

# Code of Ethics

2026 Edition

Renault  
Group



At Renault Group, Ethics and Compliance are deployed at all levels of the company, based on fundamental values of integrity and respect.

Our purpose obliges us: we affirm that « *Our spirit of innovation takes mobility further to bring people closer* » and that « *we are caring, believing in responsible progress that respects everyone* ». Such an objective would be meaningless without a duty to set an example supported by specific obligations in the daily conduct of business.

Ethics precisely refers to all the written and unwritten rules that help us make the right decision in a given situation, with discernment and a sense of responsibility.

It concerns each employee of the Group, regardless of their hierarchical position, their function and the country in which they work. And it engages the top management, which must be exemplary.

This new Code of Ethics is intended to be a point of reference on a daily basis.

It is there to guide you and help you act in accordance with the laws and regulations in force in each country, in accordance with the commitments made by Renault in the social, societal and environmental fields.

Never hesitate, if in doubt, to contact the Ethics and Compliance Department, which will advise and support you.

Ethics and Compliance are of course a subject of regulatory compliance. But they engage much more than that. More than ever, as the demande for meaning increases in our societies, we see in their respect and in their promotion and essential lever of performance for the entire Group, as well as a source of attractiveness.

More ethical, fairer, more humane, we will be individually and collectively stronger to achieve our goals and sustainably grow Renault Group.



**Jean-Dominique SENARD**  
Chairman of the Board of directors

A handwritten signature in black ink, appearing to read "J D Senard", with a horizontal line above and below the name.



**François PROVOST**  
Chief Executive Officer

A handwritten signature in black ink, appearing to read "F Provost", with a horizontal line below the name.





|           |   |    |
|-----------|---|----|
| <b>01</b> | <b>Ethics<br/>at Renault Group</b>                |    |
|           | The official corporate purpose of Renault Group   | 07 |
|           | Why do we have a Code of Ethics?                  | 07 |
|           | What does a Code of Ethics apply to?              | 07 |
|           | How to use the Code of Ethics?                    | 08 |
|           | Governance  | 09 |
| <b>02</b> | <b>Our Ethics<br/>as an employer</b>              |    |
|           | Health, Safety and Environment                    | 11 |
|           | Diversity and inclusion                           | 12 |
|           | Fight against all sorts of harassment             | 14 |
|           | Political and religious neutrality                | 14 |
|           | Paid activity outside Renault Group               | 15 |
| <b>03</b> | <b>Our Ethics<br/>as a company</b>                |    |
|           | Business ethics and fight against corruption      | 17 |
|           | Relations with consumers                          | 18 |
|           | Relations with shareholders                       | 19 |
|           | Relations with suppliers                          | 20 |
|           | Confidentiality policy                            | 21 |
|           | Protection of personal data                       | 22 |
|           | Renault Group's heritage and image                | 23 |
| <b>04</b> | <b>Our Ethics<br/>as a corporate citizen</b>      |    |
|           | Human rights                                      | 25 |
|           | Job assignments                                   | 26 |
|           | Foundation  | 27 |
|           | Environment                                       | 28 |
|           | Mobility  | 28 |
| <b>05</b> | <b>Non-compliance<br/>with the Code of Ethics</b> |    |
|           | Whistleblowing Alert system                       | 31 |
|           | Disciplinary sanctions                            | 32 |
| <b>06</b> | <b>Useful<br/>links</b>                           |    |
|           | Ethics and Compliance Department                  | 34 |
|           | Ethics and Compliance network                     | 34 |
|           | Ethics and Compliance website and intranet        | 34 |

0

# Ethics at Renault Group

1



# 01 Ethics at Renault Group

## THE OFFICIAL CORPORATE PURPOSE OF RENAULT GROUP

The purpose of Renault Group « **Our spirit of innovation takes mobility further to bring people closer** » illustrates Renault Group's ambition in terms of sustainable and responsible development.

This is the bedrock of our strategic plan and the course we have chosen in terms of social and environmental responsibility.

This inspires the Ethics of our company.

Is Ethics linked to a specific activity or area? No. Ethics is a state of mind that guides our behavior based on values.

The alignment of our purpose, our ethics and our strategy allows us to perform well.

Thanks to the Ethics shared by all, Renault Group acts responsibly by guaranteeing non-discrimination, fairness, diversity of background and profiles, assistance to people with disabilities, dialogue, quality of life at work.

## WHY DO WE HAVE A CODE OF ETHICS?

Ethics shared by all allow Renault Group to act sustainably with respect, integrity and fairness, as a responsible company. The Renault Group Code of Ethics anchors and promotes the values of Renault Group and invites us to act with integrity and vigilance.

Respect for these values contributes to the quality of Renault Group's image, its attractiveness and its performance.

It reaffirms our collective commitment to promoting values based on trust and respect between employees, customers, suppliers, partners and shareholders.

It helps us question us what attitude we should adopt in the delicate situations that we sometimes face.

The Code of Ethics thus helps us make the right decision in all circumstances..

## WHAT DOES A CODE OF ETHICS APPLY TO?

The Code of Ethics is a reference that applies to each and every one of us, managers, employees, apprentices, interns, temporary workers of Renault Group and the subsidiaries it controls around the world.

The principles of this Code of Ethics, which take into account the interests of customers, suppliers and shareholders, apply to our main stakeholders.



## HOW TO USE THE CODE OF ETHICS?

The Renault Group Code of Ethics is deployed throughout Renault Group through various internal communication media.

Renault Group asks everyone to refer to it and share its content.

The Code of Ethics describes principles that distinguish between what is acceptable and what is not and commits us to report behaviour or solicitations that do not comply with this Code.

Each manager plays an essential role in disseminating the company's values. Managers are role models and must encourage their team to act ethically and responsibly and to absorb the content of this Code of Ethics.

