



Stock Market Code of Conduct

**Renault
Group**

01 Introduction

- Why a Code of Conduct? [04](#)
- Purpose of the Code [04](#)
- Scope of the Code [04](#)
- Glossary [05](#)

02 Notions and principles

- « Market Abuse » [07](#)
- « Inside Information » [07](#)
- Consequences arising from the identification of Inside Information [08](#)

03 Obligations and sanctions

- Persons who have access to « Inside Information » [11](#)
- Persons who have access to « Confidential Information » [12](#)
- Persons concerned by « Black-out Periods » [13](#)
- Persons discharging Managerial Responsibilities [16](#)
- Penalties applicable to market abuse offences and violation [17](#)

04 Reference documents and Whistleblowing alert system

- Reference documents [20](#)
- Whistleblowing alert system [20](#)
- Responsible for the Code within Renault Group [21](#)

01 Introduction

01 Introduction

WHY A CODE OF CONDUCT?

The Renault Group's Code of Ethics is complemented by **dedicated codes of conduct**.

- The Code of Ethics sets out principles and commitments. It defines the state of mind in which internal and external professional relations should be approached. It also sets out the behaviour to be adopted in the event of breach of ethics.
- The dedicated codes of conduct define the ethical rules governing the practice of a profession, function or activity for which **higher ethical standards** are required.

The rules that are contained in the dedicated codes of conduct are not only moral, but they are also technical and legal, and they derived from legislative and regulatory provisions, which must be complied with, or face potential sanctions.

PURPOSE OF THE CODE

As the shares and other financial instruments of Renault S.A. (hereinafter "Renault") are listed on the Euronext Paris regulated market, Renault and all Renault Group Employees must comply with the specific rules applicable to listed companies.

The purpose of the **Stock Market Code of Conduct** (hereinafter the "Code") is to set out the applicable rules, particularly with regard to the management of "Inside Information", the prevention of market abuse and the control of transactions involving Renault financial instruments.

The Code also sets out the administrative and/or criminal sanctions for non-compliance with these rules.

In addition, breaches of these rules may seriously damage the reputation and image of Renault Group and of its Employees.

SCOPE OF THE CODE

Entities concerned

The **Stock Market Code of Conduct** applies to all Renault Group legal entities.

Some of the legal obligations described in this Code also apply to third parties (service providers, partners, suppliers, etc.). These specific situations are described in chapter 3 of this Code.

Employees concerned

The **Stock Market Code of Conduct** is applicable to all Renault Group Employees, who must therefore ensure that they are fully aware of and comply with the stock market rules set out in this Code.

In application of stock market regulations, this Code sets out preventive measures for certain specific situations. All persons involved in these situations will be informed of their obligations (see chapter 3 of this Code).

- ❖ Renault Group's Code of Ethics and dedicated codes of conduct can be consulted on the Ethics and Compliance Intranet / see « *Ethical standards* » section (accessible from the Declic home page and the web site www.renault.com/see « *commitments* » section.

01 Introduction

GLOSSARY

Market abuse: any unlawful behaviour by a financial market participant that prevents full and adequate transparency of that market. The three types of market abuse provided for by the regulations are specified in chapter 2 of this Code.

AMF: French Financial Markets Authority (*Autorité des marchés financiers*).

ESMA: European Securities Market Authority.

Market Abuse Regulation (MAR): Regulation (EU) no. 596/2014 of 16 April 2014 on market abuse, in force since 3 July 2016.

Renault Group (or the "Group"): the group formed by Renault S.A., the listed company, and all the companies directly or indirectly controlled by Renault S.A.

Employee: an employee, trainee or apprentice, or a corporate officer of a Renault Group company.

Issuer: a company which has issued securities (shares, bonds or other) that are traded on a regulated market (the stock exchange). Within Renault Group, the Issuer is Renault S.A.

Securities: (i) all Renault shares and all securities that have been or will be issued by Renault; (ii) the rights that may be detached from these various securities, in particular preferential subscription or allocation rights; (iii) all derivative instruments the underlying of which comprises the rights or securities mentioned in (i) and (ii), and, in particular, future contracts (including the equivalent instruments that give rise to a cash settlement in, swaps and options contracts).

