



# **ANTI-CORRUPTION CODE OF CONDUCT**



# “Zero tolerance”

This is the non-negotiable motto that applies to all Renault Group’s employees when dealing with the subject of corruption.

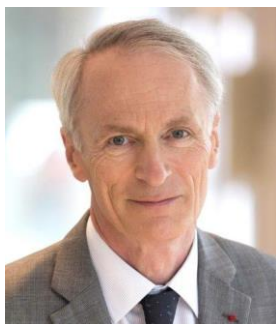
As part of the United Nations Global Compact, which calls on companies to "act against corruption in all its forms", our group must naturally prevent and detect any attempt at bribery and influence peddling in its relations with its various stakeholders.

But given our history, the symbolic strength of our image and our high visibility, our duty to set an example is even more compelling.

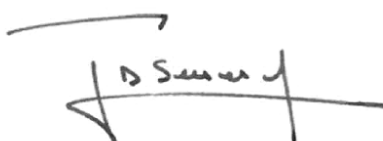
The notion of responsible progress is at the heart of our purpose. Discernment, a sense of responsibility and ethics are the obligations of each and every one of us. We must also be aware of the particularly high economic, social and reputational costs of any breach of integrity.

Renault Group has published an ethics charter, which will be revised in the next six months. Cornerstone of our ethics and compliance policy, it is completed by this highly illustrated anticorruption code of conduct, which has been updated to inspire everyone's behavior in an obsessive quest for integrity.

We are counting on you to set an example, which is key for the Renault Group's quest for sustainable and responsible performance.



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

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**Luca DE MEO**  
Chief executive officer

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# 01

## Why an anti-corruption code of conduct?



# 01 Why an anti-corruption code of conduct ?

**The strength of the Renault Group lies above all in the day-to-day commitment of all its employees, in all their activities, to promoting shared values that help to preserve the bonds of trust, transparency and responsibility that are essential to ensure the Group's long-term survival.**

This culture of integrity, also affirmed by the Code of ethics and our corporate purpose, is an integral part of the Group's DNA. It transforms a company into a human adventure in the service of sustainable ambitions.

Renault Group intends to actively fight against all forms of corruption in its relations with its various stakeholders. To this end, it has signed the United Nations Global Compact.

Corruption and influence peddling are violations of honesty that have an extremely high economic and social impact. According to an estimate used by the International Monetary Fund, the annual cost of bribe-like acts alone is approximately 1,500 to 2,000 billion dollars (about 2% of the world's GDP).

At the European level, the annual cost of corruption could amount to 990 billion euros, or 6.3% of European GDP, according to a study by the European Parliament.

Corruption and influence peddling can therefore have extremely serious consequences for the functioning and development of the Group.

Everyone has a duty to promote this culture of integrity, which is a guarantee of the Group's sustainable performance.

## ► What are the Renault Group's obligations in the fight against corruption and influence peddling?

All companies controlled by the Renault Group, in France and abroad, must comply with the French law on transparency, the fight against corruption and the modernization of economic life (known as "Sapin 2"), as well as other anti-corruption laws and regulations applicable to them.

The Sapin 2 law requires the implementation of a plan to prevent and detect corruption and influence peddling structured around the following eight measures:

- An anti-corruption code of conduct

- A whistleblowing system
- A corruption risk map
- Procedures for evaluating third parties, clients and suppliers
- Accounting control procedures
- A training and awareness program
- A specific disciplinary system
- Monitoring and evaluation of the implementation of the program

## ► What are the risks for the company and its employees?

### FOR RENAULT GROUP

For the company, significant fines accompanied by publicity measures, bans on bidding for public contracts in France or abroad, the impossibility of going public and significant consequences on its reputation, its activity and its financial situation (e.g. loss of stock market value, loss of customers and partners, etc.).

### FOR MANAGERS AND EMPLOYEES

For managers and employees, in addition to disciplinary sanctions for non-compliance with this code, a sentence of several years' imprisonment in addition to a substantial fine, confiscation of assets and possible deprivation of civic rights may be imposed on them.

Any act of corruption or influence peddling committed by an employee may under no circumstances be considered to have been committed in the interest of and/or on behalf of one of Renault Group's companies.

## FOREIGN LEGISLATIONS

In addition, certain acts of corruption or trading in influence may also be punishable under foreign laws with extraterritorial scope.

