



# **Whistleblowing handling procedure**

Renault  
Group

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Glossary

Alert	Internal report by an individual qualified as a Whistleblower within the framework of Renault Group's Whistleblowing System, in compliance with the current procedure.
CEC	Ethics and Compliance Committee(s), consisting of the Alert Referent and representatives of main functions of the concerned entity (such as Legal, Internal Control, Human Resources ...) for each entity concerned
CTA	Alert Handling Committee for Renault s.a.s and the Renault Group companies for which DDAP acts as Alert Referent
Ethics and Compliance Officer	Head of Whistleblowing System for the Renault Group entities other than Renault s.a.s, acting as Alert Referent and responsible for handling alerts in the absence of CEC in the entity concerned
DEC	Ethics and Compliance Department or Ethics and Compliance SVP
DDAP	Deputy Department of Professional Alerts or Deputy Director of Professional Alerts
Professional Alert System	Internal Whistleblowing System of Renault Group
Whistleblower	Individual who issues an internal report as part of the Renault Group's Whistleblowing System and in compliance with the legal and regulatory conditions given in article 2 of this procedure
Sapin 2 Act	French Act No. 2016-1691 of 9 December 2016 on transparency, fight against corruption and modernisation of economic life
Act on Duty of Vigilance	French Act No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and ordering companies
Data Processing and Freedoms Act	French Act No. 78-17 of 6 January 1978 on data processing, files and individual liberties, as amended by the GDPR.
MFS	Mobilize Financial Services (previously RCI Banque)
Alert Referent	Responsible for collecting and acting upon the Professional Alerts for one of the Renault Group companies (DDAP for Renault s.a.s. and some companies controlled by Renault SA, Ethics and Compliance Officer for other companies controlled by Renault SA, under the conditions defined in Article 4.2.2)

Renault Group	Renault SA and all its subsidiaries and companies under its control in France and abroad
GDPR	Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regards to the processing of personal data and on the free movement of such data
HR	Human Resources
Report	Report of any information likely to concern a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, a unilateral act of an international organisation taken on the basis of such a commitment, European Union law, the law or regulations, or facts likely to be contrary to Renault Group procedures and rules on ethics and compliance.
EU	European Union

## 1. Introduction

### 1.1. Context

Renault Group encourages open communication and dialogue and invites all its employees and stakeholders to report promptly any observations or concerns relating to ethics and compliance.

For this purpose, Renault Group has set up a professional alert system (hereinafter, the "Whistleblowing System") enabling any individual defined in section 2 of this procedure to report to it, in a confidential and secure manner, any information relating to (1) a crime, (2) an offence, (3) a threat or harm to the general interest, (4) a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, a unilateral act of an international organisation taken on the basis of such a commitment, European Union law, law or regulation, or (5) facts likely to be contrary to Renault Group procedures and rules on ethics and compliance ("Whistleblowing report"), so that it can be dealt with quickly and effectively.

This Whistleblowing System meets the following requirements:

- From Article 17, II, 2°, of French Act 2016-1691 of 9 December 2016 on transparency, fight against corruption and modernisation of economic life (known as the "Sapin 2 Act"). In this framework, Renault Group is implementing a program to prevent corruption and influence peddling, one of the measures of which is the implementation of a Whistleblowing System to collect reports of conduct or situations contrary to the Renault Group Anti-Corruption Code of Conduct.
- Articles 6, 8 and 9 of the Sapin 2 Act, as amended by Act No. 2022-401 of 21 March 2022 "aimed at improving the protection of whistleblowers", supplemented by Decree No. 2022-1284 of 3 October 2022 "relating to the procedures for collecting and handling Reports issued by Whistleblowers and establishing the list of external authorities instituted by Act No. 2022-401 of 21 March 2022".
- From Article L. 225-102-4, I, 4° of the French Commercial Code, as introduced by French Act No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and ordering companies (known as the "Duty of Vigilance Act"), which provides for the establishment of, within Renault Group, a mechanism for alerting and collecting Reports relating to the existence or occurrence of serious violations towards human rights or fundamental freedoms, the health and safety of individuals and the environment.

## 1.2. Purpose

This procedure describes:

- The scope and field of application of the Whistleblowing System set up within Renault Group for any individual issuing a Report in accordance with the criteria defined by the Sapin 2 Act (articles 1.3 and 2);
- Channels through which Reports can be submitted both within and outside the Whistleblowing System (article 3 and Annex I);
- The steps and conditions for collecting and handling a Report, in the framework of the Whistleblowing System, and in compliance with the conditions set out in this procedure (article 4);
- The protection afforded to the Whistleblower who has issued an Alert in accordance with the conditions afore mentioned and defined in this procedure, as well as certain third parties (article 5).

## 1.3. Scope

This procedure applies to Renault SA and all its subsidiaries and companies under its control in France and abroad (hereinafter referred to as the "Renault Group"), subject to any adjustments applicable to a given Renault Group company resulting from its organisation and the facilities at its disposal or from applicable national legislation.

It must be noted that Appendices I and II attached to this procedure concerns Renault Group companies having their head office in France. Foreign companies must draw up appendices in accordance with their national legislation.

The aforementioned changes will be validated by the Renault Group's Ethics and Compliance Department ("DEC").

## 1.4. What to do if you have any questions ?

Any person wishing to obtain an opinion or advice, or to ask a question relating to this procedure or to the operation of the Whistleblowing System, may also at any time seek the opinion of the person responsible for collecting and acting upon alerts in the Renault Group company to which he/she belongs (hereinafter, the "Alert Referent", whose role is described in Article 4.2.2 a)). The Alerts Referent must ensure strict confidentiality of exchanges with this person.