02

Notions and principles

02 Notions and principles

"MARKET ABUSE"

The applicable regulation defines three (3) types of market abuse:

- **Insider dealing, which implies** involving the use of Inside Information to carry out a transaction in Renault securities.
- **Unlawful disclosure of Inside Information**, which arises where a person discloses an Inside Information to another outside the normal exercise of a job, profession or duties, whether or not this information has been used to carry out an Insider dealing.
- **Market manipulation**, which includes:
 - o *Price manipulation*, i.e. a transaction or behaviour which gives or is likely to give misleading indications about a financial instrument or sets its price at an abnormal or artificial level; and
 - o *Dissemination of false information*, i.e. information giving false or misleading signals concerning the situation or the prospects of an Issuer or concerning the price of a financial instrument or fixing the price of the latter at an abnormal or artificial level.

While all Issuers may be affected by one of these three types of market abuse, the first two types carry the highest risk of occurrence for Renault and the Group's Employees.

As a result, this Code sets out below the concept of "Inside Information", which is at the heart of these two types of market abuse and, more generally, of the mechanisms for preventing stock market violations.

"INSIDE INFORMATION"

Definition

"Inside Information", as defined in the MAR Regulation, refers to:

- information of a precise nature;
- that has not been made public;
- that directly or indirectly concerns Renault Group and/or Renault financial instruments; and
- that, if it were made public, would be likely to have a significant effect on the price of Renault shares or of other Renault financial instruments.

Information of a precise nature

Information is deemed to be precise if it refers to an event or a project which:

- has a *certain degree of certainty*, i.e. is sufficiently defined between the parties to have a reasonable chance of being achieved;
- has a *certain degree of precision*, i.e. is sufficiently precise to allow a conclusion to be drawn about its possible effect on the share price.

Information likely to have a significant effect on the price of the Securities

It is information that a reasonable investor would be likely to use as part of the basis of his or her decision to buy or sell Renault Securities.

Information that ceases to be Inside Information

Information is no longer an Inside Information (i) when it has been made public by Renault Group in a press release or (ii) when it becomes irrelevant (for example, the project concerned is abandoned). Publication in the press or in any other media of rumours relating to Inside Information, which is not officially confirmed by Renault Group, does not cause such information to lose its Inside Information status.

02 Notions and principles

Application of the definition and examples

The regulatory definition of Inside Information therefore includes several components which must be analysed successively to determine whether, in concrete terms, an event or project can be classified as Inside Information.

Identification of Inside Information within Renault Group

Renault Group has set up a Disclosure Committee, the role of which is, in particular, to identify and qualify Inside Information within the Group by analysing the information that is reported to it.

The permanent members of this committee are the following Renault Group managers: the Chief Financial Officer, the Chief Legal Officer, **the Head of Investors Relations, Chief Strategy Officer**, the Chief Communications Officer and the General Counsel Governance, Corporate Law and Financial Law. Other Group managers may be invited to the Disclosure Committee meetings to present a specific project or event.

Examples of projects or events likely to qualify as Inside Information

- Group financial situation not in line with guidance or analysts' consensus.
- Presentation of the Group's strategic plan.
- External growth projects (acquisitions, joint ventures, etc.).
- Divestment project (sale of significant assets or shareholdings).
- Merger or strategic partnership projects.
- Significant litigation involving the Group.
- Change in Group governance.

CONSEQUENCES ARISING FROM THE IDENTIFICATION OF INSIDE INFORMATION

Principle

Renault must **immediately** publish any information that the Disclosure Committee has just qualified as Inside Information.

Immediate publication of Inside Information ensures equal access to such information for all investors. It is also a means for preventing Insider dealing. Lastly, it is Renault's best protection against the risks of rumours or leaks and against stock market violations.