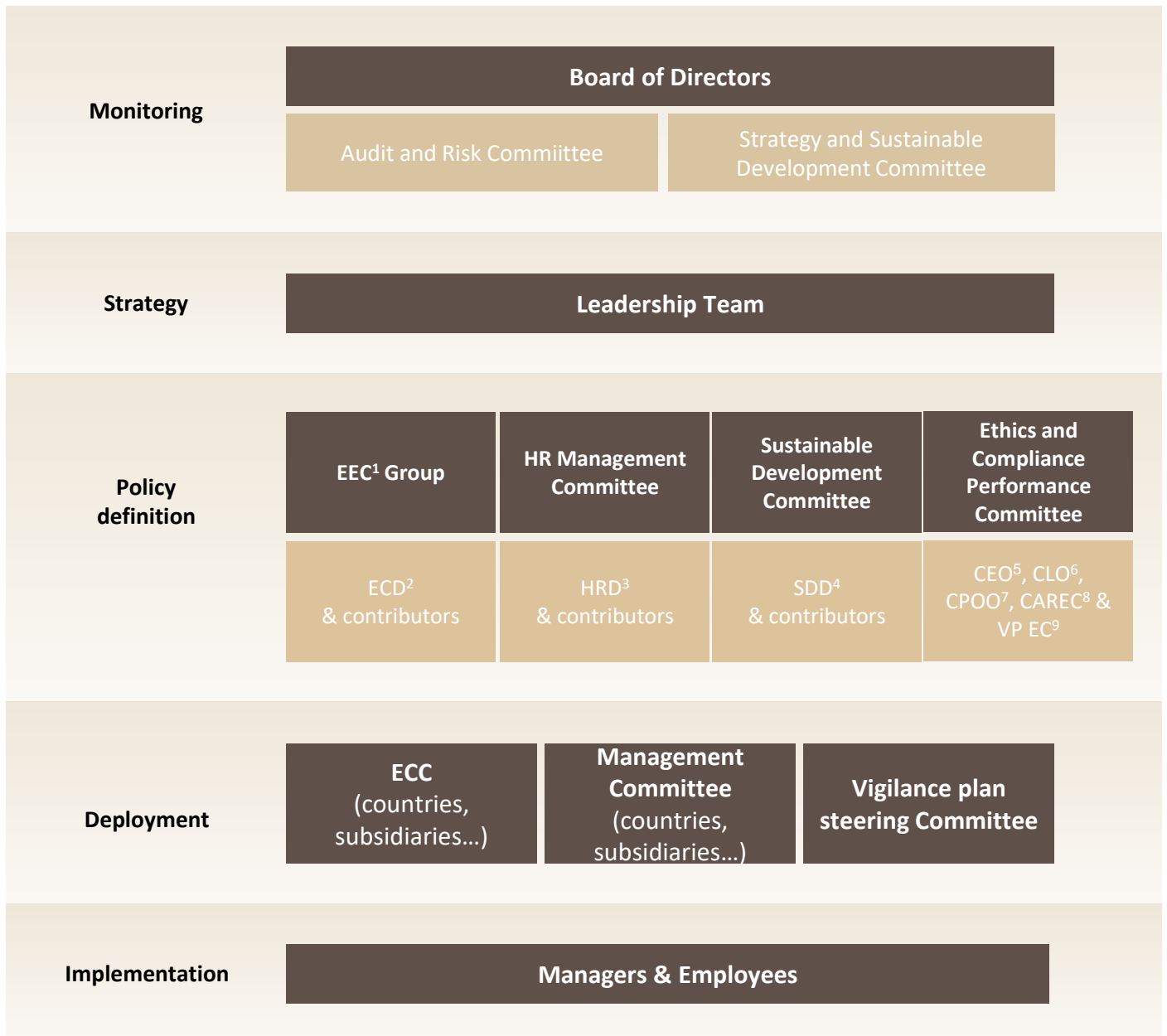
The Code of Ethics is supplemented and illustrated by a set of documents such as the Anticorruption Code of Conduct and Code of Ethics dedicated to certain functions or activities: Supplier and Purchasing, Commerce, Customs, IT, Global Security, Stock Exchange, Representation of interest.

Some countries in which Renault Group operates may have laws that are more demanding than those mentioned in the Code of Ethics. In this case, it will be appropriate to comply with the most demanding law.

Renault Group encourages all its employees to express their points of view and defend their opinions through dialogue.



GOVERNANCE



- (1) ECC: Ethics and Compliance Committee
- (2) ECD: Ethics and Compliance Department
- (3) HRD: Human Resources Department
- (4) SDD: Sustainable Development Department
- (5) CEO: Chief Executive Officer, Renault Group
- (6) CLO: Chief Legal Officer, Renault Group
- (7) CPOO: Chief People and Organisation Officer, Renault Group
- (8) CAREC: Chief Audit, Risk and Compliance Officer, Renault Group
- (9) E&C VP: Ethics and Compliance Vice-President, Renault Group

# 02

## Our Ethics as an employer

# 02 Our Ethics as an employer

## HEALTH, SAFETY AND ENVIRONMENT

Renault Group reaffirms its commitment to take the necessary preventive measures in terms of health, hygiene, safety and improvement of the working conditions and ergonomics of its employees by:

- ▶ Promoting physical and mental health and well-being in the workplace.
- ▶ Providing a healthy and safe working environment.
- ▶ Applying the principle of continuous improvement proactively and with a focus on the prevention of the risks of occupational injuries and diseases.
- ▶ By working to eliminate the most dangerous processes/materials/substances.

### GOING FURTHER:



The Health, Safety and Environment Direction is available to answer any questions you may have.



### PRACTICAL CASE

As a manager, I notice that an employee is handling chemicals without personal protective equipment (PPE).

#### What can I do?

I ask the employee to immediately interrupt their activity, for the time to consult the instructions (or the safety data sheet) of the product and to check whether the wearing of personal protective equipment (PPE) is obligatory. In this case, I ask the employee to wear the appropriate PPE.

The Industrial Hygiene team carries out continuous improvement actions aimed at reducing the risks inherent in the use of chemicals on Renault Group sites.

In the industrial sector, before starting their first job, each employee is trained in the safety DOJO (situational learning mode), then they necessarily receive specific training in safety at the workstation (SWI – Specific Workstation Induction). The risks linked to the handling of chemicals as well as the means implemented to protect against them are detailed there.



### DIVERSITY AND INCLUSION

Respect for people is a fundamental value of Renault Group. In particular, it helps to guarantee the dignity of people, trust and quality of life at work.

Renault Group is thus committed to preventing any form of discrimination on a daily basis and at all stages of professional life, and to placing skills and performance at the heart of our human resources policies, with the aim of welcoming, developing and supporting its employees fairly.

