GUIDE FOR PREVENTING CORRUPTION AND INFLUENCE PEDDLING
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Introduction

Groupe Renault expressly bans all forms of corruption and is a signatory to the United Nations Global Compact which calls upon companies to “work against corruption in all its forms, including extortion and bribery”.

In its Code of Ethics, Groupe Renault has solemnly reaffirmed this firm, sustainable commitment shared by all its staff and officers.

This guide sets out the comprehensive, proactive approach defined by Groupe Renault for preventing and combating corruption and influence peddling.

This approach forms part of the Group’s effort to achieve the sustainability of its performance.

This guide applies to all employees of Renault and its subsidiaries, and for the corporate officers, all of whom are hereafter referred to as the “Employee(s)”.

Employees may seek the assistance of the Ethics department with any questions in case of doubt on the proper conduct.
Preventing Corruption and Influence Peddling

The Groupe Renault companies and Employees each reaffirm their commitment to complying with the anti-corruption legislation and regulations applicable to them.

Each Groupe Renault Employee organising or taking part in exchanges or activities committing the Group must act in an ethically irreproachable manner.

1. **PATRONAGE**

Groupe Renault has established formal decision-making rules in the DOA (Delegation of Authority) manual for the handling of charitable requests from volunteers, associations or non-governmental organisations. These rules must be strictly observed. On the basis of pre-determined criteria, the selection committees meet several times each year to choose charitable projects consistent with the Group’s strategic guidelines for CSR (Corporate Social Responsibility). The selected projects will receive financial support.
To ensure compliance by sponsoring organizations with the ethical values of Groupe Renault and its Brands in all the countries in which it is present, Groupe Renault has defined and deployed guidelines to enable the communication and marketing functions to select key partners.

Clearly-defined rules govern the selection of these partners, in conformity with the principles set out in the Renault Code of Ethics. These rules are documented in the DOA (Delegation of Authority) manual. They must also be strictly observed.

Each Employee shall refrain, within the scope of his or her duties, from making a decision which could appear to conflict or could conflict with the interests of the Group company that employs him or her, where such decision directly or indirectly benefits a natural person or legal entity with whom or with which that Employee maintains financial, family or friendly relations.

An Employee’s decision could be influenced by having direct or indirect family, financial or business relationships with customers, suppliers or competitors of Groupe Renault.

In any event, even if such a decision, however, were in accordance with the interests of the Group company employing him or her, the Employee must formally notify his or her line management of the situation beforehand.

An example of prohibited behaviour

A supplier delivers parts to a Renault plant. The parts are inspected by an Employee who happens to be the supplier’s cousin. The Employee notices that some parts are defective. The supplier explains that he had a production problem but this would not happen again. The supplier asks the Employee to accept the delivery as compliant. The Employee accepts the delivery in view of his family relationship with the supplier.

*The employee must refuse this proposal.*
Undue, unofficial payments, even of a moderate amount, in favour of a public official to secure or accelerate administrative procedures within his or her scope of responsibilities (customs clearance of goods, obtaining a visa, the issue of a licence, etc.) are prohibited.

An Employee calls at the embassy to obtain a visa. The public official states to that Employee that the normal waiting time for a visa is thirty days. However, the official indicates to the Employee that, exceptionally, he can issue the visa immediately provided the Employee pays him a bribe of fifty euros. The Employee agrees because he does not wish to waste time. *The employee must refuse this proposal.*
In dealings with third parties:
➢ do not give, promise or offer to give;
➢ do not receive, or request any benefit whatsoever (money, gift, invitation, travel, preferential treatment, etc.) with the intention of influencing the behaviour of a person, company or organisation, in order to obtain or retain an undue economic or commercial benefit whether for oneself or for someone else.

Legislation applicable to the Group prohibits and penalises the corruption of public officials.

The principle: all gifts, invitations or benefits of any kind, whether requested, received, promised or given, directly or indirectly, are prohibited.

Certain legislation gives a broad interpretation to the term “public official”. It may refer to a person vested with public authority, a person tasked with a public service mission, or a person holding elected office, but it may also refer to any employee working within a public international organisation or in an entity owned or controlled by the State.

The opinion of the Legal department must be sought in case of any doubt about the definition of a public official.