Publication must comply with certain formal requirements: the information is published in a press release which allows "effective and full dissemination", i.e. free and simultaneous dissemination throughout the European Union, to regulators and to as wide a public as possible. The press release is also made available online on the Renault Group website.

Exception

Renault may decide to **defer publication** of Inside Information if the following three **cumulative** conditions are met:

- 1) First condition: immediate publication of the information is likely to **harm Renault's legitimate interests**.

Examples:

- Renault is still negotiating with a partner and the outcome of these negotiations could be compromised if the information is published immediately.
- The information concerns a decision which, under applicable laws, requires the prior authorisation of the Board of Directors.

02 Notions and principles

2) Second condition: delay of publication is not likely to mislead the public.

If Renault had previously published information which is different from the Inside Information, the delay in publishing this Inside Information would mislead the public.

Consequently, it is not possible to defer the publication of a profit warning. Indeed, a profit warning becomes necessary precisely when Group's financial performance will differ significantly from the information known to the market (Group guidance or analysts' consensus). In this context, absence or delay of an immediate corrective information keeps the public in error.

3) Third condition: once the delay of publication of the Inside Information has been decided, Renault must take all necessary measures to ensure the confidentiality of this information.

In practical terms, it means that Renault must:

- draw up an **Insider list** (see section 3 below), and
- set up a mechanism for immediate communication system in the event of a "leak" of Inside Information whose publication is deferred.

Renault must inform the AMF of any delay of publication of an Inside Information.

FOCUS ON THE KEEPING OF "INSIDER LISTS" BY RENAULT

- Renault must establish a separate "Insider List" for each Inside Information.
- Renault must notify the Group's Employees and external service providers concerned of their inclusion on the Insider List and of the related obligations and sanctions.
- Insider Lists are established according to a specific format and with regulated content (including personal information for each Insider).
- Renault must keep the Insider List up to date and provide it to the AMF at its request.

03 Obligations and sanctions



03 Obligations and sanctions

PERSONS WHO HAVE ACCESS TO "INSIDE INFORMATION"

Any person who holds an Inside Information becomes an "Insider". As such, he or she is registered on an Insider List specific to this Inside Information. This Insider List is maintained by Renault in accordance with applicable regulations.

The Insider receives an email from the Group Legal Department informing him/her of his/her inclusion on this list and of the obligations arising from it.

The Insider's first obligation is to complete the following two formalities:

- provide, complete or update all personal information required by the regulations, and
- acknowledge receipt of the notification and of the obligations attached to Insider status and the applicable sanctions.

As long as this Inside Information has not been made public by Renault, the Insider must also comply with the three (3) obligations detailed below.

➤ **Obligation n°1 : DO NOT DISCLOSE PRIVILEGED INFORMATION**

If an Inside Information is held, the Insider must refrain from communicating it to any other person, including within Renault Group. If the Insider has to communicate the Inside Information to a person whose activity or mission requires knowledge of such information, the Insider must inform the Group Legal Department, who will update the Insider List accordingly.

In addition, Insiders must ensure at all times:

- that they never mention the Inside Information they hold in public or with their family members or friends;
- that they protect access to documents concerning the Inside Information and limit the number of copies and reproductions to the minimum necessary.

More generally, the Insider must not disseminate information, or spread rumours, in the media or by any other means, that give or are likely to give false or misleading indications about the Group, its financial situation or its prospects.

➤ **Obligation n°2 : DO NOT CARRY OUT OR ATTEMPT TO CARRY OUT "SECURITIES TRANSACTIONS"**

The Insider must refrain from carrying out or attempting to carry out, directly or indirectly, for his or her own account or on behalf of others, on or off market, any operation involving Renault Securities before the Inside Information has been made public.

Securities Transactions mean, in particular:

- the purchase or sale of Securities, immediately or in the future, on or off market,
- the conclusion of an agreement to acquire or sell Securities,
- the trading in derivatives with the Securities as underlying assets,
- a coverage or hedging transaction resulting in the acquisition or transfer of the financial risk associated with the Securities,
- the subscription or purchase of shares through the exercise of options to subscribe for or purchase shares, even if they do not result in the assignment of the shares thus obtained.