As such, each of us undertakes in particular to:

- ▶ Recognize diversity and promote it, particularly in the recruitment of future employees and in the internal mobility of employees.
- ▶ Promote inclusion by allowing all employees to feel safe, respected and valued for who they are and for the values they help to share within the company.
- ▶ Treat everyone with dignity, without discrimination and with respect for privacy, while recognizing skills and performance.

#### ZERO discrimination

Renault Group pays particular attention to the principle of non-discrimination. Discrimination is the unfavourable treatment of a person or group of persons on the basis of criteria unrelated to professional competence.

Grounds of discrimination may include gender, age, allegedly racial, ethnic, national, social, cultural origins, sexual orientation or gender identity, disability or health problems, physical appearance, political or religious opinions, trade union activities...

Discrimination can manifest itself in more or less visible forms and occur at any time in professional life, resulting, for example, in exclusion from a recruitment procedure or an appointment, from access to an internship or training or even creating inequality in the career management of employees (salary, promotion, transfer).

On the other hand, incitement to discrimination and instruction to discriminate also constitute discrimination.

Renault Group points out that discrimination is criminally and civilly punishable.

Renault Group's ZERO Discrimination policy strongly condemns discrimination in all its forms.

Renault Group is asking each of us to:

- ▶ Do not discriminate under penalty of sanction.
- ▶ To alert if you become aware of cases of discrimination.

In order to eradicate all discrimination, Renault Group has set up alert channels so that all employees can report situations that would be contrary to the ZERO Discrimination policy.

Renault Group is also committed to promoting employee training and awareness and ensuring enhanced communication, both on the professional alert system (see page 31) and on discriminatory behavior and measures.

Furthermore, as part of its ZERO Discrimination policy, Renault Group has set up ZERO Discrimination representatives on all of its sites.





**PRACTICAL CASE**

Luis is hard of hearing. You notice that he has difficulty following discussions in team meetings and participating in daily conversations. His manager makes no effort to include him in discussions, regularly cuts him off and rolls his eyes when Luis asks questions to better understand. He misses important information and, as a result, sometimes makes mistakes in his work. He feels isolated and his performance declines. He does not dare to share his difficulties with his manager for fear of being even more sidelined and stigmatized.

**What can I do?**

Luis is potentially a victim of discrimination. I should advise him to speak to a ZERO Discrimination representative or to his Human Resources Manager, or to issue a Whistleblowing Alert in complete confidentiality (see page 31). I should also make sure that Luis is aware of the ZERO Discrimination policy which mentions the prohibition of any discrimination under penalty of sanctions and the possibility of alerting in the event of discrimination. Indeed, whatever my position within an organisation, facts which constitute discrimination should be reported or if I witness a situation which seems discriminatory I can make an alert as a witness under the same conditions of anonymity and confidentiality.

The Renault Group Diversity & Inclusion Code is shared and all employees must follow a training module on this subject. It sets out the principles of Diversity & Inclusion, in particular respect for all and non-discrimination. The Renault Group Diversity & Inclusion policy allows people like Luis to work in the best possible conditions. To be able to benefit from it, Luis must contact his Human Resources Manager who will support him in setting up an adaptation to his workstation (e.g.: installation of a portable hearing loop). Furthermore, in order to ensure the adoption of appropriate behaviors, e-learning courses adapted to different forms of disabilities are offered to the manager and the team if the employee so wishes.

Finally, Renault Group offers training to detect cognitive biases (« Living Diversity Together ») to all employees with access to the Learning@RenaultGroup platform, and « Inclusive Management » training dedicated to managers. These training courses aim to develop inclusive practices and fight against cognitive biases. Other devices, such as the tools for deciphering discrimination situations, available in the ZERO Discrimination Pack, can also help identify discriminatory behavior.

**GOING FURTHER:**



The Diversity & Inclusion Department, the ZERO Discrimination representatives and the Deputy Department of Whistleblowing Alert are available to answer any questions you may have.



The Diversity & Inclusion Code is on line on the [Global Diversity & Inclusion](#) intranet site

Issue a whistleblowing Alert via WhistleB : <https://report.whistleb.com/en/portal/renaultgroup> (see page 31)



### FIGHT AGAINST ALL SORTS OF HARASSMENT

In order to combat all forms of moral or sexual harassment at work, Renault Group is committed to protecting and guaranteeing the dignity, respect, physical and psychological integrity of all its employees.

Thus, any facts, remarks, behaviors or pressures exerted having as their object or effect a deterioration of working conditions resulting in an alteration of the physical or mental health of an employee are formally prohibited.

Renault Group reminds that all types of harassment are criminally and civilly reprehensible.

### POLITICAL AND RELIGIOUS NEUTRALITY

Employees are free to exercise their political and/or religious activities and opinions, in compliance with the laws in force, but their manifestation must not undermine the proper functioning of Renault Group.

No form of political or religious proselytism is allowed at Renault Group.

Renault Group also does not finance religious institutions or political parties and is not involved in sponsoring political campaigns.

#### PRACTICAL CASE



My manager systematically makes fun of me in the presence of other colleagues: he humiliates me, gets angry with me, criticizes my way of behaving. I have a very hard time dealing with the situation which is affecting me physically and psychologically.

##### What can I do?

I can make a report via the Renault Group Whistleblowing System in complete confidentiality (see page 31).

#### PRACTICAL CASE



During an exchange in a meeting, one of my colleagues relays to the team the program of a political party and encourages people to vote for its representatives in the next elections.

##### What can I do?

I remind him that the Code of Ethics provides that no form of political proselytism is permitted within the Renault Group and that this behavior is likely to be subject to disciplinary action.

The “Ethics within Renault Group” training helps raise awareness among stakeholders about these situations and prevent risks. Discussing it regularly as a team helps prevent the emergence of this type of behavior.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer any questions you may have.



Issue a Whistleblowing Alert via:  
<https://report.whistleb.com/en/portal/reaultgroup>  
(see page 31)

### PAID ACTIVITY OUTSIDE RENAULT GROUP

No paid activity outside Renault Group may be carried out if it competes with its interest (principle of loyalty) and/or if it results in an infringement of the legislation on maximum working hours. To prevent any difficulties, any Renault Group employee wishing to have a professional activity outside the company will first communicate with their superiors and the Human Resources Department.



#### PRACTICAL CASE

A member of my team informed me that he recently received significant compensation for training he provided in his area of expertise. This training was provided via an organization external to Renault Group.