Exceptionally, gifts offered in a symbolic and perfectly transparent manner may be allowed, such as gifts offered at a specific event, provided that such gifts do not influence a future decision or the relationship.

However, the line manager must be systematically notified in writing of such gifts beforehand.

Loans of vehicles must be controlled under strict, supervised procedures. Each department concerned shall submit an implementation report annually to the Groupe Renault VP, Ethics.
An Employee answers an invitation to tender issued by a government agency to renew its vehicle fleet. The public official, in charge of the invitation to tender, guarantees to the Employee that the contract will be awarded to Renault but, in return, the official demands that his son be offered a job within Renault. The Employee considers it legitimate to grant this request.

_The employee must refuse this proposal._

In exchange for rapid customs clearance of spare parts held up in customs for weeks, an Employee offers to service the car of the official responsible free of charge in exchange for customs clearance.

_The employee must not make this offer._

An Employee offers to lend a car to a public official in charge of giving government authorisation in exchange for a decision by the authorities favourable to Renault.

_The employee must not make this offer._

At the request of a public official in charge of issuing vehicle registration documents, an Employee agrees to make a large donation on behalf of Renault to a local association with which that official has close links.

_The employee must not make this donation._

**In dealings with private persons (whether natural persons or legal entities)**

The principle: all gifts, invitations or benefits of any kind, whether requested, received, promised or given, directly or indirectly, are prohibited.

However, gifts or invitations are allowed provided they strictly comply with the rules of courtesy and are of moderate, modest value, and provided they do not influence a decision or commercial relationship; this is the case, for example, of invitations to collective events of professional interest, such as a visit to a Group business site.

The line manager must systematically be notified in writing of such gifts beforehand.

Loans of vehicles must be controlled under strict, supervised procedures. Each division concerned shall submit an implementation report annually to the Groupe Renault VP, Ethics.
During the negotiations for the renewal of a contract, an Employee in charge of drafting the specifications is offered by the supplier a ticket to attend the football World Cup finals, which the Employee accepts.  

*The employee must refuse this proposal.*

An Employee, after completing a long-term assignment at a supplier to resolve a quality crisis, is thanked by the supplier who invites the Employee to share a relaxing weekend. The Employee accepts since he or she thinks it legitimate to benefit from such gratitude.

*The employee must refuse this proposal.*

During an invitation to tender, a supplier invites an Employee to a luxury restaurant to ask him/her for information on the competitors’ price bids. The Employee agrees to provide the information.

*The employee must refuse this proposal.*

An Employee makes a car available to the purchasing manager of a company in exchange for the promise of being awarded a new contract.

*The employee must not make this offer.*

An Employee tries to convince his/her service provider to use a subcontractor with which he/she has a personal relationship. The service provider will award to the subcontractor part of the services of the main agreement. In exchange, the Employee will receive a cash payment of 20% of the amount of the subcontracting agreement.

*The employee must not make this offer.*

A customer wishes to renew his vehicle fleet of about one hundred units and to purchase a car for his private use. He negotiates a discount on the price of the vehicle fleet and asks the Employee to convert a portion of the discount in a car purchased for his personal use. In order to win the contract, the Employee agrees after obtaining the approval of his supervisors since it helps them meet their targets. To prevent this gift from being too visible in the event of an audit, the Employee proposes that the customer purchase the car on credit and that Renault make the payments. This is not a problem since the Employee has very good relations with the bank.

*The employee and his or her supervisors must refuse this proposal and must not propose a fraudulent payment.*
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INFLUENCE PEDDLING

**The principle:** it is prohibited to illicitly propose, whether directly or indirectly, offers, promises, gifts or benefits to a third party in order to persuade him to abuse his real or presumed influence on a decision-maker for the purpose of obtaining a decision in favour of Renault.

An Employee is awaiting a certification decision from the authorities. He asks one of his friends, who is closely acquainted with the public official responsible for making the decision, to intercede with the public official so as to obtain a decision favourable to Renault. In exchange, the Employee promises to give his friend an invitation for two to a Formula One Grand Prix.

*The employee must not make this proposal.*
All payments made by Groupe Renault companies must be documented, justified and entered in the accounts.