This means that an act of corruption or influence peddling committed by a Renault Group executive or employee, wherever he or she may be, could constitute an offence under foreign laws, such as the UK Bribery Act or the US Foreign Corrupt Practices Act. He or she could thus be liable under French and foreign law.

### ▶ What is the purpose of this code?

This code of conduct lists Renault Group's commitments in the fight against corruption and contributes to the dissemination of its ethical culture. As such:

- it illustrates what corruption is, what is at stake, its forms and its risks;
- it presents examples of situations in which corruption may arise and the most common warning signs so that it can be identified;
- it sets out the behaviors to adopt and the procedures to follow in order to prevent it as well as possible and to remedy it if it occurs;
- it directs employees to detailed procedures and specific functions that can help them in case of doubt.

This reference guide cannot be exhaustive, given the diversity and multiplicity of situations that may be encountered in the field. It is, however, a practical tool that can be used to make the most appropriate decision in the circumstances.

In the event of difficulty in interpreting this document, all employees are invited to discuss the matter with their colleagues, their line manager, the local legal advisor and, in the first place, the ethics and compliance officer for their function or country.

### ▶ Compliance with this code

This code of conduct applies to all persons with an employment contract with Renault Group, regardless of their hierarchical level, geographical location or the entity to which they belong.

### ▶ Local anti-corruption legislations

This code of conduct cannot take into account all the requirements of local legislation, which only apply when they are more restrictive than the rules imposed by Renault Group.

If necessary, employees may contact their local ethics officer to discuss the scope and consequences of these local specificities.





# 02

## Forms of corruption

# 02 Forms of corruption

The prevention and detection of corruption requires, among other things, knowledge of the main offences that give rise to this risk.

## ► What is the crime of corruption?

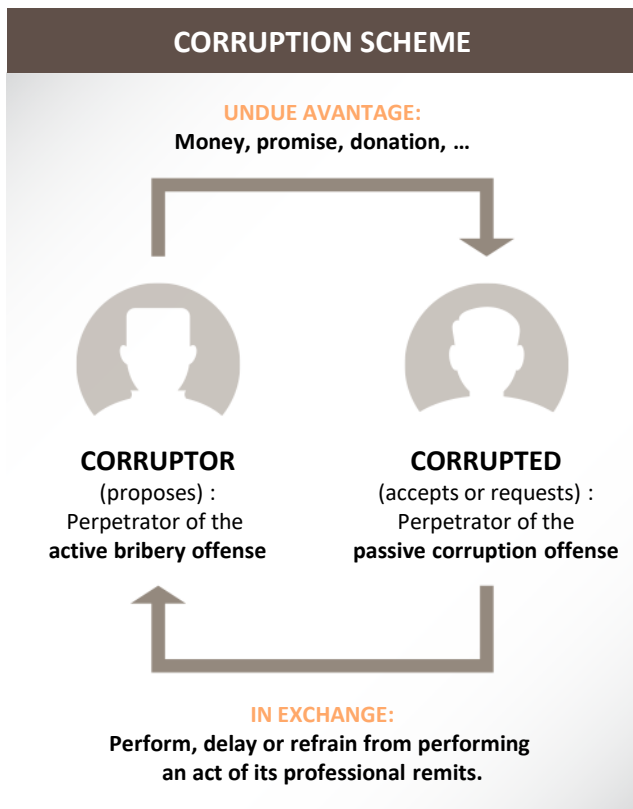
The offence of corruption is only one aspect of breaches of probity. It can take many forms, such as influence peddling, which will be presented in a second step.

### CORRUPTION CAN BE PASSIVE OR ACTIVE

Corruption is passive when a person takes advantage of his or her position by soliciting and/or accepting, directly or indirectly, gifts, promises or advantages of any kind, for his or her own benefit or that of a third party, with a view to performing or refraining from performing an act of his or her activity or function. This person is qualified as corrupt.

Example: A member of staff invites a member of parliament to the final of a prestigious sporting event to convince him to introduce a legislative amendment favourable to the Group.

Example : An official demands a sum of money from an employee in exchange for the approval of vehicles.



Bribery is active when a person offers and/or gives, directly or indirectly, gifts, promises or advantages of any kind, for his or her own benefit or that of a third party, to a person so that he or she performs or refrains from performing an act of his or her function. This person is called a briber.