##### What can I do?

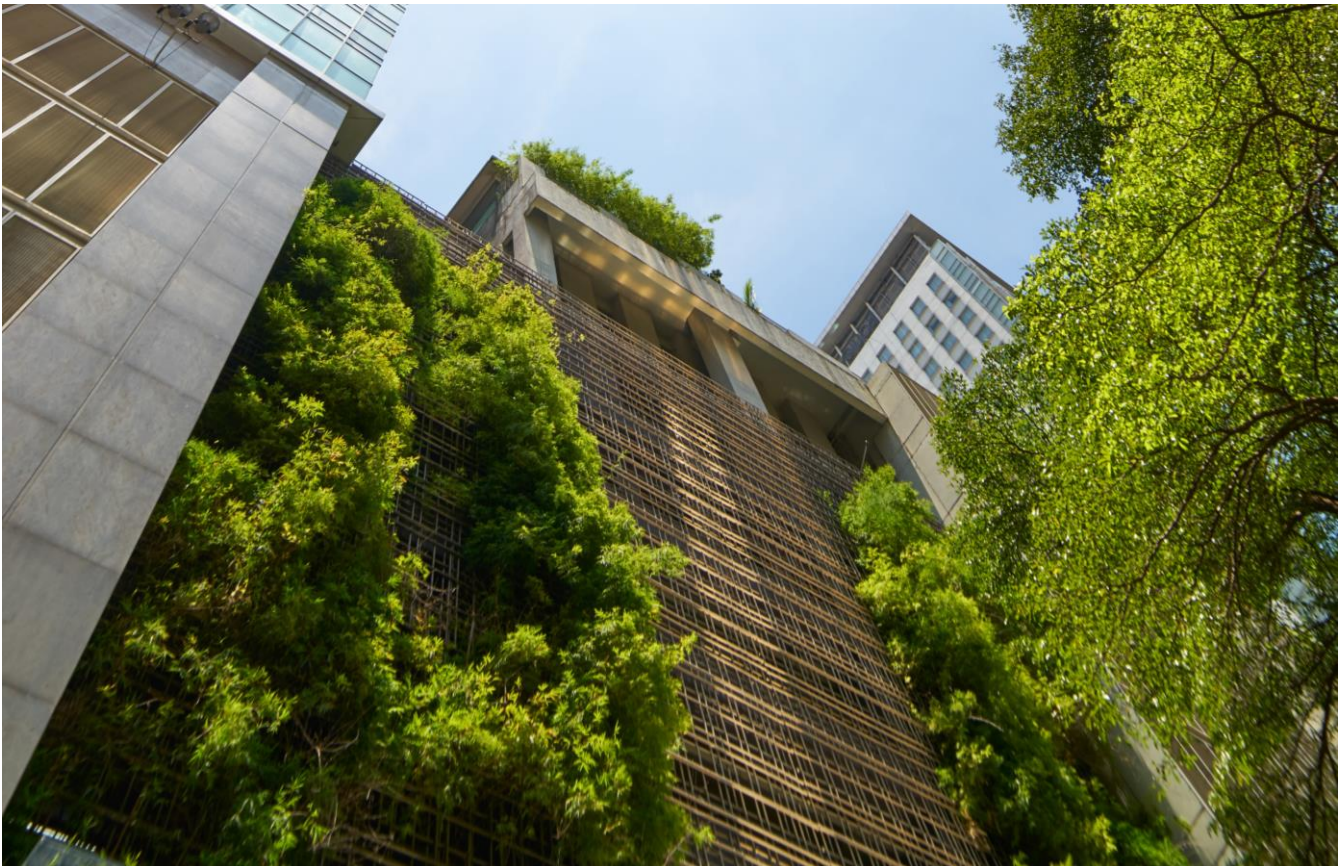
I should ask him if he had informed Human Resources. Failing this, I remind him that carrying out a paid activity outside the company requires first verifying its compatibility with the interests of Renault Group and verifying compliance with working hours. I also ask him for information on the content of his intervention to ensure that he complies with Renault Group rules relating to the management of information.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer any questions you may have.

Communicating in advance with your manager encourages good behavior. The « Ethics within Renault Group » training raises awareness among stakeholders of these risky situations.



# 03

## Our Ethics as a company



# 03 Our Ethics as a company

## BUSINESS ETHICS AND FIGHT AGAINST CORRUPTION

Ethics are the foundation of our activities. We are committed to acting in a fair, loyal and transparent manner.

We are committed to acting in a fair, loyal and transparent manner.

Integrity, at the heart of relationships with our stakeholders (customers, suppliers, subcontractors, service providers, shareholders, public authorities, non-governmental organisations...), guides the behavior of each and every one. It inspires respect, honesty, trust and guides the behavior of each person in any professional relationship.

With this mind, Renault Group is committed to:

- ▶ Anchor ethical values, on a daily basis, in all its activities.
- ▶ Prevent and detect ethical breaches of ethics and integrity and remedy them.

Wherever Renault Group is present, we conduct our operations and establish commercial relationships in compliance with the laws and regulations applicable to us as well as the rules defined by the company. This concerns in particular the rules relating to the fight against corruption and other forms of integrity violations, competition law, intellectual property, the protection of personal data, export control, and the fight against tax evasion, the fight against industrial espionage...

### Prevention and detection of corruption and influence peddling

Renault Group undertakes to:

- ▶ Comply with French law, known as « Sapin II », relating to transparency, the fight against corruption and the modernization of economic life, as well as other anti-corruption laws and regulations applicable to it.
- ▶ Comply with the Renault Group Anti-corruption Code of Conduct.

As such, Renault Group employees likely to find themselves confronted with situations in which their interests are in contradiction with the interests of Renault Group must declare this to their superiors.

Furthermore, employees must not accept or offer, directly or indirectly, donations, promises or benefits for their own benefit or that of third parties.



The prevention and detection of corruption and influence peddling are conducted according to an Anti-corruption Management System which was **certified ISO 37001** on October 15, 2024, for a period of three years.

ISO 37001 is an international reference standard for anti-corruption management systems. It provides international recognition which demonstrates the company's determination to implement best practices in preventing and combating corruption at all levels of the organization..

[www.eurocompliance.com](http://www.eurocompliance.com)

### Compliance with competition law

Renault Group promotes free and undistorted competition and is committed to complying with competition law by combating anti-competitive practices.