03 Obligations and sanctions

➤ **Obligation n°3 : DO NOT RECOMMEND OR ENCOURAGE ANY OTHER PERSON TO CARRY OUT SECURITIES TRANSACTIONS**

It is strictly prohibited for the Insider to recommend to (or to induce) any person to carry out, or to have carried out by another person, a Securities Transaction on the basis of an Inside Information.

The use of recommendations or inducements constitutes insider dealing where the person who uses the recommendation or the inducement knows, or should know, that it is based on an Inside Information.

In this regard, each Employee must be aware of the risk represented by the execution of Renault Securities Transactions by his/her close relations, i.e. all persons who, due to their relationship with the Employee concerned, could be suspected of having used an Inside Information communicated by the latter.

PERSONS WHO HAVE ACCESS TO "CONFIDENTIAL INFORMATION"

When a piece of information (project, event, circumstance) is particularly sensitive and confidential, but does not meet all the legal requirements to qualify as Inside Information, the Disclosure Committee may decide to classify it as "Confidential Information" and apply the appropriate prevention procedure, as described below.

These people are therefore included on a "Confidentiality List" maintained by Renault.

Unlike the keeping of Insider List which arises from a legal obligation, the keeping of "Confidentiality List" is a voluntary approach by Renault to align with best market practices in terms of preventing market abuse.

Thus, the system is based on the commitment of the people on the Confidentiality List to respect the obligations arising from it.

These obligations are very similar to those imposed by regulations on Insiders. They apply as long as the Confidential Information has not been made public by Renault or, otherwise, until the date specified by Renault.

➤ **Obligation n°1 : DO NOT DISCLOSE CONFIDENTIAL INFORMATION**

The Employee holding a Confidential Information must refrain from communicating it to any other person. If he or she has to communicate the Confidential Information to another Employee whose activity or mission requires knowledge of this information, the holder of the Confidential Information must inform the Group Legal Department, who will update the Confidentiality List accordingly.

In addition, holders of Confidential Information must ensure at all times:

- that they never mention the Confidential Information they hold in public or with their family members or friends;
- that they protect access to documents concerning the Confidential Information and limit the number of copies to the minimum necessary.

03 Obligations and sanctions

➤ **Obligation n°2 : DO NOT USE CONFIDENTIAL INFORMATION TO CARRY OUT SECURITIES TRANSACTIONS**

The Employee holding a Confidential Information must refrain from using such information to carry out or attempt to carry out, directly or indirectly, for his own account or for the account of a third party, on or off market, any Renault Securities Transaction.

This abstention commitment shall apply until receipt of a new notification from Renault informing them of the closure of the Confidentiality List.

The Confidentiality List is closed if the Confidential Information is reclassified as Inside Information or if the project is stopped without being reclassified as Inside Information.

In all cases, a notification of the closure of the Confidentiality List is sent to each person concerned.

PERSONS CONCERNED BY THE "BLACK-OUT PERIODS"

Since accounting and financial information are not necessarily Inside Information, applicable regulations provide for another preventive mechanism to regulate the necessary sensitive period when the Group's financial results are being prepared, namely the "Black-Out Periods" mechanism.

In compliance with these regulations, Renault has set up "Black-Out Periods" prior to the publication of annual, semi-annual and quarterly financial information.

The Black-Out Periods are as follows:

- 30 days before the publication of the Group's annual and semi-annual results (including the day of the publication);
- 15 days before the publication of the Group's quarterly turnover (including the day of the publication).

Persons subject to Black-Out Periods

1°) Renault Group officers

In compliance with current regulations, the Renault Group officers concerned are:

- the members of Renault's Board of Directors,
- the CEO of Renault and, where applicable, the Deputy CEO(s) of Renault,
- the members of the Leadership Team (or any other management body that replaces the Leadership Team, with the same prerogatives and role).

Members of Renault's Board of Directors (with the exception of the Chairman) may not be subject to the Black-Out Periods relating to quarterly financial information if they do not have access to such information prior to its publication.