### CORRUPTION CAN BE PRIVATE OR PUBLIC

Corruption is said to be "public" when the bribe taker is a public official, i.e:

- any person in a position of public authority (civil servant or local or regional authority);
- any person entrusted with a public service mission (in particular a person employed by a public institution or by an association mainly financed by public funds);
- any person holding an elected office locally (mayor, parliamentarian, etc.);
- any person employed by an international public organization;
- any company in which a State or a public entity holds shares or a participation.

It could also be considered an act of bribery of a public official, under certain circumstances, to give an advantage to persons acting on behalf of a public official or to persons close to the public official.

It is qualified as "private" when the bribe taker is not a public official.

### PENALTIES IN FRANCE

The mere fact of making a proposal or a promise is sufficient to be held liable even if it is not followed up.

In France, private bribery is punishable by 5 years imprisonment and a fine of 500,000 euros.

Public corruption is punishable by 10 years imprisonment and a fine of one million euros.

These fines can be increased to twice the amount of the proceeds of the offence.

To find out about the penalties in your country, please contact your local legal advisor.

► **What is the crime of influence peddling?**

Some laws, such as those of France, Brazil and Spain, distinguish the offence of bribery from that of trading in influence. Other laws, such as that of the United States, do not make this distinction.

**LIKE THE CRIME OF CORRUPTION, A DISTINCTION MUST BE MADE BETWEEN ACTIVE AND PASSIVE INFLUENCE PEDDLING**

Influence peddling is passive when a person solicits or accepts an advantage in order to use his or her influence, real or supposed, directly or indirectly, to obtain a decision favorable to the person who granted the advantage.

Example: A minister asks for a job for his daughter in exchange for a decoration for the person who accepts.

Influence peddling is active when one person offers an advantage to another, or has yielded to the latter's solicitations, to use his or her influence, real or supposed, directly or indirectly, to obtain a favorable decision.

Example: A contractor gives money to an official to influence the awarding of a government contract to the contractor's cousin's company.

**DIFFERENCE BETWEEN CORRUPTION AND INFLUENCE PEDDLING**

The essential difference between bribery and influence peddling is the number of people involved in the commission of the offence.

Corruption involves a briber and a bribe-taker. The bribe-taker abuses his power for the benefit of the bribe-taker.

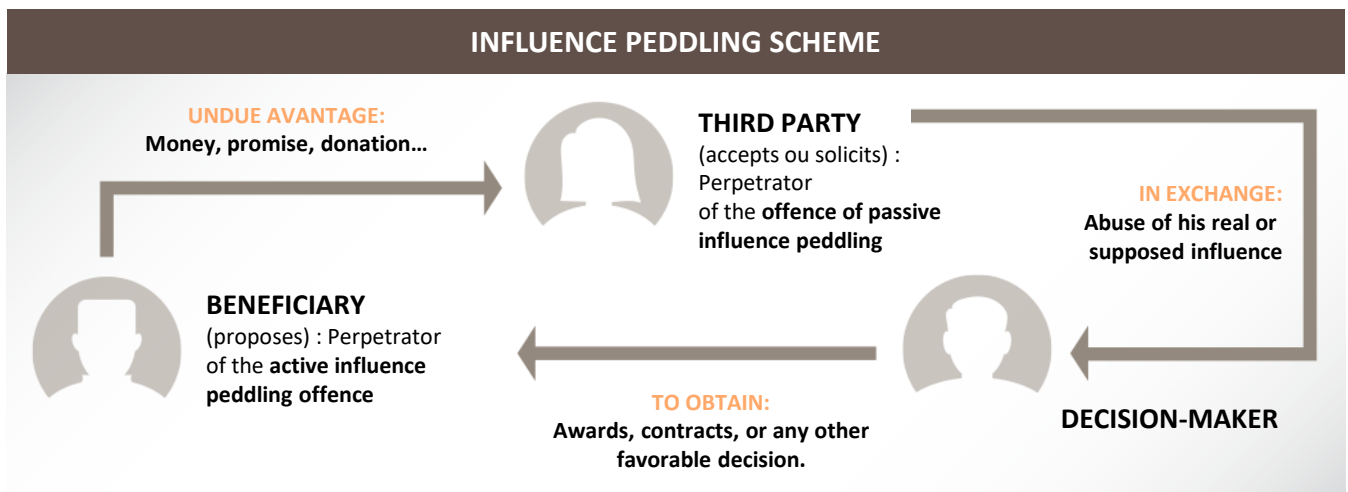
Influence peddling involves a third party who abuses his or her influence with a decision-maker, to the benefit of the beneficiary of the decision.

