, vulnerable workers. Secondly, we will work with colleagues in our UK events business to identify suppliers supporting shows in high-risk countries as part of our human rights impact assessment work.

In 2020, we will also continue training procurement colleagues to empower them to raise any concerns with suppliers during supplier visits. We will also create an ethical supplier channel on our training portal, concentrating on suppliers located in high risk areas.

### **ADVOCACY**

We promote the rule of law through our products and services, particularly those of LexisNexis Legal & Professional, which help legal professionals and support governments and justice systems, to function more effectively. We make laws accessible to increase the transparency of legal systems as a fundamental element of a healthy society and growing economy. We are bold advocates for the rule of law and provide training and access to our legal tools and solutions.

Our Rule of Law Working Group, comprised of colleagues from across our business helps track and expand our rule of law activities. We are an active member of the UNGC Sustainable Development Goals (SDGs) Action Platform 16 (Peace, Justice and Strong Institutions) to help businesses go beyond legal minimums to advance the rule of law and sustainable development.

The free RELX SDG Resource Centre features content on avoiding human trafficking and modern slavery and also features tools like the LexisNexis Rule of Law Impact Tracker developed with the World Justice Project to show the link between the rule of law and sustainable development; stronger rule of law leads to higher GDP per capita and life expectancy, lower child mortality, homicide, and corruption.

The SDG Resource Centre also features eyeWitness to Atrocities, developed with the International Bar Association, which allows citizens to securely and verifiably report human rights atrocities, including human trafficking and modern slavery, so the information can be used as evidence in law courts. Anyone with an Android-enabled smartphone – from journalists and investigators to affected citizens – can download the free app and help bring perpetrators to account for crimes against humanity, including human trafficking. eyeWitness utilises the same technology LexisNexis Legal & Professional deploys to safeguard sensitive and confidential material for its clients.

We also offer Access to Justice Law360, which provides free content to enable legal aid organisations and others to help citizens with the fewest resources gain equal treatment within civil and criminal justice systems.

Our LexisNexis Risk Solutions business assists in the recovery of missing and exploited children through the Automated Delivery of Alerts on Missing Children (ADAM) programme which they developed. ADAM examines a database of all possible recipients of a missing child poster within a specific geographical search area and, within minutes, circulates the posters to police, news media, schools, businesses, medical centres and other recipients. Since launching in 2000, 184 children have been located, including 2 in 2019 ADAM is designated for use by the National Center for Missing & Exploited Children (NCMEC) in the US. Throughout 2019, we worked to expand consumer opt-ins to allow individuals to receive an email alert when a child is reported missing near to them, with over 2300 registrations to date.

In the UK, we work with Missing People providing access to our tools and resources to help in their search for missing children and adults. In the year, with free access to LexisNexis Risk Solutions TracelQ® product, Missing People re-launched its Lost Connect service, helping people to reconnect with someone missing who is not legally missing or at risk in the eyes of the law.

LexisNexis Legal & Professional and STOP THE TRAFFIK a non-governmental organisation dedicated to eradicating human trafficking, published Dressed to Kill, available on the RELX Group SDG Resource Centre. The report raises awareness about forced labour and human trafficking in the cotton industry, for companies and consumers, with actions to eliminate and reduce related risk.

LexisNexis Legal & Professional is providing pro bono expertise to the Australian Human Rights Commission on The Human Rights and Technology Project, which considers how we protect and promote human rights in the context of new and emerging technologies.

### **PARTNERSHIPS**

At RELX, we recognize the importance of multistakeholder partnerships to achieve greater impact. We participate in a number of partnerships to advance progress against modern slavery:

Name of partnership	Description	
Global Compact UK Network's Modern Slavery Working Group	We are founding members of this forum which meets quarterly and which helps its members respond to the MSA. The Working Group has provided a sa space where members can discuss the challenges of implementing the MSA and learn how companies from other sectors are tackling their supply chain due diligence.	
UN Global Compact's Action Platform on Decent Work in Global Supply Chains	UN Global Compact launched the Action Platform on Decent Work in Global Supply Chains in 2017 to build an alliance of companies who are committed to respecting human rights and fundamental principles and rights at work by leveraging their supply chains and taking collective action to address decent work deficits. In 2020 the platform will become Tackling Working Poverty Action Platform to address human rights issues within a company's operations as well as its supply chain.	
The Book Chain project	The Book Chain Project, managed by Carnstone, is a collaborative project involving 28 leading book and journal publishers, over 400 print suppliers, and more than 300 paper manufacturers. Its three main components are: forest sourcing, chemicals and materials, and labour. We currently participate in the paper component.	

This statement has been approved by the RELX Board on 11 February 2020.

Sir Anthony Habgood, Chairman

[1] In accordance with Section 54 of the United Kingdom's Modern Slavery Act 2015, this RELX Modern Slavery Act Statement 2019 covers the following RELX subsidiaries: RELX (UK) Ltd [www.lexisnexis.co.uk]; Butterworths Ltd [www.lexisnexis.co.uk]; Elsevier Ltd [www.uk.elsevierhealth.com]; Reed Business Information Ltd [www.reedbusiness.com]; and Reed Exhibitions Ltd [www.reedexhibitions.com]

