Code of Ethics 2022 Edition

Renault Group

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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



Luca DE MEO Chief executive officer

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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 responsability.

This inspires the Ethics of our company.

Is there a different Ethics for a field or an activity? No. Ethics is above all a mindset that instills a way of acting that respects each and everyone and is based on values.

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

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

WHY DO WE HAVE A CODE OF ETHICS?

Renault Group's Code of Ethics reaffirms our collective commitment to promoting values based on trust and respect between employees, customers, suppliers, partners and shareholders.

It requests our integrity and vigilance regardless of our role and responsibilites. It thus helps us to question the attitude to adopt in the delicate situations that we sometimes face.

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

WHO DOES THE CODE OF ETHICS APPLY TO?

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

All those who work directly or indirectly with Renault Group can consult it and refer to it.



HOW TO USE THE CODE OF ETHICS?

Renault Group asks to each and everyone of us to read this Code of Ethics, to refer to it and to 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 soliciations that do not comply with this Code.

The respect of these values contibutes to the image quality of Renault Group, to its attractiveness and to its performance.

Every manager must be exemplary and courages their team to act ethically and responsibily.

The Code of Ethics is supplemented and illustrated by a set of documents such as the Anti-corruption Code of Conduct and dedicated code of ethics more specifically applicable to certain professions, functions or activities.

Renault Group encourages all its employees to express their views and defend their opinion through dialogue. Thus, if you have concerns or questions, you can legitimately express them to your hierarchy, guarantor of compliance with the Code of Ethics.

Renault Group reminds you that it is the duty of each of us to report unacceptable behaviours or requests.

It is the responsibility of each of us to report behavior or requests, with regard to the Code of Ethics, the law and the regulations.

Whenever you think you are faced with a situation that does not comply with Renault Group's ethical principles, you should ask yourself the following questions:

- Does it have integrity?
- ▶ Is it honest?
- Does it comply with the principles of the Code of Ethics?
- What would my colleagues think? My relatives?
- What if this was picked up by the media and social networks?

If the answer to any of the above questions is negative or equivocal, you must consult your hierarchy or the Ethics and Compliance officer or referent of you perimeter or the Ethics and Compliance Department at: **contact-ethique-compliance@renault.com.**

The situation you are facing may also justify making a report, in complete confidentiality, via the Whistblowing Alert application: WhistleB.

Find the Whistleblowing Alert in chapter 5 of this Code of Ethics / section « Useful links ».



02 Our Ethics as an employer

02 Our Ethics as an employer

HEALTH, HYGIENE AND SAFETY AT WORK

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

- Promoting physical and mental health and wellbeing 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.
- Eliminating the most dangerous processes/materials/substances.
- Promoting new ways of working with the use of telework where possible.





DIVERSITY AND INCLUSION

Respect for people is a core value of the Renault Group. In particular, it makes it possible to guarantee the dignity of people, non-discrimination, diversity, trust and quality of life at work.

Renault Group is committed to preventing all forms of discrimination and to promoting diversity and inclusion among all its employees.

As such, each of us undertakes in particular to:

- Promote diversity in the recruitment and selection of future employees.
- Promote inclusion at every step of working life.
- Treat everyone with dignity without favoritism and with respect for privacy.

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, racial, ethnic, national, social, cultural origin, sexual orientations or gender identity, disability, physical appearance or health problems, political or religious opinions, trade union acitivities...

Discrimination can result in comments, decisions or behaviour that violate dignity and equality or that constitute intimidation or serious pressure. It can manifest itself in more or less visible forms and occur at any time of professional life.

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

Renault Group's ZERO discrimination policy strongly condemns discrimination it all its forms and at any time of professional life.

Renault Group is asking each of us to:

Do not practice any form of discrimination under penalty or punishment, in particular that which may result in the exclusion of a recruitment procedure or an appointment, access to an internship or training or create inequality in the career management of employees (salary, promotion, transfer...). In order to eradicate all discrimination, Renault Group is committed to promoting employee training and awareness and ensuring enhanced communication, both on the Whistleblowing system (see chapter 5) and on discriminatory behaviour and measures.

In addition, as part of its ZERO discrimination policy, Renault Group has set up ZERO discrimination referents on all its sites.