## 2. Field of Application of the Whistleblowing System

An Alert falls within the scope of the Professional Alert System (i) if it is issued by an individual meeting the definition of Whistleblower (2.1) and (ii) this Alert concerns certain types of situations (2.2) (iii) which justifies the use of the Professional Alert System (2.3).

Any Alert that does not comply with the conditions described in articles 2.1 to 2.3 will not be considered admissible and will not be taken into account as part of the Professional Alert System.

## 2.1. How is a Whistleblower defined?

A whistleblower is defined by the Sapin 2 act as an individual who reports or discloses, without direct financial consideration and in good faith, information relating to:

- A crime or an offense;
- A threat or harm to the general interest;
- A violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France;
- A violation or an attempt to conceal a violation of a unilateral act of an international organization taken on the basis of such an undertaking;
- A violation or an attempt to conceal a violation of European Union ("EU") law;
- Violation or an attempt to conceal a violation of the law or regulation.

For Renault Group companies in a country other than France, the definition of a Whistleblower is set out in an appendix specific to that country.

## 2.2 What types of situations can be reported?

For example, corruption, influence peddling, moral or sexual harassment, discrimination, violence or threats, theft, misuse of company assets, tax, accounting or financial fraud, money laundering, insider dealing, anti-competitive agreements or violation of personal data protection regulations are all violations of laws and regulations that are punishable under criminal law and may be the subject of a Report. The same applies to violations of international sanctions or export and import control rules.

The Whistleblower may also, in accordance with Article 17 of the Sapin 2 Act and the Duty of Vigilance Act, issue Reports in the following cases:

- The existence of conduct or situations contrary to the Renault Group Ethics Charter and Anti-Corruption Code of Conduct, or to any Renault Group procedure or rule relating to ethics and compliance, and in particular any breach of probity;

- The existence of serious harm or a risk of serious harm to human rights or fundamental freedoms, to the health and safety of individuals or to the environment, resulting from the activities of the Renault Group or of suppliers or subcontractors with whom it has an established commercial relationship, where such harm is related to that relationship.

Questions and complaints relating to human resources ("HR") management (pay, promotion, etc.) or to Renault Group strategic decisions do not fall within the scope of the Whistleblowing System and must be submitted to the relevant HR department or to line managers.

Specifics of RCI (commercial name Mobilize Financial Services)

In accordance with banking regulations, employees and external and occasional collaborators of RCI Banque SA and its subsidiaries may also report facts likely to characterise breaches of banking obligations defined by European regulations, by the Monetary or Financial Code or by the General Regulations of the "Autorité des Marchés Financiers" (Authority of Financial markets). They may also report directly to the "Autorité des marchés financiers", the "Autorité de contrôle prudentiel et de résolution" (Authority for Prudential Control & Resolution) or the European Central Bank any facts likely to indicate a breach of the obligations defined in these texts.

### 2.3 Who can issue a report within the Whistleblowing System?

The individuals listed below who report or disclose, without direct financial consideration and in good faith, information mentioned in articles 2.1 and 2.2 obtained in the course of their professional activities and relating to facts which have occurred or are very likely to occur within Renault Group, may report this information through internal channels, under the conditions set out in article 3.1 given below.

If the information was not obtained in the course of professional activities, the person reporting it must have had personal knowledge of it.

This option belongs to:

- Renault Group staff members (full-time or part-time, fixed-term or indefinite-term employees), persons whose employment relationship with one of the Renault Group entities has ended, where the information was obtained in the course of that relationship, and persons who have applied for employment with one of the Renault Group entities, where the information concerned was obtained in the course of that application;
- Shareholders, members and holders of voting rights at the General Meeting of one of the Renault Group entities;



- Members of the administrative, management or supervisory bodies of any Renault Group entity;
- External and occasional employees, including temporary staff, trainees, apprentices and employees on assignment working for or on behalf of a Renault Group entity;
- Co-contractors of one of the Renault Group entities (e.g. dealers, suppliers, partners), sub-contractors of these co-contractors or, in the case of legal entities, members of the administrative, management or supervisory bodies of these co-contractors and sub-contractors, as well as members of their staff.

Except in cases where the Report is anonymous, the person reporting it must transmit, at the same time as the Report, any evidence proving that he/she belongs to one of the aforementioned categories.

### 3. How to submit a Report?

To issue an Internal Report, the person reporting it must use one of the internal channels provided in this procedure (3.1). Where appropriate, and in compliance with applicable national legislation, an External Report may be sent to the competent public authorities (3.2).

#### 3.1 Internal report

##### 3.1.1. Form of Report

As permitted by the applicable regulations, Renault Group specifies that Reports must be in writing. Unless otherwise provided for in a specific Renault Group document expressly derogating from this procedure, any report made orally will not be taken into account as part of the Whistleblowing System. If a report is given orally before being issued in writing, the date on which the Report was issued will be the date on which it is written.

##### 3.1.2. Internal channels available

The person submitting the Report may send it to Renault Group using one of the following internal reporting channels made available as part of the Whistleblowing System.

- Confidential and secure reporting platform

As part of the Professional Alert System, Renault Group has set up a confidential and secure internal reporting platform administered by a specialized external service provider. The interface for accessing this platform is available on the Renault Group intranet. The tool can also be accessed via the Renault Group corporate website.