**PENALTIES IN FRANCE**

Like bribery, the mere act of making a proposal or promise is sufficient to constitute the offense.

In France, the penalties are similar to those prescribed for corruption.

**WARNING:**  
Bribery and influence peddling are strictly prohibited, even if they are carried out for the benefit of the company and without direct or indirect profit for the employee.



# 03

## Alert signals and at-risk situations

# 03 Alert signals and at-risk situations

In this section, we look at the warning signs that should alert us when we encounter them. We then detail the different situations in professional life where corruption can occur.

## ▶ Alert signals

The practices and behaviors described below should be considered abnormal in business life. In the event that you encounter any of the following, you should be vigilant and report the situation to your supervisor without delay:

**Any lack of transparency and traceability** in transactions, expenses and statements of operations;

**any request to pay costs** in cash and/or insufficiently documented, payments without reference to an invoice or an order;

**any method of payment not provided for contractually or unusual:** request for transfer to a third party or to a third country, request for modification of certain payment methods, etc;

any proposal to use, unnecessarily or without explanation, **intermediaries**;

**any proposal of an advantage and/or request** for a gift in cash or in kind for the performance of a service;

any business partner who provides **false invoices or other false documents**;

any employee of a company or public official **who gives the impression** of acting alone, outside the structure or organization to which he belongs;

any request for **commissions / fees / provisions of a high amount** compared to the market practices, without objective reason;

any **refusal to certify** in writing that he/she complies with the anti-corruption legal provisions;

any request for **employment** (outside of the company's formal recruitment process) **for a friend or family member**;

any request to make a donation to a **charitable organization** in exchange for a benefit;

any **negative information relating to the reputation** of the person or company with whom the business relationship is established (incriminating article in the local press, previous conviction for offences against probity, etc.).

## ▶ Situations likely to encourage acts of corruption

While the risk of corruption can occur at any time in one's professional life, there are circumstances in which it is more likely to occur.

In the context of Renault Group's activities in France and abroad, these situations have been identified using the corruption risk map.

There are ten of them :

- Conflicts of interest
- offer and acceptance of gifts and invitations
- facilitation payments
- vehicle loans
- sponsorship
- patronage operations
- representation of interests actions
- commercial relations
- accounting entries
- mergers and acquisitions

These situations are described below in detail, along with practical advice to help you protect yourself and your company from the risks of corruption and influence peddling.

The occurrence of these situations may depend on a number of factors, such as geographic location and the nature of the business relationship.



# 1 Conflicts of interest

**In order to protect ourselves and the image of Renault Group towards its stakeholders, we should avoid situations in which our private interests could be in conflict with the company ones.**

Recognizing a conflict of interest situation is not necessarily easy. A good way to do so is to ask yourself:

- Do I have a privileged (family, friendship or business) relationship with a business partner with whom I am holding talks or negotiations?
- Could this situation affect my judgment, or appear to affect the decisions I make on behalf of the company?
- Do I feel like I owe of any kind of consideration, either current or future, to this business partner as a result of this relationship or the contemplated transaction with them?
- If I had to explain this situation to a colleague, a line manager or in case of a control, would I be at ease during the explanation?

Being in a conflict of interest situation is not illegal and could happen at any time of our professional life. However, even if it is potential, this situation could hinder our ability to act professionally

It is therefore mandatory to declare this conflict of interest, even if it is potential, in order to allow for an in-depth analysis and to avoid getting into trouble. This process will lead to a confidential treatment of the situation with the line manager and Human Resources.



## EXAMPLE OF RISKY SITUATION:

A supplier delivers spare parts to a Renault Group factory. They are inspected by an employee who happens to be the supplier's cousin. The employee finds that some of the parts are defective.

The supplier explains that he had a production problem but that it will not happen again. He is tempted to accept the delivery to please his cousin.