03 Obligations and sanctions

2°) "Sensitive Persons"

In addition to the Group's managers, Renault establishes a list of "Sensitive Persons" which includes the following categories of Employees:

- the persons involved in the preparation of the financial statements and/or the publication of the Group's financial information,
- persons who have regular or occasional access to sensitive and confidential information that could have a significant effect on the financial statements.

Renault Group's service providers are not included on the list of Sensitive Persons. It is therefore the responsibility of each Employee to ensure that any service provider with whom he or she shares sensitive and confidential information (particularly in connection with the preparation or publication of periodic financial publications) is bound by an obligation of confidentiality and made aware of the risks of penalties in case of inappropriate use of said information.

➤ In practice at Renault

- The list of persons subject to Black-Out Periods is updated quarterly by the Legal Department, with the help of several Group's central departments.
- Notifications to the persons concerned are sent approximately one week before the start of each Black-Out Period, using the *Insider Manager* platform, which also allows these people to acknowledge receipt of this notification.

➤ **Obligation n°1 : DO NOT CARRY OUT SECURITIES OPERATIONS DURING "BLACK-OUT PERIODS"**

Principle

During the four "Black-Out Periods" of the year, certain persons are strictly prohibited, due to their functions within Renault Group, from carrying out directly or indirectly Renault Securities Transactions.

Exceptions

In compliance with current regulations, Renault may exceptionally authorise Renault Securities Transactions to be carried out during the Black-Out Periods,

- either due to exceptional circumstances that must be analysed on a case-by-case basis (such as serious financial difficulties faced by an Employee); or
- or due to the specific features of the contemplated transaction, in particular in the context of employee share ownership schemes or savings plans, or transactions that do not entail any change in Securities ownership. For example, delivery of shares to beneficiaries of the Group's free share plans remains possible if the vesting date falls during a Black-Out Period.

All authorisations that are requested due to exceptional circumstances must be decided by the Disclosure Committee.

03 Obligations and sanctions

The specific case of beneficiaries of performance shares

As part of annual share-based compensation plans (or LTI: Long-Term Incentive Plans), Renault shares (known as “performance shares”) are allocated free of charge to certain Group managers.

In accordance with the provisions of the French Commercial Code, the beneficiaries of these performance shares may not sell them during the four Black-Out Periods preceding the publication of the Group's periodic financial information.

Suspension of the share buyback programme during the Black-Out Periods

Under certain strict conditions set forth by applicable regulations, an Issuer may buy back its own shares. The “share buy-back programme”, authorised annually by the General Shareholders' Meeting, is mainly intended to enable Renault to implement its plans for free allocation of performance shares and its employee share ownership schemes.

Share buybacks under this programme must take place outside the Black-Out Periods and the periods when publication of an Inside Information is deferred.

Embargo period

In accordance with the AMF's recommendations, and in order to avoid the risk of disclosing piecemeal financial information, which can lead the recipients to anticipate Renault Group's results before they are published, Renault has decided to set an “embargo period” before the announcement of its annual and half-yearly results, as well as of its quarterly financial information. During the embargo periods, Renault refuses to give financial analysts and investors new information on the status of its business and its results.

The embargo period is a minimum of 15 calendar days before the publication of the annual and semi-annual results and a minimum of 8 days before the announcement of the quarterly financial information

03 Obligations and sanctions

PERSON DISCHARGING MANAGERIAL RESPONSIBILITIES

MAR lays down specific obligations for “Persons Discharging Managerial Responsibilities” (PDMR).

In application of this regulation, Renault Group's PDMRs are:

- the members of Renault's Board of Directors,
- the CEO of Renault and, where applicable, the Deputy CEO(s) of this company,
- the members of the Renault Group's Leadership Team.

➤ **Obligation n°1 : DECLARE HIS/HER RENAULT SECURITIES TRANSACTIONS**

When a PDMR carries out a Renault Securities Transaction (i.e. outside the Black-Out Periods and in the absence of an Inside Information), he or she must declare it to the AMF and to Renault.

