



# **Code of conduct for interest representation activities**

**Renault  
Group**

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# 01 INTRODUCTION



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## WHY A CODE OF CONDUCT?

Certain documents, such as the **Code of Ethics** and the **Anti-Corruption Code of Conduct**, are intended for all employees of Renault Group and its controlled subsidiaries: managers, employees, apprentices and temporary workers. Those who work directly or indirectly with Renault Group are invited to consult and refer to them.

The Code of Ethics not only sets out principles and commitments, but above all 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 Anti-Corruption Code of Conduct is a decision-making tool on which each and every one can rely. In this sense:

- It defines corruption, presents its form and risks through examples (conflict of interests, gifts or invitations, etc.) and lists the most common warning signs;
- It sets out the behaviour to adopt and the rules to respect in order to prevent corruption and remedy it if necessary;
- It refers to detailed procedures in case of doubt.

The Group's Code of Ethics and Anti-Corruption Code of Conduct are complemented by dedicated codes of conduct. Their purpose is to define the ethical rules governing the practice of a profession, function or activity for which higher ethical standards are required.

## PURPOSE OF THE CODE

The **code of conduct for interest representation activities** is part of this framework.

This code sets out the guiding principles that apply to Renault Group representatives (the "Interest representatives") who are likely to come into contact with people responsible for drawing up and voting on public decisions or leading national or local public action (the "Public decision-makers"\*)).

## INTEREST REPRESENTATION ACTIVITIES

**Interest representation** can be defined as an **action aimed at informing and guiding a public decision, particularly the content of a law or a regulatory act.**

It is supported by **Interest representatives** whose role is to defend the interests of Renault Group and provide **Public decision-makers\*** with technical expertise on the consequences and practical scope of current or planned public decisions.

(\*) In France, the list of Public decision-makers is defined by the HATVP (High Authority for Transparency in Public Life).

Renault group's Code of Ethics and Anti-Corruption Code of Conduct can be consulted on the Ethics and Compliance Intranet / see « *Ethical standards* » (accessible from the Declic home page and the web site [renault.com](http://renault.com) / see « *commitments* »

# 02 SCOPE



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## SCOPE

The rules laid down in this code must apply in the context of any Interest representation activity on behalf of Renault Group.

The activities of Renault Group's Interest representatives are part of Renault Group's strategy.

As such, Renault Group's Interest representatives must:

- ▶ Protect and promote the reputation of Renault Group while listening to its stakeholders.
- ▶ Support the development of the company and seek the best conditions for success and sustainability for its current and future projects that create value to society.
- ▶ Support Renault Group's climate ambition, which, at the time of writing this code, aims in particular to become carbon neutral in Europe by 2040 and worldwide by 2050.

## EMPLOYEES CONCERNED

All interest representation activities carried out by Renault Group Interest representatives must be coordinated with the Group's Public Affairs Department.

In every country where the Renault Group's Public Affairs function is represented, the local representatives of this function must ensure that the provisions of the present code are known to all persons required to carry out interest representation activities in the country concerned.

If Renault Group were to engage outside counsel to assist it in its interest representation activities, the principles of the present code would also apply and the said outside counsel would be asked to undertake to apply these principles insofar as they are concerned.

To ensure that the actions undertaken by the professional associations of which Renault Group is a member are consistent with the principles contained in this code, it is forwarded to the said professional associations by the local representatives of the Public Affairs function in each country where this function is represented.



# 03 PRINCIPLES AND EXPECTATIONS

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## FUNDAMENTAL PRINCIPLES

Renault Group is committed to:

- ▶ Listen to Public decision-makers and respond to them transparently, without political discrimination, subject to confidentiality.
- ▶ Not to disseminate deliberately distorted information in order to mislead Renault Group's stakeholders.
- ▶ Not to grant any direct or indirect funding of political activity or party in accordance with the Code of Ethics.
- ▶ Make public the main positions or subject of interest of the company, in the context of its interest representation activities, in France and in Brussels (where its interest representation activities are the most numerous).