In particular, Renault Group is committed, through an Antitrust Policy, dedicated training and a compliance program led by the Legal Department, to:

- ▶ Promote among all its employees a culture of competition based on merits, innovation and in compliance with the rules of competition law.
- ▶ Prevent the implementation of behavior contrary to competition law (in particular anti-competitive agreements, abuse of dominant position, failure to notify under merger control, obstruction of the investigative powers of the competition authorities).
- ▶ Monitor the correct knowledge and application by all employees of the rules resulting from the Renault Group's Antitrust Policy.

### International economic sanctions

Renault Group complies with international trade rules and international sanctions that apply to it. Renault Group is particularly attentive to the integrity of the entities with which it contracts.

### RELATIONS WITH CONSUMERS

Customer trust in our activities and products is crucial for Renault Group. It contributes to its sustainability.

With this in mind, Renault Group is committed to:

- ▶ Complying with current consumer protection legislation.
- ▶ Complying with the rules, processes and technical and environmental requirements that apply to the products and services delivered.
- ▶ Making the safety of each customer a priority.
- ▶ Only providing customers with verified information regarding the offer and characteristics of the products and services offered.



RELATIONS WITH SHAREHOLDERS

Transparency of financial and extra-financial communication

In application of the main principles of market communication, Renault Group is required to publish sincere, precise and accurate information to its shareholders, whether this information is of an accounting, operational, financial or extra-financial nature.

The General Management and the Board of Directors ensure the quality of the information communicated to the market, in compliance with the accounting, financial and stock market standards and regulations, as well as equal access to the information published.

Each Renault Group employee must ensure the accuracy and precision of the information they transmit and feel responsible for the information communicated externally.

Compliance with « market abuse » regulations

As Renault shares are listed on the stock exchange, the Group and all its employees must comply with the specific rules applicable to listed companies, in particular those relating to the prevention of « market abuse ».

Thus, Renault Group has adopted a **Code of Stock Market Ethics** which sets out the rules applicable in particular with regard to the management of « Privileged Information » or « Confidential Information », the prevention of market abuse and supervision of operations on Renault’s financial instruments. The Code also sets out the administrative and/or criminal sanctions attached to non-compliance with these rules.

Each employee must familiarize themselves with the rules provided for in the Code of Stock Market Ethics and respect the obligations of absolute confidentiality and the restrictions on intervention in Renault securities which are imposed on them once they have received notification to this effect from the Renault Group Legal Department.

Focus on four principles from the Stock Market Code of Ethics

- ▶ Do not disclose to another person (including internally) any « Privileged Information » or « Confidential Information » that you hold.
- ▶ Do not carry out transactions in Renault securities on the basis of Inside Information or Confidential Information.
- ▶ Comply with periods prohibiting transactions in Renault securities (« Negative Windows »).
- ▶ Carry out the formalities required by regulations and recalled in the notifications sent by the Legal Department.



**PRACTICAL CASE**  
regarding the prevention of market abuse

Renault Group’s financial results will be communicated to the press, financial analysts and investors in 15 days. My colleague who works on the subject informed me of the financial situation of the Group and the current projects.

**What can I do?**

I must speak to my manager and notify the « Governance – Corporate Law and Financial Law ». I cannot transmit this information to any other person, internal or external to the company, until this information has been made public by Renault Group.

**GOING FURTHER:**



The Legal Department is available for any questions you may have.



The Stock Market Code is on line on our Ethics and Compliance intranet site and on [renault.com](http://renault.com) / [Commitments](#) / [Ethics](#) section.

The Stock Market Code of Ethics specifies the behaviors to be adopted by employees who participate in the preparation of the Group’s financial accounting information, particularly during the periods of « Negative Windows » which precede the publication of this information.

It is therefore essential to list all people with access to sensitive information to ensure that they receive all the prior notifications provided for by the Renault Group’s market abuse prevention systems

### RELATIONS WITH SUPPLIERS

The implementation of fair and loyal relations represents a guarantee of trust between Renault Group and its suppliers. A responsible purchasing policy is implemented within the Renault Group. It integrates compliance with social and environmental requirements when choosing suppliers.

To this end, Renault Group has taken the following steps:

- ▶ Developed, with business partners, a relationship of trust based on respect and transparency.
- ▶ Treated suppliers fairly by respecting tendering procedures and relying on documents establishing the principles of responsible contractual relations (corporate social responsibility expectations in terms of safety, quality, human and labour rights, environment, compliance...).
- ▶ Strengthened the identification and prevention of CSR (Corporate Social Responsibility) risks in the supply chain, by regularly assessing the situation of suppliers.

- ▶ Ensured that Renault Group suppliers undertake to implement in their own companies the fundamental social rights mentioned in the global framework agreement on social, societal and environmental responsibility.
- ▶ Ensured that suppliers undertake to comply with Renault Group's guidelines for "Supplier Social and Environmental Responsibility".