Persons subject to the declaration obligation

The declaration obligation applies to PDMRs and their “persons closely associated” with them.

The “persons closely associated” with a PDMR include:

- the spouse or the partner who is considered to be equivalent of the spouse (in France, spouses who are not legally separated and civil partners);
- dependent children (in France, children over whom the PDMR exercises parental authority, or who habitually reside with him/her or of whom s/he has alternate custody, or who in practice are in his/her permanent care);
- a relative of the PDMR or anyone connected to him/her as a result of marriage, this person being a member of the same household as the PDMR for at least one year;

- a legal entity the managerial responsibilities of which are exercised by the PDMR or by a person who is directly or indirectly controlled by the PDMR or who has been set up for the benefit of the PDMR, or whose economic interests are substantially equivalent to those of the PDMR.

Transactions covered by the declaration obligation

A non-exhaustive list of transactions that must be declared is provided in Article 10 of the Delegated Regulation (EU) 2016/522 of 10 March 2016. These include the following transactions: acquisition, disposal, short sale, subscription or exchange, borrowing, donation, etc.

Transactions may involve shares, bonds or any other financial instrument linked to Renault Securities.

Transaction declaration threshold

Once the total value of all transactions executed during the calendar year exceeds €20,000, it is only necessary to declare transactions after this threshold has been reached.

The threshold is calculated with only the transactions carried out by the PDMR, excluding those executed by the persons closely associated with him or her.

Procedures for declaring the transactions to the AMF

Within three working days of the execution date, the transaction should be declared on the “Onde” extranet which is accessible on the AMF website.

Publication of the declarations sent to the AMF

The AMF publishes on its website the declarations received via Onde within a few days following their filing. When the declaration is made by a person closely associated with a PDMR, only the name of the relevant PDMR will appear on the declaration published by the AMF.

03 Obligations and sanctions

➤ In practice at Renault

Renault notifies each new PDMR in writing of his/her obligations in terms of declaring Securities Transactions. Then, the PDMR is responsible for:

- providing Renault with a list of natural and legal persons with whom he/she is closely associated;
- notifying these persons in writing of their obligations to declare Renault Securities Transactions, as well as retaining a copy of said notification.

Each PDMR is required to inform the Group Legal Department of any change in the list of persons closely associated with him/her, and to respond to the requests for updates made by the Legal Department.

➤ Obligation n°2 : HOLD RENAULT SHARES IN NOMINATIVE FORM

The CEO and the directors of Renault are required to register in their name all Renault shares that they hold or may acquire, or to deposit them with an account holder or custodian of financial securities. The same obligation applies to the spouses and minor children of these persons.

This nominative registration must be made within twenty days of acquiring the Renault shares.

If the CEO or a Director of Renault has not complied with this obligation to register the shares in their names, the voting rights and dividend rights of the Renault shares concerned shall be suspended until the situation has been rectified. Any vote cast or dividend paid during the suspension period shall be null and void.

In addition, the other PDMR, i.e. the members of the Group Executive Committee (Leadership Team) other than the CEO, are also required to hold their Renault shares in nominative form.

PENALTIES APPLICABLE TO MARKET ABUSE OFFENCES AND VIOLATIONS

Violation of any of the obligations set out in this Code may constitute one of the “market abuses” defined by MAR :

- insider dealing,
- unlawful disclosure of inside information,
- market manipulation (which covers price manipulation and dissemination of false information).

Depending on the type of enforcement procedure chosen, market abuse may constitute a criminal “offense” or an administrative “infringement”.

To choose one or the other of these two enforcement procedures, a consultation procedure is implemented between the French National Prosecutor's Office for financial crimes and the AMF.

Market abuse offences (criminal penalties)

The maximum criminal penalties that are applicable to market abuse offences (insider dealing, unlawful disclosure of inside information or market manipulation or attempts to commit these offences) are as follows:

- For natural persons:
 - a five-year prison sentence (ten years when the offence is committed by an organised group), and
 - a fine of €100 million; this amount may be increased up to ten times the amount of the benefit derived from the offence and may not be less than the said benefit.