Even if the collaborator holds family ties with the supplier, he should not accept these spare parts as it would engage his responsibility.

## GOING FURTHER:



**The Ethics and Compliance Department is at your disposal for any questions on the conflict of interest subject.**



**Conflict of interest management procedure**



## 2 Gifts and invitations

**We may occasionally offer or receive invitations or gifts to foster good business relationships.**

However, such courtesies or tokens of sympathy could constitute or be considered a vehicle for corruption if they do not comply with the rules and principles defined by Renault Group and with the law.

A gift is any means of payment, gratuity, advantage, present or service offered or received, for example the payment of business travel expenses, the provision of services or work free of charge and the loan of premises.

Invitations are any form of event, entertainment (sports or cultural, vacations, ...), travel, accommodation or meals offered or received.

### ► Interdiction

It is prohibited for employees to offer or receive gifts or invitations:

- With the intention of influencing the decision or the behavior of a public or private person, a company or an organization;
- in cash, or a cash equivalent (eg. gift cards or vouchers);
- under the form of a facilitating payment (see. Point 3 – Facilitating payment);
- during sensitive periods (eg. call for public tenders) or to obtain information.

Besides these prohibitions, it is mandatory to observe the following rules depending on whether the person we are dealing with is a public official or a private person:

### ► Public official

All laws condemn the corruption of public officials. In this context any offer intended for them is **prohibited**. Exceptionally, a courtesy gift may be given to them if it meets the following conditions:

1. Be for a symbolic amount (see "Going Further" for a list of authorized amounts by country);
2. respect the applicable legislation;
3. not be made with the aim of influencing the employee or obtaining a consideration;
4. be subject to prior written authorization from the supervisor.



#### EXAMPLE OF RISKY SITUATION:

An employee offers to lend a car to a public official in charge of granting an administrative authorization in exchange for a decision by the administration in favor of Renault Group.

He must not make this offer because it constitutes corruption of a public official.



#### EXAMPLE OF RISKY SITUATION:

During the negotiations on a contract renewal, the employee in charge of the redaction of the specifications is offered tickets to a sport final event by one of the providers.

This proposal should be rejected in any case, especially when it is made in a sensitive period such as the renewal of a contract.

## 2 Gifts and invitations

### ▶ Private person

For persons other than a public agent, the gift or invitation must:

1. Be made in a professional context (eg. not integrate family or friends) and respect the local legislation;
2. Frequency must be occasional;
3. The amount may not exceed a maximum unit value of 60 euros for countries in the euro zone (see "Going Further" for a list of authorized amounts per country).

If the value of the gift or invitation exceeds the above-mentioned amount, then prior written authorization must be obtained from the line manager to ensure traceability.

### ▶ Commercial, promotional or communication event, organized by the Group

For this type of events (eg. agreement for the launch of a new vehicle, inauguration of new facilities, ...), reference should be made to the specific internal regulations issued by the management concerned when launching each operation.

This regulation will have to specify the purpose, the calendar and the content of the event days, the reception and stay modalities of the value of the planned package, the invitation criteria for external and internal, the budget allocated.

#### EXAMPLE OF RISKY SITUATION:

An employee takes over the vacation of a client company's purchasing manager and his family in exchange for the promise of winning a new contract.

He should not make this offer because it is a corrupt practice .

Any employee wishing to be reimbursed for business expenses must ensure that he or she only requests compensation for amounts strictly related to his or her activity.

The "Travel and Reimbursement of Business Expenses" policy, which governs the payment of expenses incurred in connection with travel in France or abroad and/or in the normal course of business, must be followed.

#### EXAMPLE OF RISKY SITUATION:

An employee organizes an event to present his products to selected customers; at the end of the event, each guest leaves with a product catalog and a luxury leather goods item bearing his initials, worth several hundred euros.

The latter must not offer gifts of such a high value, as this practice does not comply with the Group's procedure for managing gifts and invitations.

#### GOING FURTHER:



The Ethics and Compliance Department is available to answer your questions about the management of gifts and invitations.



Gifts and invitations management procedure

Travel and reimbursement of business expenses policy

The list of maximum amounts authorized by country is available on the "Renault Group Ethics" intranet, "Gifts and Invitations" tab



### 3 Facilitation payments

Payments, even if small, undue, unofficial, made to a public official to secure or expedite administrative procedures related to his or her duties (clearance of goods, obtaining a visa, issuing a license, etc.), **are strictly prohibited**.