This platform makes it possible to transmit any written information, in any form or on any medium, which may support the Reporting of the situations mentioned in Article 2.2 given above which have occurred or are very likely to occur within the Renault Group.

Reports issued via this platform are received by the Alerts Referent (whose role is described in article 4.2.2 a)) of the Renault Group company to which the person issuing the report has sent it. If the person submitting the report intends to send it directly to Renault s.a.s., he/she is invited to select the "Renault Other" section.

The Report will be collected and acted upon by the Alerts Referent appointed by the Renault Group company to which the report was sent, subject to the hypotheses provided for in article 4.2.2 b).

- Traditional reporting channels

The traditional reporting channels available within the Renault Group, such as the hierarchical lines, the DEC (contact-ethique-compliance@renault.com) or the Department of Professional Alerts (the "DDAP"), the HR Department and the employee representative bodies can also be used.

A Report addressed to one of the above-mentioned persons must be forwarded by the recipient, where appropriate and without delay:

- either to the Alerts Referent of the Renault Group company to which the recipient belongs,

- or to the HR Director of the entity to which the recipient belongs when the case is clearly of an HR nature, such as moral harassment or sexual harassment,

subject to the specific cases described in article 4.2.2 b), as well as cases where the secondary recipient identified above (the relevant Alerts Referent or HR department) is referred to or mentioned in the Report. In these situations, the Report must be forwarded to the DEC, which will act in accordance with the rules set out in 4.2.2 b).

### 3.1.3. Content of the Report

To enable and facilitate the handling of the Report, the person issuing the report is invited to identify himself/herself, being specified that his/her identity will be treated confidentially by Renault Group.

As far as possible, the person issuing the alert will provide the following information to the Alerts Referent:

- Factual description of the breach(s) reported;
- The date and place of commission of the acts reported;
- The identity of the person(s) involved;
- Identity of witness(es), if any;
- Any evidence that he/she belongs to one of the categories mentioned in article 2.3 given above, except when the Report is anonymous;
- The way in which he/she became aware of the facts or was informed of them;
- The name of the company for or with which he/she works, in particular in the case of external or occasional employees and co-contractors, unless the Report is anonymous.

The Report must be accompanied by any useful document, whatever its form or medium, enabling the Report to be substantiated, processed usefully and followed up appropriately.

The person reporting shall ensure that the information provided is factual and relevant, directly related to the subject of the Report and strictly necessary to prove or verify the allegations made. These data must not be relative to national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of the investigation or judicial investigation or the professional secrecy of the lawyer.

The Alerts Referent may at any time request additional information from the person reporting in order to establish whether the Report falls within the scope of the Professional Alert System and/or to assess the accuracy of the allegations made.

In order to preserve the integrity of the processing of his/her Report, his/her own protection and respect for the rights of the persons targeted or mentioned, the person reporting is strongly recommended to maintain the strict confidentiality of the information contained in his/her Report.

#### 3.1.4. Anonymous reporting

Anonymous reporting, when permitted by relevant national legislations, is not encouraged as it may complicate or even make impossible the processing of such reports.

An Anonymous Report will be processed, subject to compliance with applicable local laws, when the seriousness of the facts reported is established and the accompanying evidence is sufficiently clear and accurate.

In all cases, the person reporting, even if he/she has chosen to remain anonymous, is encouraged to provide details enabling him/her to be contacted so that he/she can be asked for clarification and to facilitate the processing of his/her Report. In particular, when the report has been issued via the Whistle B platform, the author is invited to regularly reconnect to the platform in order to take note of the responses, feedback and possible questions addressed to him.

#### 3.2 External report

When permitted by applicable local laws and regulations, and in accordance with the conditions set out therein, where appropriate, a Report may be sent to a competent public authority, either after an internal Report has been made in accordance with the conditions set out in this procedure, or directly, in accordance with the procedures set out in Annex I.

### 4. How is the Alert collected and processed within Renault Group?

The collection and handling of internal Reports, qualified as Alerts where applicable, are carried out within the framework of the Whistleblowing System in accordance with the applicable laws and regulations (4.1), by designated persons with the necessary guarantees of independence and impartiality (4.2), to collect and process Reports qualified as Alerts where applicable according to a specific process (4.3), guaranteeing the integrity and strict confidentiality of all information collected (4.4).

#### 4.1 Compliance with applicable laws and regulations

The collection and processing of Reports under this procedure are carried out in compliance with (i) the laws and regulations applicable to the Renault Group and in particular to Renault s.a.s., and (ii) the internal rules of the Renault Group, in particular the Renault Group Code of Ethics.

#### 4.2 Persons designated to receive and process a Report

Several persons or departments specifically designated by the Renault Group companies concerned are involved in collecting, acting upon and/or processing Reports as part of the Whistleblowing System:

- The Whistleblowing System Managers - the DEC, the DDAP and the Ethics and Compliance Officers - are responsible for ensuring that this procedure is properly applied (4.2.1);
- The Alert Referents are appointed by each Renault Group company to collect the Reports, ensure their follow-up action (4.2.2 a)) and interact directly with the person reporting the Alerts, except in the specific cases mentioned below (4.2.2 b)) which must be forwarded directly to the DEC. The role of Alerts Referent is ensured, under the conditions defined in Article 4.2.2 a), by the DDAP for Renault s.a.s. and some Renault Group entities and by the Ethics and Compliance Officers for the other Renault Group entities;
- The Alert Handling Committee ("CTA") is responsible for processing Reports, qualified as Alerts where applicable, for Renault s.a.s. (4.2.3) and for the other Renault Group companies for which the DDAP acts as Alerts Referent. This processing is carried out by the Ethics and Compliance Committees ("CEC") for the other Renault Group companies, where one exists depending on their size and organisation, or by the Ethics and Compliance Officers (4.2.4).