### EXAMPLES:

If a Renault Group Interest representative regularly visits Parliament to meet with elected officials, they must register with the relevant institution, if such a register exists.

If a family member of a Renault Group Interest representative is a Public decision-maker, the Interest representative must report this to Renault Group and follow the Conflict-of-Interest Procedure.

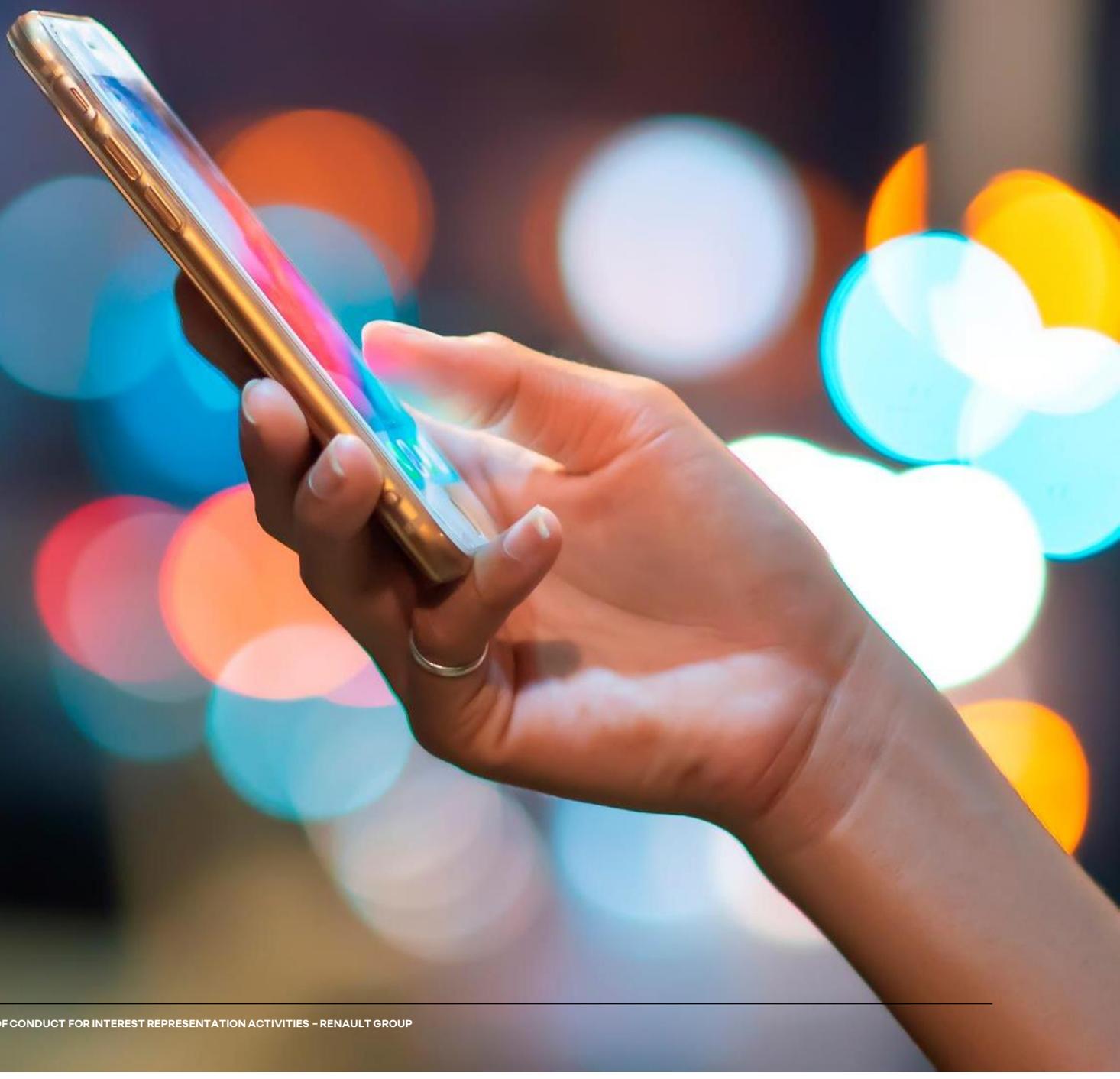
In France and Brussels, where Renault Group's interest representation activities are most numerous, Renault Group's main interests and positions are made public on the HATVP website and the European Commission's Transparency Register respectively. They are also sent to Public decision-makers at their request and/or as part of regular exchanges with them.