03 Obligations and sanctions

- For legal persons:
 - a fine of €500 million; this amount may be increased up to ten times the amount of the benefit derived from the offence and may not be less than the said benefit.

The fine imposed on a legal person can be increased up to 15% of the total annual turnover as stated on its most recent company financial statements (or, as applicable, consolidated financial statements).

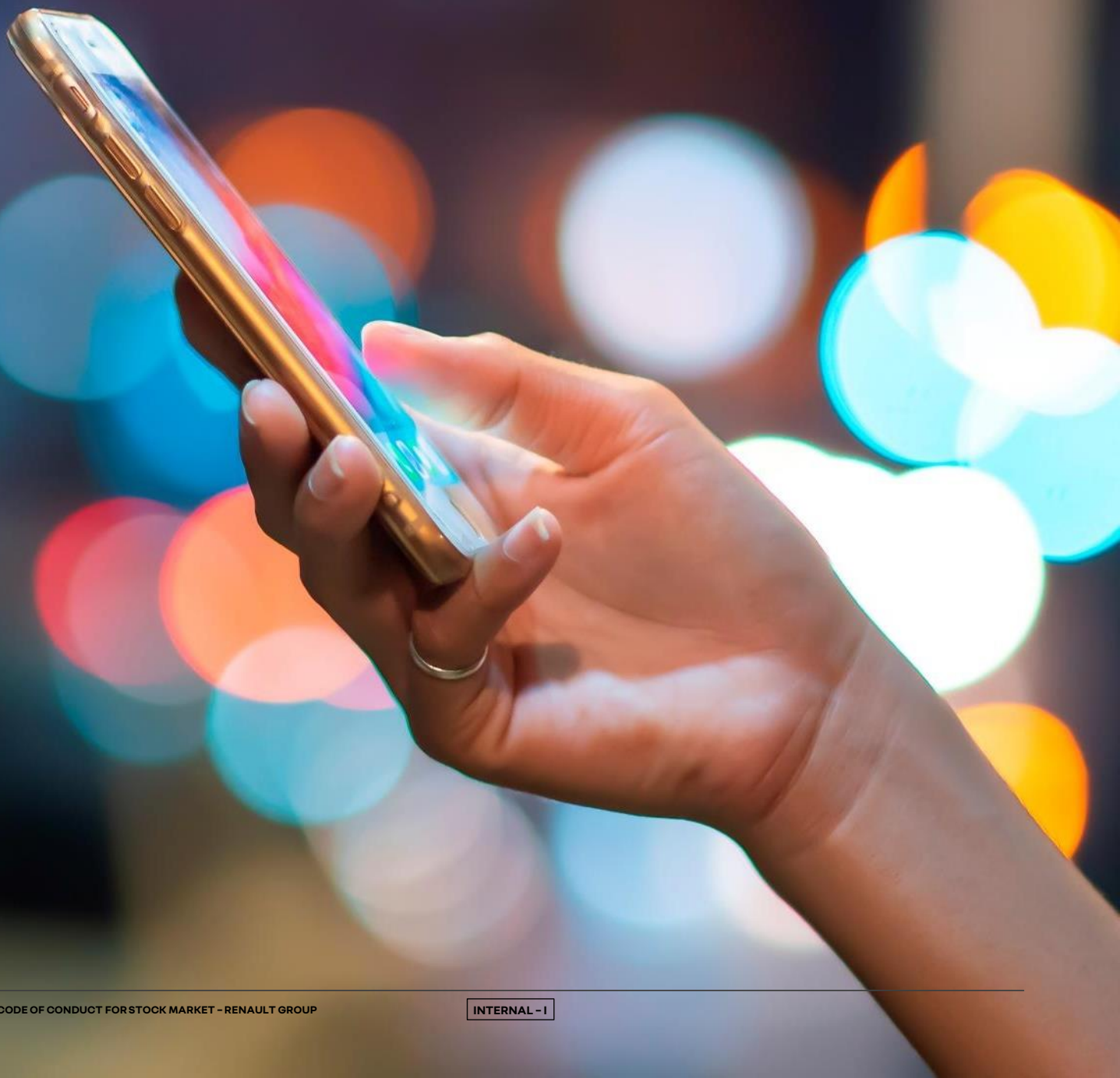
Market abuse infringements (administrative penalties)