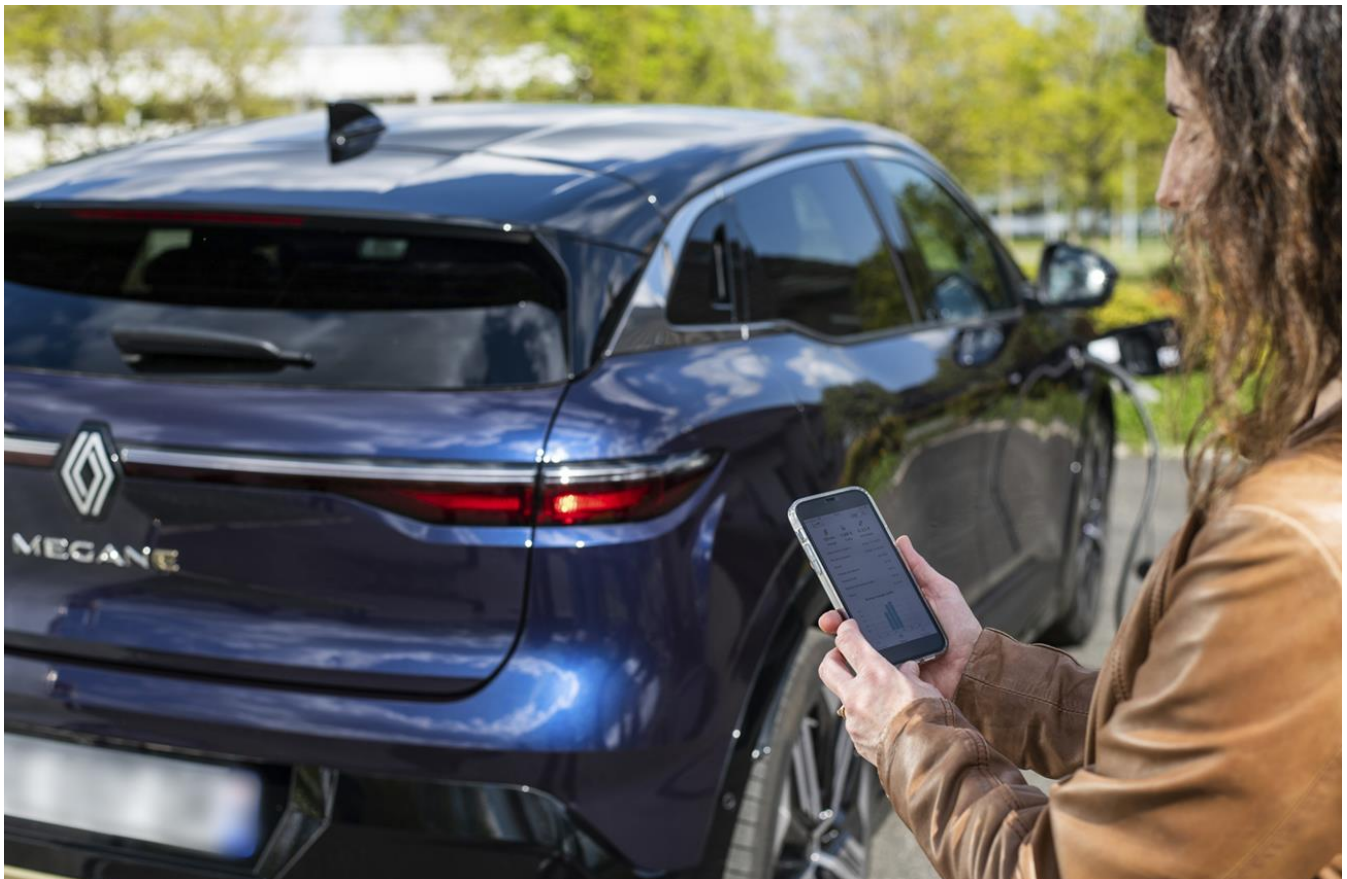
#### GOING FURTHER:



The Renault Group Procurement Department and the Ethics and Compliance Department are available to answer any questions you may have



The Renault Group Procurement Code (Purchasing) is on line on our Ethics and Compliance intranet site and on [reault.com](http://reault.com) / Commitments / Ethics section.



### CONFIDENTIALITY POLICY

#### Control of information

Ethics is also the application of good behaviour for each employee and the respect of the internal rules of the company. In particular:

- ▶ The Information Management Policy which explains how to protect the information identified by its owner (material information such as parts or prototypes, or immaterial information i.e. all the company's documents and data), with regard to the risks incurred, such as those linked to disclosure.
- ▶ The protection of the personal data.
- ▶ The Code for the use of Renault's IT Resources and Digital Tools, which explains how to use the Renault Group's IT resources and sets out the rules of use and the rights and duties of the company and users (employees, trainees, apprentices, service providers etc.).

All holders of such information must therefore ensure:

- ▶ That they are protected in accordance with the rules set out.
- ▶ Is not to be communicated to persons or entities not entitled to know about it, either inside or outside the company.
- ▶ They do not to falsify or modify it in order to harm or hide unethical or illegal acts.

The same applies to temporary workers, interns and apprentices, and to any person required to execute a service contract for Renault Group.

Furthermore, the use for personal purposes of inside information of an accounting or financial nature concerning the group is unethical and constitutes insider trading.

#### GOING FURTHER:



The Information Protection and Control Department and the Ethics and Compliance Department are available to answer any questions you may have.



#### PRACTICAL CASE

I realize that one of my colleagues has just published, by mistake, a document classified as confidential in an internal sharepoint and visible to all Renault Group employees.

#### What can I do?

I must alert the author of the document of the leak, asking him to delete this document. I must also inform the PMI Pilot (Protection and Information Control) of my Department (available on the intranet site of the Department of Prevention and Protection - D2P) and the legal representative and check with her/him the level of confidentiality indicated on the document. I can also alert the D2P, as well as the Privacy Ambassador of my Department (available on the DataPrivacy intranet site), if the documents contain personal data.

All Renault Group employees must be aware of and apply the PMI rules, available on the Information Management Policy intranet site.



### PROTECTION OF PERSONAL DATA

Renault Group undertakes to:

- ▶ Comply with laws and regulations regarding the protection of personal data of customers and/or prospects and ensure that they are processed securely and in compliance with regulations.
- ▶ Establish an organisation with processes and tools to protect the personal data of its employees and customers/users, shareholders and suppliers.
- ▶ Raise awareness among all employees on the protection of personal data.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer any questions you may have.



#### PRACTICAL CASE

A software publisher, with whom we are developing a business application, asks me to provide them with the list of future users.

##### What can I do?

This publisher asks me to transmit personal data. This data is protected and I must first check whether or not I can transmit it and under what conditions. I therefore contact the Privacy Ambassador of my Department who will help me make the right decision. If in doubt, they will ask for a second opinion from the Data Privacy Officer of the company in which I work. Depending on their answers, I will know whether or not I can transmit the data to the publisher or not (and how).

During IT projects, procedures make it possible to control the transmission of personal data. They must be applied. The organization is described on the DataPrivacy intranet site.



### RENAULT GROUP'S HERITAGE AND IMAGE

Protecting and preserving the tangible (buildings, service vehicles, furniture, historic vehicles, Renault art Collection...) and intangible (patents, brands, digital data) heritage of Renault Group is a guarantee of its prosperity. Employees have a duty to contribute by ensuring protection against denigration, damage, theft, misappropriation and any other action, including via social networks, which could harm the company. Employees must not, moreover, use these assets for personal purposes.

Finally, it is the responsibility of each and every person to report to their superior any action or comment that could damage the reputation of Renault Group.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer any questions you may have.



The social network guide is on line on Declic (the intranet site).