FIGHT AGAINST ALL SORTS OF HARASSMENT

In order to combat all forms of harassment at work, including moral and sexual harassment, 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 may have political and/or religious activities but they undertake not to carry them out within the Renault Group. These activities are carried out only on a strictly private capacity, in application of the laws and regulations on the exercise of political rights, outside working hours, without mentioning their membership of the Renault Group.

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

Renault Group also does not finance political parties or religious institutions.

PAID ACTIVITY OUTSIDE RENAULT GROUP

Any paid activity for the benefit of an entity outside the Renault Group cannot be accepted if it conflicts with the latter's interests. To prevent any difficulty, any employee of the group employed full-time and wishing to have a professional activity outside the company will first seek the agreement of his hierarchy and the human resources department.

03 Our Ethics as a company

03 Our Ethics as a company

BUSINESS ETHICS AND FIGHT AGAINST CORRUPTION

Ethics is the bedrock of our activities. It is how we manage our relationships with our suppliers, service providers, customers, shareholders, public authorities and non-governmental organisations, how we protect and respect them.

With this in mind, Renault Group is committed to:

- Anchor ethical values, on a daily basis, in all its activities.
- Prevent and detect ethical breaches and breaches or probity.

With regard to the fight against corruption and influence peddling, each employee is committed to:

- Comply with the 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 Renault Group's Anti-Corruption Code of Conduct (online on the Ethics and Compliance intranet site or on the renault.com website) which describes the different forms of corruption, warning signals and risky situations (conflicts of interest, gifts and invitations, payment of facilitation, vehicle loans, etc.).



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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:

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

RELATIONS WITH SHAREHOLDERS

In accordance with stock market regulations, Renault Group is required to publish sincere, precise and accurate information to its shareholders, whether this information is of an accounting, operational, financial or non-financial nature.

General Management and the Board of Directors ensure the quality and accuracy of the information communicated to the market.

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

In addition, Renault Group managers and employees are bound by an obligation of confidentiality with regard to the information to which they have access in the course of their duties and which is not public. Some of this most sensitive confidential information may lead to the opening of confidentiality lists or insider lists when such information is labeled as « inside ».

Each employee must read the rules set out in the dedicated Renault Group Stock Exchange Code of Ethics, which can be consult on the Ethics and Compliance intranet site / « Ethical standards » section and comply with the obligations of absolute confidentiality and restrictions on trading in Renault shares which are binding on them in the event of notification of inclusion on a specific list.

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 in the choice of suppliers.

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

- Develop, with business partners, a relationship of trust based on respect and transparency.
- Treat 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...).
- Strengthen the identification and prevention of CSR (Corporate Social Responsability) risks in the supply chain, by regularly assessing the situation of suppliers.
- Ensure 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.
- Ensure that suppliers undertake to comply with Renault Group's guidelines for "Supplier Social and Environmental Responsibility".



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.
- Not to be communicated to persons or entities not entitled to know about it, either inside or outside the company.
- Not to falsify or modify it in order to harm or hide unethical or illegal acts.

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





Protection of personal data

Renault Group undertakes to:

- Respect confidentiality by protecting personal data in particular. This strengthens the trust established with employees, customers, suppliers and shareholders.
- Respect the 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 the 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.

RENAULT GROUP'S HERITAGE AND IMAGE

Protecting and preserving the tangible asset (buildings, company vehicles, furniture, etc...) and intangible asset (patents, digital data) assets of the Renault Group is a guarantee of its prosperity. Employees have a duty to contribute to this by ensuring protection against denigration, damage, theft, misappropriation and any other action, including via social networks, which could be detrimental to the company.

Employees must not use this heritage for personal purposes.

Finally, each employee must report to his or her hierarchy any action or comment that could damage the reputation of Renault Group.

Our Ethics as a corporate citizen

CODE OF ETHICS - RENAULT GROUP

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.
- A prohibition on the manifestation of violence at work, harassment in any form and, in particular, sexual or moral harassment or discrimination against employees.
- Freedom of association and protection of the right to organise and bargain collectively, and of workers' representatives in order to prevent any form of discrimination on the grounds of trade union involvement.
- Equal pay for work of equal value.
- Respect for working hours, the right to paid leave, the right to disconnect.