Each person involved in the Professional Alert System carries out their mission independently and impartially, in particular through their hierarchical position, status, skills, authority and the human and financial resources at their disposal.

#### 4.2.1. Whistleblowing System Managers

The DEC and the DDAP are designated as responsible for the Whistleblowing System in order to ensure the correct application of this procedure for Renault s.a.s. and Renault Group companies which are not obliged to appoint an Ethics and Compliance Officer.

For other Renault Group companies, the role of Whistleblowing System Manager is ensured by Ethics and Compliance Officers who have been appointed by these other companies.

#### 4.2.2. Alert Referents

##### a) General principle

The Alert Referents are responsible for collecting and acting upon the Reports with the initiators on behalf of the Renault Group company through which they have been appointed.

For Renault s.a.s. and for French subsidiaries that are not required to appoint an Ethics and Compliance Correspondent, this role of Alert Referents is ensured by the DDAP (and alternatively, if the DDAP is unable to act, by the DEC).

The other Renault Group entities appoint an Ethics and Compliance Correspondent as Alerts Referent who, given the organisation of these entities and the resources at their disposal, and in order to allow the independent and impartial performance of his/her duties, may be the DDAP. He/she is assisted by a deputy Alerts Referent.

In the event that a Report is received by a person who is not an Alert Referent, the initial recipient must forward the Report without delay to the Alerts Referent of his/her entity. In this case, the Report will be deemed to have been received at the time of its transmission to the competent alert channel.

b) Particular cases

Reports addressed to a Renault Group company and corresponding to the situations listed below will be systematically forwarded by their initial recipient to the DEC (or to the DDAP if the DEC is unable to attend (e.g. due to illness)):

- Any Report relating to events occurring in a country or entity for which no Ethics and Compliance Correspondent has been appointed;
- Any Report concerning an Ethics and Compliance Correspondent, an Alert Referent, a member of the Executive Committee or the Management Committee of the Renault Group company concerned, as well as any Report which cannot be dealt with impartially at entity level due to a risk of conflict of interest and/or possible reprisals against its person reporting the Alert;
- Any Report revealing a structural problem within the Renault Group, involving several Renault Group subsidiaries or relating to facts which are highly likely to occur in another Renault Group company, as well as any Report concerning a Renault Group subsidiary which has already been the subject of several Reports of a similar nature;
- Any Report which, due to its seriousness and/or complexity, requires the resources and support of Renault s.a.s., as well as any Report concerning facts, whatever their nature, likely to (i) expose Renault Group to a major legal or reputational risk, such as corruption or influence peddling, infringement of competition law, violation of international sanctions or rules relating to export/import controls, money laundering or the financing of terrorism, and more generally, any Report concerning breaches of the Renault Group's internal compliance rules, or (ii) compromising the continuity of the business of the subsidiary concerned.

The DEC will assess the appropriateness of processing these Reports in their entirety at Renault s.a.s. level, by the CTA in particular, or assist in the processing by the CEC or the Ethics and Compliance Correspondent of the Renault Group company(ies) concerned.

Prior to the forwarding of any Report to the DEC in the above situations, the initial recipient of the Report must ensure that (i) the DEC (or the DDAP) is not in a situation of conflict of interest with regard to the Report to be forwarded, and (ii) such communication does not risk exposing the person reporting the Alert to an increased risk of reprisals. Any actual or

potential conflict of interest will be analysed in accordance with the Renault Group's rules for managing conflicts of interest.

In the specific cases above, the person reporting consents to the transmission of the Report to the DEC by submitting a Report within the framework of the Whistleblowing System.

In the event of a conflict of interest affecting the DEC, either because he/she is involved in the Report, or because he/she is mentioned in the Report and, on analysis, the existence of a conflict of interest cannot be ruled out, then the Report is forwarded to the DDAP. If the DDAP considers that the Report must be forwarded to the CTA for processing, he/she must first inform the DEC's L+1 and the CEO of Renault s.a.s of the existence of the conflict of interest. The DEC does not take part in any special CTA meeting that concerns him/her, and the processing is handled by the other CTA members.

In the event of a conflict of interest affecting the DDAP, either because he/she is involved in the Report, or because he/she is mentioned in the Report and, on analysis, the existence of a conflict of interest cannot be ruled out, the Report is forwarded to the DEC. If the DEC considers that the Report needs to be forwarded to the CTA for processing, the DDAP will not take part in any special CTA meeting that concerns him/her and the processing is handled by the other CTA members.

#### 4.2.3. Alert Handling Committee (CTA)

Renault s.a.s. reports are processed by the CTA. The later also processes Reports for other Renault Group companies for which the DDAP acts as the Alerts Referent.

The CTA is chaired by the DEC and may intervene at the DEC request when the matter is referred directly, especially in specific cases as described in Article 4.2.2 b). In this case, the DDAP will be contacted by the DEC to check whether the Report in question falls within the scope of the Whistleblowing System and must therefore be handled collectively by the CTA. The composition and operating rules of the CTA are defined in an internal Renault Group procedure.