#### PRACTICAL CASE

You read on your favorite external social network an excessively harsh post against the quality of the Group's range. You realize that this post is made by a Renault Group employee and that it clearly damages the company's image.

##### What can I do?

I must inform the D2P (Prevention and Protection Department) and the Communications Department who will deem it necessary to respond or not to the post. The D2P or the Communications Department will inform the managerial line.

The social media guide should be known. It specifies: « We exercise our freedom of expression, in a loyal and responsible manner: the principle of loyalty also applies on social networks: do not blame a colleague or harm your employer".

Furthermore, as a collaborator and ambassador of the brand, I must observe a duty of reserve and confidentiality in order to protect Renault Group, its employees and its customers. I must also respect the copyright and intellectual property of the company. Under no circumstances should I publish internal documents without having ensured that it is possible to do so with my superiors.

# 04 Our Ethics as a corporate citizen



# 04 Our Ethics as a corporate citizen

## HUMAN RIGHTS

In 2004, Renault Group published a "declaration of fundamental social rights". Since then, two global framework agreements in 2013 and 2019 have reinforced these commitments, notably in terms of:

- ▶ The effective abolition of child labour for minors below the legal minimum working age in each country or region, and in any case for all minors under the age of 15.
- ▶ The elimination of all forms of forced or compulsory labour.
- ▶ Prevention of discrimination and elimination of discrimination in employment and occupation.

These principles are set out in various conventions of the International Labor Organization.

Furthermore, since 2000 Renault Group has been committed to the OECD guiding principles for multinational companies and, since 2001, has adhered to the universal principles, more particularly linked to human rights, which constitute the Global Compact adopted at the initiative of the United Nations (Global Compact).

Renault Group is also strengthening its commitments on:

- ▶ The prohibition of manifestation of any form of at work, sexual or moral harassment or discrimination.
- ▶ Freedom of association and protection of the right to organize, the right to organize and collective bargaining, of worker representatives in order to prevent any form of discrimination due to union involvement.
- ▶ Equal pay for work of equal value.
- ▶ Respect for working hours, the right to paid leave, the right to maternity, the right to disconnect.

Renault Group also includes these commitments based on their selection criteria in the contractual documentation linking it to its suppliers. Renault Group also reserves the right to ask its suppliers to have the conformity of commitments assessed by a third party, a certified and internationally recognized organization.

Finally, Renault Group is committed to respecting the fundamental rights of indigenous peoples and local communities, as defined in the 2007 United Nations Declaration on the Rights of Indigenous Peoples.



### PRACTICAL CASE

As part of my duties, I am in contact with a raw materials supplier and the conclusions of a recent audit show that minors under the age of 15 work on its behalf contrary to the Renault Group policy which it is committed to respecting.

#### What can I do?

I immediately alert my manager and the buyer in charge of this service. A supplier who does not respect its commitments in this area must remedy it without delay. In the absence of satisfactory remediation, other measures may be taken into account up to and including termination.

Suppliers must be reminded that global framework agreements in 2013 reinforce the commitments made by Renault Group regarding the effective abolition of work for minors under the age of 15. Renault Group also makes these commitments a selection criterion for its suppliers. Renault Group suppliers must formally undertake not to employ minors under the age of 15.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer any questions you may have.

**JOB ASSIGNMENTS**

Wherever it is located, Renault Group contributes to revitalizing the employment area, in collaboration with local public authorities. In the event of a significant impact on employment, revitalization plans are implemented to develop employment.

Since 2019, employees who wish to get involved with solidarity associations and companies have had specific arrangements, in compliance with local legislation, the time devoted to these activities can be considered as working time.

Renault Group thus encourages its suppliers to develop activities that have a positive impact on the local communities in the territories where it operates.

**GOING FURTHER:**



The Ethics and Compliance Department is available to answer any questions you may have.



### FOUNDATION

The Renault Group Foundation, created in 2001, is aligned with the company's purpose: it is actively committed to solidarity and integration through employment for the most needy. It collaborates with the 6 other Group's foundations (Argentina, Brazil, Colombia, Morocco, Spain and Romania) which support sponsorship actions throughout the world.

The Renault Group Foundation's projects aim to bring people closer to what is essential to their lives and their projects, by articulating its actions around 3 pillars:

- ▶ **Safety:** the Renault Group Foundations contributes to prevention, road education and research into safety innovations.
- ▶ **Support:** the Renault Group Foundation supports access to inclusive mobility, driving licences and transport for those who need it most.
- ▶ **Relief:** the Renault Group Foundation intervenes alongside NGOs to meet the basic needs of local populations during emergency situations in the countries where the Group operates.

Furthermore, the Renault Group Foundation offers Renault Group employees who so wish the opportunity to get involved alongside it to support associations via:

- ▶ solidarity team-building actions,
- ▶ volunteering or mentoring,
- ▶ or even participating in the Patronage Committee which validates associative projects, directly linked to the Group's patronage strategy and supported by employees.



### PRACTICAL CASE

A friend of mine who works for a non-profit sports association informs me that they has made a verbal commitment to ensure that Renault Group support the cause through sponsorship support.

#### What can I do?

I should inform them that they must submit first the request to the Art, Heritage & Patronage Department which is in charge of the analysis and follow-up.

The decision to carry out Sponsoship actions is taken into account according to the strategic axes defined by Renault Group, after analysis of the third party, in accordance with the Third Party Integrity Management (TIM) process. This process aims to secure the sponsorship operations carried out by Renault Group and to preserve its reputation and its image.

### GOING FURTHER:



The Art, Heritage & Patrimoine Department and the Ethics and Compliance Department are available to answer any questions you may have.



**ENVIRONMENT**

Reducing the environmental footprint throughout the value chain, through innovative solutions and mobility, is part of the Renault Group's environmental policy. This is part of the "Renalution" strategic plan launched in January 2021.

Reducing the negative impacts of Renault Group's activities on the environment is therefore essential.

To this end, Renault Group is committed to:

- ▶ Training the relevant employees in the factory and in engineering whose function is related to the environment.
- ▶ Training the environment manager and internal auditors on each site in fundamental environmental rules.
- ▶ Implementing an action plan going from upstream to downstream of the supply chain – from supply to the end of vehicle life – with the objective of reducing the environmental footprint: climate, resources, ecosystem, biodiversity and health.
- ▶ Setting targets for reducing this environmental footprint. For the climate: achieve carbon neutrality by 2040 in Europe and 2050 worldwide.