Renault Group also makes these commitments a criterion for the selection of its suppliers and requires a written commitment from them to respect these obligations. It therefore reserves the right to ask its suppliers to have their compliance with these commitments assessed by a third party, i.e. a certified and internationally recognised organisation.

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.





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 local foundations (Argentina, Brazil, Colombia, Morocco, Spain and Romania) which support sponsorship actions throughout the world.

The Renault Group Foundation's projects aim:

- To restore equality of opportunity.
- To advise and support vulnerable people in their efforts to access or return to employment.

In addition, the Renault Group Foundation offers Renault Group employees who wish to do so the opportunity to become involved with the Foundation by making contributions to associations such as:

- Round up salaries accessible to all employees in France.
- Voluntary donations made each month, deducted directly from their pay slip, for the benefit of associations (the amount of their donations being matched 100% by the Foundation).
- Volunteering, solidarity team-building and mentoring.

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 "Renaulution" strategic plan launched in January 2021.

Reducing the negative impact of Renault Group activities on the environment is therefore essential.

To this end, Renault Group is committed to:

- Train the relevant employees in the factory and in engineering whose function is related to the environment.
- Train the environmental manager and ISO 14001 auditors at each site in basic environmental rules.
- Implement an action plan from upstream to downstream of the value chain - from procurement to the end of the vehicle's life - with the aim of reducing the environmental footprint: climate, resources, ecosystem, biodiversity and health.
- Set targets for reducing this environmental footprint. For the climate: achieve carbon neutrality by 2040 in Europe and 2050 worldwide.

MOBILITY

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





05 Useful links



05 Useful links

WHISTLEBLOWING ALERTS

Are you confronted with or have you witnessing a violation of one of the principles of the Code of Ethics?

You can issue a Whistleblowing Alert in complete confidentiality.

To do this, you can connect to the WhistleB application accessible from the Renault Group's Ethics and Compliance intranet site:

https://grouperenault.sharepoint.com/sites/EthiqueetC ompliance

This application is also available on the homepage of the Renault Group intranet site at the following address <u>WhistleB</u>, <u>Whistleblowing Centre</u>

WhistleB is available in 14 languages. It enables all current and former Renault Group employees, as well as candidates, shareholders, external or occasional employees and contractors, to send reports in **complete confidentiality** to the Professional Alert Department (in France) or to the Ethics and Compliance correspondents in the subsidiaries and countries, 24 hours a day, 7 days a week (see the list of Ethics and Compliance country correspondents in the "Ethics and Compliance Network" section).

The other channels of communication for issuing a Professional Alert remain the reporting line, Human Resources, the occupational medicine, the Renault Group Ethics and Compliance Department as well as trade unions and employee representatives.

ETHICS AND COMPLIANCE DEPARTMENT

For any information on the Code of Ethics, please contact the Renault Group Ethics and Compliance Department at the following address: <u>contact-ethique-compliance@renault.com</u>

In addition to the Code of Ethics and to go further, you can consult the Ethical Standards on the Renault Group intranet, at the bottom of the home page in the "useful links" section "Ethics and Compliance" under "Ethical Standards".

ETHICS AND COMPLIANCE NETWORK

In order to improve the effectiveness and impact of the actions initiated by the Renault Group's Ethics and Compliance Department, a network of Ethics and Compliance officers and referents works in the countries, subsidiaries, global functions and brands

Thus, if you would like an opinion, advice or to report a situation that you feel does not comply with the principles of the Code of Ethics, you can, in complete confidentiality, contact the Ethics and Compliance network.

You will find the list of network members on the Renault Group intranet, at the bottom of the home page in the "Useful links" "Ethics and Compliance« section « Who are we?".

WhistleB QR Code



ETHICS AND COMPLIANCE WEBSITE

The Renault Group Ethics and Compliance Department also provides its employees with a dedicated "Ethics and Compliance" site on the Renault Group intranet, at the bottom of the home page in the "useful links"

https://grouperenault.sharepoint.com/sites/EthiqueetCompliance

In particular, you will find the latest news on Ethics and Compliance as well as the reference framework (Code of Ethics, Anti-Corruption Code of Conduct, professional codes of conduct, procedures, etc.), access to the whistleblowing system, training, etc...



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