#### 4.2.4. Ethics and Compliance Committees

Depending on their size and organisation, Renault Group companies may have a CEO, made up of the Alerts Referent and representatives of the main functions of the entity concerned (such as Legal Dept, Internal Control Dept, HR Dept ...), which is responsible for processing the Reports received by the said entity (subject to the provisions relating to the specific cases set out in Article 4.2.2. b) given above). It is chaired by the entity's legal representative or the most senior manager in charge of the concerned entity's activities.

### 4.3 Steps in collecting and processing a Report

The collection, follow-up action and handling of the Report are carried out in several steps, starting with an acknowledgement of receipt to the person who issued the Report (4.3.1), information to the person who is the subject of the Report (4.3.2), information to the person who issued the Report on the progress of the processing of his/her Report (4.3.3), analysis and investigation of the Report (4.3.4) and, finally, the processing closure step (4.3.5).

The information collected is treated confidentially in accordance with the rules in force within the Renault Group, as set out in Article 4.4 given below.

#### 4.3.1. Acknowledgement of receipt

The Alert Referent shall send an acknowledgement of receipt of the Report to its author within seven (7) working days of its receipt.

This acknowledgement of receipt specifies the procedures by which the person reporting the Alert will be informed of the action taken on it and reminds him/her that all precautions have been taken by Renault Group to protect his/her identity. Except in cases where the Report was issued via the WhistleB platform, the acknowledgment of receipt also contains the information relating to the processing of personal data provided for in the GDPR: the existence of the processing, its characteristics, the rights of access, rectification and erasure available to data subjects, the rules applicable in the event of transfer outside the EU and the right to issue a complaint with the competent authority. This information is automatically transmitted to the author during the issuance of his Report via the WhistleB platform.

This acknowledgement of receipt does not constitute acceptance of the Report and its classification as an Alert.

In the event of a Report not containing sufficient elements to trigger an investigation, and in the absence of a response from the author of the Report to requests from the Alerts Referent inviting him to complete his Report, it will be kept in active database for a period of two months from the last request for information from the Alerts Referent. After this two-month period, without adequate feedback from the Author, the Report will be considered inadmissible.

If the Report is considered inadmissible, the person submitting the Report will be informed of the reasons for its inadmissibility and, if necessary, will be directed to the appropriate internal contact or communication channel. Anonymous Reports considered inadmissible will be redirected to the appropriate contacts wherever possible and, if this is not possible, they will be destroyed.



#### 4.3.2. Information and protection of the person who is the subject of a Report

The person subject to a Report must be notified by the Alerts Referent (or by the DEC or the HR Manager of the person concerned, where applicable) as soon as possible of the registration of the Report and, within a period not exceeding one (1) month, of the existence of processing of personal data concerning him/her so that he/she can assert his/her rights as set out in Appendix II.

However if precautionary measures are necessary, in particular to prevent the alteration or destruction of evidence necessary for the processing of the Report and to preserve the integrity of the processing of the Report, this person will be notified, exceptionally and in compliance with the RGPD, after such measures have been taken.

This information will indicate in particular (i) the legal entity responsible for the Whistleblowing System, (ii) the facts of the allegations, (iii) the departments to which the Report may be sent, and (iv) the procedures for exercising the rights of access, rectification and deletion of personal data concerning them under the specific conditions laid down for Alerts (see Appendix II in particular).

However, the person who is the subject of the Report may under no circumstances obtain the identity of the person who issued the Report.

Any person implicated by a Report is presumed innocent and must be given the opportunity to give his/her version of the facts when the Report implicating him/her is processed.

#### 4.3.3. Information to the person reporting

Within a reasonable period not exceeding three (3) months from the acknowledgement of receipt of the Report or, in the absence of acknowledgement of receipt, three (3) months from the expiry of a period of seven (7) working days following the Report, the Alerts Referent will provide the person who submitted the Report, by e-mail or via the confidential and secure Whistleblowing platform, with information on the measures planned and/or already implemented to assess the accuracy of the allegations made in the Report and, where applicable, to remedy the situation that is the subject of the Report.

In the case of anonymous Reporting, the provisions requiring feedback to the person reporting an internal Report do not apply (unless the Report was made via the confidential and secure Whistleblowing platform).

#### 4.3.4 Analysis and investigation of the Report

The Alerts Referent ensures that the Report issued falls within the scope of the Whistleblowing System as defined in article 2. If the facts reported are manifestly unverifiable or implausible, the Report will be anonymized and classified, or destroyed.

If the report is not classified, the CTA or the Ethics and Compliance Committee of the Renault Group company concerned (or, in the absence of the latter, the Ethics and Compliance Correspondent appointed by the company concerned, as indicated in 4.2.4 given above), shall carry out all the necessary investigation actions in order to (i) determine whether the allegations contained therein are proven and founded, (ii) gather any evidence and, where applicable, (iii) formulate its conclusions and possible recommendations for action, including remedial measures.

The Report investigation is conducted objectively and impartially, in application of all compliance rules in force within each Renault Group entity concerned. The progress of investigations and their content are strictly confidential.

The CTA or the Ethics and Compliance Committee of the Renault Group company concerned (or in the absence of the latter, the Ethics and Compliance Correspondent appointed by the company concerned, as indicated in 4.2.4 given above), relies where necessary on the different functions of the entities concerned and/or targeted (in particular internal audit, compliance management, Ethics and Compliance correspondent, HR, legal, security, finance, purchasing, accounting, etc.) to collect the information required for the verifications. These functions only receive data that is strictly necessary for the performance of their duties.