In order to avoid this kind of situation, it is imperative to follow the administrative procedures to the letter and, whenever possible, to pay the mandatory administrative fees online.

In case of undue solicitation or doubt about the nature of a payment request, you must first ask your line manager or your local ethics and compliance officer.



#### EXAMPLE OF RISKY SITUATION:

An employee asks his usual intermediary to clear spare parts through customs urgently. He answers him that it will take several weeks.

However, the intermediary undertakes to obtain customs clearance within 48 hours in exchange for a doubling of his commission.

He must refuse this proposal as it would constitute a prohibited facilitation payment.

#### GOING FURTHER:



The Ethics and Compliance Department is available for any questions regarding facilitation payments.



# 4

## Vehicles loans

To enhance the reputation or media visibility of models, vehicles belonging to the Group may be loaned free of charge to certain third parties (individuals who are not employees, legal entities under private or public law).

In order to avoid any abuse, any vehicle loan operation must meet certain conditions:

- Be part of a legitimate promotional objective;
- be subject to a prior formal decision in accordance with local procedures;
- be subject to a contract that complies with local standards and procedures;
- be for a fixed term.

Each department concerned will send an annual report on its application to the Ethics and Compliance Department, which is responsible for monitoring the procedure.



### EXAMPLE OF RISKY SITUATION:

An employee wants to lend a new model for a month to the representative of a company that may be purchasing a fleet of vehicles.

The representative has not specified whether he will use the vehicle for personal use or whether it will be used by employees and potential future users for the purpose of testing the model

Make sure that the use of the vehicle is strictly in accordance with the terms of the loan agreement.

### GOING FURTHER:



The Ethics and Compliance Department is available to assist you with any questions regarding vehicle lending.



Procedure for lending vehicles outside the company

## 5 Sponsoring

Sponsoring is a contract by which Renault Group (or one of its brands) seeks to benefit directly from the reputation of a partner (association, charity, etc.), an event (championship, etc.) or an ambassador (well-known sportsman, etc.) with the aim of increasing the visibility and/or appeal of its brands and products.

In exchange, Renault Group undertakes to provide financial or material support to said partners, events or ambassadors.

These partnerships must not be entered into in order to obtain an unjustified advantage in return (personal benefit, consideration not provided for contractually, etc.). This risk is accentuated when the operation involves a public official.

To ensure that these operations respect the ethical values of Renault Group in all the countries where it is present, the selection of partners is governed by precise rules. These are set out in the service memo. They must also be strictly adhered to.



### EXAMPLE OF RISKY SITUATION:

A local official proposes to an employee of the Group to organize an image partnership with his city in exchange for a promise to purchase a large fleet of vehicles.

This proposal should be rejected as an attempt at bribery and should be reported immediately to the supervisor.

### GOING FURTHER:



The Communication and Commercial Departments are available to listen to you on the subject of image partnership.



TIM process



# 6 Patronage

Patronage is a disinterested support (financial donation, sponsorship of skills, etc.) given by the Group without any consideration or without disproportionate consideration (maximum 25% of the donation in France) to an institution/association or an entity carrying out a non-profit activity in the general interest.

These initiatives must not be carried out in order to obtain an undue advantage in return that could be considered as an act of corruption.

In order to secure the operation, the following actions must be carried out regardless of the nature of the sponsorship operation envisaged (within or outside the framework of the Corporate Foundation) :

- Ensure that the operation complies with the rules of the country in which it is carried out and with the themes eligible for patronage;
- verify the integrity of the beneficiary structure;
- enter into a patronage agreement;
- have the agreement validated by the different actors involved;
- ensure that the conditions for granting the donation are respected, and in particular that the funds are properly allocated, by monitoring the project and drawing up a report;
- keep all documents relating to donations for possible audits.

Renault Group does not finance political activities or institutions of a religious nature.



**EXAMPLE OF RISKY SITUATION:**

A representative of an association asks an employee to sign a patronage agreement to benefit a scientific research project. The agreement simply states that Renault Group will make a financial contribution to the project, without detailing the purpose of the patronage and the conditions for granting donations. However, it turns out that one of the board member of the association is also involved in representing interests to a European institution.