Any remuneration granted to a representative, agent or other intermediary must be transparent and must be made in return for a service legitimately and actually rendered to Groupe Renault. The Company closely monitors developments in the business environment, its suppliers, subcontractors, customers and intermediaries but also, more generally, monitors its commercial partners regardless of the country where the business is carried out.

For purposes of any contract with partners, suppliers, distributors, consultants, customers and any natural person or legal entity, each Groupe Renault company concerned shall request an undertaking from its co-contractors not to engage in corrupt practices and/or influence peddling and shall reserve the right to terminate agreements if these obligations are not fulfilled.

Before engaging in or renewing a business relationship, a risk analysis shall be performed in accordance with the third-party integrity management process, under the control of the Group Prevention and Protection department (Third Party Integrity Management process: “TIM process”).

On completion of this evaluation, if doubt persists, a closer review shall be performed as a precaution to check the integrity of the third party, focusing on its compliance with anti-corruption legislation and the Groupe Renault anti-corruption policy. Depending upon the information obtained, it may be decided not to enter into relations with that third party.

An example of prohibited behaviour

An Employee asks his usual intermediary to urgently proceed to the customs clearance of spare parts. The latter responds that this will take several weeks.

However, the intermediary agrees to obtain customs clearance within 48 hours if its commission is doubled. The intermediary explains that, for urgent customs clearance, he relies on a company whose shareholders are closely linked to customs officers.

The employee must refuse this proposal.
An Employee who has personal knowledge of any behaviour likely to breach the principles laid down in this guide must report it to the Ethics department or its representatives (Country Ethics Officers), particularly using the whistleblowing system (see the chapter entitled “Implementation”).
Implementation

1 WHISTLE-BLOWING SYSTEM

A whistleblowing system is available to Groupe Renault Employees on the intranet for reporting breaches, in addition to the regular internal alert-reporting channels namely, the line management, Human Resources, employee representatives, the Ethics department, and the Group Prevention and Protection department.

https://grouperenault.sharepoint.com/sites/ETHIQUE/fr-FR/alerte/Pages/default.aspx

2 INTRANET SITE

Groupe Renault makes available to Employees on the ethics intranet site a guide entitled “Ethics in practice”, which sets out a series of questions concerning potential or actual corruption situations with which Employees may be faced. This guide provides answers to questions on the attitude to adopt in such circumstances.

https://grouperenault.sharepoint.com/sites/ETHIQUE/fr-FR/PQSR/Pages/default.aspx
Training in business ethics are given worldwide to Employees.

The training focuses on the extremely serious impacts of corruption and influence peddling on Groupe Renault, including on its performance and reputation. It describes as well the resources deployed to prevent this type of behaviour.

Managers and the most exposed employees will regularly receive appropriate training. New employees must be trained within the year of their arrival. The Ethics department shall ensure that such training is provided.

The risks of corruption have been mapped. The mapping of those risks is regularly updated.
Seeking Advice

When an Employee seeks an opinion, advice or wishes to report any difficulty in implementing the Guide for preventing corruption and influence peddling, he or she may seek the help of the Ethics Director or the Country Ethics Officers.

Whistleblower Employee Protection

Each Groupe Renault company affirms that no Employee shall be penalised, dismissed or targeted by any discriminatory measure whether directly or indirectly, particularly affecting remuneration, for having reported or witnessed in good faith and in a disinterested manner, firstly to his or her employer and, as the case may be, to the judicial or government authorities, acts of corruption and/or influence peddling of which such Employee may become aware in the exercise of his or her duties.

Risks and Penalties

Breaching of the provisions in this guide will subject the Employee to disciplinary measures, without prejudice to any civil sanctions and penal measures (fines, imprisonment, etc.). The reputation and the business of the Group may be severely impacted by such unlawful acts.

In no circumstances shall any act of corruption or influence peddling committed by an Employee be regarded as having been committed in the interest and/or on behalf of any of the Groupe Renault companies.
REFERENCE DOCUMENTS

➢ Groupe Renault Code of Ethics
➢ Groupe Renault Code of Ethics

CONTACTS
For any information concerning this guide, enquiries should be made to:
➢ the Groupe Renault VP, Ethics;
➢ the Groupe Renault VP, Group General Counsel.

This guide may not be amended or updated without the agreement of the Groupe Renault VP, Ethics.