When investigating a Report, the Alerts Referent may interview any person and request any useful document, in compliance with the conditions defined in article 5.1.1.

The author of the Report may at any time be asked by the Alerts Referent to clarify or complete certain elements of his/her Report.

The Ethics and Compliance Correspondent of a Renault Group company may at any time request the opinion and advice of the DDAP and/or the DEC, without disclosing any information that could identify the person reporting the Report, the person implicated by the Report and/or the witnesses.

In the event that it is necessary to call on the services of an independent external advisor, the latter will be subject to enhanced rules of confidentiality under the conditions set out in article 4.4 given below, as well as to the rules of professional secrecy.

Processing times may vary depending on the nature and complexity of the Report.

#### 4.3.5. End of processing and closure

After gathering all useful information for the purposes of investigating the Report, the CTA, the Ethics and Compliance Committee of the Renault Group company concerned, or in the absence of the latter, the Ethics and Compliance Officer of the company concerned:

- Closes the Report if (i) the allegations are unverifiable, inaccurate or unsubstantiated or (ii) the Report has become irrelevant;
- When the facts of the allegations contained in the Report are established, forwards its conclusions, possibly including recommendations on the action to be taken, to the Renault Group's Management Board or Companies concerned. In particular, these follow-ups include all remedial measures intended to deal with the Report and its consequences, including any malfunctions or ethical deficiencies identified (modification or strengthening of Renault Group's internal procedures and rules, implementation of disciplinary measures or legal proceedings, etc.). It shall also ensure that any sanctions decided upon after the verifications are implemented.

The Alert Referent informs the Whistleblower in writing of the closure of its Report and, where applicable, and to the extent permitted by the applicable privacy rules, measures that have been taken to assess and remedy the accuracy of the allegations.

#### 4.4 Strict confidentiality

Renault Group guarantees strict confidentiality of the identity of the person submitting a Report, of the person(s) targeted or implicated by such a Report and of any third party mentioned in the Report. The information contained in the Report or gathered during the processing of this Report, or of the Alert if applicable, is also examined in a strictly confidential manner. The procedures in place guarantee the integrity of this information.

Information likely to identify the person reporting the Alert may only be disclosed with the consent of the person reporting. In the specific cases provided in Article 4.2.2 b), the consent of the person reporting the Alert is induced by the fact of making a Report within the framework of the Whistleblowing System.

Except for the specific cases provided in 4.2.2 b), Renault Group companies may not pass on to another Renault Group company any Reports addressed to them, unless the person issuing the Report has given his/her consent to such communication.

Alert Referents are duly trained and bound by a strict confidentiality obligation with regard to the information they receive and process. The same applies to any person likely to be involved in the collection, acting upon and processing of a Report and/or Alert.

Information is exchanged in accordance with the rules for the protection of sensitive data in force within the Renault Group.

## 5. What protection is granted to the Whistleblower and other third parties involved?

If the person submitting the Report complies with the legal definition of a Whistleblower and issues a Report in accordance with the conditions set out in articles 2 to 4 given above, regardless of the method of Reporting chosen, he/she and certain third parties associated with him/her (5.2) benefit from several forms of protection (5.1). On the other hand, misuse of the Whistleblowing System is liable to be penalised (5.3).

### 5.1 What protection is granted to the Whistleblower?

Whistleblowers benefit from the preservation of the strict confidentiality of their identity (5.1.1), the absence of civil and/or criminal liability (5.1.2), and protection against the risks of reprisals and discrimination (5.1.3).

#### 5.1.1. Protection of the strict confidentiality of the identity of the Whistleblower

Renault Group is particularly vigilant in respecting the provisions relating to the confidentiality of the identity of the Whistleblower. Enhanced measures have been put in place to safeguard the security and confidentiality of data relating to the Whistleblower in terms of its collection, communication and storage.

The following specific protections are provided:

- All persons authorised to take part in the Whistleblowing System undertake to observe strict confidentiality;
- Access to information and documents collected in the context of the application of this procedure is limited to the Whistleblowing System's participants referred to in Article 4 given above, who have been specially trained and authorised by Renault Group for this purpose;
- If the confidential and secure Reporting platform is used, a specific login and password will be allocated to the Whistleblower on a personal basis to enable him/her to connect and view the follow-up messages of the Report or, where applicable, the Alert;
- In the event of disclosure to third parties, where such communication is made necessary solely for the purposes of verifying the events or facts reported by the Whistleblower, confidentiality will be ensured by having such third parties sign a confidentiality agreement on a case-by-case basis.

Depending on the applicable national legislation, the identity of the Whistleblower may be communicated to the judicial authorities, under the conditions specified in Appendix I.

#### 5.1.2. No civil or criminal liability

Depending on the applicable national legislation, the Whistleblower may not be liable under civil and/or criminal law. Where such non-accountability exists, the terms and conditions are described in Appendix I.

#### 5.1.3. Protection against the risk of retaliation and discrimination

Depending on the applicable national legislation, the Whistleblower may benefit from protection against the risks of reprisals and discrimination. Where such protection exists, it is described in Annex I.

The person reporting an Alert who believes that he/she is the subject of retaliation may report it in writing to the Alerts Referent or via the secure reporting platform.

When a Report has been made anonymously, a Whistleblower who discloses his/her identity following the Report benefits from the same protections under the applicable legislation.

### 5.2 Which third parties may benefit from the protection given to the Whistleblower?

Depending on the applicable national legislation, some third parties may benefit from the legal protection granted to the Whistleblower. Where such protection exists, the third parties concerned are defined in Annex I.