The purpose of the patronage is not actually charitable, but to influence the adoption of European regulations favorable to car manufacturers.

**GOING FURTHER:**



The Corporate Social Responsibility Department is available for any questions relating to patronage.



Procedure for managing patronage activities



## 7

## Lobbying

Lobbying can be defined as a legal and regulated activity intended to influence a public decision and in particular the content of a law or a regulatory act.

When its use is clear and transparent, this activity can contribute to the performance and positive reputation of the Group.

Consequently, any person who, in the course of his or her duties, is required to represent the interests of the Group must comply with the following rules:

- Refrain from inciting any person to contravene the standards of conduct applicable to them;
- refrain from taking any steps to obtain information or decisions by fraudulent means;
- refrain from transferring documents not officially published by the institutions for a fee or for any other consideration;
- must register in the institutions' lobbying registers, where they exist.

All lobbying activities must be carried out in close coordination with the Public Affairs Department to ensure consistency of approach, compliance with legal procedures and ethical practices.



## EXAMPLE OF RISKY SITUATION:

A lawyer partner asks a public relations employee to pay him a substantial financial commission to influence the decisions of a government official in charge of thermal vehicle files.

Even if this request is in the Group's interest, it should be refused because it constitutes influence peddling.

## GOING FURTHER:



The Public Affairs Department is available to answer questions about interest representation.



Lobbying code of conduct

## 8 Business relationships

Renault Group ensures that relations with its business partners (suppliers, service providers, subcontractors, dealers, customers, etc.) are in line with its rules on ethics and compliance.

To this end, the following provisions are made at the time of formalization and in the course of the business relationship:

- Assess the integrity of third parties in accordance with the TIM (Third Party Integrity Management) process;
- comply with the procedures and rules in force particularly with regard to the sale of assets, the selection of suppliers, dealers and importers, donations and sponsorship;
- include anti-corruption clauses in contracts with third parties, allowing for the termination of agreements and the interruption of any relationship.

In the event of recourse to an intermediary, i.e. any independent person (lawyer, sales agent, representative, etc.) acting on behalf of or on the orders of Renault Group to conclude, develop, maintain or bring to a successful conclusion business deals by means of contacts or information, it is advisable to ensure, in addition to the foregoing:

- That any remuneration granted is transparent and corresponds to a legitimate and effective service rendered to Renault Group;
- that the service provided is precise in its content, but also in the means of achieving it. Evidence of the services provided by this intermediary must be thoroughly checked to ensure that the service is genuine.



### EXAMPLE OF RISKY SITUATION:

A public authority wants to buy a fleet of cars and initiates the appropriate public purchasing process. Given the level of discount required, the dealer obtains commercial support from the brand beyond the standard rules.

Part of this amount is used to bribe the public authority's representative in charge of managing the purchasing process to win the order.

### GOING FURTHER:



**The Ethics and Compliance Department is at your side for the implementation of this procedure.**



**TIM Process**

**Purchasing code of conduct**

**Sales and marketing code of conduct**

**VIP discount procedure**



## 9

## Accountability

Renault Group has standards and procedures for accounting and financial controls designed to ensure that records, books and accounts are not used to conceal corruption or influence peddling.

Incorrect or manipulated documents can be incriminating evidence against a company prosecuted for these offences.

In order to ensure that they are accurate, reference should be made to the list of accounting controls.

These specific controls concern in particular patronage operations, mission and reception expenses, the granting of discounts, purchases of services and image partnerships.

In any event, it is the responsibility of any employee who, in the course of his or her duties, agrees to the payment of a service or the delivery of goods to ensure that the service or goods have actually been provided.



## EXAMPLE OF RISKY SITUATION:

A service provider proposes to an employee to overcharge for a service by passing on the overcharged amount and asking the employee to intervene on its behalf in future tenders.

The employee must refuse because this practice constitutes an act of corruption.

## GOING FURTHER:



The Financial Compliance Department is available for any questions related to this subject.



Accounting controls guide

## 10

## Mergers and acquisitions

Mergers and acquisitions are complex strategic transactions which may have significant financial, legal and operational impacts.

The Group may be held liable for criminal acts committed by the companies it has acquired.