## COMPANY'S EXPECTATIONS

Each Renault Group Interest representative, in accordance with the Code of Ethics and the Anti-Corruption Code of Conduct, must:

- ▶ Refrain from any act or attempt of corruption or influence peddling.
- ▶ Refrain from any attempt to obtain information or decisions by fraudulent means.
- ▶ Not encourage Public decision-makers to infringe the rules of conduct applicable to them, particularly with regard to conflicts of interest, confidentiality and compliance with the ethical obligations to which they are subject.
- ▶ Declare any situation that could be a source of conflict of interest, and in particular refrain from holding any national or European political mandate; for these matters, please refer to the "Anti-corruption Code of Conduct" and the "Procedure for managing conflicts of interest".
- ▶ Refer to the "Procedure for gifts, invitations and business meals" for all benefits, gifts, invitations or payment of expenses likely to be (i) granted to, (ii) offered to or (iii) received from Public decision-makers.
- ▶ Respect (i) any confidentiality undertakings entered into in respect of a previous professional activity of the Interest representative, and (ii) the confidentiality rules in force within Renault Group.
- ▶ Declare him/herself or Renault Group to the institutions with which he/she engages in discussions (where registers exist).

# 04 CONTROL AND ALERT



# 04 Control and alert

## CONTROL OF INTEREST REPRESENTATION ACTIVITIES

In each country where the Public Affairs function is represented, controls will be set up. They will cover :

- ▶ The existence of an exhaustive list of Renault Group Interest representatives in the country concerned.
- ▶ The existence of an exhaustive list of professional associations to which Renault Group belongs in the country concerned and which carry out interest representation activities.

Local representatives of Renault Group's Public Affairs function will ensure that each year they draw up and send to the Group's *corporate* Public Affairs Department:

- An updated, exhaustive list of the Interest representatives within the country concerned;
- An updated list of the business associations (including their name, purpose, form and the amount of the annual fees paid to the association concerned in respect of the previous year) to which Renault Group belongs in the country concerned and which carry out activities of interest representation.

The procedures for monitoring compliance with these obligations will be set out in a dedicated procedure.

## WHISTLEBLOWING ALERT SYSTEM

Any person who encounters or witnesses a violation of one of the principles of this code of conduct for interest representation activities may **report it in complete confidentiality**.

### WHO CAN ISSUE AN ALERT?

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

### Access to the whistleblowing system

The whistleblowing system can be consulted on the Ethics and Compliance Intranet / see « *Whistleblowing* » (accessible from the bottom of the Declic home page) and on the *renault.com* website / see « *commitments* » or by **flashing the QR Code**:



# 04 Control and alert

## Conditions for acquisition of whistleblower status

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

1. Report facts contrary to the law, the Code of Ethics or the present Code.
2. Act in a disinterested manner, i.e., not act out of vengeance or for any consideration whatsoever.
3. To act in good faith, i.e., to sincerely and legitimately believe in the reality of the facts reported.
4. Have personal knowledge of the reported information, i.e. not relay rumors or "gossip".

## WHAT PROTECTION FOR WHISTLEBLOWERS ?

Renault Group guarantees the strict confidentiality of the identity of the whistleblower, the person who is the subject of the whistleblowing and the facts that are the subject of the report.

Whistleblowers' reports are treated confidentially, subject to applicable legal obligations and any administrative or legal proceeding.

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.