### 5.3 What are the consequences of misusing the Whistleblowing System?

Any person using the Whistleblowing System improperly, maliciously or in bad faith, or reporting or relaying false, slanderous or misleading information, for example with the intention of harming others or with the knowledge that it is false, shall be liable to disciplinary action and legal proceedings in accordance with the national laws and regulations in force.

Conversely, when the conditions of article 2 of this procedure are met, the good faith use of the Alert System will not expose its author to any disciplinary sanction, even if the facts subsequently prove to be inaccurate or would not give rise to any action.

## 6. How is the Whistleblowing System controlled within the Renault Group?

First and second level controls of the Alert System are planned and specified in the Renault Group\_AFA control plan.

As part of its duties, the Internal Audit Department may carry out third-level checks on the Professional Alert System. The findings and recommendations must be forwarded to the DEC, which can assist the departments and subsidiaries in implementing the corresponding action plans.

## 7. How is this procedure distributed by Renault Group?

Renault Group communicates the existence of the Professional Alert System and how to access it to its employees and stakeholders by all appropriate means, in particular the Group's corporate website and intranet.

## Appendix I. Rules applicable to companies having their head office in France

### 1. How to issue a Report outside Renault Group?

The Whistleblower may send an external Report, either after having sent an internal Report under the conditions set out in this procedure, or directly:

- To the competent authority among those listed in the appendix to decree no. 2022-1284 of 3 October 2022 "relating to the procedures for collecting and processing Reports from the Whistleblower and establishing the list of external authorities instituted by Act No. 2022-401 of 21 March 2";
- To the "Défenseur des droits" (Defender of rights), who will direct the whistleblower to the authority or authorities best placed to deal with it;
- To the judicial authorities;
- To an EU institution, body, office or agency competent to collect information on violations falling within the scope of Directive (EU) 2019/1937 of 23 October 2019.

### 2. Field of Application of the Whistleblowing System

Facts, information and documents, whatever their form or medium, the revelation or disclosure of which is prohibited by the provisions relating to national defence confidentiality, medical confidentiality, the confidentiality of judicial deliberations, the confidentiality of judicial investigations or proceedings or the professional confidentiality of lawyers are excluded from the Professional Alert System.

### 3. Confidentiality

Information that could identify the Whistleblower may only be disclosed with consent of the Whistleblower under the conditions described in article 4.4 of this procedure. They may, however, be communicated to the judicial authorities, in cases where the persons responsible for collecting or processing reports are required to report the facts to the judicial authorities, in particular at the request of the judicial authorities in accordance with article 60-1 of the Code of Criminal Procedure. The Whistleblower is then informed, unless there is a risk that this information could compromise the legal proceedings. Written explanations are attached to this information.

## 4. What protection is granted to the Whistleblower?

### 4.1 .What are the protections granted to the Whistleblower?

#### 4.1.1.No civil or criminal liability

Persons who have reported or publicly disclosed information under the conditions set out in Article 2 of this procedure shall not be civilly liable for any damage caused as a result of their reporting or public disclosure if they had reasonable grounds to believe, when they did so, that the reporting or public disclosure of all such information was necessary to safeguard the interests involved.

In addition, persons who have reported or disclosed information under the conditions set out in article 2 of this procedure are not criminally liable under article 122-9 of the French Criminal Code.

#### 4.1.2. Protection against the risk of retaliation and discrimination

No person may be excluded from a recruitment procedure or from access to an internship or training period in the company on the grounds of having reported or disclosed information under the conditions set out in Article 2 of this procedure, and no employee may be penalised, dismissed or subjected to any direct or indirect discriminatory measure, in particular with regard to remuneration, as defined in the Article L. 3221-3 of the Labour Code, profit-sharing measures or the distribution of shares, training, redeployment, assignment, qualification, classification, professional promotion, working hours, performance evaluation, transfer or renewal of contract, or be subject to any other measure mentioned below:

- Suspension, layoff, dismissal or equivalent measures;
- Demotion or refusal of promotion;
- Transfer of duties, change of workplace, reduction in salary, change in working hours;
- Suspension of training;
- Performance evaluation or negative work certificate;
- Disciplinary measures imposed or administered, reprimand or other sanction, including a financial penalty;
- Coercion, intimidation, harassment or ostracism ;
- Discrimination, disadvantageous or unfair treatment ;
- Failure to convert a fixed-term employment contract or a temporary contract into a permanent contract, where the employee could legitimately expect to be offered permanent employment;



- Non-renewal or early termination of a fixed-term or temporary employment contract;
- Damage, including damage to a person's reputation, in particular on an online public communication service, or financial loss, including loss of business and loss of income;
- Blacklisting on the basis of a formal or informal agreement at sector or industry level, which may mean that the person will not find employment in the sector or industry in the future;
- Early termination or cancellation of a contract for goods or services;
- Cancellation of a licence or permit;
- Improper referral for psychiatric or medical treatment.

Any person reporting an Alert who believes that he/she is being retaliated against may report the matter to the Alerts Referent, in writing and/or via the confidential and secure reporting platform.

#### 4.1.3. Offence of discrimination (art 225-1 of the Criminal Code)

Any distinction between individuals or legal entities on the basis of the status of Whistleblower, facilitator or persons in relation to a Whistleblower as defined by the Sapin2 Act constitutes an act of discrimination.