**GOING FURTHER:**



The Environment Department is available to answer any questions you may have.



**PRACTICAL CASE**



I am a manager and one of my colleagues does not respect the instructions given on waste sorting.

**What can I do?**

I remind you of the instructions by making them aware of the importance of sorting waste, it being noted that non-compliance with the instructions can result in disciplinary action.

In the factory, all employees must receive job training including the related environmental aspects and the actions to be followed for sorting waste.



**MOBILITY**

To encourage the ecological transition and help achieve carbon neutrality objectives, Renault Group is committed to developing new shared mobility services.

**GOING FURTHER:**



Mobilize Beyond Automotive Operations Department is available to answer any questions you may have.

# 05

## Non-compliance with the Code of Ethics

# 05

## Non-compliance with the Code of Ethics

Each time you think you are confronted, as an actor, witness or victim, with a past or future situation which could be non-compliant with Renault Group's ethical principles, ask yourself the following questions:

Is it honest?

What would my colleagues think?  
My loved ones?

What if this was picked up by  
the media and social networks?



By asking yourself these questions, if the situation does not seem to you to comply with the principles of the Code of Ethics, consult your manager or the Ethics and Compliance country officer or referent in your area or the Ethics and Compliance Department at the address:

[contact-ethique-compliance@renault.com](mailto:contact-ethique-compliance@renault.com)

The situation you are faced with may also justify issuing a report, in complete confidentiality (see page 31).

## IN WHICH CASES SHOULD A WHISTLEBLOWING ALERT BE ISSUED?

You are a victim, witness or informed of a potential violation of one of the principles of the Code of Ethics, particularly relating to the following elements:

- ▶ Moral or sexual harassment, discrimination
- ▶ Corruption, theft, swindled
- ▶ Anti-competitive practices, money laundering
- ▶ Breaches of personal data protection

**You can issue a Whistleblowing Alert in complete confidentiality**

### Via the WhistleB application(\*) accessible from:

- ▶ The Renault Group Ethics and Compliance site / Whistleblowing section  
<https://grouperenault.sharepoint.com/sites/EthiqueetCompliance>
- ▶ The Renault Group website  
[www.renault.com](http://www.renault.com) / Commitments / Ethics section  
[WhistleB, Whistleblowing Centre](#)
- ▶ The QR Code below



### Or through other internal Renault Group channels:

- ▶ The hierarchy
- ▶ The Human Resources
- ▶ The staff representatives
- ▶ The Ethics and Compliance Department
- ▶ The Deputy Direction of the Whistleblowing Alert (for Renault sas) or the countries and subsidiaries officers

**An analysis of each situation will make it possible to say whether the Alert is admissible or not. You will be informed, in complete confidentiality, of the action taken.**

(\*) WhistleB is available in 14 languages. It allows reports to be sent in complete confidentiality 24 hours a day, 7 days a week: to the Deputy Direction of the Whistleblowing Alert (in France) or the Ethics and Compliance country officers in the subsidiaries and countries. Find information concerning the Ethics and Compliance country officers in section 6 below « Useful links ».

### The Whistleblowing Alert system is available to the following natural people:

- ▶ Employees, former employees, external and occasional employees (temporary, intern, apprentice).
- ▶ Candidates excluded from recruitment.
- ▶ Shareholders, partners and holders of voting rights of Renault Group.
- ▶ Members of the administrative, management or supervisory body of one of the Renault Group entities.
- ▶ Co-contractors (dealers or suppliers / service provider) or its subcontractors as well as their staff members.

### CONDITIONS FOR THE ACQUISITION OF THE WHISTLEBLOWER STATUS

To qualify for whistleblower status, several criteria must be met :

1. be a natural person;
2. reporting or disclosing facts that have occurred or are very likely to occur, contrary to the law, the Code of Ethics, the Anti-Corruption Code of Conduct or the procedures and rules relating to ethics and compliance;
3. act without direct financial compensation;
4. be in good faith;
5. obtain the information in the course of their professional activities. If the information was not obtained in the course of professional activities, the person issuing the alert must have had personal knowledge of it.

For more details, you can refer to the Whistleblowing management procedure available on the Ethics and Compliance intranet site.

### DISCIPLINARY SANCTIONS

It is important to note that non-compliance with this Code of Ethics may incur civil and criminal liability and may be subject to disciplinary action.

### PROTECTION FOR THE WHISTLEBLOWER

Renault Group guarantees strict confidentiality of the identity of the whistleblower, the person targeted, any third party mentioned in the report, witnesses, and the facts subject to the report.

Reports are treated confidentially subject to applicable legal obligations and any administrative or legal proceedings.

No disciplinary or discriminatory measures may be taken against employees who have made a report, or witnesses in good faith, even if the facts are not proven, provided that these employees have acted according to the criteria previously stated.

However, misuse of this device may result in disciplinary sanctions or even legal sanction.

# 06 Useful links



# 06 Useful links

## ETHICS AND COMPLIANCE DEPARTMENT

For any information on the Code of Ethics, you can contact the Renault Group Ethics and Compliance Department at the following address:

[contact-ethique-compliance@renault.com](mailto:contact-ethique-compliance@renault.com)

## ETHICS AND COMPLIANCE NETWORK

In order to improve the effectiveness and impact of actions initiated by the Renault Group Ethics and Compliance Department, an Ethics and Compliance network made up of country officers and Ethics and Compliance function representatives, works in the countries, subsidiaries, global functions and brands.

Thus, as a Renault Group employee, if you would like an advice regarding a situation which you believe does not comply with the principles of the Code of Ethics, you can contact the Ethics and Compliance department who will inform you and send you the contact details of the Ethics and Compliance representative or correspondent for your entity or country.

## ETHICS AND COMPLIANCE WEBSITE AND INTRANET

Informations concerning Ethics and Compliance, the Ethical standards and the Whistleblowing Alert system can be consulted by the public on the Renault Group website at [www.renaultgroup.com](http://www.renaultgroup.com) « Commitments / Ethics » sections.

In addition, an intranet dedicated to Ethics and Compliance is made available to employees: <https://grouperenault.sharepoint.com/sites/EthiqueetCompliance>



No modification or update of this Code of Ethics can be made without the agreement of the Ethics and Compliance Department.