It is essential to carry out anti-corruption audits and verifications of the target companies before any merger or acquisition is undertaken.

These verifications can be understood as the steps taken in order to:

- On the one hand, to determine the possible involvement of the target company in a case of breach of probity, or, if it has been sanctioned for such acts, to find out what sanctions have been taken against it;
- secondly, to ascertain the existence and, if possible, to evaluate the quality and effectiveness of its anti-corruption system.

## GOING FURTHER:



The Legal Department is available to answer any questions on the subject of mergers and acquisitions.

# 04

## Coping



# 04 Coping

In order to manage these risky situations and ensure that you have the right behavior to deal with them, Renault Group provides a set of tools to help you make the best decision.

## Whistleblowing system

A whistleblowing system is available to all employees, as well as to external and occasional employees and suppliers, to enable reports to be received.

It complements the regular internal channels for reporting whistleblowing, which are management, human resources, employee representatives, the Ethics and Compliance Department, the Group Prevention and Protection Department and the network of ethics and compliance officers.

### ► Conditions for acquiring whistleblower status

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

1. Report facts contrary to the law, the code of ethics or this code;
2. to act in a disinterested manner, i.e. not to act out of revenge or for any other consideration;
3. to be in good faith, that is, to sincerely and legitimately believe in the reality of the facts that one reports;
4. have personal knowledge of the information you are reporting, i.e., do not relay rumors or "gossip".

For more information, please refer to the procedure for managing professional alerts.

### ► Whistleblower protection

In any event, the Renault Group guarantees strict confidentiality of the identity of the whistleblower, the person to whom the whistleblowing relates and the facts that are the subject of the report.

Whistleblowers' reports are treated in complete confidentiality, 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, even if the facts are not proven, insofar as these employees have acted in accordance with the criteria set out above.

However, misuse of this system may be subject to disciplinary sanctions or even legal action.

### ► How to access the system?

The whistleblowing system is accessible on the Group's intranet, in the "Renault Group Ethics" section, under the "whistleblowing" tab, or directly from Declic.

#### GOING FURTHER:



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



Procedure for managing professional alerts

## Third Party Integrity Management

Before starting, continuing or renewing a business relationship, a risk analysis is carried out according to the TIM procedure (Third Party Integrity Management).

Its purpose is to assess the integrity of third parties (suppliers, dealers, customers, etc.), and to identify potential risks of corruption, fraud or other unethical acts, as well as risks associated with international sanctions programs.

An initial analysis or "due diligence" is performed internally. If necessary, an additional analysis, provided by external service providers - always on the basis of open sources - is used to clarify and support the assessment.

Depending on the information obtained, it may be decided not to enter into or to interrupt the relationship, or to continue it by implementing appropriate preventive measures: protective contractual clauses, request for guarantees, reinforced controls.

### GOING FURTHER:



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



TIM Process

## Training

Online or face-to-face training on business ethics (anti-corruption, ethics, conflicts of interest, etc.) are available to all employees on the Group's intranet under the heading "Ethics in the Renault Group" or in the "LEARNING@ALLIANCE" section.

These training courses are generally compulsory for certain positions, departments or Group subsidiaries.

They cover in greater detail the topics addressed in this code, and in particular the means to be implemented to detect and prevent risks related to all the situations described.

## Intranet

The Group makes available on Declic, in the "Renault Group Ethics" section, a set of resources relating to ethics and compliance, including the main reference documents (Ethics Charter, business line codes of conduct, etc.), the procedures referred to in this Code, access to the whistleblower system, training courses, a glossary and an updated list of members of the ethics and compliance network.

## Ethics and compliance network

Renault Group has a structured network dedicated to ethics and compliance issues. Members of the network are present in the countries, subsidiaries, global functions and brands.

If you would like advice, guidance or to report a difficulty in the application of this Code, you may request assistance in confidence from members of this network or from the Ethics and Compliance Department.

An updated list of members of the ethics and compliance network is available on the "Renault Group Ethics" intranet site, under the "Who are we?" tab.

## Contacts

For any information on this code, please contact Renault Group Director of Audit, Risk, Ethics and Compliance at the following address: [contact-ethique-compliance@renault.com](mailto:contact-ethique-compliance@renault.com)

No changes or updates to this code may be made without the approval of the Ethics and Compliance Department.

## ADDENDUM