#### 4.1.4. Protection of Witnesses in Good Faith

No person who has given evidence in good faith of facts constituting an offence or a crime of which he may have become aware in the course of his/her duties, or who has reported such facts, may be excluded from a recruitment procedure or from access to an internship or a training period in the company, and no employee may be penalised, dismissed or be the subject of a direct or indirect discriminatory measure, in particular with regard to remuneration, as defined in the Article L. 3221-3, profit-sharing measures or the distribution of shares, training, redeployment, assignment, qualification, classification, professional promotion, transfer or renewal of contract.

The person mentioned above who testified in good faith also benefits from the absence of civil or criminal liability.

#### 4.2. What are the guarantees granted to the Whistleblower who wished to remain anonymous?

The Whistleblower who wishes to remain anonymous benefits from the same protections as described in article 5.1 of this procedure, including if the Whistleblower decides to reveal his or her identity thereafter.

#### 4.3. Which third parties can benefit from the protection granted to the Whistleblower?

The protection granted to the Whistleblower also applies, where applicable, to:

- Facilitators, defined as any individual or any non-profit-making legal entity governed by private law that helps the Whistleblower to issue a Report in compliance with articles 2 and 3 of this procedure;
- Individuals in connection with the Whistleblower, as defined in the Articles 2 and 3, who may be subject of retaliatory measures in the course of their professional activities by their employer, their client or the recipient of their services;
- Legal entities controlled, as defined in the article L. 233-3 of the French Commercial Code, by the Whistleblower as defined in the articles 2 and 3 of this procedure, for which he/she works and with which he/she has a professional relationship.

## Appendix II. Protection of personal data in the context of the Whistleblowing System

The processing of personal data as part of the Renault Group Whistleblowing System is carried out in compliance with the provisions of the GDPR.

### 1. Legal basis

The legal bases for this procedure are Articles 6 to 9 and 17 of Act No. 2016-1691 of 9 December 2016 on transparency, preventing corruption and modernisation of economy, as amended, and Article 1st of Act No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and instructing companies.

### 2. Purpose

Data processing is implemented in order to:

- Collect and process alerts or reports aimed at reporting a breach of a specific rule;
- Carry out the necessary checks, investigations and analyses;
- Define the follow-up to be given to the report;
- Ensure the protection of the people concerned;
- Exercise or defend legal rights.

Under no circumstances will the information collected and processed within the framework of the Alert System be used for purposes other than those referred to in this procedure.

### 3. Categories of personal data processed

The data collected through the Professional Alert System is processed in accordance with the specific provisions of the GDPR and the French act No. 78-17 of 6 January 1978 on data processing, data files and individual freedom, as amended, (known as the "Data Processing and Freedoms Act").

The categories of data processed as part of the Whistleblowing System are as follows:

- Identity, position and contact details of the Whistleblower;
- Identity, position and contact details of the person(s) targeted by the Report;
- Identity, position and contact details of the persons involved in collecting or processing the Report;
- Identity, functions and contact details of the facilitators and people linked to the author of the Report

- Facts reported;
- Information gathered as part of the verification of the facts reported;
- Audit report;
- Action taken in response to the Report.

#### 4. Rights of the persons concerned

Persons identified in the context of an Alert may exercise their right to access and rectify the data concerning them, under the conditions described in the CNIL Standards relating to the processing of personal data intended for the implementation of a Whistleblowing System, and request that such data be rectified or deleted if it is inaccurate, incomplete, ambiguous or out of date, at an address available on the website: [dataprotection-com@renault.com](mailto:dataprotection-com@renault.com).

In France, appeals to the “Commission nationale de l’informatique et des libertés” (CNIL) (French Data Protection Authority), for the purpose of respecting these rights are possible, unless they are considered unfounded or excessive.

It should be noted that the person implicated may under no circumstances obtain the identity of the issuer of the Report.

#### 5. Transfers of personal data outside the EU

Where it is necessary to transfer personal data to non-EU countries that do not provide adequate protection for personal data, such transfers are subject to specific legal supervision before they are carried out, in compliance with the French Data Protection Act and the GDPR, depending on the country of destination.

The acts and regulations in force will define the conditions of these international transfers and, if necessary, the European Commission's Standard Contractual Clauses or any other appropriate equivalent measure will be put in place.

#### 6. Retention and archiving of personal data

The personal data collected will be retained in an active database for as long as the Report is being processed.

Data relating to a Report considered inadmissible is destroyed or archived after anonymisation, without delay.

When the Alert is admissible, the data relating to this Alert is kept in intermediate archiving after the final decision has been taken on the follow-up to be reserved for the alert for the time strictly proportionate to verifying the application of the final decision and to the protection of the various stakeholders (its author, the facilitators and related persons, the

persons targeted and the third parties mentioned), taking into account the deadlines for possible additional investigations. This interim archiving retention period extends either until the end of the limitation period applicable to the facts in question, or until the end of the subsequent disciplinary or litigation procedure, taking into account appeal deadlines, if applicable. The data necessary for the following purposes may be kept for longer in intermediate archiving: if the data controller has a legal obligation to do so (for example to meet accounting, social or tax obligations), or for evidentiary purposes with a view to for a possible audit or dispute, or for the purposes of carrying out quality audits of the reporting processing processes.

At the end of this interim archiving retention period, the data will be immediately destroyed, or anonymized and then archived.

Given the very nature of the activity "processing professional alerts", which necessarily implies different retention periods depending on individual cases, the GDPR information notices intended for the persons concerned will indicate the criteria used to determine the duration data retention.

These retention periods apply regardless of the internal channel used by the author of the Report.