Market abuse infringements (insider dealing, unlawful disclosure of inside information or market manipulation) render the perpetrator liable to a fine imposed by an administrative authority, i.e. the AMF enforcement committee.

The amount of this administrative penalty can reach €100 million, or ten times the amount of any profits made (applicable to natural and legal persons), and up to 15% of the total annual turnover for legal persons.

These penalties can be increased by up to 10% of the initial amount in order to finance assistance to victims.

04 Reference documents and whistleblowing alert system



04 Reference documents and whistleblowing alert system

REFERENCE DOCUMENTS

- ▶ Regulation (EU) no. 596/2014 of 16 April 2014 on market abuse, in force since 3 July 2016 ("MAR").
- ▶ Implementing Regulations and Delegated Regulations on MAR, as well as ESMA's positions and recommendations on these Regulations.
- ▶ Articles L. 465-1 to L. 465-3-5 and L. 621-15 of the Monetary and Financial Code.
- ▶ AMF Position-Recommendation of 26 October 2016 - Guide to permanent information and management of Inside Information DOC-2016-08.
- ▶ Ansa Practical Guide n°18-052 of December 2018 - Handling of Inside Information by Issuers.
- ▶ Code of Ethics of Renault Group.

WHISTLEBLOWING ALERT SYSTEM

Any person listed below can submit an alert in complete confidentiality through the Renault Group whistleblowing system.

This system is accessible to all employees, former employees, unsuccessful candidates from recruitment, shareholders, partners and holders of voting rights, members of the administrative, management or supervisory body of one of the Renault Group entities, external and occasional employees (temporary staff, trainees, apprentices and employees on assignment etc.), co-contractors (e.g., dealers or suppliers/service providers) and their sub-contractors.

It complements the channels for reporting alerts, which include management, human resources, employee representatives, the Ethics and Compliance Department and the Deputy Department of Professional Alerts.

▶ Conditions for the acquisition of the whistleblower status

To qualify for whistleblower status, a number of criteria must be met:

1. Be a natural person. report or disclose facts that have occurred or are very likely to occur that are contrary to the law, the Code of Ethics, the Anti-Corruption Code of Conduct or this Code;
2. Act without direct financial consideration and in good faith;
3. 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.

▶ Access to the whistleblowing system

The whistleblowing system is accessible :

- on the Ethics and Compliance Intranet / « *Whistleblowing* » section (accessible from the bottom of the Declic home page),
- on the renault.com website / Commitments / Ethics section, or
- by flashing the QR Code :



04 Reference documents and whistleblowing alert system

► Protection for the whistleblower

Renault Group guarantees the strict confidentiality of the identity of the whistleblower and of the person targeted by the alert, as well as the facts reported in the alert.

Alerts are treated confidentially, subject to applicable legal obligations and possible judicial proceedings.

Whistleblowers also benefit, where applicable, from civil and criminal immunity as well as protection against the risks of retaliation and discrimination.

No disciplinary or discriminatory measures may be taken against employees who have made a report, even if the facts are not proven, provided that these employees have acted in accordance with the criteria set out above. However, the abusive, malicious use of this system or its use in bad faith may result in disciplinary sanctions and legal proceedings.

RESPONSIBLE FOR THE CODE WITHIN RENAULT GROUP

For any information on the application and interpretation of the rules set out in the Code of Conduct for Stock Market, please contact the Chief Legal Officer or the Governance, Corporate Law and Financial Law Department.

The Code of Conduct for Stock Market is approved, including for any changes or updates, by the Legal Department and the Ethics and Compliance Committee (ECC) of Renault Group.

